



Draft
**Local Planning
Strategy 2022**

Adoption & Endorsement

The Shire of Denmark Local Planning Strategy is adopted when signed by the Shire President and Chief Executive Officer on behalf of the Shire Council. The Local Planning Strategy becomes a recognised and operative strategic planning document once endorsed by the Western Australian Planning Commission.

Advertising

The Shire of Denmark Local Planning Strategy certified for advertising on

22 September 2023

Signed for and on behalf the Western Australian Planning Commission

C. Gustavsson

An officer of the Western Australian Planning Commission duly authorised by the Commission (*pursuant to the Planning and Development Act 2005*)

Date 22 September 2023

Adopted

The Shire of Denmark hereby adopts the Local Planning Strategy, at the Ordinary Council Meeting held on the

_____ day of _____ 2024.

Shire President

Chief Executive Officer

Endorsement

Endorsed by the Western Australian Planning Commission on

An officer of the Western Australian Planning Commission duly authorised by the Commission (*pursuant to the Planning and Development Act 2005*)

Date _____



Acknowledgement of Country

This document sets the course for the future of land development and protection in the Shire of Denmark which is situated on Minang and Bibbulmun Noongar Boodja. We aim to ensure that the Local Planning Strategy respects Indigenous cultural, social and environmental connection to this Country.

The Shire of Denmark acknowledges the Minang and Bibbulmun people who have cared for these lands and waters around Kwoorabup (Denmark), Nornalup and Kwallup (Peaceful Bay) for thousands of years and welcome their guidance and counsel.

We pay our respect to the Minang and Bibbulmun Elders past, present and emerging, and extend those respects to all First Nations people living, working or visiting in our Shire.



Shire Snapshot



Population (2021)
6,422



Median Age (2021)
50 years old



Number of families (2021)
1,400



Additional persons by 2036
1,400



755 – 1,000
additional homes needed
by 2036



65%
of housing is 3 – 4 bedrooms
(2021)



27.7%
Housing vacancy rate (2021)



742
Local businesses (2016)



160,000
day visitors (2019)



167,000
visitor overnight stays (2019)



86.9%
use a car to travel to work
(2021)



**1,200m²-
1,500m²**
additional industrial
floorspace required



47%
of the Shire is bushland



84km
of mostly undeveloped
coast



This Document Aims to

- Avoid urban sprawl
- Promote housing diversity and affordability
- Achieve greater sustainability
- Encourage flexible commercial and industrial land to accommodate for future changes
- Support a sustainable and resilient local economy with services and employment for our community
- Retain rural areas for agricultural production
- Promote opportunities to increase the sustainability of tourism land use and development
- Preserve and invest in high quality public open space
- Contribute to protecting and managing the Shire's environmental features and ecological communities
- Protect and conserve the quality and quantity of the Shire's natural resources
- Recognise and seek to preserve the outstanding landscape values of the district
- Preserve the 'village feel' and existing character within the Denmark Town Centre
- Minimise the risk to life, property and service delivery from natural hazards
- Acknowledge the importance of high-quality community facilities and services
- Support a safe and well-connected movement network



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Part 1 – Local Planning Strategy

1 Introduction

The Shire of Denmark Local Planning Strategy is adopted when signed by the Shire President and Chief Executive Officer on behalf of the Shire Council. The Local Planning Strategy becomes a recognised and operative strategic planning document once endorsed by the Western Australian Planning Commission.

This Local Planning Strategy (Strategy) is a key component of this framework, outlining a pathway to realise our collective vision for land management and development across the Shire.

The role of this Strategy is to facilitate land use planning and development responses that enact the vision, aspirations, and objectives of the Shire's Strategic Community Plan – Our Future 2033 over a 15-year period. The Strategy has also been informed by community feedback received through preliminary community consultation undertaken by the Shire's planning team during 2020 and 2021, which included online surveys and in-person events across the Shire.

This Strategy applies to the entire Local Government Area within the Shire boundaries and provides direction for the review of Town Planning Scheme No.3 (TPS3) and the preparation and implementation of a new Local Planning Scheme.

As required by the *Planning and Development (Local Planning Schemes) Regulations 2015 (Regulations)*, the purpose of a local planning strategy is to:

- a) Set out long-term town and regional planning directions;
- b) Apply relevant state and regional planning policies; and
- c) Provide the rationale for changes to the local planning scheme.

The Strategy is divided into two sections:

- Part 1 – Strategy
- Part 2 – Background Information

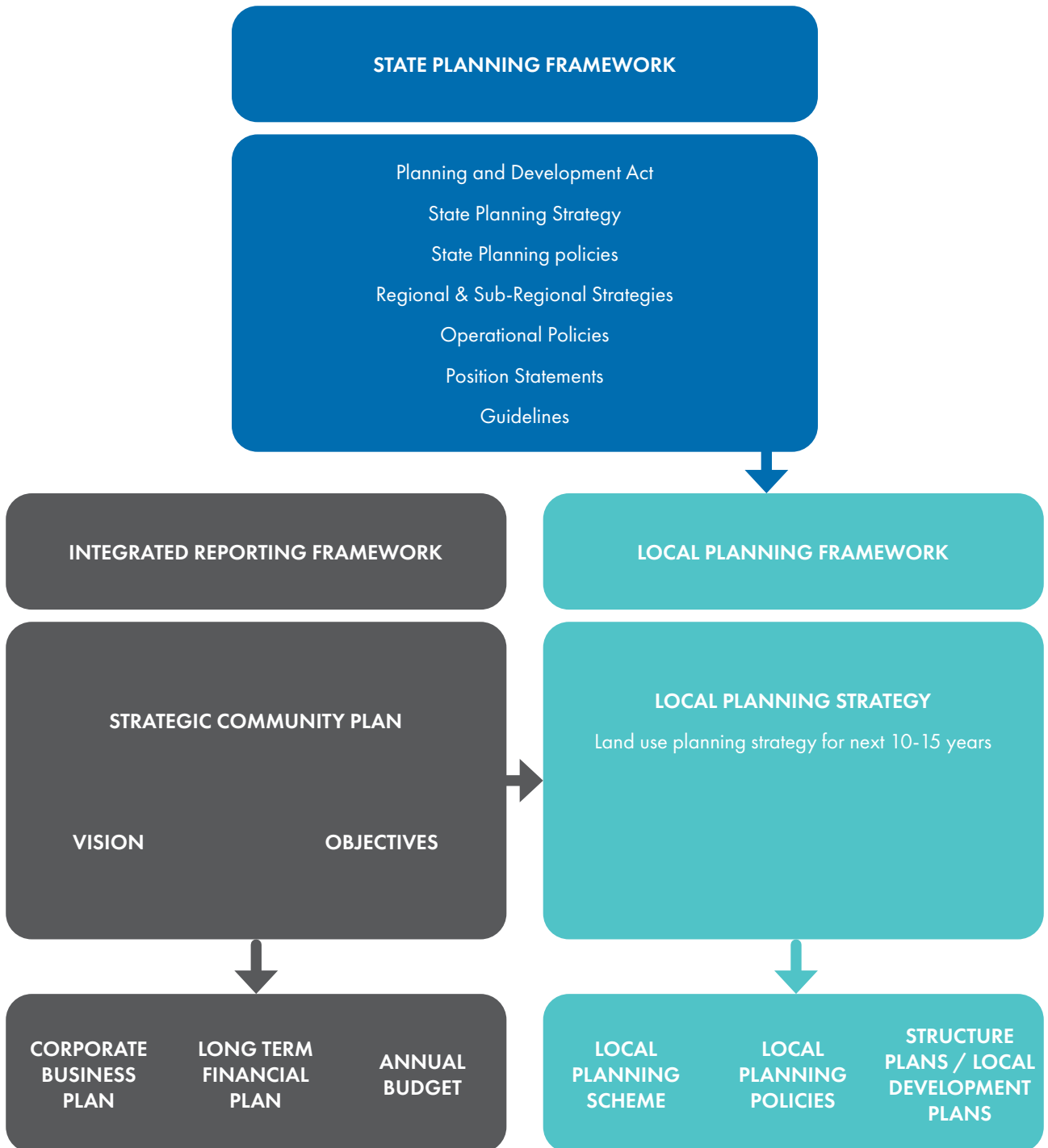
Strategy Maps are provided within this document for the following purposes:

- a) The purpose of the Strategy Maps is to spatially represent the actions, future planning and desired land uses identified in this Strategy.
- b) The Local Planning Strategy Maps are not zoning maps, but rather a conceptual representation of broad planning intentions to assist in identifying the future urban and regional planning direction for the Shire and with the review and preparation of an updated Local Planning Scheme. Therefore, the planning areas and future land use designation on the maps require further detailed investigation to formalise the land use zoning or reservation in the Local Planning Scheme.

This Strategy comes into operation on the day on which it is endorsed by the Western Australian Planning Commission (WA Planning Commission), at which time the Shire's preceding Local Planning Strategy (2011) will be revoked.



Planning Framework



2 Vision

The Shire's Strategic Community Plan (*Our Future 2033*) establishes a collective vision for Denmark's future as:

"A vibrant coastal community, connected to the environment, living the village lifestyle."

The Strategic Community Plan outlines the community's values and long-term priorities for the Shire and has a broad range of implications for this Strategy. There are three key objectives:

| Objectives of Denmark's Strategic Community Plan (<i>Our Future 2033</i>) | | |
|---|---|--|
|  |  |  |
| Enhance community connection and well-being. | Operate as environmental custodians for the future. | Support local jobs, industry, and small business and facilitate sustainable development. |

In September 2019, the Shire declared a Climate Emergency and aligned itself to 2016 Paris Agreement Targets. Council and our community have identified ecological sustainability as a critical priority for the Strategy. The Strategy will attempt to address inherent tensions between environmental, social, cultural and economic values, identifying strategies and actions that represent a balance between competing interests. Land use planning initiatives in the Strategy seek alignment with the objectives and actions contained within the Shire's Sustainability Strategy and Sustainability Action Plan. The Shire is committed to facilitating our community's transition to achieving more sustainable outcomes, particularly working towards a net-zero emissions target as an important step in tackling climate change.

The vision of this Strategy is to support the creation of a sustainable and resilient community, providing direction for the continual improvement in land use and development planning practice, and providing a framework for growth that protects and enhances Denmark's unique character and environment.

The vision of this Strategy also comprises the following objectives:

Our Economy:

- Provide opportunities for businesses to service the needs of the Denmark community locally as our district grows.
- Provide flexibility to support businesses and commercial developments that maximise the benefit to the local community.
- Promote community resilience by encouraging a diversified and circular local economy.
- Protect agricultural land from fragmentation, competition, and incompatible land use, while encouraging regenerative land management and food production systems.

- Promote increased sustainability within tourism, agriculture, commercial and industrial land uses and development, including responsiveness to climate change.
- Support the development and expansion of educational establishments as a locally significant service industry.

Our Natural Environment:

- Improve ecologically sustainable land use and development outcomes.
- Provide for the protection, enhancement and regeneration of the natural environment to meet the needs of current and future generations.
- Support our community's response and adaptation to climate change by improving land use and development standards.
- Encourage behaviour change and a reduction in ecological footprints, to ensure that consumption of resources occurs within the environmental limits of the bioregion and planet earth.
- Plan for land use and development in a way that minimises the risks and impacts of natural hazards.

Our Built Environment:

- Support a sustainable settlement pattern that reduces the reliance on urban sprawl to accommodate future population growth.
- Retain the Shire's unique sense of place by preserving and enhancing its character and cultural heritage.
- Plan for the development of accessible, equitable and ecologically sustainable residential communities.
- Promote housing affordability by encouraging diverse housing types and enabling suitable land supply.
- Promote the primacy of the Denmark Town Centre and use the local planning framework to create places and spaces that are cohesive, inclusive and vibrant.
- Promote the consolidation of residential growth to support the efficient use of public infrastructure.

Our Community:

- Acknowledge the interests of Traditional Custodians of land within the Shire and work to integrate their perspectives into land use planning.
- Support the development of accessible and adaptable community facilities to maximise community benefit.
- Provide public open space that enhances community liveability and promotes healthy lifestyles.
- Use land use planning to promote accessibility to services and sustainable transport choices.
- Facilitate the development of a happy, healthy, inclusive and diverse community that supports access to employment and housing for all residents and aims to eliminate inequity.
- Plan for land use in a way that minimises conflict and balances competing needs, including between the Shire's permanent residents and visitors.

Our Local Government:

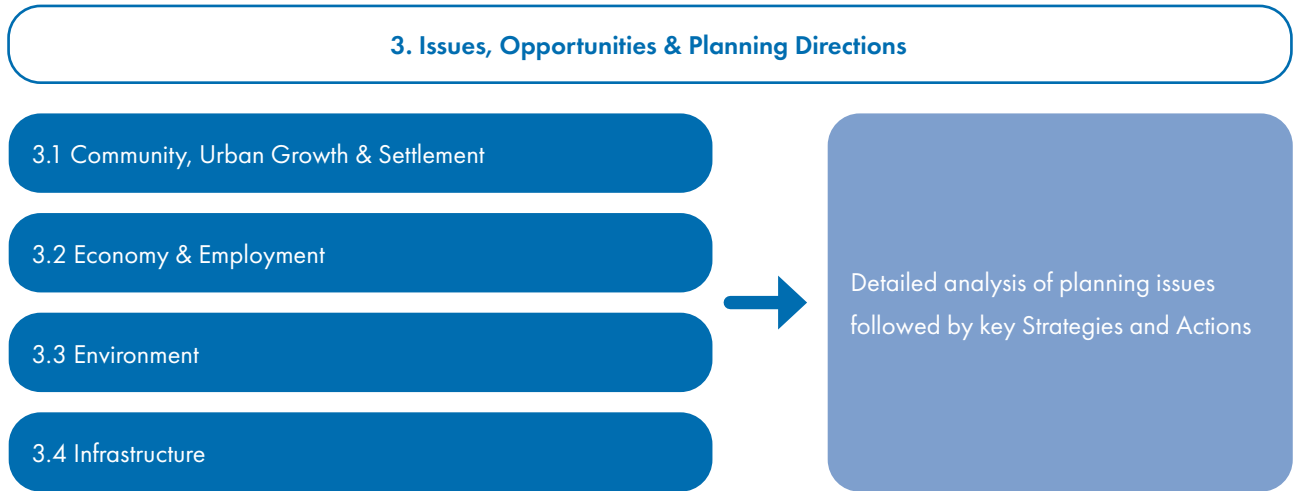
- Consult and collaborate with our local community to develop a simplified local planning framework that is more easily understandable and reduces unnecessary approval requirements.
- Provide a framework that supports consistent and considered decision-making for land use planning and development.
- Promote the use of land, infrastructure and resources efficiently and equitably.
- Initiate partnerships with government authorities and service providers to facilitate the delivery of community services and infrastructure.



3 Issues, Opportunities & Planning Directions

As shown in the diagram below, Section 3 contains four overarching themes:

Community, Urban Growth & Settlement, Economy & Employment, Environment, and Infrastructure. Each subsection discusses key issues and opportunities that have been considered in developing the Strategies and Actions proposed by this Local Planning Strategy.



3.1 Community, Urban Growth & Settlement

3.1.1 Demographic Profile and Planning Implications

Complementary to the information included in Part 1, Section 7 in Part 2 of this Strategy includes an overview of the Shire's demographic profile that provides background information and analysis of the demographic considerations and key planning issues for the Shire. Assessment of the Shire's population and demography demonstrates the following implications for future settlement planning:

- The Shire has experienced steady population growth driven by lifestyle migration and retirees, and it is expected that this will continue in the near future.
- An increasing proportion of aged persons in the community will require consideration in the provision of housing and services.
- The attraction of families with children to the district will increase demand for relevant services.
- The Shire currently experiences a low level of cultural diversity relative to other Local Government areas.
- While income levels are relatively low, the Shire overall demonstrates a relatively high level of socio-economic well-being within the broader region.
- A high proportion of absentee property owners and tourism accommodation has implications for the provision of housing and the seasonality of demand for a range of community and commercial services.
- The Shire has experienced steady population growth consistently above averages for Regional WA, with recent growth resulting in pressure on housing and services.

3.1.2 Settlement Planning

The strategic planning direction for the growth of our community and settlements is influenced by a range of considerations, including the local context, community preferences, State and Regional planning frameworks, and various technical studies.

This Strategy approaches settlement planning by pursuing improved sustainability and management of growth in line with the community's vision.

State and Regional strategic direction and policies emphasise the need to create sustainable and liveable communities, make efficient use of land and infrastructure, limit our impact on the environment, and improve community resilience to natural hazards.

The Shire is likely to experience population growth and this Strategy acknowledges that change to previous practice is required to balance the opportunities that growth provides while reducing impacts on our existing community values and attributes.

This Strategy's approach to settlement planning remains consistent with the Shire's 2011 LPS in the following ways:

- Preserve the 'village feel' of Denmark and support development that contributes to this.
- Reduce the impacts of urban growth by carefully managing visual and environmental impacts.
- Support the Denmark Town Centre as the primary focus for commercial activity.
- Protect the ongoing viability of agricultural industries within the Shire.

The Strategy differs from the 2011 LPS in its approach to several areas, including:

- Prioritising consolidated urban growth and placing a greater emphasis on infill development to accommodate a proportion of additional housing.
- Reducing the extent of land identified for urban growth and increasing the expected yield from zoned land acknowledging our community's desire to contain unnecessary sprawl.
- Emphasising the need for housing diversity and encouraging smaller format housing to promote affordability and sustainability.

- Emphasising the need to plan for sustainable transport modes and minimising infrastructure costs.
- Reducing the expectation that expansion of the Shire’s rural villages is required to accommodate growth, acknowledging that they are isolated from community services and further development is highly constrained.
- Acknowledging that large lifestyle lot subdivisions are inherently unsustainable because they increase public infrastructure costs, depend on cars for transport, consume more land and compete with other productive land uses.
- Acknowledging the potential need for an additional bridge over the Denmark River to provide alternative access in an emergency is not required as the current access is considered sufficient for the foreseeable future.

The following sections of the Strategy will detail how these directions will be put into practice. It is acknowledged that in some circumstances, the legacy of previous approaches to settlement planning cannot be unwound, but it is critical that change towards a more sustainable future starts within this Strategy.

3.1.3 Population Growth & Sustainability

While the views of the Shire’s community vary, some residents express satisfaction with the current population and levels of development, communicating a desire for these to remain as they are. Linked to this is the discussion about whether there is a ‘sustainable’ population level for the Shire’s community and environment. Although population growth within the Shire is assumed in this Strategy, this is an acknowledgement, rather than an intentional position or design, for the future of the community.

In preparing this Strategy, it is acknowledged that the majority of influences on population growth and demographic change are occurring on a much broader scale and are outside of the control of the local community. For example, the retiring of the baby boomer generation has created a large population cohort that is mobile and seeking a place of residence in a ‘lifestyle’ location, without the need to be close to a workplace. Online and remote forms of working supported by increased internet access have promoted a similar response within the working-age population. The increasing price of housing in capital cities has also prompted migration to regional areas, while relatively high levels of affluence in Western Australia have supported the purchase of second homes for holiday use.

The Shire is fortunate to have many of the attributes sought by migrants to regional Western Australia, but demand has historically been limited by a lack of employment/employment diversity and the relative distance from Perth. As such, the Shire has not experienced the same pace of growth as some other regional towns in locations closer to the Perth metropolitan area.

An adequate response to demand pressures is necessary to avoid a shortfall in housing supply, which can result in a decline in housing affordability, an increase in rental prices, increased housing insecurity and homelessness, a loss of workers in lower-paid service industries, and limited opportunities for housing for young people.

It is also difficult to select any particular number as a ‘sustainable’ population for the Shire, given this is strongly associated with levels of resource use. For many businesses and services, an increased population improves viability, allowing the community to benefit from a wider range of locally provided services. The Shire’s community has also benefitted from an increased range of clubs, societies and other opportunities for recreation that have contributed to increased community social capital. The natural environment is often challenged by population growth and the need for additional housing, but the degree of impact is highly dependent on the form this takes, not simply the number.

A key tenet of this Strategy is an acceptance that population growth is likely to occur, that the community has a limited ability to contain this without significant social costs, and that the principal role of the Strategy is to guide and manage growth in accordance with the community’s vision.

3.1.4 Residential Growth

A key purpose of this Strategy is to identify sufficient land to accommodate housing needs for the next 15 years.

The 2011 LPS identified extensive urban growth areas, taking into account a high growth projection, traditional patterns of development and planning related to a period of time longer than 15 years (20 years).

Results from community engagement for this Strategy have necessitated a review of the 2011 trajectory for future growth and housing.

This section focusses on how and where land for residential housing is prioritised, in accordance with the community's vision and the adopted approach to settlement planning.

Assuming the population forecasts presented in this Strategy, the Shire has a sufficient supply of zoned land to accommodate forecast housing needs to 2037.

Consistent with the 2011 LPS, the Denmark townsite will remain the primary focus for population growth given the ample opportunities for additional housing and support of existing community services, infrastructure, and commercial activity/employment.



3.1.4.1 Infill & Consolidation

The Shire has previously experienced a predominance of conventional subdivision and development patterns, resulting in low density suburban housing and a majority of detached three and four bedroom homes (representing 65% of the total dwellings within the Shire) (ABS 2021). Projected forward, this development pattern would require significant expansion of the existing footprint of the Denmark townsite. Given the ambitions of the Shire community to avoid urban sprawl, improve housing diversity, promote affordability and achieve a greater level of sustainability, this development profile requires significant intervention.

To achieve these objectives, the Strategy seeks to prioritise consolidation of the Denmark townsite through limited expansion in key locations and infill development.

What is Infill Development?

Infill development can be broadly described as additional development on land that already has some development in place, which may be retained or replaced in the process. This typically occurs in older suburbs with large lot sizes where additional housing can be provided near town centres and existing services and transport infrastructure.

Conventional infill development in Western Australia over the past 30 years has produced medium density rear battle-axe lots and duplex/ triplex developments within older suburban areas. In many cases this has led to development outcomes that have negatively impacted on liveability, with a lack of sympathy to established character, limited northern orientation, small garden spaces and the removal of mature trees. These undesirable outcomes have created a poor perception of infill development, creating a significant challenge in promoting infill as a critical part of housing the Shire's growing population in a sustainable manner.

These shortcomings have been recognised by the State Government and changes to the State Planning Policy 7.3 (Volume 1) - Residential Design Codes (SPP 7.3) are being progressively implemented to improve outcomes. This includes the introduction of a specific Draft State Planning Policy 7.3 – Low and Medium Density Code (draft SPP 7.3) and associated draft guidelines (November 2020).

This Strategy acknowledges that conventional infill development on a large scale would detract from the character and amenity of the Denmark townsite. In order to provide infill housing that is appropriate for the Denmark townsite, this Strategy considers changes occurring within State policies as well as a range of alternative approaches that are supported within our community.

Achieving desirable forms of infill development may require an outcome focussed, criteria driven approach that enables greater flexibility in development standards. For example, this may involve greater flexibility in lot sizes or setbacks where necessary to preserve remnant vegetation.

This Strategy supports infill development through a wide range of built form outcomes, which supports housing diversity and provides opportunities to achieve infill in a variety of ways. Further discussion on alternative housing types is included in Section 3.1.4 of this Strategy.

Density

In order to facilitate infill development, this Strategy recognises that changes to the zoning of existing residential areas will be necessary to accommodate increases in density. This will allow vacant land to be used more efficiently and support additional development in established residential areas.

Residential areas with existing servicing infrastructure, adequate public open space and within a walkable catchment to the Denmark Town Centre are acknowledged as the most suitable locations for increased residential density. This will enable the development of additional dwellings in well-serviced locations and encourage more sustainable transport options.

The application of the Residential Design Codes through local planning schemes has encouraged the development of uniform lot and housing sizes. This has seen the development of many streetscapes with a consistent type and style of housing and promoted this as the expected norm rather than a more varied pattern of development. This Strategy supports varying densities within streetscapes. An increase in density coding would likely produce this diversity as infill development typically occurs incrementally and at a small scale.

Incentivising Infill Development

It is recognised that the Shire has a housing market generally driven by a 'lifestyle' interest, relatively low land values and a 'traditional' development pattern that has resulted in lower density housing outcomes. The local planning framework also strongly favours low density housing development, and changes to this framework are necessary to enable and incentivise infill development relative to urban expansion.

- **Conditional Coding**

Throughout Western Australia it is common to use 'dual' or 'split' density codes to set pre-conditions for development at a higher density. It is acknowledged that the imposition of additional requirements for accessing a higher coding may hinder the achievement of infill housing in the Shire, and instead work to maintain development at the lower density. It is recommended that current provisions and zoning of dual coded properties under TPS3 be reviewed as part of a new Local Planning Scheme, having regard to the directions of this Strategy and changes in the broader planning framework, including sewerage, bushfire and environmental considerations.

This Strategy proposes to explore options to introduce a minimum density requirement to ensure that residential land in key locations is used productively and for its highest and best use. This may include disincentives for low density development and/or a minimum density requirement. Taking into account the conditions of the site, this may require a proposal for development at a lower density to demonstrate how opportunities for potential future infill development are being preserved, or how larger dwellings can be adapted in the future into multiple smaller dwellings.

- **Minimum Lot Size Variations**

In seeking to create a more diverse and affordable range of housing, avoid uniformity of development outcomes, and promote the uptake of infill development opportunities, the Strategy supports the flexible application of the Residential Design Codes minimum lot size standards within an 800 metre walkable catchment from the Denmark Town Centre. This will enable the offset of higher density development by lower density development. Variations to minimum lot sizes will, in some cases, remove the need to demolish existing homes in the pursuit of infill development. This will preserve established streetscapes and amenity, while also providing additional opportunities to subdivide smaller lots and develop smaller dwellings.

For example, reducing minimum lot sizes from those in the Residential Design Codes whilst maintaining the lot averages could potentially result in a greater diversity of lot and housing outcomes such as the development of a 440m² lot and a 900m² lot within an R15 coded area, compared to two 670m² lots. Other development standards, such as setbacks and open space requirements, would be maintained to ensure the preservation of neighborhood amenity.

- **Reticulated Sewerage Infrastructure**

Some parts of the Denmark townsite are not currently provided with a reticulated sewerage service, and the achievement of infill development is therefore constrained by the Government Sewerage Policy (2019). Investment by the State in this infrastructure would enable new housing development as well as improving environmental outcomes. In particular, the development of a reticulated sewerage service in residential areas within an 800 metre catchment of the Town Centre should be prioritised.

This is unlikely to be achieved without State-led investment due to the fragmentation of land ownership and preliminary costs that would be borne by the first developer.

Utility services are discussed in detail in Section 3.4.2 of this Strategy.

- **Financial Incentives**

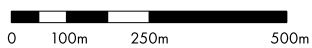
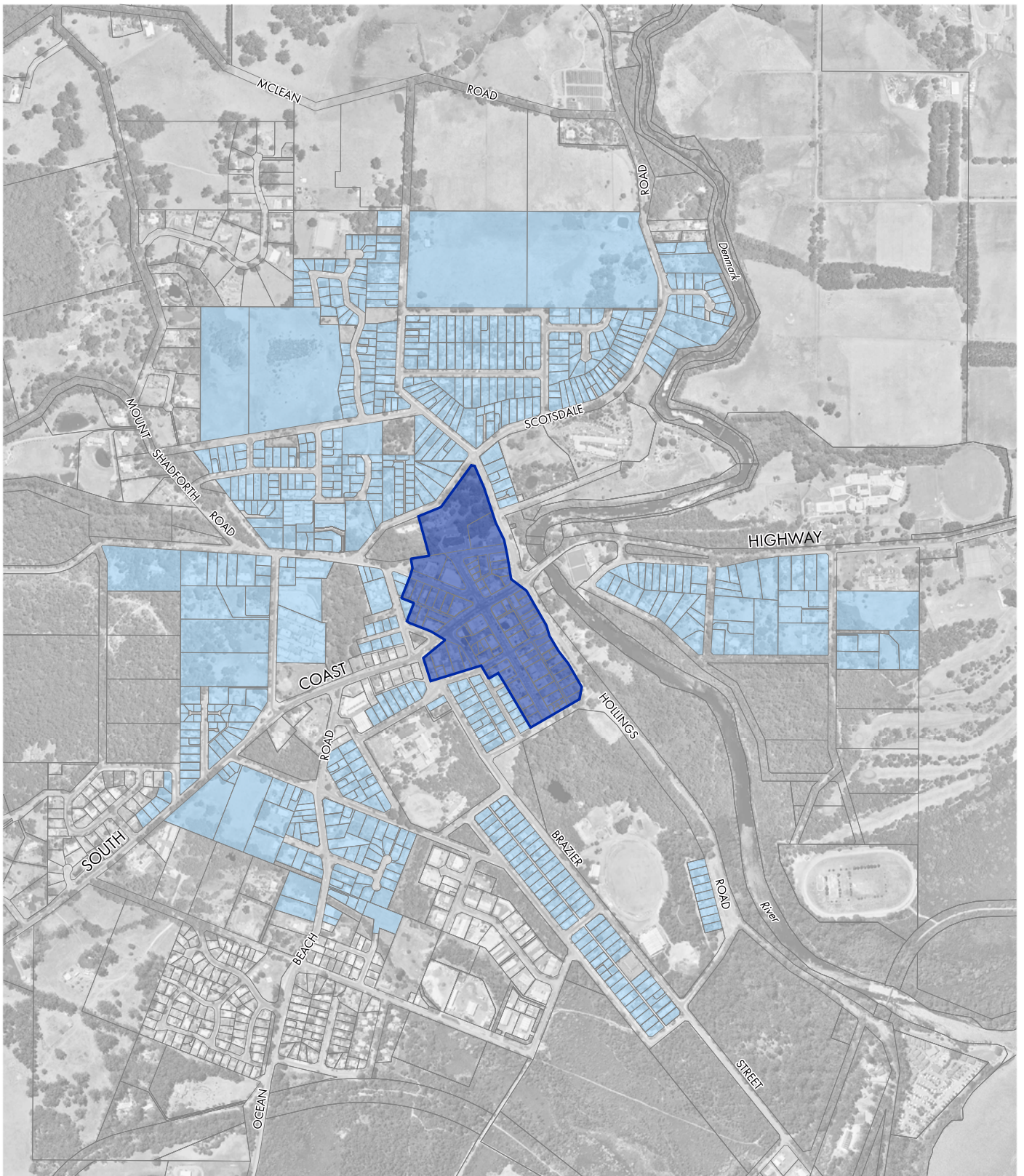
Infill development often occurs at a small scale, releasing an additional one or two lots at a time. At this scale, the cost of development is often higher per lot, somewhat reducing its viability for developers, however it is still more achievable for landowners who would not have the means to subdivide on a larger scale. The Strategy supports investigation into financial incentives to encourage infill development, potentially including discounts on developer contribution levies. Financial incentives can potentially be justified by the reduction in externalised costs from less sustainable forms of residential subdivision and development.

Strategies & Actions – Infill & Consolidation



1. Support sustainable urban growth by promoting quality infill development to enhance social capital, encourage economic viability and conserve the natural environment.
 - a) Prepare a local planning policy to provide guidance for the achievement of a high standard of infill development, incorporating the following criteria:
 - i. Development that enhances the streetscape.
 - ii. Support and encourage ecologically sustainable development.
 - iii. Remnant vegetation is retained and protected wherever practical.
 - iv. Impacts on surrounding residential amenity and landscape values are minimised.
 - v. Utility services are adequately provided, including connection to a reticulated sewerage and stormwater system capacity.
 - vi. Development represents an efficient and appropriate use of residential zoned land to meet the housing needs of the community.
 - vii. Development facilitates the achievement of greater housing diversity.
2. Enable the development of medium density housing in serviced locations close to and within the Denmark Town Centre to provide for changing housing needs.
 - a) Enable infill development by making the following changes to residential density codings in the local planning scheme:
 - i. Increase residential density to R40 within an 800 metre walkable catchment of the Denmark Town Centre.
 - ii. Increase residential density to R60 for consolidated infill sites over 2000m² within an 800 metre walkable catchment of the Denmark Town Centre.
 - iii. Within the areas identified at i. and ii. above, investigate the introduction of minimum density requirements that mandates the achievement of at least 50% of the identified residential density coding or the preservation of opportunity for this to be achieved in future, via local planning policy or scheme provisions.
 - b) Investigate means to facilitate additional housing within mixed-use development as part of further planning for the Denmark Town Centre Planning Area.
 - c) Advocate for the extension of reticulated sewerage to residential areas within the Denmark townsites that are not currently serviced.
3. Support alternative approaches to infill development to promote flexibility, diversity, sustainability and affordability in housing supply.
 - a) Introduce variations to the Residential Design Codes to relax minimum lot sizes within a 800 metre walkable catchment of the Denmark Town Centre.
 - b) Review all existing TPS3 dual coded zoning and related provisions over Residential Zoned land in the new Local Planning Scheme.

Map 1

Walkable Catchment



Legend

-  Denmark Town Centre Commercial Core
-  Residential Lots within a 10 minute walk (800m) from the Denmark Town Centre Commercial Core

3.1.4.2 Urban Expansion

Zoned Land

A number of landholdings in close proximity to the Denmark townsite are currently zoned for Residential or Special Residential development in the Shire's TPS3 but are yet to be developed. Subject to the resolution of relevant planning and infrastructure issues, these sites are likely to provide the majority of opportunities for land development in the short to medium term. These sites are detailed in Figure 1 and spatially represented in Map 2.

While the Strategy acknowledges that these landholdings have been attributed a development right by having been zoned in the Scheme, it is noted that some sites have critical issues constraining their potential development. Constraints to land development within the Shire include:

- **Project Scale**

Due to the Shire's relative isolation and small population size, the economics of land developments differ greatly from larger urban centres such as Albany and Perth. The cost of development is also significantly higher in regional locations, with the cost of materials, tradespeople and infrastructure all coming at a premium due to limited competition, shortages and added transport costs.

A typical subdivision stage within the Shire comprises a relatively small number of lots created at a time (in the range of 10 to 20 lots maximum), as compared to an equivalent greenfield subdivision in metropolitan Perth (potentially hundreds of lots at a time). The same economies of scale do not exist to support infrastructure investments. Slower lot sales can also create increased holding costs. Developers undertaking urban greenfield subdivision projects in the Shire are also typically smaller companies, less likely to have adequate capital available to fund large scale projects.

- **Site Constraints**

Due to slope, water management and the presence of remnant vegetation, a number of sites currently zoned for urban expansion have complex constraints and high development and infrastructure costs.

- **Bushfire Risks**

The presence of bushfire risk may reduce the developable area of some urban expansion sites and suggest that others are unable to be developed within the requirements of the current State planning framework.

- **Reticulated Sewerage**

The Government Sewerage Policy (2019) categorises the majority of areas identified for future urban development as being within sewerage sensitive areas, falling within a 2km buffer around the Wilson Inlet and lower reaches of the Denmark River. The policy restricts potential subdivision where a reticulated sewerage service is not available. The cost of extending sewerage infrastructure and constructing pumping stations is cost prohibitive for many smaller development sites.

Urban Expansion

The preparation of a local planning strategy enables consideration of the need for 'new' urban land to provide for housing needs. A strategy also allows for reconsideration of land previously identified in light of contemporary community values, planning policies and the impacts of climate change.

The 2011 LPS identified a number of landholdings that were potentially suitable for Residential or Special Residential development, subject to detailed investigation and rezoning. The extent of land identified at the time of the 2011 LPS took into account higher population forecasts over a longer period of time than this Strategy does, as well as being premised on a development pattern that prioritised urban expansion. This was highlighted in the Denmark Regional Land Supply Assessment (2017), which assessed the available land supply as potentially capable of providing for 9,000 additional residents over the following 36 years. As the majority of this land has remained undeveloped, each of these sites has been reconsidered in light of the Shire's current trajectory (as at 2022) and the 15 year outlook of this Strategy.

Some of the areas previously identified as 'Special Residential' within the 2011 LPS are now identified by this Strategy as 'Rural' as they are no longer deemed as being suitable to be rezoned for more intensive development, because of various site constraints including slope, environmental characteristics, bushfire planning matters (extreme BHL), and servicing.

Additionally, the 2011 LPS previously identified Lot 5434 (DP144747) Crowea Road, Denmark as 'Urban', however this Strategy now designates the site as 'Rural Residential' due to significant site constraints, most notably the presence of remnant vegetation.

While recognising that existing zoned land is potentially sufficient to provide for housing needs for the next 15 years, this Strategy acknowledges that land development in the Shire is constrained and some zoned land may not be economically viable to develop within this time. The required time to assemble land, resolve planning issues and procure investment can also vary considerably according to the site. The retention of additional land for urban expansion is necessary in order to provide sufficient flexibility and security to ensure future housing needs can be met.

The identification of selected sites for urban expansion will also promote improved development outcomes by supporting a logical staging of the development front and the extension of servicing infrastructure.

Consistent with the adopted vision of this Strategy, it is proposed to minimise reliance on urban expansion. Where necessary to identify new growth areas, the Strategy identifies sites that are concentrated in and around the Denmark townsite to support access to services, infrastructure and opportunities for sustainable transport.

Structure Plans

A critical stage in the development of land for housing is the preparation of a local structure plan, which shows the proposed layout of housing lots, roads, parks and other infrastructure.

Structure plans provide an avenue for the directions of this Strategy to be implemented, along with the various other requirements of the State planning framework.

This Strategy promotes the review of historic structure plans, where possible, to support the implementation of contemporary planning policies, to promote improvements to sustainability, and to increase housing yield and diversity. Many of the structure plans for growth areas within the Shire have been in existence for some time and require updating to align with current State planning framework and the intent of this Strategy.

This Strategy identifies some of the relevant considerations for the preparation and assessment of structure plans, acknowledging that each structure plan will have a need to address generally similar matters despite the different characteristics of each site.

Further discussion on the integration of sustainability into the structure planning process is included in Section 3.1.7 of this Strategy.



Strategies & Actions – Urban Expansion

1. Maintain a consistent supply of zoned land to support potential urban expansion, while acknowledging the preferred settlement pattern adopted by this Strategy.
 - a) Retain existing zoned land for urban expansion and explore alternative outcomes for sites with critical constraints as identified in Figure 1.

Figure 1: Considerations for existing sites zoned Residential or Special Residential identified for land development

| Location | Identifier Number (Regional Land Supply Assessment) | Lots | Indicative Yield* | Sewerage | Notes | Recommendation |
|---------------------------|---|--|-------------------|--|--|--|
| Wattle Wy | DMK05 | Lot 3000 (P044260), Smith St | 10 | Available adjacent to development site | <ul style="list-style-type: none"> Zoned Residential (R10/20) Within 800m of Town Centre No recent approvals | Retain for residential development, seek increased yield & diversity |
| Smith St | DMK03, DMK04 | Lots 2 (D082651) & 358 (DP230731), Smith St | 108 | Available adjacent to development site | <ul style="list-style-type: none"> Zoned Residential (R10/20, R20) Part site within 800m of Town Centre Prior approval for 68 lots on Lot 2 | Retain for residential development, seek increased yield & diversity |
| Kearsley Rd to Horsley Rd | DMK06 | Lot 999 McLean Rd and Lot 106 McLean Road (DP46635) | 106 | Prior approval at a density where sewer is not required | <ul style="list-style-type: none"> Zoned Special Residential (SR12) Approved Subdivision WAPC 158185 – 24 Lots Approved Structure Plan | Retain for low-density residential development (R5 density) |
| | DMK29 | Lot 9000 Wishart Pl (DP61012) | | Prior approval at a density where sewer is not required | <ul style="list-style-type: none"> Zoned Special Residential (SR9) Approved Subdivision WAPC 162020 – 15 Lots Approved Structure Plan | Retain for low-density residential development (R5 density) |
| | DMK30 | Lot 901 & Lot 902 Horsley Rd (DP422025) | | Sewer extension required | <ul style="list-style-type: none"> Zoned Part Special Residential (SR9) and Residential R12.5 Approved Structure Plan (Expires October 2025) | Retain for low-density Residential development, and Residential R12.5 density as outlined within the Approved Structure Plan. Seek to maximise yield from R12.5 designated portion. |
| West of Kearsley Rd | DMK07 | Lot 349 (DP230731) & 9000 (DP77503) Kearsley Rd, Lot 350 (DP230731) Mount Shadforth Rd | 117 | Sewer extension required/ prior approval at density where sewer not required | <ul style="list-style-type: none"> Zoned Residential (R10)/ Special Residential (SR13) Approved structure plan | Retain for residential development, seek increased yield & diversity |

| Location | Identifier Number (Regional Land Supply Assessment) | Lots | Indicative Yield* | Sewerage | Notes | Recommendation |
|--------------------------|---|---|-------------------|--|--|--|
| Buckley St to Kemsley Pl | DMK38 | 12 lots in the area bound by Buckley St, Ocean Beach Rd, Kemsley Pl and South Coast Hwy | 174 | Available on site | <ul style="list-style-type: none"> Zoned Residential (R20, R2.5/20) Structure planning required | <p>Apply a Special Control Area over this group of lots in the new Scheme to require structure planning to ensure a coordinated approach.</p> <p>Retain for residential development, seek increased yield & diversity.</p> |
| Lot 5 South Coast Hwy | DMK14 | Lot 5 South Coast Hwy (DP57222) | 378 | Connection to reticulated sewer is required, including significant headworks | <ul style="list-style-type: none"> Zoned Residential (R20), Reserve (Recreation) Approved structure plan | <p>Support the rezoning of the land to Urban Development Zone. A structure plan is required prior to subdivision and should address the following issues:</p> <ul style="list-style-type: none"> Land capability assessment Visual impact Retention and protection of remnant vegetation Screen development from South Coast Hwy and Ocean Beach Rd Restrict access to South Coast Hwy Stormwater management Diversity of lot sizes Foreshore reserve and POS provision Fire protection Coordinate planning with DMK45 Rehabilitation of gravel pit |

| Location | Identifier Number (Regional Land Supply Assessment) | Lots | Indicative Yield* | Sewerage | Notes | Recommendation |
|------------------------------------|---|--|-------------------|--|--|--|
| Ocean Beach Rd and Little River Rd | DMK37 | Lots 213, 214 and 215 Ocean Beach Rd (DP52368) | 168 | Connection to reticulated sewer is required, including significant extension and headworks. | <ul style="list-style-type: none"> Zoned Residential (R10, R20), Commercial, Public Use (Primary School), Reserve (Recreation), Tourist Historic structure plan for residential development (Lot 214) | Support the rezoning of the land to Urban Development Zone |
| | DMK47 | Lot 32 Ridley Pl (D062910) | | Existing subdivision approval at Residential R2 currently allows unsewered development. Connection to sewer would be supported if a future connection was made available by then future development of DMK37 | <ul style="list-style-type: none"> Zoned Residential (R2) and Rural Prior approval for low density residential subdivision (Lot 32). | Retain for low-density Residential development. Proposals for higher density sewer development may also be supported. |
| Springdale Beach | DMK19 | Part Lot 9012 (P425632) | 103 | Prior approval at density where sewer not required | <ul style="list-style-type: none"> Zoned Special Residential (SR6), Tourist (T9) Approved structure plan Proposed Amendment No. 149 to TPS3 to include Tourist zoned lot in Special Residential Zone. | Retain for continuing low density residential development |
| Hardy St | DMK28 | Lots 303-304 Hardy St (DP230726) | 20 | Sewer extension required | <ul style="list-style-type: none"> Zoned Residential (R10/20) Within 800m of Town Centre | <p>Retain for residential development, seek increased yield & diversity. Key issues to be addressed prior to the development of this site include:</p> <ul style="list-style-type: none"> Remnant vegetation Bushfire risk Connection to reticulated sewerage |

| Location | Identifier Number (Regional Land Supply Assessment) | Lots | Indicative Yield* | Sewerage | Notes | Recommendation |
|----------------|---|---|-------------------|--|---|---|
| Ocean Beach Rd | DMK50 | Lots 11 (D082894), 12 (D082894) & 13 (D082894) Ocean Beach Rd | Unknown | Sewer available adjacent to development site. Connection to reticulated sewer is required. | <ul style="list-style-type: none"> Zoned Residential (R2) | Retain for residential development, seek increased yield & diversity. Key issues to be addressed prior to the development of this site include: <ul style="list-style-type: none"> Remnant vegetation Bushfire risk Connection to reticulated sewerage |
| Beveridge Rd | DMK68 | Lot 152 Beveridge Rd (DP224101) | 22** | Sewer extension required | <ul style="list-style-type: none"> Zoned Residential (R5/15) No structure plan/recent approvals | Retain for residential development, seek increased yield & diversity |

* Based on Denmark Regional Land Supply Assessment and planning approvals issued.** Indicative based on current zoning.

Strategies & Actions – Urban Expansion

b) Identify priority areas for potential urban expansion as outlined in Figure 2.

Figure 2: Considerations for sites identified for future urban expansion

| Location | Identifier Number (Regional Land Supply Assessment) | Lots | Indicative Yield* | Sewerage | Notes | Recommendation |
|----------------------------|---|---|-------------------|--|--|---|
| Horsley Rd to Scotsdale Rd | DMK01 | Lots 366 (DP230731) & 372 (DP230731) Horsley Rd, Lot 50 (D093372), 51 (D093372) & 365 (DP230731) Scotsdale Rd | 343 | Sewer available adjacent to development site. Connection to reticulated sewer is required. | <ul style="list-style-type: none"> Lots 366, 372 and Lot 51: Zoned Residential (R20); Lots 50 and 365: Zoned Rural Approved Structure Plan (2012) | Support the rezoning of the land to Urban Development Zone. A structure plan is required prior to subdivision and should address the following issues: <ul style="list-style-type: none"> Visual impact Retention and protection of remnant vegetation Landuse conflict Stormwater management Diversity of lot sizes POS provision Vehicular access to Scotsdale Rd Buffers |

| Location | Identifier Number (Regional Land Supply Assessment) | Lots | Indicative Yield* | Sewerage | Notes | Recommendation |
|-----------------------------------|---|--|-------------------|--|---|---|
| McClellan Road and Scotsdale Road | DMK49 | Part Lot 374 Scotsdale Rd (DP230731) | Unknown | Connection to reticulated sewer is required. | Zoned Rural | <p>Support the rezoning of the land to Urban Development Zone. A structure plan is required prior to subdivision and should address the following issues:</p> <ul style="list-style-type: none"> • Visual impact • Retention and protection of remnant vegetation • Landuse conflict • Stormwater management • Diversity of lot sizes • POS provision • Vehicular access to Scotsdale Rd • Buffers • Coordinate planning with DKM01 |
| Kemsley Pl to South Coast Highway | DMK45 | Lots 1 (D023279) & 617 (DP230743) South Coast Hwy, Lot 621 (DP230743) Harlequin St | 140 | Sewer available adjacent to development site. Connection to reticulated sewer is required. | <ul style="list-style-type: none"> • Zoned Rural • Logical extension of Townsite that enables connection between existing identified growth areas and associated infrastructure | <p>Support the rezoning of the land to Urban Development Zone. A structure plan is required prior to subdivision and should address the following issues:</p> <ul style="list-style-type: none"> • Visual impact • Retention and protection of remnant vegetation • Stormwater management • Diversity of lot sizes • Foreshore reserve and POS provision • Fire protection • Screen development and restrict access to South Coast Hwy • Coordinate planning with DMK14 • Land capability assessment |

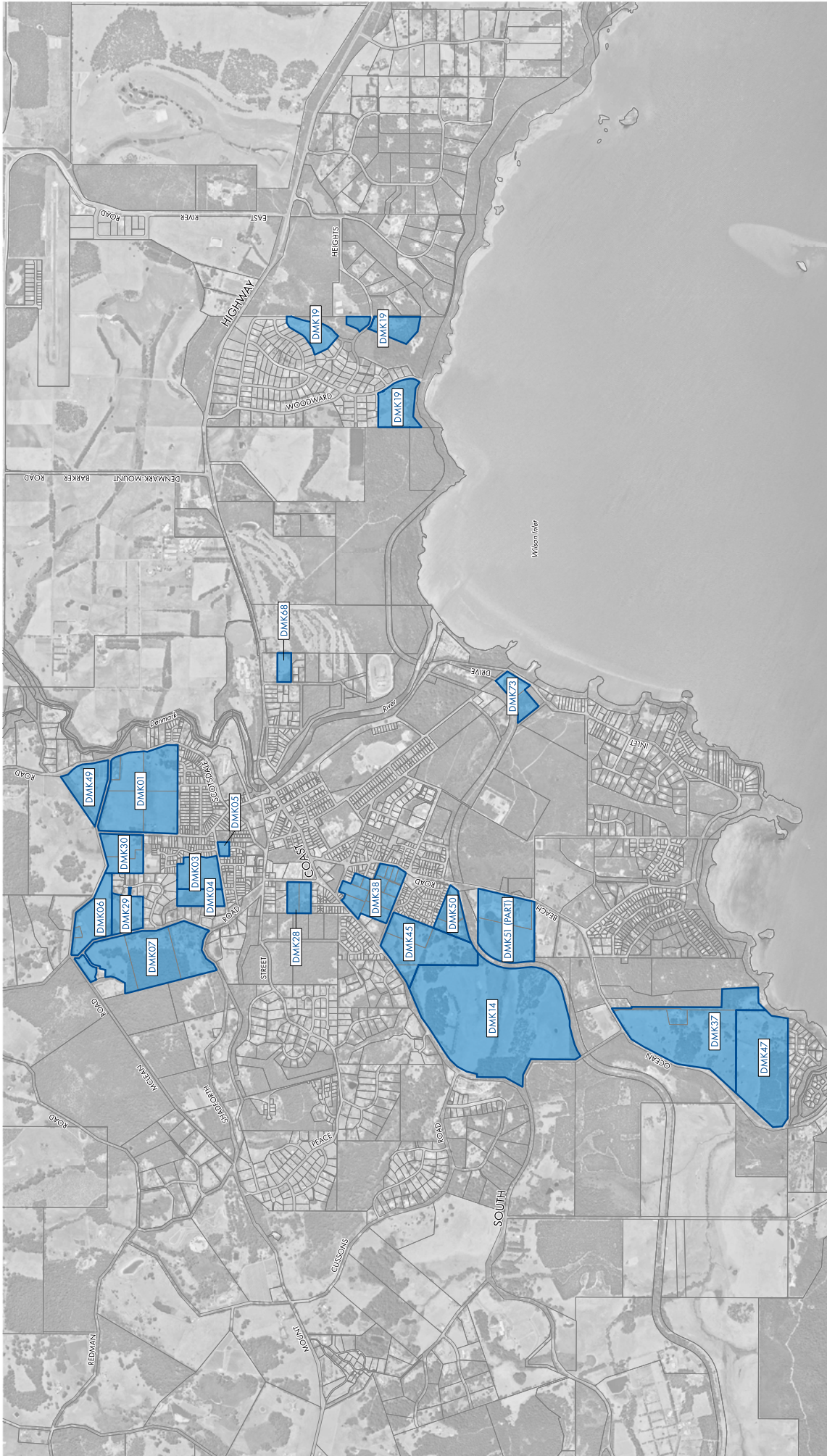
| Location | Identifier Number (Regional Land Supply Assessment) | Lots | Indicative Yield* | Sewerage | Notes | Recommendation |
|----------------|---|--|-------------------|---|--|--|
| Ocean Beach Rd | DMK51 (part) | Lots 3, 4 & 5 (portion) Ocean Beach Rd (D085810) | Unknown | Sewer currently located approximately 250m away. Connection to reticulated sewer is required. | <ul style="list-style-type: none"> • Zoned Rural • Logical extension of Townsite that enables connection between existing identified growth areas and associated infrastructure. | <p>Support the rezoning of the land to Urban Development Zone. A structure plan is required prior to subdivision and should address the following issues:</p> <ul style="list-style-type: none"> • Visual impact • Retention and protection of remnant vegetation and waterways • Stormwater management • Diversity of lot sizes • POS provision • Fire protection • Coordinate planning with DMK14 |
| Inlet Drive | DMK73 | Lots 2 (D054097) & 210 (DP144746) Inlet Dr | Unknown | Sewer available approximately 220m from Lot 210. Connection to reticulated sewer is required | <ul style="list-style-type: none"> • Lot 210 zoned Rural • Lot 2 zoned Residential (Portion R40) and Reserve (Parks & Recreation) | <p>Site is heavily constrained due to vegetation over Lot 2, however some potential for residential development exists given proximity to Denmark townsite. Key issues to be addressed prior to the development of this site include:</p> <ul style="list-style-type: none"> • Remnant vegetation • Bushfire risk • Connection to reticulated sewer • Interface with adjoining reserve • Land capability |

Strategies & Actions – Urban Expansion

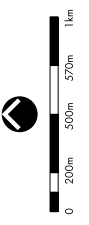
2. Require comprehensive structure planning prior to subdivision and development of residential estates as identified in Figures 1 and 2 (zoned and identified for expansion), including consideration of:
 - a) Logical coordination with existing and planned/anticipated development;
 - b) Land capability assessment, including consideration of wastewater management;
 - c) Bushfire hazard separation and risk mitigation;
 - d) Assessment and mitigation of impacts on visual landscapes;
 - e) Accessibility, including a priority for sustainable transport modes;
 - f) Achievement of targets for housing yield and diversity;
 - g) Buffers to agricultural land to protect against issues such as noise, odours and spray drift;
 - h) Impact on the environment, including a priority to preserve remnant vegetation and downstream water quality;
 - i) Water management planning, incorporating water sensitive urban design;
 - j) Ecological sustainability, including assessment against the criteria identified in this Strategy; and
 - k) Other relevant planning matters, as necessary.
3. Improve the consistency of zoning for low-density residential land uses in the local planning scheme and pursue alignment with the State planning framework.
 - a) Swap the existing Special Residential zone with low-density residential zoning whilst retaining appropriate amenity and land use controls in the local planning scheme.



Map 2 Urban Expansion



Legend
Urban Expansion Sites



3.1.4.3 Rural Residential

Rural Living Estates

The Shire's desirable natural features, climate, ecology and secluded coastal location make it an attractive option for the increasing number of people leaving cities and larger towns in the pursuit of a tree or sea change, often with a preference for 'lifestyle' blocks.

Over the course of the last 30-40 years, approximately 1,630 hectares of the Shire's rural land has been subdivided or identified for rural living lots. This has produced about 500 lots in the range of 1-10 hectares in the Hay, Kentdale, Kordabup, Ocean Beach, Scotsdale, Shadforth and William Bay localities.

While the 2011 LPS acknowledged the legitimacy of rural living estates as a lifestyle choice, there is increasing recognition of the impacts of this form of development. In previous years, there has been an uptake and sprawling of rural living estates within the Shire. However, given the amount of land required per dwelling, rural living estates are an inefficient use of land in providing for our community's housing needs.

The designation of land for rural living estates can also result in the loss of land suitable for agriculture and other rural enterprises. While it has been countered that a lack of rural living opportunities results in large agricultural lots being bought for lifestyle purposes, the subdivision of land into smaller parcels results in the irreversible fragmentation of rural land that will reduce the potential for future agriculture.

In years past, rural residential development was pursued to preserve remnant vegetation by attributing value to vegetated areas on agricultural land. As bushfire mitigation requirements have increased this has drastically reduced the amount of remnant vegetation possible to retain within these estates, whilst also resulting in a significant number of properties that have already been subdivided and developed in locations where bushfire risks are inherently higher. This was reflected in the 2011 LPS, which noted that additional zoning or lots within the Landscape Protection Zone would not be supported.

Further risks to environmental health may also result from the lack of an adequate compliance mechanism for the maintenance of on-site wastewater disposal systems, which typically results in a higher amount of nutrients in adjacent waterways than is forecast at the establishment of rural living estates.

The development of rural living estates has been supported by land developers who have been granted the opportunity to develop land distant from the townsite with fewer up-front infrastructure costs. The expense of establishing a water supply, wastewater disposal, as well as clearing and developing a home site is commonly passed on to subsequent lot owners, while the ongoing costs of inefficiently used power, road and drainage infrastructure are shared by the community more widely.

These concerns are reflected in State policy which has moved towards limiting the development of further rural living estates.

From a settlement planning perspective, rural living estates are essentially incompatible with the community vision and the objectives of this Strategy to pursue improved sustainability in land use and development. The Strategy therefore adopts a position that does not support the rezoning of land for the development of new rural residential estates, beyond what has already been zoned for in TPS3 (as Special Rural and Landscape Protection). This will include removing a number of designations from the 2011 LPS that may have potentially supported rezoning.

In order to seek greater efficiencies from existing zoned land, the Strategy supports infill development within existing Special Rural zoned areas where it can be adequately demonstrated that bushfire risks, environmental impacts and other relevant land use planning considerations can be appropriately addressed. This should be resolved through a structure plan review.

The majority of the Shire's rural residential estates contain few businesses and cottage industries due to a very limited range of permissible land uses. The largely dormitory nature of rural residential estates has resulted in the 'preservation of amenity' being a primary planning concern of many residents, which has inhibited more functional uses of these large lots.

The Strategy recommends expanding land use permissibility to enable more functional and productive uses of rural residential land in appropriate locations.

Consistency of Provisions

Land use permissibility and development standards within the Shire's Special Rural Zone are guided by Special Provisions in TPS3. This has resulted in significant variations between each rural living estate and caused the local planning framework to be confusing and difficult for the community to understand. To align with the model provisions for local planning schemes in the State planning framework, the Strategy supports the zoning of existing Special Rural zoned lots to the Rural Residential zone, and Landscape Protection zoned lots to the Rural Residential or Conservation zones, as appropriate.

The Strategy also supports the consolidation and alignment of land use permissibility and development standards for future Rural Residential and Conservation zones.

Rural Multiple Occupancy

The Rural Multiple Occupancy Zone includes several rural landholdings used for cooperative forms of rural residential living. This Zone supports rural residential land use with a non-conventional approach to ownership and development – where freehold subdivision does not occur.

The Rural Multiple Occupancy Zone has a number of distinctions from other rural living zones that would not be easily merged, and no commensurate zone is contained within the model provisions of the Regulations. The Strategy recommends that areas currently zoned Rural Multiple Occupancy by TPS3 are identified as Rural with additional use designations in the Shire's new local planning scheme, in order to align with the WA Planning and Development (Local Planning Schemes) Regulations 2015.

As a rural living land use, the Strategy does not support the expansion of the Rural Multiple Occupancy zone beyond what is currently identified in TPS3. Minor infill development may be considered where relevant planning considerations can be addressed.

Rural Smallholdings

The 2011 LPS proposed the introduction of a Rural Smallholdings Zone into TPS3 consistent with the model provisions of the Regulations. This Strategy does not propose the introduction of a Rural Smallholdings Zone, recognising that this is not required in order to provide distinctions in land use permissibility for rural lots over/under 40 hectares and that the promotion of additional subdivision to facilitate rural lifestyle lots is not desirable.

Strategies & Actions – Rural Residential

1. Improve the consistency of zoning for rural living land uses in the local planning scheme and pursue alignment with the State planning framework.
 - a) Introduce a Rural Residential zone into the local planning scheme consistent with the model provisions of the Planning and Development (Local Planning Schemes) Regulations 2015. Include landholdings currently zoned Special Rural within the Rural Residential Zone.
 - b) Review zoning provisions within the local planning scheme for the Special Rural Zone to enable a consolidated, more consistent suite of development standards and permissible land uses for the Rural Residential Zone, only supporting variations for individual estates where this is necessitated by the unique geographic characteristics of that estate.
 - c) Areas currently zoned Rural Multiple Occupancy by TPS3 are identified as Rural with additional use designations in the Shire's new local planning scheme.
 - d) In some instances, structure planning may be required for Rural Residential zoned land prior to any proposed subdivision, in order to ensure orderly and proper planning, including the coordination of strategic road connections across multiple landholdings.
2. Acknowledge the inherent conflict of rural living estates with sustainable land use and only support the retention of existing zoned land for this purpose.
 - a) Not support the identification of any additional land for inclusion in the Rural Residential Zone.
3. Increase the function and utilisation of land zoned for rural living purposes by providing greater opportunities for small scale businesses and self-sufficiency and supporting increases in density and limited infill development to increase housing yield.
 - a) Consider proposals for infill development within the Rural Residential Zone subject to the resolution of land use capability, bushfire risk, environmental impacts and other relevant land use planning considerations.
 - b) Support a wider range of permissible land uses within the Rural Residential Zone to promote consistency and encourage the establishment of small scale, ancillary functions such as home businesses, small scale horticulture, cottage industries and tourist accommodation.

3.1.4.4 Availability & Affordability

A recent significant issue has been the availability and affordability of housing in the Shire. This experience has been similar to other regional coastal and 'lifestyle' locations in Western Australia and Australia, resulting from an increase in regional migration since the onset of COVID-19.

While relatively stable in the preceding years, the housing and rental markets in the Shire have experienced a spike in demand since mid-2020. Demand has been significantly higher than the supply of existing properties available and the capacity of the building industry to keep pace, creating increased competition and a surge in housing prices.

With the availability of housing substantially reduced, a significant number of new and existing residents have been forced into insecure housing, homelessness, or leaving the Shire. Due to the lack of housing supply in both the rental and sales market locally, residents with financial capacity are also facing demand-driven pressures.

While the local planning framework has limited ability to address the demand for housing in the region and some of the other broad level issues that influence housing prices, the Strategy has a role to play in ensuring that land for housing is identified and used efficiently to meet the community's needs.

Diversity & Inefficiency

An underlying cause of the lack of housing availability is limited housing diversity and the inefficient use of existing housing stock.

In 2021, the Shire contained an estimated 7,350 bedrooms within 2,453 occupied private dwellings, equating to approximately 1.22 bedrooms for each resident. This does not account for a further 922 unoccupied dwellings. This figure is one of the highest of regional Local Governments in Western Australia and has gradually increased from 1.12 bedrooms for each resident in 1996.

Within the Shire, there is an inadequate number of houses with two bedrooms or less (22.9%) relative to the number of households with one person (29.8%) or two persons (40.6%). This lack of smaller homes requires singles, couples and small families to occupy larger homes than they may need or can potentially afford. This mismatch between housing type and family size means that available housing resources are used inefficiently. This lack of smaller dwellings is also a key influence on the affordability of property, with few small and entry-level housing options available locally.

Some of the factors influencing housing efficiency include demographic change (for example, empty nesters staying in large family homes, young couples investing in a home for a future family), affluence (wealth enabling ownership of houses larger than needed) and region-specific needs (for example, homeowners maintaining rooms for travelling family/visitors).

A key intention of this Strategy is to facilitate the development of a greater range of housing, particularly smaller homes and medium density development. The achievement of this will be challenged by a market preference for three bedroom dwellings, which are considered to appeal to the largest market segment.

This Strategy identifies minimum targets for housing diversity based on the achievement of a range of residential densities within new urban growth areas.

House Prices

Over the past 15 years, the cost of housing in the Shire has been relatively affordable compared to the Perth metropolitan area, but above the mean for the broader Great Southern Region. This has offset other costs of living that are higher in regional areas, resulting in an overall cost of living within the Shire that has been relatively comparable to metropolitan Perth. Recent increases in the cost of housing are therefore having a significant bearing on the overall cost of living within the district.

Recent figures from the Real Estate Institute of Western Australia (REIWA) suggest relatively stable housing prices between 2017 and 2020 and a marked jump in the median price in 2021.

Residential rental prices were relatively consistent over the 2014 to 2018 period; however, recent figures suggest a current median rent of \$420 per week.

For more information refer to Section 7, in Part 2 of this Strategy.

Constraints to Supply

The supply of additional housing has been constrained by limited capacity within the local residential building industry, little land development activity, and materials shortages being experienced across Western Australia. Developing land and building homes within the district comes at a higher cost than in other larger markets that are faced with fewer topographical and servicing constraints, lower transport costs and greater economies of scale.

While a sufficient supply of land zoned for development has been maintained within the local planning framework, current wastewater and bushfire planning requirements introduced by the State Government have proven a substantial constraint to development. It is broadly noted that the standard of housing and urban development has progressively increased in Australia for several decades, and while changes to building and planning requirements have generally improved quality of life and reduced risk this has also contributed to increased housing costs.

While many of these matters are outside of the control of this Strategy, relevant actions are proposed to help to address some of the broad issues that are limiting housing availability and affordability.

Holiday Homes

The prevalence of both commercial and private holiday homes is often criticised within the community as exacerbating housing supply issues. This typically relates to the impact of additional competition in the housing market, the consideration of 'empty' houses when a local housing need exists, and negative perceptions associated with affluent second home owners that are absent from the community.

The Shire estimates that there are between 120 and 140 commercially operating holiday homes within the Shire, a number that is unlikely to have a significant impact on the overall availability of properties for residential use. It is noted that a small number of properties switch between long-stay residential tenancies and seasonal short-stay businesses, a practice that can have a direct impact on residents and is likely to be escalating concerns about the broader impact of holiday homes.

Privately used holiday homes also make up a significant portion of the Shire's housing stock, and the majority of unoccupied dwellings in the Shire. While the proportion of overall housing used as private holiday homes has remained relatively consistent, anecdotal reports of an increase in demand over the past two years may have contributed to overall housing market pressures. The high proportion of private holiday homes that remain vacant for the majority of the year represents an inefficient, inequitable and unsustainable use of resources and the Shire's housing stock. This detracts from an area's vibrancy, affordability and sense of community, and forces full-time residents to compete with private holiday home owners and prospective purchasers who don't reside in the Shire, for access to the Shire's limited housing stock. As the Shire does not currently have the ability to distinguish between privately used holiday homes and permanent residences within the planning framework, the Strategy supports further investigation into how these distinct land uses can be categorised.

Further discussion on holiday homes is included within Section 3.2.5.4 of this Strategy.

3.1.4.5 Housing Forms

The Strategy supports the development of a diversity of housing forms to improve affordability and encourages innovations in building design and tenure.

Aged Housing

The community is supported by aged housing and care services located within the Denmark townsite, with a wider range of accommodation and healthcare facilities throughout the broader Great Southern region. Due to the relatively high proportion of residents over 60 years of age within the Shire there is likely to be a significant increase in demand for aged housing and care facilities in the future. The development of a greater diversity of housing will provide more options for independent seniors than currently exists, while infill housing could facilitate opportunities to provide a greater amount of low maintenance and disability friendly housing options to enable ageing in place.

The Strategy supports the development of additional aged housing and care facilities in highly accessible locations in close proximity to community services. The Residential Design Codes provide concessions to incentivise this form of housing within residential areas. These are not generally preferred land uses at the urban fringe and are not supported in the Tourism and Rural zones as they are considered vulnerable land uses.

Key Worker Accommodation

Recent housing market pressures have reduced available options for accommodating employees working in a variety of industries, with flow on effects for community services and businesses when critical roles cannot be filled. Some businesses that have been unable to find housing to accommodate staff have consequently had reduced capacity to deliver services, particularly during peak visitor seasons.

The Shire's Sustainable Tourism Strategy identifies recent challenges in attracting and accommodating seasonal workers to support the tourism and hospitality industry sectors. The attraction of workers to seasonal roles is an industry-wide issue, influenced by limited work security and relatively low wages. However, housing for seasonal workers can potentially be accommodated in different ways to permanent residents.

Planning provisions enable the development and use of accommodation for staff in several ways, with assistance provided by recent relaxations for ancillary accommodation and the tourism length of stay provisions proposed in this Strategy.

Ancillary Dwellings

Ancillary dwellings (commonly referred to as granny flats) provide for the expansion of residences and the development of small-scale dwellings as an additional form of housing. This supports extended families, multi-generational households and provides increased availability of small dwellings within the rental market. Unlike a grouped dwelling, an ancillary dwelling cannot be subdivided from the main residence and is limited in the maximum allowable floorspace.

The local planning framework supports the development of ancillary dwellings in any zone where a single house may be developed, in accordance with relevant development standards. Recent changes to TPS3 and the introduction of accompanying Local Planning Policy 49: Ancillary Dwellings have provided greater opportunities to develop ancillary dwellings and enabled their use by non-family members. Further changes to optimise these opportunities may be considered on merit.

Tiny Houses on Wheels

Similar to caravans, Tiny Houses on Wheels (THOW) are constructed on a trailer. Utilising traditional house building techniques and materials, they are built to last longer than caravans and offer increased comfort to the occupants, being similar in character to traditional homes.

Within the community, THOWs are increasingly becoming viewed as a form of long-term transportable housing, particularly given the context of declining housing affordability and rental shortages. THOWs allow for the separation of land and home ownership, offering an affordable and flexible housing form that is capable of being moved periodically. The State regulatory framework currently considers THOWs the same as caravans, restricting the permitted length of stay and the location of their use.

Allowing land owners to rent space to a THOW dweller could be a quick and cost-effective way to increase rental supply for certain demographics, subject to meeting appropriate minimum standards regarding aesthetics, services, safety and environmental impact. For example, research indicates that single women over 50 are at a particularly high risk of homelessness in Australia, and are also the demographic group most interested in occupying a THOW.

Acknowledging that the Shire has to work within existing legislation, the Strategy supports further investigation into means to facilitate the use of THOWs as a legitimate form of accommodation. This may include:

- Investigating means of approving the use of a THOW as an alternative to an ancillary dwelling.
- Investigating minimum standards for design, construction and servicing to ensure THOWs are safe, comfortable and low impact on the natural environment.
- Suitable requirements to guide the appropriate locations of THOWs and to protect the amenity of neighbourhoods and streetscapes.
- Consider approving THOWs for an initial one or two year trial period subject to review, in order to alleviate any potential community concerns.
- Providing guidance on the use of THOWs on long-stay sites within caravan parks and camping grounds.

Flexible Infill

The application of the Residential Design Codes through local planning schemes has historically encouraged the development of uniform lot and house sizes. To enable infill development, support the retention of existing homes and promote housing diversity, the Strategy proposes to relax the Residential Design Codes minimum lot sizes within residential areas. Allowing the creation of smaller lots in existing residential areas will increase housing yields by providing additional opportunities to construct smaller homes, without the demolition of existing dwellings. The development of smaller homes on individual titles will also improve the affordability of the Shire's housing stock, providing more one and two bedroom homes that are well-suited to singles, couples and small families. Small homes also offer significant potential to achieve reduced ecological footprints through efficient use of land, building materials and energy. Further discussion on the environmental implications of housing design and size is included in Section 3.1.7 of this Strategy.



Converted Dwellings

The adaptation of existing single houses into grouped or multiple dwellings can produce an affordable form of infill housing that has minimal impact on the streetscape and a reduced environmental footprint. The Strategy recommends a review and clarification of regulatory constraints to understand how this outcome can be better facilitated, noting that limitations exist in the Building Code of Australia, TPS3 and potentially other State regulations. This may be assisted by introducing variations to ancillary dwelling requirements.

It is also recognised that non-habitable structures such as shipping containers and sheds are sometimes converted into homes. The local planning framework should provide guidance and development requirements to ensure the appropriate management of potential amenity impacts.

Affordable Housing Schemes

The State Government supports a range of programs aimed at delivering affordable housing under the WA Housing Strategy 2020-2030. In some cases, the planning system can be used to enable the development of targeted affordable housing schemes. For example, the Residential Design Codes provide for discounts on standard development requirements to support the development of aged housing. A successful initiative such as this could potentially be used to promote other forms of affordable housing.

Co-operative Housing

There are several existing examples within the Shire of co-operative housing developments where ownership is shared, as an alternative to more common housing development formats. Using shared resources, housing co-operatives can potentially enable greater access to housing, provide cost savings and improve social capital. The Strategy supports the development of housing co-operatives as a part of the development of future housing within the district.

Social Housing

The Strategy encourages the development of social and transition housing within the Shire, providing opportunities for a diverse range of housing needs. As the Shire's population continues to grow so will the need for the complete spectrum of housing options within the local area. The Shire will work with State agencies and not-for-profit organisations to enable delivery wherever possible.

Strategies & Actions – Housing

1. Support the development of a diverse range of housing types to improve affordability and encourage innovations in building design and tenure.
 - a) Require new and revised structure plans for residential growth areas to demonstrate achievement of the following housing diversity targets:
 - i. A minimum of 10% of total housing lots are high density (R60 or above).
 - ii. A minimum of 25% of total housing lots are medium density (R30 to R60).
 - iii. A minimum of 25 dwellings per hectare net residential density.
 - b) Investigate the potential introduction of scheme and/or local planning policy provisions to:
 - i. Incentivise the development of one and/or two bedroom dwellings and affordable housing schemes.
 - ii. Facilitate the legitimate use of tiny houses on wheels as a form of semi-permanent dwelling and tourist accommodation.
 - iii. Incentivise the development of high quality infill housing development.
 - c) Support proposed initiatives and the development of:
 - i. Low maintenance and disability friendly housing options that enable independent seniors to age in place.
 - ii. Aged care facilities within the Denmark townsite (only).
 - iii. Tourism-led initiatives developing dedicated key workforce housing.
 - iv. Co-operative housing and other innovative forms of tenure and housing development.
 - d) Review regulatory constraints to the adaptation of existing single houses into grouped or multiple dwellings.
 - e) Review the local planning framework to minimise or remove approval requirements where appropriate and continue to improve the efficiency of the approval process.
 - f) Advocate for the provision of crisis services and transition housing in the Shire to support residents experiencing insecure housing and homelessness.
 - g) Advocate that the State Government assess the housing affordability implications of all proposed changes to planning policy.
 - h) Work with the land development and building industries to understand cost and regulatory constraints, and consider opportunities to promote housing affordability.

3.1.5 Built Form, Design & Character

The design and form of buildings and the way that they interact with the street plays a significant role in our experience of a place. The style and characteristics of a building should also be sensitive and contribute to the existing character of the local area.

Built form typically varies according to locally available materials, climate, consumer demand and the common building practices of the day. Timber was once the predominant building material throughout the Shire. However, more recently there has been a relative consistency with broader State-wide building trends and styles. As a result, a diverse range of building styles and materials used can be seen throughout the district, and although some streets have a common character, there is no single distinct architectural style across the urbanised areas within the Denmark townsite or the Shire more broadly.

This Strategy supports a diverse range of design style or character throughout the Shire. The majority of responses received during community consultation emphasised the importance of the 'village atmosphere', as well as 'natural', 'green' and 'wild' elements being the key desirable elements of the Shire's built form and character.

This Strategy adopts the ten design principles outlined in the State Planning Policy 7 – Design of the Built Environment (SPP7) as the basis for the assessment of new development proposals and the preparation of more detailed guidance within the local planning framework. The implementation of design review practices as proposed by SPP 7 may be considered should the need arise, while the Shire may refer major development proposals to external, independent professionals to assist with design assessment.

3.1.5.1 Denmark Town Centre

The Denmark Town Centre retains a traditional 'main street' environment and development is typically small scale, with a sense of 'village feel' supported by retained heritage buildings and a relative lack of franchise retailers. The experience of this environment plays a very significant role in its success in attracting visitation.

The Town Centre maintains relatively low-scale built form, with few buildings above three storeys in height and a majority being one or two storeys. Some buildings have utilised natural slopes to increase building height without increasing the visible size and bulk when viewed from the street. The relative height of karri trees and natural topography surrounding the Town Centre also serve to reduce the visual prominence of larger developments within the wider landscape. The cumulative effect of this supports the retention of the 'village feel' experienced in the Denmark Town Centre.

While this Strategy discusses principles for development, it also acknowledges that appropriate height limits may be site specific and should be investigated in more detail as part of the preparation of a precinct plan. It is also desirable that built form is sufficiently flexible to accommodate changing land uses over time.

Although the Town Centre does not demonstrate a consistent architectural style, common design elements include the prevalence of awnings and verandas, front façade parapets, and buildings up to front lot boundaries. A more detailed assessment of urban design and form may be undertaken to inform the preparation of revised design guidelines for built form within the Town Centre, in order to promote new development in a manner sensitive to existing character. Desirable characteristics on main street frontages generally reflect existing development form, including zero lot setbacks, highly active shopfronts, connected awnings, and human scale at street level.

Heritage buildings within the Town Centre provide landmarks and contribute significantly to identity and character, and their retention and enhancement should therefore be prioritised. Section 3.1.8 of the Strategy identifies the need to preserve and enhance heritage buildings, an important part of retaining character within the Town Centre.

The Town Centre benefits from attractive surrounds, with public reserves maintaining a strong sense of the natural environment. This includes parklands along the Denmark River, providing space for formal and informal public activities. The Strategy supports the development of stronger connections between these parklands and the remainder of the Town Centre. The preparation of a precinct plan for the Town Centre Planning Area will allow for improvements to public spaces and infrastructure to be explored in greater depth.



Pedestrian Environment

Through preliminary consultation for this Strategy and the Strategic Community Plan, our community expressed a strong desire to improve the pedestrian environment within the Denmark Town Centre. Upgrades to road infrastructure and public spaces are possible avenues to enhance pedestrian movement.

Strategic improvements to the Town Centre's streetscapes and pedestrian environment have the potential to reduce the dominance of cars and car parking areas on main streets. The Strategy supports the gradual relocation of longer stay car parking toward the periphery of the Town Centre, retaining short term parking and parking for persons with a disability in prominent locations.

Additionally, future land use and development proposals within the Town Centre should facilitate a more positive pedestrian experience and provide universal access, reducing the dominance of vehicles. As such, land uses that rely on direct vehicle access are considered inappropriate within the core of the Town Centre. This will be addressed by prohibiting drive-through facilities and limiting inappropriate land uses within the Commercial Zone.

Improved pedestrian experience will be investigated through more detailed planning for the Town Centre Planning Area. Each of these considerations require a high standard of design for any new development within the Town Centre, consistent with the ten design principles identified in SPP7.

Strategies & Actions – Denmark Town Centre

1. Promote a high standard of built form design within the Denmark Town Centre that maintains the main street environment, ‘village feel’ and existing sense of character, while acknowledging contemporary needs.
 - a) Complete a detailed urban design assessment for the Denmark Town Centre to inform the preparation of a precinct plan and consolidated and revised urban design guidelines. Include consideration of:
 - i. Architectural principles for building design in keeping Denmark’s ‘village’ character.
 - ii. Increased density and height limits that respond to topography.
 - iii. Human scale and interaction at street level.
 - iv. Visual presentation on landmark sites.
 - v. Minimising the visual impact of commercial signage.
 - b) Assess all new development proposals against the ten design principles of State Planning Policy 7 – Design of the Built Environment and promote best practice in building design.
 - c) Identify improvements to public reserves and streetscapes as part of the preparation of a Town Centre precinct plan, promoting the connection of the Town Centre to the Denmark River parklands.
 - d) Prioritise pedestrian movement and universal access as streetscapes are progressively upgraded, identifying priority improvements as part of the preparation of a Town Centre precinct plan.
 - e) Support improvements to the portion of South Coast Highway within the Town Centre that will improve the pedestrian environment and retain the ‘village’ character.

3.1.5.2 Residential Areas

Within the Denmark townsite, there is a range of residential areas with low to medium density housing. These areas vary in character according to the environmental conditions and era of development, resulting in different lot sizes, housing styles, construction methods and earthworks, and the retention of remnant vegetation. While there is relative consistency in housing type, there is no uniformity in architectural style or building materials.

Over time, the size of residential lots has reduced and the size of new houses has increased. This has been a result of consumer demand, building industry practices and State Government policies. It means the typical ‘suburban’ area of 2021 has a very different character to those developed in decades prior. Reductions in yard space, privacy and remnant vegetation are factors often cited as negative outcomes of development that reflect the current format. Conversely, contemporary design has increased the efficiency of land and promoted improved walkability, public open space and stormwater management.

The design and development of residential areas is largely governed by the State’s policy framework, which aims to promote consistency across the State and accommodates only limited discretion at a local level. As these policies continue to evolve and seek to address previous shortcomings, the Strategy supports efforts to optimise their use to achieve preferred design outcomes within the Shire.

This Strategy acknowledges the potential for conflict between a desire to maintain the existing character of Denmark townsite and support for consolidation and infill development. Ensuring that new development is of a high standard and does not detract from existing streetscapes is critical to achieving community support, creating an urban environment that still reflects desired values, and accommodating future housing needs.

Key issues include:

- **Remnant vegetation** – residential and urban growth areas within the Shire are fortunate to contain a high proportion of remnant vegetation, particularly within road and public reserves. In combination with the natural topography, this has preserved the dominance of trees within the skyline and a strong sense of the natural environment, even from within highly developed areas.
- **Earthworks** – the creation of new residential lots can involve bulk earthworks that rely on ‘cut and fill’ retaining, effectively creating terraces on sloped land. This has a higher level of impact on the natural landscape, increases the loss of remnant vegetation, and can increase the cost of land development (and therefore housing affordability).

- **Retention of existing homes** – within any streetscape the retention of existing development helps maintains character. Supporting this outcome while providing for new development may require greater flexibility in design. This is particularly important in areas with a significant proportion of heritage listed and older character homes.
- **Garages** – as double garages have become more common and lot sizes reduced, garages are becoming an increased proportion of streetscapes. This limits building design outcomes, minimises passive surveillance and reduces interactions between homes and the street.

Strategies & Actions – Residential Areas

1. Support new and infill residential development that achieves the desired streetscape values and maintains a high level of amenity.
 - a) Implement the Draft Medium Density Code to improve the standard of design of development.
 - b) Require subdivisional design to provide for tree planting within all road reserves.
 - c) Investigate local planning policy provisions that vary the Residential Design Codes to increase required deep soil areas and landscaping requirements.
 - d) Incorporate desired ecological linkages and visual buffers as identified in structure plans.
 - e) Promote reduced ‘cut and fill’ retaining within residential subdivision and retain natural features of the landscape where site conditions allow.
 - f) Investigate opportunities to incentivise the retention of existing dwellings as part of zoning provisions within the local planning scheme to support infill development.
 - g) Encourage consideration of ‘cottage lot’ subdivision design, tandem parking and other alternative design measures to reduce the prevalence of garages on street frontages.
 - h) Investigate local variations to the Residential Design Codes to reduce the prevalence and visual impact of garages on residential street frontages.

3.1.5.3 Building Materials

The Shire’s TPS3 identifies standards for external building materials in several Special Residential and Special Rural estates where reflective glare is a potential concern and/or development may be visually prominent within a sensitive landscape.

These requirements are generally consistent in intent but should be better clarified by aligning related terminology within a new local planning scheme and updated set of local planning policies. Revised provisions should be clear in the need to address potential impacts but avoid directing architectural style or unnecessarily inhibiting personal design choices.

It is also recommended that a standard suite of policy provisions is prepared for all areas considered to have significant visual landscape values to promote consistency in approach.

Strategies & Actions – Building Materials

1. Manage the use of building materials where necessary to avoid reflective glare or reduce the visual impact of development within sensitive landscapes.
 - a) Align policy provisions and definitions for non-reflective and external building materials within a local planning policy.



3.1.5.4 Public Art & Interpretive Materials

Interpretive materials may be provided as signage or produced in a range of other formats, including integration with artworks. They provide an opportunity to share historical accounts, local stories and cultural perspectives relating to historical buildings or sites, points of interest, environmental features or other displays.

Consideration of the design and placement of artworks and interpretive materials in public spaces is necessary to ensure they provide best value and support consistent themes within the district. Planning approval may be required in some circumstances; however, a non-legislative approval process may also be considered by the Shire to support the appropriate development of artworks and interpretive materials in public spaces.

The Shire currently maintains a local planning policy that requires the provision of public art within substantial development proposals and guidance for how this is to occur. The Strategy recommends a review of this policy to ensure alignment with Shire plans and strategies for cultural development, as well as seeking to pursue best practice in the management of development contributions.

The provision of public art, heritage interpretation, wayfinding and other visual amenity improvements are relevant considerations for the preparation of a precinct plan for the Denmark Town Centre.

Strategies & Actions – Public Art & Interpretive Materials

1. Support the development of artworks and interpretive materials in public spaces that reflect community values.
 - a. Review local planning policy provisions relating to public art to improve outcomes and align the collection of financial contributions with best practice.
 - b. Consider the preparation of a plan for the development of public art, heritage interpretation, wayfinding and other place-making improvements as part of precinct planning for the Denmark Town Centre.
 - c. Investigate the introduction of an approval process for the development of artworks and interpretive materials in public spaces.

3.1.5.5 Commercial Signage

A key component of the maintenance of visual amenity across the Shire is the appropriate management of commercial signage. The proliferation of commercial signage can create visual clutter, traffic hazards, detract from predominantly natural landscapes and create a sense of over-development.

This Strategy asserts that without regulation, key community values could potentially be compromised by excessive, poorly designed and inappropriately located signage.

While the Shire maintains town planning scheme and policy requirements that address the development of signage, it is recommended that provisions are reviewed to ensure relevance, clarity of guidance for proponents, and alignment with the Visual Landscape Evaluation prepared in support of this Strategy. This would be assisted by a coordinated public information program to promote an understanding of policy rationale and practice.

Strategies & Actions – Commercial Signage

1. Mitigate the impact of commercial signage on visual amenity across the district.
 - a) Review local planning scheme and policy requirements for signage to ensure clarity, relevance and alignment with the preservation of visual landscape values.

3.1.6 Rural Planning

3.1.6.1 Rural Settlements

Nornalup, Bow Bridge and Peaceful Bay are identified in the 2011 LPS and the Lower Great Southern Strategy (2016) as rural villages, potentially accommodating additional population and limited local services. This Strategy recommends that further development is pursued in Nornalup only, with Peaceful Bay retained as a tourism node and no further development progressed at Bow Bridge.

This approach recognises that focussing potential growth within a single settlement is more likely to promote self-sufficiency, while supporting the viability of developing utility services and community facilities. Self-sufficiency is likely to be challenged by services remaining in Denmark and Walpole, requiring residents to travel to access employment, health, education and general commercial services. In addition, the viability of local services can be undermined by a predominance of unoccupied dwellings (56.8% Nornalup and 89.8% Peaceful Bay (ABS 2021)). Trends towards the online delivery of services, working from home, and sustainability improvements in transport will be influential.

Recent changes to State planning policies also represent significant constraints to the development of each of these rural settlements. The major changes that most significantly impact the viability of progressing the intensification of the three settlements relate primarily to servicing requirements, environmental protection and bushfire prone areas.

All of the existing and proposed rural settlements are without a reticulated sewerage service and are within a designated 'sewerage sensitive area' under the Government Sewerage Policy. On the basis that this Strategy does not support the designation of additional land for rural residential subdivision, the establishment of a reticulated sewerage service is therefore a pre-requisite for further development.

Nornalup

Nornalup is an existing settlement of approximately 80-85 lots and minor community facilities located on the South Coast Highway, on the eastern side of the Frankland River, at the western extent of the Shire. Nornalup has a high level of visual amenity owing to its riverside location, elevated land and proximity to the Walpole-Nornalup National Park. Nornalup is approximately 9.5km from the Walpole Townsite (within the Shire of Manjimup) which provides access to a range of services.

Nornalup has the strongest attributes of the proposed rural settlements to accommodate and benefit from additional development. The proximity of Walpole provides a reasonable level of access to established community services, while the proximity of the Frankland River, Valley of the Giants and other attractions within the Walpole-Nornalup National Park provide amenity and a high level of tourism activity.

Consultation during the preparation of this Strategy indicated a strong level of interest from local residents and landowners to see Nornalup grow its population, with cleared rural landholdings to the south and east to be considered to provide opportunities for additional housing.

The Nornalup Character Study, prepared in 2011, provides guidance for potential future development for the Nornalup area. Some recommendations are relevant to consider in the preparation of a new local planning scheme, some within any future concept or structure planning, and others require review in light of recent changes to State planning policies.

The zoning of additional land along the South Coast Highway to facilitate the development of commercial businesses is supported by this Strategy. Future planning should also identify land for tourism-oriented development in a prime location to enable the development of accommodation and/or attractions at an appropriate scale.

Comprehensive concept planning and detailed investigation of servicing requirements is necessary to demonstrate that expansion of the Nornalup Townsite can occur in a safe and environmentally sustainable manner, and to determine the appropriate number of potential new residential lots.

Peaceful Bay

Peaceful Bay is a small coastal settlement situated approximately 50km west of the Denmark townsite and is comprised of approximately 49 freehold lots, 203 leasehold sites, a 130-site caravan park, chalet development and a number of community facilities. Although few permanent residents live in Peaceful Bay, the seasonal population can reach over 1,500 people.

Further development of Peaceful Bay is limited by bushfire risk and access constraints, a lack of adequate utility services, the extent of remnant vegetation and the lack of (or distance to) community and commercial services. In addition, preliminary consultation for this Strategy indicated a community desire to retain Peaceful Bay largely as it is.

In 2000/01, a structure plan was adopted to guide the potential expansion of Peaceful Bay up to approximately 700 lots, including additional tourism development. Since this time changes in State planning policies have rendered this structure plan obsolete, while community expectations around the amount of clearing this plan would have resulted in have also shifted.

In 2010, a study was undertaken into the potential provision of services and infrastructure in Peaceful Bay, including alternatives to traditional infrastructure. This recommended the installation of a reticulated wastewater service and the reuse of treated wastewater as key outcomes, with the need to explore potential funding mechanisms to provide capital funding.

In 2014, a feasibility study was undertaken to assess the conversion of leasehold lots to freehold, providing funding for the development utility services. This proposal was voted against by the Peaceful Bay community and the existing leasehold arrangement has been maintained, which limits potential permanent occupancy within this area.

The historic and aesthetic value of the leasehold settlement is recognised, with the Peaceful Bay Conservation Plan Development Guidelines adopted in 2004 to guide the preservation of this special character.

Recognising the considerable constraints and acknowledging the community's desired direction, this Strategy identifies the settlement as a 'tourism node' given this more appropriately reflects its current use. This supports the retention of tourism and residential land uses to the existing extent, while supporting efforts to optimise recreation assets and improve utility infrastructure.



Bow Bridge

Bow Bridge is a rural locality approximately 40km west of the Denmark townsite. A roadhouse has existed at the junction of South Coast Highway and Valley of the Giants Road since the 1960s, while several tourist attractions are clustered within the vicinity. Bow Bridge is a short drive from regional attractions in Peaceful Bay and the Valley of the Giants.

In 1999, a structure plan was prepared to explore the concept for a potential village at Bow Bridge, based on the initial development of unserviced rural residential lots. This proposal was without the support of detailed investigations, and issues were subsequently identified with servicing infrastructure, remnant vegetation protection, bushfire risks, land capability, highway access, waterway management and flooding that remained unresolved. A study of flood risk in 2009 and contemporary expectations of the retention of remnant vegetation substantially reduces the potential area available for development.

This Strategy does not support any future proposals for a new settlement at Bow Bridge, acknowledging that there is no considered need and that pursuing this outcome would potentially detract from the viability of development at Nornalup.

Strategies & Actions – Rural Settlements

1. Identify Nornalup as a 'rural village' and support the potential future expansion of the Nornalup Townsite subject to more detailed investigations:
 - a. Any proposed amendment to the local planning scheme to accommodate potential expansion of the Nornalup Townsite is to be accompanied by a detailed Concept Plan.
 - b. Investigations into the potential expansion of the Nornalup Townsite should address the provision of (or access to) community and commercial services, including potential funding mechanism.
 - c. Consider the recommendations of the Nornalup Character Study (2011) for all planning processes relating to Nornalup, including the preparation of a new local planning scheme, structure planning, and development and subdivision assessment.
 - d. Identify dedicated site/s for the development of tourist accommodation and/or attractions within structure planning for the expansion of the Nornalup Townsite. Dedicated sites should demonstrate a high level of achievement against recognised tourism attributes.
2. Identify Peaceful Bay as a 'tourism node' and support low-key residential and tourism development within its existing extent.
 - a. Not support further expansion of Peaceful Bay, acknowledging that the existing extent of development is the preferred outcome at this time.
 - b. Support low-key development within Peaceful Bay that is sensitive to historic and aesthetic values and consistent with the Peaceful Bay Conservation Plan Development Guidelines (2004).
 - c. Investigate potential mechanisms to fund the provision of reticulated potable water and wastewater services to Peaceful Bay.
 - d. Support the development of recreational facilities and infrastructure at Peaceful Bay that enhance its function as a coastal tourism node.
3. Not support further investigation into the establishment of settlement at Bow Bridge, retaining this area as a rural locality.
 - a. Recommend that the designation of Bow Bridge as a 'rural village' is removed from the Lower Great Southern Strategy at next review.

3.1.6.2 Rural Land Uses

The Shire has a diversity of rural land uses and issues. Extensive parts of the Shire remain as uncleared remnant vegetation, including State Forests, National Parks and a significant proportion of private land. On cleared land, agriculture and horticulture are the most common land uses, with tree plantations, extractive industries and residential lifestyle lots also evident. The district is also fortunate to contain some of the most picturesque rural landscapes within Western Australia, supporting the operation of a mix of tourism accommodation and destinations.

The district’s rural areas should generally be used for agricultural production, while providing for a range of rural pursuits which are compatible with the capability of the land and which also retain the rural character and amenity of the locality. In the appropriate circumstances, rural areas can also provide opportunities for non-agricultural land uses which are not detrimental to agricultural productivity, landscape values, or environmental conservation.

This section seeks to provide direction for some of these rural land uses, acknowledging the unique demands and sometimes competing interests between these varying land uses.

The preservation of ecological values is addressed in Section 3.3 and tourism is further discussed in the Section 3.2.5.

Agriculture & Food

The Shire receives relatively high annual rainfall and has a range of soil types, supporting opportunities for a wide range of agricultural pursuits within the Shire. The largest single type is beef cattle farming, which accounted for the largest employment industry at the time of the 2016 Census. Other common agricultural land uses include feed production, horticulture and viticulture, animal husbandry, and rural processing at both cottage and industry scales.

While these land uses will continue to change over time according to market and industry trends, there is a state-wide need to preserve land for agricultural production in order to maintain food security. This is driven by population growth within the State, concerns about the resilience of our food production systems within Australia, and growth in global demand for high quality foods.

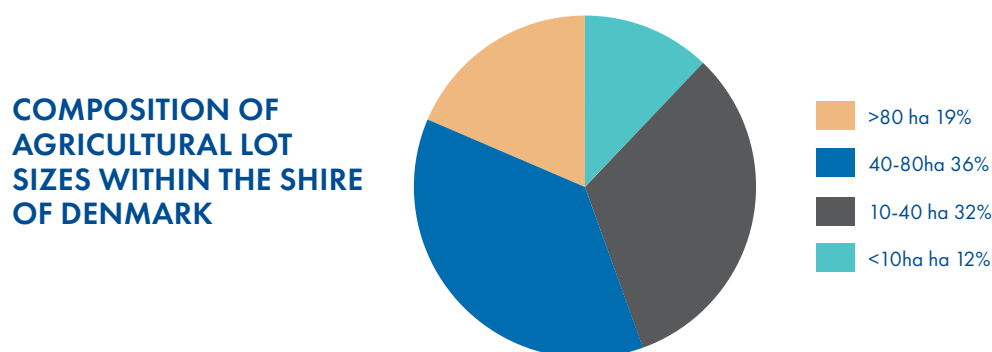
Many forms of agricultural production have adapted in order to remain viable within changing markets – some have increased in scale, some have sought to add-value through processing, and others have diversified outside of agriculture. The Strategy seeks to maintain a local planning framework that accommodates these varying directions, providing that food production remains the primary land use.

The district has a high capability for a range of more intensive agricultural pursuits, often with the potential for ‘value adding’ through processing and tourism. Value-adding may involve, for example, an existing dairy adding on a cheese-making business and farm-gate shopfront. The Shire has a number of existing examples of successful businesses, and further co-location will enhance the district’s reputation, tourism market and production/processing capacity. This has the potential to result in the intensification of land use in rural areas and become a key driver of economic growth.

Preserving Land for Agriculture

Rural zoned land within the Shire is highly fragmented, with a significant portion having been subdivided since the 1980s to create rural living lots. Almost half of all rural landholdings are under 40 hectares in size as shown in Figure 3.

Figure 3: Composition of Agricultural lot sizes within the Shire of Denmark



There is currently a wide variety of lot sizes within the Rural Zone and therefore a suitable range of rural properties that can potentially support the establishment of agriculture and other rural pursuits. This diversity demonstrates that there is no need to further subdivide rural land to enable business opportunities, and existing rural lot sizes are therefore not considered a precedent for further subdivision.

The further fragmentation of rural land also poses a threat to the long-term viability of agriculture and food production. Fragmentation makes the assembly of land for viable farming enterprises more difficult, while smaller rural lots are also more vulnerable to demand from buyers seeking 'lifestyle' opportunities without the intention or ability to realise commercially viable food production. Rural living estates can also consume potentially productive rural land and cause issues at the interface between residential and agricultural land uses.

Current rural land values in the Shire are relatively high compared to surrounding regions, with anecdotal evidence of continuing strong demand for farming properties. Demand for 'lifestyle' properties has the effect of pushing up the price of rural land, particularly smaller and more visually attractive properties. The Strategy does not support the creation of additional rural living estates as an approach to addressing this demand as this facilitates the further fragmentation of rural land. While some portion of rural land may be owned and used for residential purposes, retaining large lot sizes preserves the opportunity for future agricultural production.

The 2011 LPS proposed the introduction of a Rural Smallholdings Zone into the local planning scheme. In order to maintain consistent land use permissibility between rural lots over/under 40 hectares and to avoid the potential further subdivision of rural land, this Strategy does not propose to introduce a Rural Smallholdings Zone into the Shire's local planning scheme.



Priority Agricultural Land

While it is possible to identify land with more favourable attributes for agriculture, all of the Shire's agricultural land is considered important and worthy of protection. Only in locations where the Strategy identifies the need for rural land to make way for a specific alternative use (for example, expansion of the Denmark Townsite) should this be compromised.

While this Strategy recommends consistent zoning provisions across rural land, the Shire may consider the State's designations of priority or high quality agricultural land as part of discretionary decision making. For example, the establishment of large scale tree plantations on priority or high quality agricultural land may not be considered appropriate, or the Shire may support the re-establishment of pastures after completion of an extractive industry (rather than revegetation).

Agricultural Impacts

The district's climate and rainfall make it potentially desirable for forms of intensive agriculture such as horticulture, viticulture, fodder production, market gardens and turf farms. Management of the potential environmental impacts of these land uses needs to be considered, particularly the potential for nutrients, pesticides and herbicides to contaminate land or waterways offsite.

Aquaculture within the Shire has the potential to grow given the water bodies of Wilson Inlet and Irwin Inlet and the various bays within the Southern Ocean. Land based aquaculture farms are dependent upon good water supplies, sufficient land area and areas in which water can be disposed of after final treatment. Aquaculture activities need to be considered in terms of conflict with other land uses, environmental concerns, infrastructure requirements and access to roads.

Animal husbandry is the breeding and keeping of animals on an intensive basis, including cattle feedlots, piggeries, poultry farms and other similar land uses. These uses can create noise, odours and concentrated effluent, and are more appropriately located some distance from residential areas and other sensitive land uses. A detailed assessment of environmental impacts and compliance with relevant standards will be required for all proposals.

Relevant codes of practice for all forms of agriculture should be implemented through the assessment of planning applications and considered for adoption within planning policies where appropriate.

Local planning policies should also provide guidance on the appropriate level of information and assessment for agricultural pursuits according to their scale, removing unnecessary approval requirements for cottage industries and 'backyard orchards' while promoting best practice management.

Climate & Water

Climate change is already impacting the viability of agricultural land uses across the State, which could potentially lead to changes in the type and intensity of agriculture present within the Shire. A reduction in rainfall reliability may result in some agricultural land uses moving into districts where rainfall and temperatures are more favourable. This likelihood increases the importance of maintaining all potentially productive rural land within the Shire as an important resource for food security within the region and further afield.

The availability of water to support agriculture is also likely to become a critical issue should trends toward declining rainfall continue, with the need for water storage on farms potentially conflicting with landscape values and environmental water needs. This Strategy proposes to investigate ways to reduce the establishment of dams intended primarily for aesthetic purposes.

The presence of remnant vegetation also needs to be maintained and afforded a level of protection as it assists in maintaining the surface and subsurface quality of the water, preserving productive soils, and directly capturing carbon emissions from agriculture.



Strategies & Actions – Rural Land Use

1. Recognise the importance of preserving all rural land for agricultural production in order to maintain regional food security.
 - a. Avoid the fragmentation of Rural zoned land by adopting a presumption against the further subdivision, other than in the circumstances specified in Development Control Policy 3.4. Existing lot sizes are not considered a precedent for further subdivision.
 - b. Not support the identification of additional land for rural residential subdivision.
 - c. For lots containing rural residential, tourist accommodation or other sensitive land uses, support increased setbacks and buffers to preserve the capacity for productive agriculture on adjoining rural land.
 - d. Where the Department of Primary Industries and Regional Development (DPIRD) has identified priority and high value agricultural land, consider the preservation of agricultural production as part of discretionary decision making for non-agricultural land uses in the Rural Zone, via a local planning policy or scheme provisions.
2. Support the adaptation and diversification of agriculture to maintain its sustainability, including the development of value-adding processing and other rural industries.
 - a. Provide flexibility in land use in the Rural Zone to support a variety of agricultural and ancillary enterprises where these are not detrimental to agricultural productivity or the environment, including the processing of agricultural produce.
3. Promote best practice environmental management amongst rural land uses.
 - a. Assess the environmental impacts of all rural land use proposals, including the potential for offsite impacts associated with nutrients, pesticides and herbicides.
 - b. Consider the impact of climate change and the increasing scarcity of water resources as part of assessing all proposed rural land uses.
 - c. Consider the adoption of local planning policy provisions to:
 - i. Adopt relevant codes of practice for agricultural pursuits; and,
 - ii. Provide guidance on information requirements and assessment of proposed agricultural pursuits according to their scale.

Other Rural Land Uses

Rural Industry

Rural industries are processing and production facilities that have a direct association with primary produce and may therefore be established within a rural area. For example, a winery which processes grapes or a cheese factory which processes dairy produce are rural enterprises that benefit from being located on the same premises (or in the same locality) where the primary product is grown or reared. Supporting rural industries such as these is a key part of enabling value-adding and diversification within agricultural businesses.

The location and form of rural industries must be carefully managed so as not to blight rural areas or cause significant environmental impacts. General industrial land uses are not supported within rural areas.

Rural Enterprise

A range of other enterprises have been established in the Shire's rural areas to take advantage of the scenic qualities and land availability. This includes tourism and hospitality land uses such as restaurants, breweries, art galleries and tourist accommodation.

While acknowledging that these enterprises provide a diversity of attractions, this Strategy recognises that other commercial enterprises should not constrain the capacity of rural land for primary production.

The Strategy supports the establishment of other commercial enterprises within rurally-based 'Tourism Precincts' primarily, and within other rural locations where they are ancillary to the predominant use of the land for primary production.

Tree Plantations & Forestry

A significant area of rural land in the Shire is currently used for tree plantations, particularly eucalypt (blue gum) and pine species. Tree farming produces a timber resource, the demand for which is likely to increase as a result of a reduction in timber harvesting from State managed forests.

Tree plantations are a relatively passive land use that require little day to day management over a long period. Plantations, when occurring at an expansive scale, often attract criticism for competing with other forms of primary production and reducing community activity and employment in rural areas. Tree plantations can also pose significant environmental risks in relation to the removal of remnant native vegetation, loss of biodiversity, impacts on soil biology caused by non native monocultures and threats to water and soil quality posed by pesticides, herbicides and excess nutrients.

This Strategy only supports the development of tree plantations where bushfire risk, environmental impact, and adverse implications on the visual landscape amenity can be appropriately managed. Tree farming should only be established in areas already cleared and should not result in the removal of remnant native vegetation. Development of tree plantations must also consider appropriate setbacks and buffers from adjoining conservation reserves, National Parks and any other areas of biodiversity value. Additional management measures should also be implemented in order to address all potential environmental impacts.

Proposals for the harvesting of timber from remnant vegetation on private land will be assessed similarly, with additional requirements for detailed environmental assessment and the achievement of relevant State approvals.

Strategies & Actions – Other Rural Land Uses

1. Support the establishment of rural industries and other commercial enterprises in rural areas where they are compatible with primary production, land capability, sound environmental management and surrounding land uses.
 - a. Provide flexibility in land use permissibility within the Rural Zone to allow for low-key industrial and commercial enterprises associated with agriculture and tourism.
 - b. Support a wider range of commercial enterprises and the primary use of the land for non-rural purposes within identified rurally-based 'Tourism Precincts'.
 - c. Consider the preparation of local planning policy provisions to provide further guidance on the assessment of commercial enterprises in rural areas.
2. Support the establishment of tree farms in appropriate locations, subject to the resolution of relevant planning considerations.
 - a. Assess proposals for tree farms in accordance with relevant local planning policies.
 - b. Not support the establishment of tree farms:
 - i. Within the proposed Special Control Area for Landscape Values.
 - ii. On identified 'priority agricultural' and 'high quality agricultural' land unless integrated with other forms of agricultural production.
 - iii. in locations where land is uncleared and remnant native vegetation is required to be removed.
 - iv. where bushfire risks, negative environmental impacts, and adverse implications on the visual landscape amenity are not considered to be appropriately managed.
 - c. Require comprehensive measures to manage potential on and off-site impacts on ecological and biodiversity values, including the implementation of effective setbacks and buffers to adjoining conservation reserves, National Parks, and any other areas of biodiversity value.
 - d. Review and update relevant local planning policy provisions as required, including reference to relevant industry codes of practice.

Rural Workers Accommodation & Second Dwellings

Within the agricultural industry it is common for farming businesses to provide housing for staff, providing an on-site presence to ensure safe and effective farm management. Housing is sometimes used as a supplement to wages in this industry. Second dwellings on rural properties can also allow for extended families to be accommodated, supporting farm management, succession planning and aging in place.

The local planning framework currently allows a number of potential options for developing additional housing for rural workers, with provisions for housing and short-stay accommodation on rural lots that are generous compared to other Local Governments. This has promoted the purchase of rural land for lifestyle purposes, which has reduced access for agricultural use and other rural enterprises.

Acknowledging the potential for sensitive land uses (such as residential dwellings) to restrict the operation of horticulture, intensive agriculture and other rural land uses, the Strategy recognises the need for residential land uses to be carefully managed within rural areas.

This Strategy recommends reviewing existing scheme provisions to address these concerns, while preserving the opportunity to accommodate the agricultural workforce. In broad terms, this should provide a distinction between accommodation for temporary or seasonal use and housing for permanent occupation.

Strategies & Actions – Rural Workers Accommodation & Second Dwellings

1. Provide housing and accommodation options that support the sustainability of rural land uses while protecting rural land from the widespread development of residential land uses.
 - a. Support the introduction of a 'workforce accommodation' use class into the local planning scheme generally in accordance with the model provisions of the Planning and Development (Local Planning Schemes) Regulations 2015 to accommodate temporary and seasonal workforce needs.
 - b. Develop updated scheme and local planning policy provisions for workforce accommodation and second dwellings in rural areas, to guide the provision of appropriate servicing and minimise potential impacts on primary production, environmental conservation and visual amenity.

Conservation Lots

The Shire has a unique natural environment, with the extent of land clearing since European settlement being limited by the topography, vegetation types and relative isolation. A significant proportion of the Shire is included within State Forests, National Parks and other reserves, preserving extensive areas of remnant vegetation along the southern coastline and the northern half of the district. Large tracts of remnant vegetation also remain on freehold land in rural areas. Ecological values are further discussed in Section 3.3 of this Strategy.

The Shire has historically supported some forms of rural residential subdivision (e.g. Landscape Protection Zone) as a means to preserve remnant vegetation within a rural landscape setting, where this vegetation may have traditionally been attributed a low value compared to cleared agricultural land. Contemporary bushfire planning requirements have since impacted the viability of this form of development as a means to secure the long term protection of vegetation.

More recently, subdivision of Rural zoned land through the use of conservation covenants under *Development Control Policy 3.4* has been supported by the WAPC, resulting in the ad-hoc fragmentation of rural land holdings. This Strategy does not support subdivisions for conservation purposes under *Development Control Policy 3.4*, unless part of a defined ecological corridor as identified within this Strategy or a future Biodiversity Strategy, as referred to in Section 3.3.1.1.

Subdivision for conservation purposes must be carefully managed to ensure consistency with the following principles:

- A coordinated, strategic approach to the conservation of ecological values is taken, and conservation outcomes maximised.
- Development outcomes can be provided for without necessitating additional clearing or an unacceptable level of bushfire risk.

- Land use conflict and potential impacts on primary production, basic raw materials and other significant rural land uses are minimised.
- The fragmentation of rural land is appropriately considered having regard to lot sizes and viability.
- Avoid increasing the threat of bushfire to people, property and infrastructure.
- The area of vegetation preserved is sufficient to achieve long term sustainability as part of identified biodiversity corridors.
- Implications for community infrastructure are addressed.
- Appropriate management arrangements are implemented, including consideration of weeds, domestic animals and *Phytophthora Cinnamomi* (dieback).
- Resources and mechanisms are available to support ongoing monitoring and compliance with the Conservation Covenant requirements.

The Strategy recommends the preparation of a revised set of zoning and development control provisions to align with these principles, including replacement of the existing Landscape Protection Zone.

The Strategy acknowledges that this is an incentive-based approach to securing conservation outcomes and that the regulation of clearing (as discussed in Section 3.3) is also a relevant consideration.

Strategies & Actions – Conservation Lots

1. Enable the conservation of remnant vegetation on freehold land in rural areas through the local planning framework.
 - a. Introduce an Environmental Conservation Zone into the local planning scheme consistent with the model provisions of the Planning and Development (Local Planning Schemes) Regulations 2015, accommodating a limited range of land uses compatible with conservation outcomes.
 - b. Introduce provisions into the local planning scheme and policies to manage land use and development outcomes within the Environmental Conservation Zone.
 - c. Remove the Landscape Protection Zone from the local planning scheme and designate lots currently included in this zone with an appropriate alternative (i.e., Rural Residential, Environmental Conservation), with relevant provisions in place to address the landscape qualities of the area.
 - d. The Shire will recommend support of the subdivision of rural land for conservation purposes under Development Control Policy 3.4 to the Western Australian Planning Commission, in the following circumstances only:
 - i. Proposals generally located within the immediate vicinity of the 'regional ecological linkages' as depicted on Map 3 on page 90;
 - ii. Proposals that include contiguous remnant vegetation directly adjoining national parks, local reserves, conservation reserves, riverine systems or other environmental features, where they demonstrate significant capacity to contribute to a local-level ecological linkage;
 - iii. Where a minimum area of 20 hectares of contiguous remnant vegetation in good or better condition will be preserved through the proposal. Variations may be considered where, in the opinion of the Shire, ecological values are considered outstanding, and a relevant agency has endorsed the suitability of the smaller area of vegetation to retain the conservation values in perpetuity;
 - iv. Where the balance rural lot maximises the productive capacity of the land and is suitable for the continuation of the rural land use.
 - v. Consistent with other identified requirements in the local planning framework, including bushfire risk, land use compatibility and landscape values.
 - vi. Notwithstanding the above points (i) to (v), all proposals are required to have support of a relevant agency (e.g. the Department of Biodiversity, Conservation and Attractions, or other relevant agency), endorsing the suitability of the conservation lot for the intended purpose of retaining environmental values, and support to administer the necessary conservation covenant.
 - e. As part of the preparation of a Biodiversity Strategy:
 - i. Consider landholdings within rural areas that might be appropriately included within the Environmental Conservation Zone.
 - ii. Consider other biodiversity conservation incentives that may be included within the local planning framework or Shire policies.
 - iii. Consider modifications or refinement of the Shire's position in relation to subdivision proposals for conservation purposes.

3.1.7 Ecologically Sustainable Development

The Shire acknowledges that there is a government responsibility at all tiers to contribute to climate change mitigation through climate change adaptation strategies.

Acknowledging its role in addressing climate change, the Shire passed a Notice of Motion, declaring a climate emergency in September 2019. In March 2021, the Shire Council adopted the *Sustainability Strategy 2021-2031*, aiming to make the Shire an organisation that positively contributes to the genuine sustainability of the world and support the district as a whole to adopt more sustainable practices.

This Local Planning Strategy contributes towards implementing the objectives and actions of the Shire's *Sustainability Strategy*, providing a land use planning framework for how the Shire develops into the future. In particular, this Strategy will focus on how we:

- Minimise the impact of development on our natural environment and systems.
- Promote sustainable forms of transport through improved land use planning.
- Minimise resource, energy and water consumption through promoting improved development outcomes.

The planning framework has the potential to guide development in a manner that is more ecologically sustainable. Within this Strategy, Ecologically Sustainable Development (ESD) is defined as:

“Development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends”

Buildings currently account for over 50% of electricity use and almost a quarter of Australia's carbon emissions. In 2019, the Western Australian State Government adopted a Climate Policy that commits to achieving net-zero greenhouse gas emissions by 2050. Similarly, the Shire has committed in its *Sustainability Strategy* to a 50% reduction of current Shire greenhouse gas emissions by 2030 and net zero greenhouse gas emissions from all Shire operations and activities by 2050. To achieve this objective, emissions resulting from the construction and operation of buildings will need to be significantly reduced.

A range of opportunities exist to enhance the energy efficiency of buildings and reduce emissions over a building's entire lifecycle, providing operating cost savings to occupants. However, a number of challenges commonly hinder the effective implementation of these efforts - including higher up-front costs, passive return on investment, and a lack of enabling mechanisms within existing regulatory frameworks. Implementing ESD minimum development standards into the Shire's local planning framework has the potential to:

- Reduce pressure on public energy, water and infrastructure networks.
- Align with the One Planet Living sustainability framework, as adopted by Shire's Sustainability Strategy.
- Progress toward the State and Shire's aspirational carbon emission reduction targets.

3.1.7.1 Structure Planning & Subdivision

Structure planning and subdivision processes provide an opportunity to achieve significant improvements in ESD outcomes at a neighbourhood level. The local planning framework has the ability to implement a comprehensive and holistic direction for the Shire's future land releases in accordance with ESD principles and the State's Liveable Neighbourhoods (2015).

Due to changes to the Regulations, structure plans (including subdivision guide plans in the Rural Residential zone) with active approvals issued prior to 2015 will expire in coming years and require re-assessment under the current State and Local Government planning frameworks at that time. This process provides a significant opportunity to introduce contemporary planning policies, including ESD design principles and outcomes in those locations. Opportunities to implement favourable ESD elements which have not historically been fully realised in the Shire's subdivision or structure planning processes include:

- Retention of remnant vegetation and natural landscape features.
- Minimisation of earthworks, excavation and retaining of lots.
- Water Sensitive Urban Design (WSUD).
- Lot layout and design to optimise favourable solar orientation.
- Diversity of lot sizes and types.

Developers of housing estates sometimes prepare design guidelines to direct built environment outcomes, often with the intention of providing aesthetic consistency through control of colours, materials, building envelopes and landscaping. This strategy actively discourages design guidelines from containing any requirements which have the potential to conflict with ESD principles and the utility of lots - for example, guidelines that set a minimum dwelling size. Design guidelines do, however, present developers with an opportunity to embed ESD requirements that improve sustainability and may form one part of meeting minimum ESD requirements of the Shire and State planning frameworks.

Strategies & Actions – Structure Planning & Subdivision

1. Minimise infrastructure requirements and support sustainable transport modes.
 - a. Prioritise a consolidated urban growth pattern and a logical staging of extensions to the Denmark townsite, to ensure efficient use of energy and infrastructure.
2. Encourage the incorporation of ESD principles and initiatives at a neighbourhood level throughout structure planning and subdivision assessment processes, in accordance with the state planning framework.
 - a. Formulate a combination of local planning scheme and policy provisions which establish an integrated framework of ESD requirements for structure planning and subdivision proposals, with consideration given to the following:
 - Retention of remnant vegetation and natural landscape features.
 - Minimise earthworks, excavation and retaining of lots.
 - Water Sensitive Urban Design (WSUD).
 - Lot layout and design to optimise favourable solar orientation and access.
 - Diversity of lot sizes and types.
 - Encourage the inclusion of local food production systems.
 - Create walkable neighbourhoods that prioritise pedestrians and bicycles.
 - Environmentally responsible infrastructure and utility services.
 - Facilitate fully electric households.
 - Wastewater recycling and reuse.
 - Accounting of greenhouse gas emissions throughout the lifecycle of the development and demonstration of proposed mitigations.
3. Estate covenants and design guidelines should support ESD outcomes.
 - a. The Shire will advocate against estate covenants and design guidelines through subdivision clearance that conflict with the ESD principles identified in the Shire's Sustainability Strategy and the requirements of this Strategy.
 - b. Encourage the adoption of 'estate covenants' and 'design guidelines' that promote a higher standard of ESD, including targets for the mitigation of greenhouse gas emissions from the overall development.

3.1.7.2 Development Applications & Buildings

While the Shire’s 2011 LPS, TPS3 and local planning policies do not currently set any specific ESD requirements, other mechanisms do exist within the National Construction Codes (NCC) which are administered at State and National levels.

Thermal Efficiency

Houses that perform with a high level of thermal efficiency can significantly reduce heating and cooling energy use, and associated greenhouse gas emissions. The NCC require new buildings to meet minimum design standards of energy efficiency and thermal performance, applied through the process of building license assessments under the Building Act (2011). A component of the NCC, the Nationwide House Energy Rating Scheme (NatHERS) is a performance-based rating system that assesses the thermal performance of a home. Homes are assessed and scored on a scale of 0-10 stars for their energy efficiency, with a higher star rating demonstrating efficiencies that necessitate lower operational energy use to maintain heating and cooling. NatHERS scores are based on the simulated thermal performance of a building design using specialist software by accredited assessors. Factors which can influence the result include building orientation, insulation, glazing type and shading devices.

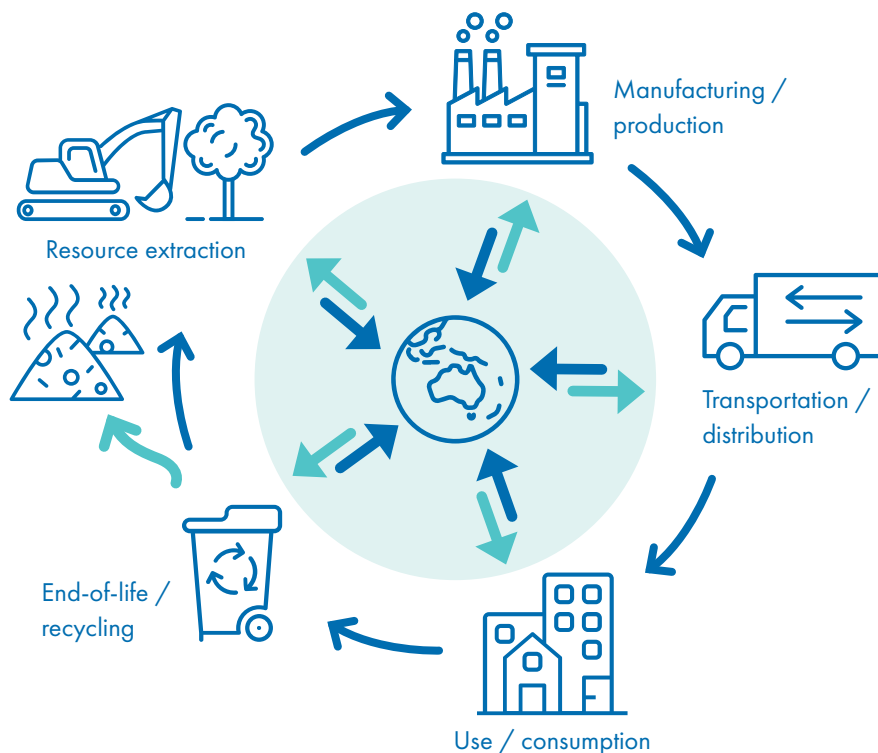
Buildings that solely prioritise thermal efficiency have been commonly found to contain high embodied energy, with the production of materials such as high-performance insulation and glazing having the potential to offset operational energy savings, when embodied energy is accounted for. The highest NatHERS rating may not necessarily result in the lowest overall energy use when considering the entire life cycle of a building.

Conversely, improvements by design can reduce both operational and embodied energy use. This is because certain strategies, such as favourable solar orientation, optimal window placement, length of eaves, reverse brick veneer walls, or exposing the concrete slab either do not require additional embodied energy, or actually reduce the total embodied energy demand by using fewer materials.

Material Selection & Embodied Energy

The selection of building materials has a significant impact on the total energy demand and ecological footprint of a home. The amount of energy required to manufacture, transport and maintain materials is an important consideration, as is the impact of where materials were sourced from and what happens to them at the end of the building’s useful life. A holistic approach of accounting for the overall material and energy requirements of buildings is known as ‘life cycle assessment’ (refer Figure 4).

Figure 4: Life Cycle Assessment (LCA) for building materials and energy requirements



Construction materials and their embodied energy can have a significant and immediate impact when compared to the projected operational energy use over the life of a building. When buildings are constructed, most materials used – along with their corresponding embodied energy – are fixed in place and not easily changed within the building’s lifecycle. The operational energy use of a building is more likely to fluctuate during its lifecycle and is an easier area to reduce energy use through more efficient appliances, technological advances, education and improved behaviour of the occupants.

Building Size

Over the past 60 years, the average Australian home has more than doubled in size, becoming one of the largest in the world. At the same time, the number of people living in each household has been declining, resulting in the average floor area per person increasing dramatically. Larger houses require more heating and cooling, resulting in higher energy use. They also need significantly more materials to build and maintain, and more energy to manufacture and replace these materials. The ratio of embodied energy and operational energy use of buildings is relatively high in Australia due to the very high amount of floor space per person and a large proportion of vacant floor space. Building size, therefore, has significant potential to directly influence a home’s total embodied energy and operational energy use.

Strategies & Actions – Development Applications & Buildings

1. Integrate a holistic set of best practice ESD requirements into the local planning framework, applicable to residential and non-residential development, in a manner that minimises impacts on affordability and prioritises a performance-based approach (water use and carbon emission reductions).
 - a. Review Shire’s existing planning scheme and policy provisions to ensure they do not hinder improved ESD outcomes.
 - b. Investigate the potential inclusion of incentive-based mechanisms.
 - c. Investigate the potential for ESD requirements to be implemented on a sliding scale in proportion to the size, impact and cost of the development.
 - d. Consider whether some building types could be exempt from additional ESD requirements, on account of their use and size.
 - e. Investigate opportunities to introduce ESD requirements with a minimum target that is able to be increased incrementally over time.
 - f. Require the inclusion of water tanks for all new single houses, plumbed into the house for non-potable use (toilet, laundry).
 - g. Incorporate WSUD principles for all development.
 - h. Investigate opportunities to set benchmarks for sustainability within new tourism developments.
 - i. Investigate the adoption of Life Cycle Assessment (LCA) methodology within the planning framework for new buildings.
 - Consider a voluntary trial period for the use of Life Cycle Assessment, before any mandatory minimum requirements are implemented.
 - Measure the size of dwelling floor area per occupant, based on the number of bedrooms.

3.1.7.3 Education & Engagement

Education and engagement programs will play a critical role in supporting our community to make informed choices to improve the sustainability of development, working in partnership with minimum requirements introduced through the local planning framework. This aims to support a cultural shift in recognising how to live more sustainably and empowering residents to make choices accordingly, addressing the need to limit our ecological footprint.

The Shire's *Sustainability Strategy* recognises the importance of and commits to sustainability education and outreach. Any introduction of new ESD requirements for buildings within the Shire's local planning framework will necessitate a proactive educational approach with the Denmark community, local building sector and Shire staff in building, planning, health and customer service areas. In order to effectively implement any new ESD policy requirements, it is important that landowners and designers are made aware as early as possible in the land development and building design process to enable the incorporation of passive solar site and building design principles from the outset, as this design approach reflects one of the most significant opportunities to make reductions to the environmental impact of new buildings at low or no cost.

Strategies & Actions – Education & Engagement

1. A proactive approach by the Shire in providing opportunities for community education and engagement to successfully implement ESD requirements within the local planning framework.
 - a. Develop and distribute ESD educational material as follows:
 - Fact sheets applicable to residential and non-residential developments, new buildings, and renovations.
 - Case studies that demonstrate best practice design and construction methods.
 - Provide information specific to the Great Southern region on sourcing and selecting sustainable building materials, including those made from renewable or waste resources.
 - Shire to engage an ESD practitioner to assist with technical and climate-specific aspects of solar passive design guidance.
 - Applicable information should be made available as early as possible in the design process so that less costly methods such as passive solar site and building design principles can be incorporated from the outset.
 - b. Educational initiatives shall be adapted for and targeted towards the community, building sector and relevant Shire staff.
 - c. Acknowledge and engage with local sustainability leaders and positive local/regional examples of ESD development.
 - d. Share links on the Shire's website to existing online ESD resources that are up to date and applicable to our local community, climate and regional context.
 - e. Distribute information regarding state and federal government initiatives that support and subsidise community members to implement sustainable design features such as the installation of energy and water-saving features.
 - f. Conduct and support education programs informing the community around sustainable living (e.g. Living Smart).
 - g. Incorporation of sustainable design principles within all Shire buildings, public spaces, streetscapes and neighbourhoods.

3.1.8 Cultural Heritage

3.1.8.1 Traditional Custodians

The Strategy acknowledges that the traditional custodians of the land within the Shire's district are the Minang and Bibbulmun people of the Noongar nation. It is understood that ancestors of the Minang and Bibbulmun people utilised the area around the Denmark River (Kwoorabup Beelia) at least as early as 40,000 years ago, developing sustainable land management practices and an intimate connection to the natural environment.

The sense of belonging to ancestral country is very personal and deeply rooted in traditional culture, reinforced by generations of spiritual and physical connection to the area. Traditional rights of access and use were, in this sense, embedded in a socio-cultural system in which both 'rights' and 'obligations' were inherited and transferred variously through ceremony, genealogical succession and affiliation to particular stretches of country over long periods of time.

Heritage Sites

Evidence of historical occupation exists in numerous places throughout the Shire, providing physical evidence of the district's history and maintaining cultural and spiritual connections to country for traditional custodians.

Noongar cultural heritage is embedded within the landscape, meaning that many natural features within the Shire hold important heritage values. Wilson Inlet, Nornalup Inlet, Frankland River, Styx River, Denmark River, Hay River and Blue Lake are all highly significant heritage features and are listed as such in the Municipal Heritage Inventory (2011). Conserving Noongar cultural heritage means conserving natural heritage as the two are completely intertwined. As such, factors impacting upon natural values such as development, dieback, invasive species, visitor impacts and erosion are also impacting upon Noongar cultural heritage values.

This Strategy acknowledges that Aboriginal heritage sites are protected under the Aboriginal Heritage Act 1972 which seeks to enable the consideration of heritage sites early in the planning process; and avoid land use designations that may create conflict.

The Strategy also supports a range of general measures aimed at reducing impacts on the natural environment, and it is hoped that this will also enable the preservation of Indigenous cultural heritage. This includes elevating requirements for the retention of remnant vegetation, measures to preserve visual landscape values and a reduction in the amount of land identified for urban expansion. This will be further influenced in future through a greater adoption of Indigenous perspectives on land use planning and management.



Shared Management

As part of the South West Native Title Settlement the establishment of the Wagyl Kaip Regional Corporation is expected to occur, providing a representative body for the Minang, Bibbulmun and other traditional custodians of the region. The Strategy acknowledges the need for the Shire to work collaboratively with Wagyl Kaip to develop strong working relationships, agreed engagement practices and enhance our community's understanding of indigenous perspectives.

It is hoped that this will facilitate the progressive development of a shared vision for the community to be realised through the Strategic Community Plan, as well as for land use planning and management to support future versions of this Local Planning Strategy.

It is anticipated that Wagyl Kaip will manage lands within the Shire's district that are granted to the Noongar Boodjah Trust, co-manage a number of significant State reserves, and coordinate housing, community and economic development programs across the region. The Strategy recognises that at the time of writing, Wagyl Kaip is at a formative stage and management directions have yet to be determined, but it is accepted that flexibility and review of the local planning framework will be considered where necessary to support the social and economic advancement of Aboriginal people in our community.

Strategies & Actions – Traditional Custodians

The following strategies are proposed to guide the Shire's approach to Aboriginal cultural heritage:

1. Recognise the traditional custodians of land within the Shire and support the establishment of strong working relationships with the proposed Wagyl Kaip Regional Corporation.
 - a. Establish relationships and agreed engagement processes with the Wagyl Kaip Regional Corporation to support consultation on heritage and other matters.
2. Identify and support the preservation of local history, culture and traditional sites within the Shire.
 - a. Identify and seek to protect Aboriginal Heritage sites at the earliest possible stage of the planning process, including while considering land use designations within the local planning strategy.
 - b. Where development potentially interacts with Aboriginal cultural heritage, require proponents to address the Department of Aboriginal Affairs Cultural Heritage Due Diligence Guidelines and meet the provisions of the Aboriginal Heritage Act 1972.
3. Work with traditional custodians towards the development of a shared vision for land use planning and management.
 - a. Engage with traditional custodians to support the development of a shared vision for the community through the Strategic Community Plan.
 - b. Following the Strategic Community Plan, continue to engage with traditional custodians to develop an understanding of indigenous perspectives on land use planning and incorporate this into review of the local planning framework.
 - c. Work with the Wagyl Kaip Regional Corporation to consider potential land use changes that may result from the establishment of the Noongar Land Estate and seek to enable this through the local planning framework.
 - d. Consider the interests of traditional custodians as part of developing and promoting environmental protection measures within the local planning framework.

3.1.8.2 European History

Exploration of the Denmark district by Europeans first occurred in 1829, but it was not until the 1880s that settlement was established on the Denmark River in support of early grazing and timber industries. Significant early events included milling between 1895 and 1905, railway construction in the early 1900s and the Group Settlement Scheme in the 1920s. Cumulatively, this resulted in significant clearing and modification of the natural landscape, increasing as farming and timber-felling mechanised through the mid-1900s.

Denmark remained a small service centre throughout most of the 1900s in support of surrounding agricultural industry, including horticulture and fisheries. Population declined as agriculture contracted and mechanised but rebounded as the tourism industry emerged and from the 1980s onwards the Shire experienced consistent population growth, trebling between 1981 and today.

The history of life in Denmark since the 1880s is reflected in numerous early buildings and sites across the district, as documented in the Shire's Municipal Heritage Inventory (now referred to as a Local Heritage Survey). The preservation of these places maintains both physical examples and stories of life in Denmark, the families that called the district home and the industries that were pursued here.

A Local Heritage Survey serves to document all locally significant heritage sites, providing a record and detailed description to inform decision making. From this, sites that require statutory protection are identified and included on a Local Heritage List adopted under the scheme. In the absence of a Local Heritage List the Local Heritage Survey is adopted for this purpose. Several heritage sites are included on the State Register of Heritage Places and preserved under the Heritage Act 2018. This recognises the importance of the heritage of these sites to state and/or regional identity.

The Strategy supports the preservation of heritage sites within the district, and within the Denmark townsite in particular where historic buildings contribute significantly to character, identity and 'village feel'. The State planning framework enables the Shire to incentivise the retention of heritage buildings, and it is further recommended that the Shire explore means to promote the retention of existing homes where infill development occurs.

Strategies & Actions – European History

1. Review the local planning framework to improve the protection and interpretation of areas and places of heritage importance including significant sites, buildings, structures and landscapes.
 - a. Undertake a review of the Shire's Municipal Heritage Inventory (Local Heritage Survey) to ensure historic sites and buildings are recorded and interpreted.
 - b. Introduce a Local Heritage List into the local planning scheme, identifying sites and places requiring preservation.
 - c. Introduce a local planning policy to provide guidance on development application requirements, assessment considerations and the use of planning incentives to preserve sites included on the Local Heritage Survey and Heritage List.
 - d. Have due regard for the potential heritage, ethnographic and archaeological implications of a proposal when assessing and making decisions in respect of an application for development approval.
 - e. Assess heritage buildings for possible inclusion in the Shire's Heritage List and Local Heritage Survey (as appropriate) and seek to promote their preservation, enhancement and adaptive re-use through the local planning framework.



3.2 Economy and Employment

3.2.1 Overview

The Shire's local planning framework accommodates a wide range of commercial land use and development types, enabling the functioning of a local economy that provides income, employment, and services to the residents of our district. Analysis of existing commercial and industrial uses by this Strategy outlines the demand and availability of land to support commercial, industrial and tourism uses over the length of this Strategy.

This Strategy seeks to support a sustainable and resilient local economy that provides services and employment for our community, encourages innovation, and adapts to change. This will be achieved by providing sufficient zoned land in appropriate locations and a balanced local planning framework that supports community outcomes but does not unnecessarily encumber business investment.

This Strategy also supports reducing regulatory requirements for small and micro businesses, supporting local employment, and encouraging entrepreneurship and innovation.

This Strategy seeks to identify appropriate measures to minimise the potential detrimental impacts of commercial and industrial development in all forms. This includes promoting attractive, articulated and cohesive built form, minimising commercial signage, and avoiding development which prioritises vehicles.

3.2.1.1 Key Industries & Workforce

In 2020, the Shire had a resident workforce of 2,869 people in 2,393 local jobs, employed within 742 businesses across a diverse range of industry sectors. This generated a gross regional product of \$261 million, a figure that has seen consistent growth since 2006.

Industry sectors generating the largest amount of local employment are Education and Training, Accommodation and Food Services, Agriculture, Forestry and Fishing. This concentration of employment around these sectors is notably different to Western Australia, reflecting the Shire's unique local context.

The high proportion of employment in Accommodation and Food Services is strongly influenced by the tourism industry. This also influences high levels of employment in retail trade and a number of other supporting services. Like agriculture, tourism is heavily influenced by broader economic and social trends.

Agriculture, Forestry and Fishing is the largest industry sector within the Shire by value and generates significant income and employment as well as having an extensive footprint within the Shire. In recent years, this sector has experienced a decline in the number and proportion of employment that it provides within the district, largely due to external factors and trends within the industry rather than localised change.

Employment and businesses within the Shire are also closely linked with the regional centre of Albany, with commuting and the delivery of services on a regional basis recognised as being a significant factor. Approximately 11% of local workers live outside of the Shire, while 22% of local working residents travel outside of the Shire to work.

Since 2018, the Shire has maintained a level of unemployment under 4%, significantly lower than regional and state figures. A lack of workers in service industries has been an acute issue identified by some local businesses since mid 2020.



3.2.1.2 National & Global Trends

Since the 2011 LPS, there have been significant shifts in National and global trends influencing economic activity, affecting consumer behaviour and disrupting commercial patterns. Global, or megatrends in technological innovation and e-commerce, climate change and environmental concerns, ageing demographic, and the impact of the COVID-19 pandemic are having a significant impact on the Shire's economy. These global economic considerations have an economic, social and cultural impact, influencing future planning for commercial and industrial land uses within the Shire.

The following global trends have been considered:

- The next wave of digital innovation will have profound and transformational impacts.
- Many industries are undergoing transformational changes which will result in more localised supply chains and decoupling of labour costs from manufacturing competitiveness. This will open new opportunities for regional areas.
- Global population growth will result in an increased demand for fresh food (fruit, vegetables fish, dairy, meat) and processed food. However, change in land uses from agricultural land to non-productive lifestyle is likely to see a reduction in farmland available for food production.
- The ageing population will stimulate employment in supporting sectors.
- Climate change is recognised as the most important global challenge by the Generation Z (Gen Z) demographic¹ and share commitment to global sustainability. A growth in the Gen Z demographic is likely to therefore focus on sustainability at all levels, with renewable energy creating opportunities for regional areas.
- The traditional definition of retail is evolving from shopping destinations to entertainment and lifestyle precincts, with a demand for experiences, not only the product.
- Future jobs are likely to be more flexible, agile, networked and connected, with a rise in entrepreneurship. Flexible commercial spaces that allow for change over time will be critical in supporting these changes.
- E-commerce has significantly shifted consumer preferences. With this, there is a demand for industrial space across the globe for e-commerce distribution and logistics facilities.
- COVID-19 has had a significant economic impact and has likely accelerated some of the existing trends, such as aspects of business digitalisation, that may have otherwise taken years to have occurred. Australian businesses will continue to monitor the nation's economic trends and main drivers over the next 40 years.

3.2.1.3 Local & Regional Trends

Local trends represent the behaviour of individual households and businesses in making decisions on the allocation of limited resources. These trends are influenced by global trends (as discussed in Section 3.3.1.2), as well as by trends within industries and the political environment.

Localised Growth

The Shire has experienced a steep increase in total consumer expenditure between February 2019 to February 2021, noting a rise of 32% over the two year period. This figure relatively exceeds the growth rate for Australia as a whole (14.5%). The significant rise in expenditure is conceivably the result of the COVID-19 pandemic and in particular, for regional areas, is likely to be influenced by State and National border closures stimulating domestic travel.

This growth has included a significant increase in visitor expenditure, the value of which has exceeded local resident expenditure for every month during this time period – previously this only occurred during holiday periods. While the continuing impact of visitor expenditure is uncertain, a substantial increase in the resident population over this same period is expected to have a lasting effect.

¹ Food Security Plan for Western Australia, September 2019 Curtin University and Perth NRM

Trade Leakage

Trade leakage occurs when residents leave their local area to purchase goods and services. Trade leakage can be seen as one measure of the self-sufficiency of a local economy. Some level of escape expenditure to higher order centres, such as Albany, is reasonable to expect, given that larger populations can support specialised commercial services, larger format retailers and a wider range of businesses.

The Shire experiences a relatively high level of trade leakage outside of the district, particularly to Albany as the regional service centre. Local spending within the Shire is lower than other local government areas within the Great Southern Region, as well as Australian averages.

Between September 2020 and September 2021, for every dollar spent by Shire resident cardholders anywhere, 24c goes online (compared to 22c national average). Another 42c is escaped expenditure (34c national average) and the rest is spent locally. Shire residents spend less of their funds within the municipality than the average Australian spends in their local precinct.

Retaining a higher proportion of consumer spending supports local businesses and employment, a significant amount of which is currently being lost to centres outside of the Shire. This provides an opportunity for the Shire's local economy to capture more trade, as well as suggesting that the district may soon be approaching a population size capable of supporting a range of new and expanded services.

To help promote opportunities for businesses and the provision of services locally it is important that the Shire has sufficient amounts of suitably zoned land (commercial, service commercial and light industry) in order to accommodate future population and subsequent commercial growth.

Small Business Growth

Like the Great Southern Region overall, the Shire has an above average proportion of small businesses and sole traders and does not rely on large employers. This, along with the diversity of industries represented, is a positive factor in maintaining local economic resilience as well as supporting creativity and innovation. The three industry sectors with the greatest growth in business numbers between 2006 and 2021 were Agriculture, Forestry and Fishing, Construction, and Professional Services.

The growth in small and micro businesses across Australia is seen to be influenced by a strong entrepreneurial culture, migration driven by lifestyle rather than employment, the ageing population (with many retirees reinventing themselves as consultants or contractors), and the increasing mobilisation of the workforce enabled by digital technology.

This reflects the relative size of commercial industry within the Shire and projects a likely demand in the future to accommodate small business with technological innovation and the Shire's lifestyle amenity and ageing population. This is coupled with the Shire's limited capacity to support more sizeable businesses across all industry sectors.

Preliminary consultation for this Strategy indicated that the community supports the predominance of small businesses and the absence of major commercial chains and franchises. This absence is acknowledged as a contributing factor to the Shire's 'village feel', but is also interrelated with the high proportion of trade leakage to Albany.

As a result, growth in the number of small businesses has seen the Shire identified within an 'entrepreneurial belt', with lifestyle driven migration enabled by online and remote forms of working. While the potential exists for this to continue to increase at a broad level, the Strategy notes that local conditions also need to support business success and retention. This may include telecommunications infrastructure, shared/collective business facilities, the availability of small office and retail tenancies, and a planning framework that accommodates the operation of home businesses.

3.2.1.4 Commercial and Industrial Floorspace Analysis

Many businesses still require physical premises to operate from – an office, workshop, factory floor, retail outlet or accommodation rooms. The local planning framework aims to provide opportunities for businesses to develop floorspace to meet their needs in locations that complement surrounding land uses, rather than create conflict.

Assessing the type of commercial floorspace that exists, understanding recent trends, and forecasting potential future needs is a key part of understanding how the local planning framework can provide an adequate amount of land zoned for commercial and industrial development.

Overall, the Shire experienced consistent growth in the total amount of commercial and industrial floorspace between 2006 and 2016 but variability between commercial sectors. Service businesses (e.g., service industry, shops, healthcare, storage and entertainment) linked to population growth experienced an increase in the amount of floorspace, while businesses in sectors subject to external influences (e.g., primary industries, manufacturing) experienced stagnation.

Between 2006 and 2016, the amount of shop floorspace per resident in the Shire decreased from 3.31m² (net lettable area) in 2006, to 2.99m² in 2011, and to 2.52m² in 2016. This suggests that the viability of each square metre of shop floorspace is improving and that Shire may be approaching population thresholds capable of supporting additional retail shopping; however, this viability is also impacted by changing retail trends and investments made elsewhere.

Commercial forms of residential accommodation experienced the strongest growth between 2011 and 2016, including tourist accommodation and aged care. Strengthening of the tourism market and an increase in aging population needs have also been trends to continue during the period between 2016 to 2021.

Section 7.3 Commercial and Industrial floorspace - Historical Change and Growth Projections in Part 2 of this Strategy provides detailed statistical information supporting the above figures.

Growth Projections

Projecting future commercial and industrial floorspace needs depends on assessment of population growth as well as trends in tourism and other commercial industries. Figure 34 in Part 2, Section 7.3 of this Strategy provides an indication of future floorspace needs.

Commercial forms of residential accommodation are expected to require the most additional floorspace over the forecast period, predominantly reflecting anticipated growth in the tourism industry and aged care sector. It is estimated that there will also be steady growth in other floorspace types, requiring a gradual increase in commercial premises to accommodate businesses within the Shire.

It is acknowledged that commercial growth occurs in a stepped (rather than linear) manner, with a range of factors influencing the timing of commercial investment decisions. Depending on the orientation of the business this may have a close link to population-driven demand or none at all. For example, no new office space might be built for a significant period of time until sufficient demand exists for new development to occur.

Forecasted commercial floorspace growth is based on a continuation of the current level of trade leakage to other centres. If a greater proportion of resident spending occurred within the Shire this would increase the commercial floorspace that was viable within the Shire. If the range of services available in the Shire continues to increase as population grows, this becomes more likely.

Forecasted commercial floorspace growth is also based on the current ratios of employment by each industry sector. If the Shire was to see a greater level of growth in emerging industry sectors, such as tourism and food and beverage manufacturing, the future requirement for commercial and industrial floorspace could potentially double.

While the Strategy seeks to identify sufficient commercial and industrial land to accommodate forecast requirements, it is acknowledged that the need to retain flexibility will be critical to enabling the establishment of a greater range of local services and accommodating the growth of key industries.

Strategies & Actions – Economy & Employment

1. Ensure a broad range of opportunities are provided for the establishment of commercial land uses to ensure that the Shire has sufficient capacity for local services and employment.
 - a. Ensure that sufficient zoned land is available to accommodate commercial and industrial land uses during the life of the Strategy.
 - b. Encourage and facilitate investment by commercial and industrial businesses that align with the community's vision for the future.
 - c. Minimise the potential detrimental impacts of commercial and industrial development by ensuring a high standard of development occurs in appropriate locations.
 - d. Support home-based offices and businesses in residential and rural residential areas at a scale and in a manner that minimises negative amenity impacts on residential development.
 - e. Review the Scheme to reduce regulatory barriers to investment for businesses that fit with the community's vision for the future, including for small and micro businesses.
 - f. Continue to monitor economic trends and commercial demands, ensuring that the local planning framework is sufficiently flexible to adapt to change.

3.2.2 Denmark Town Centre

3.2.2.1 Primacy & Consolidation

The Denmark Town Centre is the primary retail and commercial centre within the Shire, providing premises for a range of shops, offices, cafes and other businesses to service the district. This includes major supermarket shopping as well as an array of public services (police, post office, civic centre, library, parks, toilets, meeting places) and community organisations (ambulance service, community resource centre, churches, RSL, museum).

The co-location of these businesses and services creates a centre that has a high level of activity, in turn attracting more businesses and services and more reasons to visit. This is critical for the viability of many businesses, as well as for creating a vibrant and interesting centre for the community. Future commercial development should be directed towards enhancing and activating the Town Centre.

This Strategy seeks to prioritise and promote the consolidation of the Denmark Town Centre, with the intention of generating increased activity, vibrancy and viability for both businesses and community. The development of general retail shops, supermarkets and other similar land uses outside of the core of the Town Centre would disperse this activity and is therefore not supported by the Strategy.

In the Lower Great Southern Land Use and Employment Survey (2019) completed by DPLH, the Denmark Town Centre was assessed as having a total of 29,365m² of commercial floorspace (all categories). Excluding commercial forms of residential accommodation, the district is projected to require an additional 5,900m² of commercial floorspace between 2021 and 2036. The Town Centre has capacity to accommodate additional commercial development and with appropriate planning can adequately provide for commercial floorspace needs during this period. This will be facilitated by the consolidation and redevelopment of land within the Town Centre, limited expansion of the Town Centre footprint and the gradual movement of low yield land uses (e.g., showrooms) out of the Town Centre.

The Town Centre is defined in Planning Area A (as shown on the Shire of Denmark Local Planning Strategy – Denmark Town Centre (Planning Area A) map), incorporating the primary commercial area where the Strategy supports Commercial zoning to accommodate higher order land uses (e.g., shops and retail, offices, supermarkets and mixed-use development). Other commercial land west of the primary commercial area is included within the Service Commercial Zone to accommodate larger scale, car-dependent, lower-order commercial land uses (e.g., service station, drive-through development, bulky goods retail, vehicle sales and repair, warehousing) that are less suited to the primary commercial area. This is further discussed in Section 5.1 of this Strategy.



Commercial floorspace projections suggest that demand for an additional supermarket is unlikely to be generated during the next 15 years; however, this does not account for latent consumer demand or other commercial drivers having influence (such as available land and development costs). The viability of an additional supermarket may also be affected by the remote servicing from supermarket retailers based in the City of Albany.

This Strategy proposes that the Shire assist with the consolidation of landholdings within the Town Centre to support the development of a new or second supermarket if commercial interest is demonstrated. The Strategy does not support the development of a new or second supermarket outside of the Commercial Zone, as shown on the Shire of Denmark Local Planning Strategy – Denmark Town Centre (Planning Area A) map, on the basis that this would significantly affect the viability of the primary commercial area.

Strategies & Actions – Primacy & Consolidations

1. Prioritise the consolidation of the Denmark Town Centre as the primary centre for commercial activity within the Shire, with particular regard to retaining high order commercial land uses within the Commercial Zone.
 - a. Expand the Commercial Zone as follows:
 - i. Include Lot 97 on P222379 (#1) Short Street and Lot 257 (#2) Hollings Road within the Commercial Zone.
 - ii. Include a portion of Lot 228 on P217468 (#2) Strickland Street within the Commercial Zone, as identified in the maps accompanying this Strategy.
 - b. Review the range of permitted and discretionary uses in the Commercial Zone:
 - i. Accommodate a wide range of high order commercial land uses and mixed-use development.
 - ii. Prohibit drive-through development and restrict low order commercial land uses, supporting their relocation to service commercial and industrial areas.
 - iii. Reduce planning requirements for changes in land use and less complex development proposals that are consistent with development and policy standards.
 - c. Prohibit the development of high order commercial land uses outside of the Commercial Zone.
 - d. Reclassify all land zoned Commercial west of Millar Street and Short Street to the Service Commercial Zone.
 - e. Work with landowners to facilitate the consolidation of landholdings and redevelopment of under-utilised sites within the Town Centre to facilitate the delivery of new commercial floorspace.

3.2.2.2 Mixed Use & Activation

The Denmark Town Centre plays an important role as the focal point for our community coming together, interacting in formal and informal ways, and enjoying a sense of place that is an important part of our social fabric. Developing a lively and active Town Centre environment is key to promoting community interaction and supporting business viability, particularly given trends towards retail 'experience' growing in importance.

The Strategy supports a range of actions aimed at retaining and enhancing the character of the Town Centre including built form, place-making, alfresco dining, accessibility, and the ongoing improvement of public spaces.

This includes supporting the introduction of provisions within the local planning framework to ensure interaction and activation is maintained on main street frontages. The identification of active street frontages (refer to Shire of Denmark Local Planning Strategy – Denmark Town Centre (Planning Area A) map) and other frontage types allows for specific development controls to ensure active street frontages, non-residential uses on the ground floor and a high standard of building design.

The Strategy supports the use of flexibility in development standards to achieve activation. For example, while development may ordinarily be required to be built up to the front boundary on a main street frontage, a setback may be allowed where this area is specifically designed to be used for alfresco dining.

Greater activation can also be supported by increasing residential housing and tourism accommodation in the Town Centre within mixed-use development. This can increase foot traffic in the Town Centre even when few businesses are open, as well as providing passive surveillance for safety, promoting sustainable transport choices, and encouraging housing diversity.

Conversely, residential housing can detract from a Town Centre if it is located on a main street frontage where a land use with a higher level of interaction with the street is desirable. Residential housing and other forms of accommodation are more appropriately located on the upper floors of development or at the rear of a property, while shops and similar land uses ideally occupy the street front.

Residential housing can also be sensitive to noise within a Town Centre environment, particularly from entertainment venues, which are more appropriately located in the Town Centre than other areas. In seeking not to prejudice the operation of existing and potential future entertainment venues, the Strategy supports further investigation into mechanisms to mitigate these conflicts through development design, notifications on residential titles, and other mechanisms that acknowledge that residences are located within a noise generating area.

Strategies & Actions – Mixed Use & Activation

1. Support residential and tourist accommodation in the Town Centre as part of mixed-use development.
 - a. Introduce provisions into the local planning scheme to support the development of multiple dwellings within the Commercial Zone.
 - b. Introduce plot ratio density controls to support mixed use development within the Commercial Zone.
 - c. Investigate means to mitigate the impact of residential dwellings and tourist accommodation within the Town Centre on the operation of entertainment venues and other noise generating land uses.
2. Promote the development of active frontages to all main streets through careful management of land use and development design.
 - a. Introduce development requirements within the local planning scheme to facilitate street activation, particularly to designated main streets.
 - b. As part of the review of Town Centre design guidelines, identify design opportunities to activate street frontages, including minimising blank walls, providing large shop-front windows, and prioritising pedestrian access.
 - c. Review and update the local planning framework to remove provisions that constrain alfresco dining and place-making initiatives.

3.2.2.3 Flexible Building Design

The role and composition of main streets and town centre precincts throughout Australia is currently in flux. The rise of online shopping, increasingly cautious consumer and business behavior, and the disruption of COVID-19 have all impacted the retail sector and led to significant uncertainty regarding the economic viability of many retail businesses in their current form. The significant role of the tourism sector, combined with increasing short to medium-term population growth in the Shire, will likely provide a buffer to local businesses from Australia's downward retail trends. ABS data also indicates the importance of food, in particular the role of restaurants and cafes, which have been making a growing contribution to Australia's bricks and mortar retail trade turnover throughout the past decade.

Given the diverse range of existing land uses within the Denmark Town Centre and uncertainty concerning its future composition, it is considered critical that built form is flexible and capable of responding to future economic shifts and trends. The Strategy therefore supports the introduction of planning controls that support flexible building design to enable potential low-cost conversion of spaces between residential, retail and entertainment uses as economic shifts occur. The development of adaptable commercial spaces will help reduce investment risk as well as ensuring business and community needs are provided for in the long term.

All new development within the Town Centre should demonstrate the capacity for flexible building design as part of seeking planning approval, in accordance with guidelines prepared by the Shire. The following design aspects are suggested for consideration in this regard:

- Universal and independent access
- Higher ceiling heights
- Vehicle access for deliveries
- BCA requirements met for multiple use class (i.e. house and shop)
- Removable walls between tenancies

Strategies & Actions – Flexible Building Design

1. Promote a high standard of development design within the Town Centre that enables flexibility for potential adaptation to alternative uses.
 - a. Introduce provisions into the local planning scheme requiring new development on identified main streets in the Town Centre to demonstrate its capacity to be adapted to multiple land uses.
 - b. Identify development standards and provide guidance on flexible building design.



3.2.2.4 Transition Areas

TPS3 identifies a Professional Office Zone over the majority of lots fronting Price Street between Mitchell Street and Barnett Street. This zone allows for a range of commercial and residential land uses while also seeking to preserve heritage buildings and the residential character of the street. The 2011 LPS also identifies lots on the eastern side of Horsley Road south of Scotsdale Road as suitable for the introduction of commercial land uses in a similar manner.

This approach allows a more gradual transition of land uses between the Town Centre and adjoining residential areas, as well as providing additional opportunities for home based businesses and low-key commercial land uses. As part of this transition, it is key to maintain the predominantly residential nature of the built form, the existing streetscape character and the significant number of heritage buildings.

As the Professional Office Zone and its objectives do not align with any of the model zones in the Regulations, the Strategy supports the retention of these transition areas within the Residential Zone and the introduction of commercial land uses via an additional use designation, shown on the Strategy Maps in Section 4 as “Additional Use – Town Centre”. Conditions of the additional use designation can adequately address the desired retention of residential built form, with further policy guidance developed as required.

Strategies & Actions – Transition Areas

1. Support an appropriate transition in land use between the Town Centre and adjoining residential areas, seeking to retain established character while enabling commercial land use.
 - a. Remove the Professional Office Zone in preparing the local planning scheme.
 - b. Include lots that are currently included in the Professional Office Zone in TPS3 within the Residential Zone in the local planning scheme.
 - c. Introduce an “Additional Use – Town Centre” designation over Residential zoned lots in close proximity to the Town Centre on the Strategy Maps, providing for a range of low-key commercial land uses subject to the retention of residential built form.
 - d. Introduce development conditions and incentives promoting the retention of existing buildings and the maintenance of streetscape character.



3.2.3 Other Commercial Areas

3.2.3.1 Service Commercial Land Uses

Service commercial areas are areas that provide for bulky goods retail and wholesale businesses, require large premises and direct car access (e.g., showrooms, wholesale suppliers, hardware, storage facilities) as well as low impact services and industries (e.g., car mechanics, equipment hire, food processing, sign manufacturing). Service commercial areas typically benefit from co-location, transport accessibility and high visibility, yet are generally incompatible with a mixed-use, main street, Town Centre environment due to high traffic generation and the large amount of low yield floorspace required.

The Shire has a range of service commercial land uses spread between the Denmark Town Centre, South Coast Highway and the existing Light Industrial Area (LIA). Service commercial land uses are not easily distinguished by the categories used in the Land Use and Employment Survey, and it is therefore difficult to identify the current amount of floorspace and potential future growth.

Demand for additional floorspace for bulky goods retail and wholesale businesses is likely to be limited given the Shire's proximity to the City of Albany where a much greater range of comparison goods retailing exists. Notwithstanding, the Shire is aware of the interest of a number of operators seeking commercial land or a suitable business premises.

Demand for additional floorspace for low impact services and industries is expected to increase as a result of population and visitor growth. This would result in an increased demand for service commercial floorspace which is less dependent on visibility, but more on transport access and price sensitivity. As a result, it is envisioned that a small number of service commercial land uses will relocate out of the Town Centre, potentially increasing the projected demand for service commercial premises beyond what has been forecast.

This Strategy proposes the introduction of a dedicated Service Commercial Zone consistent with the Regulations and supports the consolidation of existing service commercial areas which can ably provide for anticipated demand during the life of this Strategy. This is considered the most viable and sustainable approach, reducing the need for the extension of public infrastructure and supporting successful commercial precincts. This approach also reflects community feedback during preliminary consultation for the visibility of commercial and industrial premises to be minimised.

High order commercial land uses such as shops, offices, restaurants, supermarkets and similar will not be supported within areas zoned 'Service Commercial' in order to maintain the primacy of the Town Centre.

Proposed Service Commercial Park

The 2011 LPS proposed to investigate the development of Lot 300 on P046811 (#832) South Coast Highway (corner of Denmark-Mount Barker Road). as a service commercial estate. Lot 300 is currently zoned Public Use under the Shire's TPS3 but leased to three industrial/ commercial businesses, effectively providing additional industrial land in lieu of past shortfalls.

Investigation into potential development of Lot 300 presented conflicts between desired commercial visibility and impacts of visual amenity, as well as the retention of remnant vegetation.

Based on the forecast need for service commercial floorspace and the desire to consolidate and promote land use change in the LIA, this Strategy does not propose to pursue investigations for the development of a Service Commercial Park on Lot 300. The relocation of current lessees to the East Denmark Industrial Estate is encouraged.

3.2.3.2 South Coast Highway

The Strategy recommends that land currently zoned Commercial to the west of Short Street and Millar Street is rezoned to Service Commercial, consistent with current land uses and the overall intended direction. This portion of South Coast Highway has capacity for additional development and can provide for low order commercial land uses that prefer direct vehicular access and a high visibility location. The expansion of this area is not supported as the Strategy seeks to preserve visual amenity, by avoiding inappropriate commercial sprawl on entrances to the Denmark Town Centre, and minimising land use conflict with adjoining residential development.

Lot 50 on D098777 (#82-90) South Coast Highway is a large, undeveloped commercial site within this area that has significant capacity to provide for future service commercial development. Alternatively, the site may have the capacity for medium-high density Residential or Mixed-Use development. Specific assessment of visual impact will be required for any development on Lot 50 to ensure that building design and screening minimises the prominence of development to views of the site from along the South Coast Highway, being the main western entrance to Denmark's Town Centre.

3.2.3.3 Other Commercial Nodes

TPS3 includes Commercial zoning for the following two commercial nodes at points along Ocean Beach Road:

- **Portion of Lot 214 on P052368 (#267) Ocean Beach Road, within the area included in the Weedon Hill Outline Development Plan (ODP) (now referred to as Local Development Plans (LDP)).**

Lot 214 Ocean Beach Road and adjoining lots within the Weedon Hill ODP are zoned for future urban development, but this is unlikely to occur during the life of this Strategy due to the cost of providing necessary infrastructure. The Strategy recommends that an alternative land use outcome is pursued in negotiation with the landowner, and as such the development of a local commercial node anticipated in the ODP may not be realised. Should residential development occur, this commercial node is poorly located and this Strategy does not consider it imperative that this is maintained.

- **Portion of Lot 55 on P006685 (#571) Ocean Beach**

Approximately 3,600m² of Lot 55 Ocean Beach Road is currently zoned Commercial and 8,100m² zoned Residential (R5). While conceived as a suitable location for local convenience services, the viability of development for this purpose is affected by the high proportion of seasonally occupied dwellings and tourist accommodation in the vicinity. Development of this site with a residential or tourism component is also restricted by the requirement for connection to reticulated sewerage.

The Strategy supports the retention of Commercial zoning over a portion of Lot 55 to accommodate the future development of this site as a local village node for the Ocean Beach locality. This would likely be enabled by the extension of a reticulated sewerage service to this location.

- **Nornalup Townsite**

As discussed in Section 3.1.6.1, any potential future expansion of the Nornalup townsite should consider the provision of (or access to) commercial and community services. Structure planning should consider whether a need exists to identify land for the development of commercial and tourism-related services.

The Strategy does not support the inclusion of additional land within the Commercial Zone in any other location, preferring that high order commercial land uses are established within the Denmark Town Centre. Small scale commercial land uses may be contemplated within a number of other zones.

Strategies & Actions – Other Commercial Areas

1. Support the consolidation of service commercial land uses within existing developed areas, with measures to minimise land use conflicts and enhance landscape amenity.
 - a) Introduce the Service Commercial Zone into the local planning scheme with objectives consistent with the Planning and Development (Local Planning Schemes) Regulations 2015.
 - b) Rezone lots currently included in the Commercial Zone west of Short Street and Millar Street to the Service Commercial Zone.
 - c) Not support any further expansion of Service Commercial zoning on the South Coast Highway to avoid impacts on visual and residential amenity.
 - d) Require an assessment of visual impact prior to development on Lot 50 (#82-90) South Coast Highway to ensure there is no adverse impact to the visual amenity of the western entrance to Denmark Town Centre.
2. Manage the development of other commercial nodes to promote the primacy of the Denmark Town Centre.
 - a) Support the inclusion of service commercial land uses within the existing Light Industrial Area.
 - b) Support the retention of Lot 300 on P046811 (#832) South Coast Highway for public uses.
 - c) Investigation of alternative land use outcomes, or a reduction of Service Commercial Zoned land to accommodate other land uses, over a portion of Lot 214 on P052368 (#267) Ocean Beach Road.
 - d) Subject to the outcomes of structure planning, support the development of a commercial centre within Nornalup and rezone land if appropriate.
 - e) Not support the inclusion of any other additional land within the Commercial Zone outside of the Denmark Town Centre.

3.2.4 Industrial Areas

Industrial areas provide for businesses involved in manufacturing and processing, as well as an array of other services. By the nature of their operation, industrial land uses often produce emissions of noise, dust and odour and are ideally separated from residential and other sensitive land uses. Some industrial land uses also have requirements for large landholdings and bulk transport access.

Although the Shire has a number of small industrial businesses that service the district, major industrial land uses servicing the region are based in the City of Albany and supported by extensive road, rail and maritime infrastructure. The Strategy supports the further development of local businesses, services and employment but does not support the development of any heavy or extensive industrial land uses within the Shire.

The Lower Great Southern Land Use and Employment Survey identified 17,340m² of existing industrial floorspace within the Shire, as detailed in Figure 5.



Figure 5: Industrial Floorspace by Type

| Floorspace Classification | PLUC Code | Industrial Floorspace (2019) | % of Total of Category |
|----------------------------|-----------|------------------------------|------------------------|
| Health/ Welfare/ Community | HEL | 200m ² | 7% |
| Manufacturing/ Processing | MAN | 3,170m ² | 21% |
| Office/ Business | OFF | 1,140m ² | 11% |
| Other Retail | RET | 920m ² | 20% |
| Service Industry | SER | 5,730m ² | 56% |
| Shop/ Retail | SHP | 200m ² | 1% |
| Storage/ Distribution | STO | 3,520m ² | 56% |
| Utilities/ Communication | UTE | 850m ² | 51% |
| Total Occupied | | 15,730m ² | |
| Unoccupied | | 1,610m ² | |
| Total | | 17,340m ² | |

Department of Planning, Lands and Heritage, 2019

The majority of industrial land uses are driven by industry demands and trends rather than servicing a localised population, so projections of potential growth in industrial floorspace needs are complex.

This Strategy forecasts between 1,200m² and 1,500m² of industrial floorspace will be required by 2036 to support expected population growth. However, demand for industrial land could increase in the event of growth within the agri-business and food processing industries, particularly given the ability to produce high-value agricultural products within the district. If the Shire was to achieve aspirational benchmarks for the development of these industries, based on the averages of other Local Government areas, this could result in demand for up to 10,000m² of additional industrial floorspace.

Maintaining a ready supply of industrial land is necessary to allow the Shire to respond to emerging industries, accommodate local services and provide opportunities for local businesses and employment.

3.2.4.1 Light Industrial Area (LIA)

The existing LIA is located within the Denmark townsite, providing premises for a wide range of services supporting the district.

Although the LIA has been in this location for many years, encroaching residential development and increasing requirements for buffers to industrial land uses now present a challenging land use conflict. In addition, all developed lots within the LIA are currently occupied and a lack of suitable alternative sites has resulted in some industrial and service land uses pursued in undesirable locations.

With the recent development of the East Denmark Industrial Estate, industrial land uses are now provided in an alternative location and the future of the existing LIA can be reconsidered. Given its proximity to residential housing, the Strategy acknowledges the need for the LIA to transition from an area with predominantly industrial land uses into a service commercial area.

Changes to the local planning scheme will be made in order to remove the opportunity for offensive industrial land uses to be established and encourage the relocation of existing industrial land uses. This will be supported by increasing the range of service commercial land uses that are permitted, providing for demand from this sector as well as incentivising the relocation of industrial land uses (which are typically lower yield).

The Strategy supports the introduction of a Light Industry Zone with objectives generally as per the Regulations, and the use of this zone for all existing lots within the LIA.

Land use permissibility within the Light Industry Zone is proposed to support service commercial and non-offensive industries but prohibit industrial land uses that are considered inappropriate in close proximity to residential development. This seeks to address the conflict between industrial land uses in this location and adjoining residential development. Although this may currently result in a number of non-conforming land uses within the LIA, it is acknowledged that these land uses could be accommodated within the East Denmark Industrial Estate.

The Light Industry Zone should also permit the development of a wide range of service-based land uses and bulky goods retailing, consistent with the proposed Service Commercial Zone.

To support the consolidation of the LIA as the primary commercial park within the Shire and provide opportunities for new development to stimulate land use change, the Strategy supports the relocation of the Shire's works depot and the redevelopment of this site, as well as investigation into the potential development of Lot 139 on P080498 (#32) Zimmerman Street.

To provide additional land for service commercial development and to seek to resolve land use conflicts, the Strategy also proposes to extend Light Industry zoning to the northern portion of Lot 672 on P230743 (#15) Zimmerman Street. This would be supported by the extension of Middleton Street to Zimmerman Street, enabling a more connected road network through the LIA, subject to the resolution of land tenure implications.

The establishment and maintenance of appropriate buffers between the Light Industry Zone and adjoining residential development is an important consideration that this Strategy seeks to address in consultation with affected landowners. All new development should consider means to mitigate impacts on visual amenity and the creation of vegetated buffers adjoining residential areas.

3.2.4.2 East Denmark Industrial Estate

The East Denmark Industrial Estate was developed as a partnership between the Shire and Development WA (previously LandCorp) as a response to the shortage of industrial land in the Shire and the desire to relocate heavier industrial land uses out of the existing LIA.

A first release of lots between 6,879m² and 1.4 hectares took place in mid-2018 and a further 17.3 hectares of land provides for the future expansion of the East Denmark Industrial Estate in a southerly direction. The Estate is expected to sufficiently provide for demand for additional industrial floorspace during the life of this Strategy, noting that the Estate will also potentially accommodate the relocation of a number of existing businesses.

A number of barriers, including shortcomings with water infrastructure, have prevented the sale of lots in the East Denmark Industrial Estate, the relocation of existing industrial businesses and the establishment of new industrial uses within the precinct. In addition, the Estate is currently zoned General Industry and this allows a relatively narrow range of land uses.

While ultimately desirable to retain the East Denmark Industrial Estate for general/heavy industry, it is acknowledged that there is currently no supply of lots for light industry. Although the Strategy proposes more proactive measures to encourage the relocation of general industry from the LIA and provide for expansion, this may take time to eventuate. As such, the Strategy recommends that the local planning scheme is amended to permit light industry and other similar land uses within the East Denmark Industrial Estate to respond to immediate demand and promote the establishment of operating businesses within the Estate.

To facilitate the development of lots within East Denmark Industrial Estate, it is also proposed to relax restrictions on the development of multiple tenancies within a single industrial lot, allowing for the development of factory units. This will potentially encourage investment while assisting start-up and small businesses that do not require an entire lot. Policy guidance will assist in ensuring that factory units are constructed in a manner that appropriately reflects industrial use.

Strategies & Actions – Industrial Areas

1. Support the consolidation and expansion of existing industrial areas and amend the local planning scheme to diversify development opportunities for industrial land uses.
 - a. Introduce a Light Industry Zone within the local planning scheme generally consistent with the objectives of the Planning and Development (Local Planning Schemes) Regulations 2015.
 - b. Zone all existing developed lots within the Light Industrial Area on Zimmerman Street, Hodgson Street, Industrial Road, Middleton Street and Hockley Close as Light Industry.
 - c. Support the rezoning of the northern portion of Lot 672 on P230743 (#15) Zimmerman Street to Light Industry as shown in the Strategy Maps. Planning matters to be considered at future planning stages, include, but not limited to, drainage, water management, lot sizes, environmental features, road connections and contributions, bushfire, land tenure, and servicing.
 - d. Any investigations or planning in relation to the potential development of Lot 139 on P080498 (#32) Zimmerman Street, shall address, but not be limited to the following planning matters: drainage, water management, lot sizes, environmental features, road connections and contributions, bushfire, land tenure, and servicing.
 - e. Support the relocation of the Shire's works depot to provide additional opportunities for service commercial development.
 - f. Investigate the modification of planning requirements to allow for strata-titled industrial lots.
 - g. Permit light industry and similar land uses within the General Industry Zone under the local planning scheme.
2. Minimise land use conflict and manage industrial land use and development outcomes to mitigate impacts on other sensitive land uses.
 - a. Ensure that the expansion of industrial areas incorporates appropriate buffers to minimise impacts on visual amenity and sensitive land uses.
 - b. Prepare policy guidance to encourage a high standard of industrial development, the appropriate development of factory units and strata-titles and identifying how development proponents are expected to demonstrate that impacts/emissions (including noise, dust and other impacts) to meet the relevant environmental and regulatory standards.

3.2.5 Tourism

3.2.5.1 Overview

Tourism is a significant industry within the Shire and has experienced significant growth in recent years. The district is serviced by a wide range of tourism businesses, including accommodation ranging from low-cost camping through to hotels.

The Shire's local economy is supported by a relatively high proportion of visitor expenditure compared to local resident expenditure, with a further increase over the past two years. This tourism driven demand supports many accommodation, food and retail businesses that would not otherwise be viable.

Although tourism is a significant characteristic of the district, there are inherent tensions between the tourism industry, visitors and the local community. The Strategy acknowledges these tensions and seeks to provide the basis for a planning approach to managing and mitigating apparent points of conflict.

At a regional level, tourism is acknowledged as a significant growth industry, with opportunities in food, culture and nature-based tourism promoted in the Great Southern Regional Investment Blueprint, Great Southern Regional Planning & Infrastructure Framework and the Lower Great Southern Strategy. In acknowledgement, this Strategy seeks to address a range of tourism related issues within the context of land use planning.



Sustainable Tourism Strategy

In September 2021, the Shire adopted the Sustainable Tourism Strategy (STS) to provide a vision and direction for the future of tourism in the Shire. The STS recognises that tourism has contributed to economic growth in employment opportunities, and an expanded array of lifestyle amenities for residents. Yet, it also acknowledges the need to ensure that community and environmental resources are managed sustainably.

The STS identifies that in 2019 approximately 160,000 people made day trips to the Shire and another 167,000 people made overnight visits, staying a total of 591,000 nights. Most visitor expenditure in the Shire is generated by Australian residents (domestic visitors) who account for 91% of total visitors. Visitor numbers grew by 17.6% over the five years prior to June 2019 and average annual visitor expenditure was approximately \$76 million per annum over the same period.

The STS provides a holistic review of the tourism industry, including accommodation availability and future needs. The STS also provides an over-arching vision, proposing that sustainable tourism within the Shire should:

- Make optimal use of environmental resources that constitute a key element in tourism development, maintaining essential ecological processes and helping to conserve natural heritage and biodiversity.
- Respect the socio-cultural authenticity of host communities, conserve their built and living cultural heritage and traditional values, and contribute to inter-cultural understanding and tolerance.
- Ensure viable, long-term economic operations, providing socio-economic benefits to all stakeholders that are fairly distributed, including stable employment and income-earning opportunities and social services to host communities, and contributing to poverty alleviation.

This vision builds on established tourism offerings in the Shire, supporting the further development of eco-tourism and balancing development with the needs of the local community. This Strategy acknowledges and adopts the vision for tourism expressed in the STS and seeks to address matters relevant to the local planning framework. The STS provides a detailed profile of the tourism industry and assesses industry needs, as well as community expectations.

Development Approval Requirements

The STS identifies a need to clarify and streamline planning approval processes to facilitate tourism land use and development proposals, including public education initiatives. While acknowledging that improvements can be made, this Strategy notes that finding a balance between facilitating development proposals and safeguarding the community's interests is a complex challenge.

A number of actions recommended within this Strategy will assist in providing greater clarity for proponents of tourism development once enacted through the preparation of an updated local planning scheme and policies. This may be further assisted with information sheets and self-service information that enables proponents to better understand approval requirements and processes.

In reviewing TPS3, it is recommended that land use permissibility is examined, and opportunities identified to reduce approval and application requirements. However, it is noted that tourism development is typically unique (both accommodation and attractions) and a need for planning assessment in many circumstances is likely.

Length of Stay

The Strategy acknowledges State policies and reflects the restriction on occupancy of tourist accommodation units to a maximum length of stay of three months in any 12 months.

Notwithstanding, the Strategy acknowledges that unrestricted (or long stay) units can support the viability of tourism development projects or provide key worker accommodation, and are often sought by proponents of tourism developments for these reasons.

The introduction of unrestricted units must be carefully considered and needs to demonstrate the capacity to address potential conflict between long and short stay units, preservation of the tourism function of the development, and management arrangements that enable continuing investment into common facilities. Appendix 1 of the Draft Planning for Tourism Guidelines outlines relevant factors that will be required to be addressed by proponents.

The Strategy outlines the supported proportion of unrestricted accommodation units within tourism developments according to their location (by precinct) in Figure 36 (Part 2, Section 8.2).

Assessment of proposals will consider the following favourable criteria:

- New development within identified Tourism Precincts, to help incentivise development in strategic locations.
- Where potential conflict between residential and tourism components can be adequately managed and the primacy of tourism functions maintained.
- Within close proximity to the Denmark townsite to promote access to services and where the surrounding context is compatible with residential use.

In addition, the following requirements will be considered for adoption into the local planning scheme and policies:

- The number of units with an unrestricted length of stay is to include caretaker or manager residences.
- Unrestricted units will only be supported where they are designed and located to:
 - o Be subsidiary to the tourism component of the development.
 - o Minimise conflict between unrestricted and restricted accommodation units.
 - o Avoid areas of the site providing the highest tourism amenity.
- Where a minimum number of accommodation units applies, unrestricted units will only be supported once that minimum number has been constructed and only to the applied proportion of constructed units (i.e., once 10 units have been built, two may be unrestricted use and that number increased as more units are constructed).

Strata Title Subdivision

The subdivision of tourism developments into strata titles can provide a means of promoting investment, offering the potential to raise capital for improvement in aging tourism facilities while providing a 'holiday home' investment opportunity within a tourism (rather than residential) setting. However, fragmenting ownership of tourism developments can also result in complex management arrangements, inconsistent maintenance standards within a tourism development and a lack of reinvestment in common facilities.

The Strategy recommends the adoption of a position against supporting strata title subdivision in tourism developments except in limited circumstances, seeking to preserve the interests of the development as a tourism business first and foremost.

With reference to relevant State policies, this Strategy acknowledges the need for management arrangements prior to strata titling within any tourism development to facilitate decision making, maintain standards of tourism product and provide for ongoing reinvestment into common facilities.

Strategies & Actions – Tourism

1. Acknowledge the vision and aims for tourism expressed in the Shire's Sustainable Tourism Strategy and seek alignment within the local planning framework.
 - a. Acknowledge and respond to the recommendations of the Sustainable Tourism Strategy at each stage of review of the local planning framework.
2. Develop the local planning framework in a manner that provides clarity and improves the experience of proponents of tourism development.
 - a. Review the local planning scheme and policies to improve clarity for tourism land use and development proposals, reduce unnecessary approval and application requirements, and develop self-service information options.
3. Provide direction for length of stay and strata titling of tourism developments to encourage investment while protecting the primacy and long term viability of the tourism use.
 - a. Support the introduction of a limited number of accommodation units with an unrestricted length of stay within tourism developments in the following circumstances:
 - i. Within the Denmark Town Centre, any number of unrestricted units may be supported as part of an approved mixed-use development.
 - ii. Within a designated tourism precinct to the maximum amount specified in Figure 36 (Part 2), where the total number of accommodation units is 10 or more and the site is included within the Tourist/ Tourism Zone.

- b. Introduce local planning scheme/ policy provisions to provide direction for proposals for unrestricted length of stay units within tourist accommodation.
- c. Adopt a presumption against any further strata title subdivision of tourism developments within the Shire other than built strata applications in the following circumstances:
 - i. Where associated with accommodation units that have been allowed an unrestricted length of stay (consistent with this Strategy);
 - ii. Where associated with accommodation units that have a restricted length of stay, only within tourism developments that:
 - Were in operation prior to this Strategy;
 - Demonstrate consistency with the directions expressed in this Strategy;
 - Demonstrate that subdivision is necessary to facilitate an improved tourism outcome, such as major redevelopment, additional accommodation or a new attraction; and
 - Are supported by adequate management arrangements to preserve the interests of the development as a tourism business first and foremost.
 - iii. A 10-year Maintenance Plan and Reserve Fund is required by the Shire for all built strata Tourism developments.

3.2.5.2 Tourism Sites & Precincts

Tourism Sites

TPS3 recognises important tourism sites by including relevant lots within the Tourist Zone, excluding land within the Town Centre. These sites have either substantial existing tourism infrastructure or demonstrate the qualities and attributes of a strategically significant site for tourism and are therefore zoned to facilitate their preservation for tourism purposes in future. This excludes other tourism business that are small-scale or secondary to a predominant land use. The Tourism Zone in TPS3 will be replaced by the Tourism Zone in the Shire's new Local Planning Scheme, so as to be consistent with the current Model Scheme Text.

The Strategy assesses and makes recommendations for existing Tourist zoned sites. This can be found in Part 2, Section 8.1.

This Strategy identifies tourism precincts within which new tourism sites may be supported, subject to the initiation of rezoning by the landowner and the resolution of relevant planning issues such as bushfire risk, visual landscape values and environmental impacts.

It is also acknowledged that tourism attractions may also be located on State lands where a range of unique natural assets exist. This Strategy supports tourism development on State land subject to the resolution of relevant planning issues, consistency with the STS, and consideration of how public tourism assets will contribute to the development of tourism precincts.

Tourism Precincts

Tourism land use or development proposals are assessed in accordance with the zoning of land in the local planning scheme. Under the direction of the 2011 LPS, an amendment to TPS3 to include land within the Tourist Zone has been required to accommodate any major tourism development proposal. This has resulted in a complex and uncertain process for the development proponent, and accommodated ad hoc proposals and uncertainty for neighbouring landowners.

This Strategy proposes to address this issue by strategically identifying locations where tourism land use and development is considered appropriate and beneficial. The Strategy proposes to designate these locations as Tourism Precincts.

Tourism precincts support the success of the local tourism sector by facilitating co-location, enabling higher levels of achievement of the five tourism 'As' (accommodation, access, attractions, activities and amenities) to be met in a single location. This also allows for investments in public infrastructure (e.g., road upgrades, signage, lookouts) and sustainable transport (e.g., cycle routes, potential future public transport services) to be more targeted.

Designating tourism precincts provides direction on where the Strategy supports proposals:

- For tourism land use and development that will be the primary use of the land.
Outside of the Tourism Zone or designated Tourism Precinct, tourism land use and development should be a secondary use of the land, compatible with the primary purpose of the zone and demonstrate a higher degree of sensitivity to surrounding non-tourism land uses.

- To rezone land to the Tourism Zone to accommodate larger scale tourism proposals.

Where rezoning proposals are within a Precinct and consistent with this Strategy the 'standard' amendment process may be followed, subject to the approval of the WA Planning Commission. Currently, any amendments to the Tourism Zone must follow a 'complex' amendment process.

- For an unrestricted length of stay for a proportion of accommodation units.

The Strategy provides specific direction on the level of unrestricted length of stay units that may be supported according to the tourism precinct.

Tourism precincts proposed by the Strategy are identified in Section 8.2, Part 2. Designated tourism precincts have a high level of existing or potential attributes that contribute towards the development of viable and sustainable tourism, as assessed qualitatively against the five tourism 'As'. Precincts typically contain one or more existing tourism sites.

Strategies & Actions – Tourism Sites & Precincts

1. Preserve and promote the development of strategically significant sites within the Tourism Zone for tourism purposes.
 - a. Retain the Tourism Zone (retitle from Tourist Zone) within the local planning scheme consistent with the objectives of the Planning and Development (Local Planning Schemes) Regulations 2015.
 - b. Retain existing Tourist zoned sites within the Tourism Zone as outlined in Figure 35 – Recommendations for Tourism Sites (Part 2).
2. Strategically identify precincts where tourism development is most appropriate, encouraging co-location to support successful tourism enterprises while providing more certainty for landowners.
 - a. Support proposals for tourism land use and development within the Tourism Precincts identified in Figure 36 – Recommendations for Tourism Precincts (Part 2):
 - i. Within the parameters of the existing zoning, a tourism land use or development proposal may be the primary use of the land.
 - ii. Rezoning of the land to support major tourism proposals is broadly supported, subject to the resolution of relevant planning issues.
 - iii. Further planning and the consideration of issues identified in Figure 36 – Recommendations for Tourism Precincts (Part 2) should occur prior to the approval of land use and development.
 - iv. Land use and development proposals within a Tourism Precinct that are discretionary in the underlying zone may not be supported where they are incompatible with tourism land uses on adjoining land.
 - b. Where considered necessary, undertake more detailed planning to guide the development of the Tourism Precincts identified in Figure 36 – Recommendations for Tourism Precincts (Part 2).

3.2.5.3 Caravan Parks & Camping

Caravan Parks

Caravan parks and camping grounds provide a range of accommodation types including low-cost options, supporting a way of travelling that is strongly connected to our Australian cultural identity. The Shire is well serviced with formalised options for caravan parks and camping grounds, with eight existing facilities spread across the district providing opportunities for travellers seeking this form of accommodation. Three of these facilities are located on publicly managed land, facilitating their long-term retention as community assets.

State planning policies generally recommend the retention of caravan parks within a Special Use Zone to preserve this land use; however, the Shire has not experienced challenges relating to the longevity of caravan parks as experienced in metropolitan and larger regional centres. This Strategy recommends that caravan parks and camping grounds are retained within the Tourism Zone to allow for the development of multi-faceted tourism businesses, while being responsive to industry trends.

The Strategy recommends the introduction of limits on the number of open sites that are retained for caravans and camping within a caravan park, ensuring that diversification into other accommodation types (e.g., cabins / park homes) does not represent an effective change of use.

Private Camping grounds

The STS identifies a need for the development of additional low-cost and nature-based camping options, particularly given demand in peak periods. Many campers seek low-service, low-cost options, particularly as caravans and recreational vehicles are increasingly self-contained.

The Shire regularly receives enquiries from landowners proposing to develop small-scale camping businesses (including 'glamping'). It is also acknowledged that online platforms have facilitated the unregulated leasing of small-scale, low-service campsites on private properties – similar to the trends in recent decades that have given rise to the private holiday home industry.

This Strategy supports the introduction of a 'Camping Ground' use class into the local planning scheme to facilitate the development of private camping grounds. The intent of this use class would be to encourage small scale, low-service, hosted camping grounds. Further investigation is recommended into enabling limited hosted camping grounds as an ancillary function of other land uses where adequate servicing can be demonstrated and amenity concerns addressed.

While this land use can be enabled through the local planning framework, all caravan parks and camping grounds are also required to be licensed through the Caravan Parks and Camping Grounds Regulations 1997. The Caravan Parks and Camping Grounds Regulations set requirements for the provision of servicing facilities for camping grounds and caravan parks that are inflexible and unfeasible for many small-scale parks. This Strategy advocates for review of the Caravan Parks and Camping Grounds Regulations to promote flexibility and consider servicing arrangements that reflect the changing nature of this industry.

Non-Commercial Camping

The Caravan Parks and Camping Grounds Regulations permit a landowner to camp on their own land for up to three nights in any period of 28 consecutive days with not more than one caravan. The Caravan Parks and Camping Grounds Regulations also allow for this to be extended for greater than three nights (but no more than three months in any 12 month period at the discretion of the relevant Local Government). The Caravan Parks and Camping Grounds Regulations do not make any distinction between land that is vacant and land that has an existing established dwelling.

This type of camping is already common practice in the Shire, particularly amongst absentee landowners and residents that accommodate family visitation. Often this involves more than one caravan or a stay of more than three nights without approval, contrary to the Caravan Parks and Camping Grounds Regulations.

The Strategy supports investigations of an approval process for non-commercial camping grounds to provide clarity, certainty and enable additional capacity for camping in the Shire during peak seasons. This should be considered alongside any planning-based initiatives to facilitate small-scale commercial camping.

Strategies & Actions – Caravan Parks & Camping

1. Investigate opportunities to support the development of a diverse range of caravan parks and camping ground options within the Shire.
 - a. Retain caravan parks and camping grounds within the proposed Tourism Zone.
 - b. Introduce a ‘Camping Ground’ use class into the local planning scheme.
 - c. Advocate for review of the Caravan Parks and Camping Grounds regulatory framework to better enable the development of small scale, low service, hosted camping grounds. The Shire will advocate with the Department of Local government Sport and Cultural Industries for legislative change in the regulatory framework to allow for more flexible accommodation options.
 - d. Support the diversification of tourism accommodation types within caravan parks subject to the retention of a minimum of 50% of sites remaining for short-stay use by caravans and camping.
 - e. Investigate opportunities to enable small-scale, hosted camping grounds as an ancillary function of other land uses.
 - f. Investigate the development of an approval process for non-commercial camping grounds on private land and policy or local law provisions to guide where, how and the length of time that this is considered appropriate.

3.2.5.4 Holiday Homes/Accommodation

The 2021 Census recorded 905 vacant dwellings in the Shire, approximately 27.7% of the total number of residences (refer Figure 6). It is estimated that between 75% and 80% of vacant residences are used as private holiday homes, 15% as commercial holiday homes, and the remaining 5% to 10% are vacant for other reasons.

Figure 6: Unoccupied Dwellings

| | 2001 | 2006 | 2011 | 2016 | 2021 |
|-------------------|-------|-------|-------|-------|-------|
| Shire of Denmark | 27.5% | 32.2% | 33.2% | 29.2% | 27.7% |
| Western Australia | 10.0% | 10.7% | 12.1% | 13.3% | 10.9% |

Approximately 120 residences in the Shire are currently approved to operate as holiday homes. However, the Shire acknowledges there is a strong likelihood that unapproved holiday homes are operating. This figure does not include hosted bed and breakfasts, chalets and other forms of tourist accommodation approved under other use classes but potentially utilising the same booking platforms.

Holiday homes are an important component of tourist accommodation within the district, providing a wide range of self-contained accommodation options in a variety of locations. This enables visitation to the Shire, generating income and employment within the local community.

Notwithstanding, holiday homes in the Shire are regularly criticised for their impacts on:

- Residential amenity, due to noise and anti-social behaviour.
- Community capital, resulting from a high proportion of absentee landowners who have less connections into the community.
- Housing affordability and availability, due to the effect of inflated demand (particularly for more affordable housing) within a small housing market.

The local planning framework aims to ensure appropriate development and management practices to minimise the adverse impacts of holiday homes / home accommodation.

Number of Holiday Homes

Acknowledging concerns expressed by our community about the growing number of holiday homes, the STS supports further investigation of means to maintain a sustainable number of short-stay accommodation properties.

Although the Shire has a means of regulating commercially operated holiday homes through the local planning framework, this Strategy does not recommend introducing number-based restrictions or caps given the limited

number currently evident, the difficulty designing an equitable and effective mechanism, and the low likelihood of this having a significant influence on housing affordability and other concerns.

Numbers may be further monitored and investigation into management measures pursued in discussion with the State Government. Where considered necessary, commercial holiday homes may be prohibited in selected zones within the local planning scheme to reduce further growth in numbers.

The Strategy acknowledges that privately used holiday homes are far greater in number than commercial holiday homes. The Shire does not currently have a means of distinguishing between these and permanent residences within the local planning framework, nor do any reference points exist within the State planning framework.

The Strategy supports continued investigation and advocacy with the State for means to limit the number of residences within the Shire that are not permanently occupied, acknowledging that this trend reflects an inefficient and inequitable use of land, housing and natural resources.

Hosted and Unhosted Accommodation

The Levelling the Playing Field – Managing the Rapid Increase of Short-Term Rentals in Western Australia parliamentary report released in 2019 made a range of recommendations for changes to regulatory processes for short term holiday accommodation, including the differentiation of hosted and unhosted forms of tourist accommodation.

In December 2021, the WAPC published the Draft Position Statement: Planning for Tourism including proposed new and amended land use terms providing clearer distinctions between different types of hosted and unhosted holiday accommodation. This Strategy supports the adoption of these amended land use classifications.

Hosted accommodation that has on-site management typically has less noise, behaviour and car parking issues, better management responses, and supports community outcomes through locally based operators and associated services. Unhosted accommodation is serviced remotely and results in adverse effects being experienced more frequently.

This Strategy adopts a preference for the provision of hosted accommodation over unhosted forms of accommodation and recommends that changes are made to the local planning framework that reflect this position. This includes reducing limitations to hosted accommodation relative to unhosted accommodation.

Approvals and Exemptions

As the commercial holiday home industry has developed, a regulatory framework has been created and implemented to help manage relevant planning and management issues. The Shire's local planning framework has been consistent with the regulatory approach directed in the State policy framework prior to changes now proposed.

TPS3 currently allows for the establishment of a commercially operated holiday home or holiday accommodation in a range of zones subject to the approval of the Council. Requiring planning approval has allowed the Shire to consider the appropriateness of the land use, address bushfire and building compliance matters, consult with community and require a management plan to be prepared to address relevant issues.

The Draft Position Statement: Planning for Tourism proposes exemptions from the need for planning approval for unhosted accommodation in a single house, grouped or multiple dwelling that is let for no more than 60 days per calendar year, as well as for hosted accommodation catering for less than four guests. In the absence of a registration scheme these land uses could then occur without the need for any approvals or consideration of management practices.

This Strategy does not support any exemption from approval for commercial holiday homes for the following reasons:

- In the absence of a State-led registration scheme and legislated minimum management requirements, the opportunity to ensure appropriate development standards (including bushfire policy compliance and building code standards) and management practices through the planning framework is effectively lost.
- Proposed length of use restrictions cannot be verified in practice. This would create a complex and resource consuming compliance and enforcement responsibility for Local Government.

- This approach would remove the ability of the Local Government to determine areas where holiday homes are not supported – exempt holiday homes would be operating regardless.
- The distinctions made are arbitrary in determining whether the land use is appropriate or not.
- This approach provides an incentive to use holiday accommodation unproductively, effectively making a lesser use of housing resources.
- Exemptions from approval based around partial use will make it difficult to ascertain the predominant land use for rating purposes.

It is proposed that the Shire seek to retain requirements for planning approval to ensure the appropriate location and management of holiday accommodation, protecting the interests of our community. In the event the WAPC adopts these exemptions as deemed provisions in the Shire’s local planning scheme, it is appropriate that the Shire review the extent to which holiday homes are permitted.

Management and Compliance

The Shire’s local planning framework is proactive in managing the impacts of short-stay accommodation through the requirement for a property management plan as a condition of planning approval. This aims to ensure that a nominated property manager responds to complaints, a code of conduct is in place for occupants, fire and emergency responses are clearly understood, and amenity and management issues with car parking, pets and anti-social behaviour are adequately addressed.

In practice, the local planning framework is not sufficiently agile to ensure effective compliance, verification of evidence is difficult, and enforcement options are resource intensive. This Strategy does not support the introduction of any further requirements for the management of ongoing operational issues via the local planning framework, emphasising that the ongoing management of holiday accommodation is the responsibility of the accommodation manager, and that assistance is required from the State for the development and resourcing of a consistent and effective compliance regime.

It is recommended that the Shire continue to work with the State on the design and implementation of management and compliance options and reduce unnecessary requirements within the local planning framework.

Strategies & Actions – Holiday Homes/Accommodation

1. Continue to support the establishment of a variety of forms of tourist accommodation while minimising the impact of holiday homes within residential areas.
 - a. Continue to monitor the number of commercially operated holiday homes within the Shire, using zoning and land use permissibility in the local planning scheme to restrict the establishment of holiday accommodation (hosted and unhosted forms) where considered necessary.
 - b. Seek assistance from the State to investigate potential means, both within and outside of the planning framework, to limit the number of private holiday homes.
 - c. Retain requirements for planning approval for holiday accommodation (hosted and unhosted forms) and advocate against the imposition of mandatory exemptions by the State.
 - d. Work with the State on the design and implementation of management and compliance options for holiday accommodation.
2. Reflect in the planning framework support for hosted forms as the preferred type of tourism related accommodation.
 - a. Review land use classes in the local planning scheme to differentiate between hosted and unhosted forms of tourist accommodation, aligning with State guidance wherever possible.
 - b. Amend the local planning scheme to preference the development of hosted forms of accommodation, reducing requirements relative to unhosted forms of accommodation.

3.2.5.5 Rural Tourism

The extensive rural areas of the Shire play a key role in the success of tourism within the region. In particular, high value agricultural production is connected to food tourism, and dramatic natural and rural landscapes provide a visual experience and setting for eco-tourism. The growth in demand for these experiences is noted within State and regional planning documents and could potentially translate into development pressures within the Shire's rural areas.

A significant number of tourism enterprises currently exist on land zoned Rural in TPS3, and in some cases on land zoned Tourism that is otherwise isolated within a rural area. The reasons for this typically vary between the amenity provided by rural landscapes and views, diversification of agricultural or rural production businesses, and the availability of larger land parcels. Tourism land uses can be highly complementary to agriculture and add value to produce grown or reared on site; however, tourism can also compete with agriculture for access to land as well as creating conflict between the desire for amenity and common agricultural practices – which can produce odours, noise, and spray drift.

This Strategy seeks to preserve agricultural production and environmental conservation as the primary land uses within rural areas. Secondary land uses, such as tourism, will be supported where they do not compromise these primary land uses, unnecessarily fragment landholdings and increase land costs, and can meet the sustainability objectives of this Strategy. This position is consistent with State planning policies.

Some landholdings within rural areas are predominantly vegetated and may have limited agricultural potential. In these instances, conservation is considered the primary use of the land and support for tourism development will be considered where compatible with the preservation of ecological values

A wide range of tourism land uses can potentially be permitted within the Rural Zone; however, there is currently a lack of guidance of the appropriate scale of development and other assessment criteria to assist in reducing potential impacts. The Strategy identifies several tourism precincts within rural locations to accommodate and co-locate larger scale tourism proposals that are the primary use of the land, and where rezoning to facilitate tourism may be supported. Outside of these precincts tourism land uses are required to be a secondary use of the land, relatively small scale and low impact. The Strategy proposes a review of the local planning framework to reflect this intent, notably including policies which determine the number and location of tourist accommodation units that may be permitted on rural lots.

Many forms of tourist accommodation are considered a vulnerable land use under *State Planning Policy – Planning in Bushfire Prone Areas* (SPP3.7). While accessibility has been broadly considered as part of the designation of tourism precincts, proposals for tourist accommodation need to address the requirements of SPP3.7 on an individual basis.

Acknowledging the contribution that rural and natural landscapes provide to tourism, this Strategy also seeks to preserve visual landscape values in locations of importance and prominence. While many tourism businesses rely on directional and advertising signage, excessive and poorly designed signage can detract from the values that tourism relies upon, and the local planning framework may consider appropriate limits to preserve local character, landscape values and visual amenity.

Strategies & Actions – Rural Tourism

1. Support growth in tourism while preserving agricultural production and conservation as the primary uses of land within the Shire's rural areas.
 - a. Support the identification of tourism precincts to enable the establishment of larger-scale tourism developments in rural locations.
 - b. Review the local planning scheme and policies to establish tourism as a secondary land use within rural areas, providing guidance for the development of tourism at an appropriate scale so that it does not compromise agricultural production and conservation as the primary uses of rural land.
 - c. Support measures to minimise the impact of tourism development on visual landscape values in locations of importance and prominence.

3.2.5.6 Sustainability & Contributions

The STS identifies a community desire to increase the sustainability of tourism within the Shire. This Strategy plays a role in facilitating this outcome through:

- Proposing tourism precincts to promote a pattern of land use that enables investment in sustainable transport infrastructure and promotes business viability.
- Identifying principles to guide the design and assessment of new tourism land use and development proposals.
- Proposing measures to promote more sustainable building design and construction outcomes, applying to both residential and non-residential development (and including tourism).

Principles

To achieve the community's ambition for a more sustainable tourism industry, new land use and development proposals will be assessed against the following principles:

- Achieve a high standard of design and aesthetics in built form and minimise visual impacts within sensitive environments.
- Minimise the ecological impacts directly associated with the proposal and contribute to the betterment of environmental values in the surrounding area.
- Promote positive interaction between tourists and community, including (but not limited to) contributions to the local economy.
- Contribute to the improvement of collective community assets.

To embed these principles within the local planning framework, it is recommended that they are translated into development standards and application requirements within the local planning scheme and policies. This may include opportunities to incentivise achievement of these principles and the introduction of a metric-based approach to achieving minimum standards of sustainability.

Contributions

The STS recommends investigating opportunities for tourism-related businesses and visitors to contribute towards the ongoing costs of services and infrastructure for visitors. There are a number of ways to achieve this outcome, including through the adoption of a developer contributions plan that requires financial contributions from new development.

Should the Shire prepare a developer contributions plan for community facilities and infrastructure, a detailed assessment of the proportional use of these assets by tourists should be undertaken to inform an appropriate contribution rate for new tourism development. This mechanism would only apply to new tourism accommodation on a per unit basis and existing operations would not be levied.

If a designated Tourism Precinct has specific community infrastructure requirements, the Shire may similarly investigate a developer contributions plan to support the establishment or expansion of these facilities.

Strategies & Actions – Sustainability & Contributions

1. Identify and promote opportunities to increase the sustainability of tourism land use and development within the Shire.
 - a. Promote the development of the Tourism Precincts identified in this Strategy and opportunities to enable sustainable transport to these precincts.
 - b. Adopt principles for sustainability in tourism land use and development to provide guidance for the preparation of more detailed development standards, application requirements and incentives.
 - c. Incorporate tourism proposals within the consideration of a future developer contributions plan for community facilities and infrastructure.

3.3 Environment

3.3.1 Environmental Values & Resources

The Shire contains a diverse range of scenic attractions, rich biodiversity and pristine wilderness areas including a coastline of sandy beaches, rugged cliffs and sheltered inlets (refer Map 3). Several rivers weave their way from the mountainous hinterland to the ocean. Large uncleared forest and water catchment areas occupy the northern two-thirds of the Shire.

This section considers the state of the natural environment and provides an analysis of key issues and implications for the Shire's local planning framework.



3.3.1.1 Natural Environment and Biodiversity

The extensive coverage of remnant vegetation across the district contributes significantly to the Shire's scenic landscape amenity and economy. It also provides critical ecological services such as water and air purification and pollination of food crops. Biodiversity is intrinsically valuable for the health and well-being of the community and contributes to tourism and the natural beauty of the region.

The Shire is located within the Southwest Australian Ecoregion, which is recognised by Conservation International as one of 36 global biodiversity hotspots, containing high levels of flora and fauna diversity and many unique endemic species not found anywhere else. Within the Shire, naturally occurring vegetation consists of a wide variety of vegetation types including open and closed shrublands, woodlands, wetlands, and open forests. The Shire is particularly noted for its magnificent stands of tall karri trees. A considerable amount of forested land is preserved within National Parks and State Forests.

The Shire contains a diverse range of flora species, including over 20 listed as critically endangered, as well as around 20 species of native mammals. Since European settlement, numbers of locally endemic mammals have declined due to introduced predators and loss of habitat. Within the Shire, the Carnaby's Cockatoo and Baudin's Cockatoo are currently listed as endangered, the Chuditch, Western Ringtail Possum and Quokka are all listed as vulnerable, and a number of other specially protected species are present. The variety of vegetation types within the Shire supports many species of aquatic and terrestrial birds, with about 240 species of birds in total. There are approximately 12 species of native fish and many species of frogs including burrowing frogs. Although the Shire

contains many reserves and protected forest areas, a significant amount of endangered flora and endangered fauna habitat remains on privately owned land.

The natural landscape from pre-settlement times has changed significantly due to agricultural pursuits and forestry over many years. Extensive land clearing has resulted in a reduction of habitat for animal and plant species and an increase in soil salinity levels which affects all plant growth including native flora and agricultural crops.

Prioritised protection, management and regeneration of the Shire's ecosystems will significantly contribute to long-term prosperity and intergenerational equity, while also allowing the continuation of a sustainable local economy and tourism sector.

Protection of Ecosystems and Biodiversity

The planning framework can contribute to protecting areas of remnant vegetation, particularly on private land. Native flora and fauna within the Shire are vulnerable to the following threats:

- Climate change (increased temperatures, bushfire and reduced rainfall)
- Habitat loss and fragmentation from clearing for development
- Spread of dieback disease (Phytophthora Cinnamomi)
- Introduced animal and invasive plant species
- Extraction and damming of water sources
- Salinity associated with groundwater and surface water supplies

The Shire's local planning framework will continue to establish a balance between environmental protection, bushfire mitigation measures, and reasonable use of land for agriculture and urban development. Areas containing remnant vegetation subject to future urban and rural living development proposals are at particular risk as a result of earthworks, the creation of roads, driveways, fire breaks and the establishment of asset protection zones. Planning processes - including local planning scheme amendments, structure planning and subdivision - provide opportunities for the identification of species, as well as assessment of ecological condition and conservation value. Clearing of native vegetation on individual properties in a piecemeal fashion has the potential to erode biodiversity values and ecosystem functions at a broader scale, and therefore needs to be considered on a cumulative basis.

The Shire's TPS3 and existing strategies and policies could benefit from additional detail on ecological catchments, linkages, protection mechanisms and incentives. Preparation of a Biodiversity Strategy under the Shire's planning framework, including updated ecological mapping, could provide strategic analysis and recognition of the complex interrelationships between environmental features and ecological communities within a Shire-wide and bioregional context. Up to date detailed biodiversity mapping of species, ecological communities (rare, priority, threatened and endangered), catchments, and linkages sourced from relevant State Government environmental authorities, will provide an important tool to assist in providing a holistic and accurate analysis of environmental opportunities and threats. This information will provide decision-makers with effective tools to help make well-informed choices about future land use, development and management outcomes within the broader whole-of-landscape context.

In addition to identifying priority areas of remnant vegetation requiring protection, it is envisaged that a Biodiversity Strategy for the Shire would identify opportunities for regeneration, management and consolidation of habitat linkages across public and private lands. A Biodiversity Strategy could also investigate mechanisms to incentivise private land conservation and improve guidance on the Shire's position in relation to subdivision proposals for biodiversity conservation.



Strategies & Actions – Natural Environment & Biodiversity

1. Plan strategically for the protection and enhancement of environmental linkages, corridors and biodiversity.
 - a. Adopt the ecological linkages identified in Map 3 as the basis for guiding conservation initiatives, until detailed assessment of environmental linkages has been completed as part of a Biodiversity Strategy.
 - b. A Biodiversity Strategy and environmental asset mapping to be prepared, to provide clarity when determining which natural areas are locally significant and how they will be protected and regenerated in an integrated whole of landscape context. The Biodiversity Strategy and mapping should seek to address the following:
 - i. Develop a vision, objectives, and targets for biodiversity protection and management.
 - ii. Strategic ecological assessment of all natural areas, catchments and ecological linkages across public and private lands.
 - iii. Provide detail on biodiversity, habitat and ecological linkages in both rural and urban contexts.
 - iv. Formalise criteria for determining the significance of natural areas, taking into account diversity, rarity, and maintenance of ecological processes.
 - v. Include mechanisms to incentivise private land conservation.
 - vi. Provide guidance on subdivision proposals for conservation.
 - vii. Identify lands suitable for acquisition into the public conservation estate by either State or Local Government.
 - viii. Plan for the management of local reserves and other lands managed by the Shire to conserve biodiversity and water sources.
 - ix. Provide guidance for development applications in relation to clearing vegetation.
 - c. Prepare a 'greening plan' or similar to guide the maintenance and enhancement of tree cover within the Denmark Townsite.
2. Through the planning approval process, identify and preserve areas of remnant vegetation and seek to support the preservation of biodiversity when development occurs.
 - a. Adopt a position against clearing of remnant vegetation for development, prioritising the use of cleared land wherever practicable.
 - b. Introduce provisions into the local planning scheme to prohibit the clearing of remnant native vegetation on land in the rural zone.
 - c. Require detailed assessment of ecological values at the earliest possible stage of the planning process to inform decision making that avoids conflicts between these values and development.
 - d. Support the adoption of management plans to protect significant native vegetation, addressing such considerations as revegetation, water quality, fencing, and weed and pest control.
 - e. Clarify requirements for approval for the clearing of native vegetation in the local planning scheme and through the Department of Water and Environmental Regulation under the Environmental Protection (Clearing of Native Vegetation) Regulations 2004.
 - f. Require the use of local provenance native vegetation species for revegetation activities, including in public open space and streetscapes.
 - g. Ensure that appropriate setbacks and land management practices are in place for land adjoining the public conservation estate.
 - h. Introduce provisions into the local planning scheme and local planning policy detailing when and how the Shire will support offset planting and revegetation when the clearing of remnant vegetation occurs.

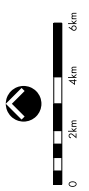
3. Review the local planning scheme to identify additional opportunities to prioritise conservation.
 - a. Introduce an Environmental Conservation Reserve classification into the local planning scheme and designate reserves by this classification where conservation is the primary purpose.
 - b. Introduce an Environmental Conservation Zone into the local planning scheme and identify appropriate landholdings to be incorporated into the zone.
 - c. Create a Significant Tree Register under the local planning scheme to identify established trees with high conservation and landscape values, including provisions for approval of works that may impact on registered trees.
 - d. Support voluntary conservation outcomes initiated by landowners, including landscape rehabilitation, the preparation of conservation management plans, introduction of covenants, and rezoning to the Environmental Conservation zone.



Map 3 Natural Environment



- Legend**
- Shire of Denmark local Government area boundary
 - National Parks
 - Nature Reserves and State Forests
 - Ecological Linkages



3.3.1.2 Water Resources

Rivers

The Denmark Townsite records an average of approximately 1,000mm of rainfall per year, making Denmark one of the wettest areas within Western Australia. This rainfall feeds many local waterways including Denmark, Kordabup, Kent and Bow Rivers, and their associated estuary and wetland systems. As shown on Map 3, the eastern boundary of the Shire follows the Hay River and on the western boundary the Frankland River divides the Shires of Denmark and Manjimup. These river systems are a valuable natural resource that provide:

- Natural drainage of land
- Aquatic ecosystems
- Habitat and wildlife corridors
- Natural beauty
- Recreation and tourism opportunities
- Cultural importance

Each of the Shire's river systems drain into inlets and swamps that have been shut off at least partially from the sea by limestone ridges, sand dunes or sandbars.

Effective stormwater management practices and the retention of remnant vegetation are critical to ensure erosion and nutrient export is minimised, while maintaining the health of these systems.

Environmental flows and the movement of aquatic species is also interrupted by the construction of on-stream dams and diversion of water away from natural waterways. The development of new dams should therefore be subject to assessment via the planning approval process.



Inlets & Wetlands

The Wilson Inlet covers an area of approximately 48km², 14km long, and 4km wide (refer Map 3). Wilson Inlet is fed by the catchments of the Hay and Denmark Rivers flowing through parts of the City of Albany and Shire of Plantagenet. The Wilson Inlet faces many threats, the most serious being nutrient flows from intensive agriculture within the surrounding catchments.

The Irwin Inlet is the second largest inlet in Denmark and is fed by the catchments of the Bow and Kent Rivers and the Karri Creek. Parry Inlet, located west of William Bay National Park, is fed by the Kordabup River catchment and flows into Parry Beach in William Bay.

While some sections of the Shire's waterways are well vegetated and protected by reserves, there is significant scope to restore fringing vegetation and riparian ecosystems. Rezoning and subdivision of land provides an opportunity for foreshore reserves to be widened, if required, and ceded free of cost to the Shire. Subdivision of any land which adjoins a foreshore reserve should include a detailed investigation into the adequacy of the width of the existing foreshore reserve by taking into account erosion processes, flooding characteristics, fringing vegetation, conservation of wildlife and possible sea level rises. Maintenance and ceding, where required, of foreshores should be required as a condition of subdivision approval for both ecological restoration and public recreation.

There are extensive areas of low-lying swamps in close proximity to the coast. Owingup Wetlands is one of the most prominent swamplands within the Shire as it is a refuge for many native species of wildlife. A Management Report for the Owingup Wetlands that was prepared in 2006 provides a number of recommendations for its ongoing management, which should be given due regard when considering subdivision and planning applications on land in the vicinity.

Groundwater

Groundwater is mostly found in the sedimentary rocks and surficial sands, but overall, the Shire lacks extensive groundwater resources. The two main types of aquifers within the Shire are:

- Surficial aquifer – local aquifers, with probable extensive sedimentary aquifer beneath, containing minor groundwater resources.
- Fractured and weathered rocks – local aquifers, containing very minor or no groundwater resources.

Whilst there is currently no plan to obtain additional potable water from groundwater resources, it is still vitally important to protect groundwater contamination from possible pollution sources and inappropriate development. There are currently no Department of Water proclaimed groundwater areas in the Shire.

Drinking Water Catchments

The Quickup River and the Denmark River catchment areas are the only two active Public Drinking Water Source Areas (PDWSA) that supply potable water for the Shire. The Department of Water and Environmental Regulation (DWER) has prepared Drinking Water Source Protection Plans (DWSPP) for both sources. These plans identify risks to water quality and guide land use in the catchment areas.

DWER recommends that the Shire apply Special Controls Areas over both PDWSAs within the Shire's local planning scheme in order to protect drinking water sources from inappropriate land use.

The Water Corporation conducted the 'Water Forever' study in 2010 to provide direction for future water supplies for the Shire. In addition, DWER has prepared a Regional Water Plan for the Great Southern Region to provide specific direction on water resource needs, including potable water. A recently constructed water pipeline from Albany connects Denmark to the Lower Great Southern Towns Water Supply Scheme, reducing the Shire's reliance on localised dam storage which is unlikely to be sufficient given recent patterns of reduced rainfall.

Quickup River Dam Catchment

Quickup River Dam is located about 6km north of Denmark Townsite and its catchment is 29km². It is the primary source of the two surface water sources currently operated by the Water Corporation for supply of public drinking water to Denmark Townsite. The Quickup River Catchment Area was proclaimed in 1990 under the Country Areas Water Supply Act 1947 to ensure protection of the water source from potential contamination. Approximately 99% of land within the catchment area is within National Park reserves. Drainage from the only private lots is diverted away from the dam wall and outside of the catchment.

Denmark River Dam Catchment

Until the late 1980s, the Denmark River dam was the primary source of public drinking water for the Denmark Townsite but is now secondary to Quickup Dam due to the higher salinity levels contained in the water. The catchment lies predominantly north of the townsite and is over 567km² partially extending into the Shire of Plantagenet. Approximately 25% of the catchment is in private ownership which has led to about 17% of catchment being cleared for agricultural use. Land clearing is the predominant cause of the increased salinity and turbidity of the drinking water.

Strategies & Actions – Water Resources

1. Protect and conserve the quality and quantity of the Shire's surface and groundwater resources.
 - a. Appropriately manage the development of new dams:
 - i. Ensure that new dams are located off stream so that flow is maintained unrestricted.
 - ii. Consider catchment plans in the assessment of proposals for new dams to ensure that the security of water and health of waterways downstream is not adversely impacted.
 - iii. Investigate restrictions on the development of new dams for non-productive uses (e.g. aesthetic purposes).
 - b. Introduce a 'Public Drinking Water Source' Special Control Area into the local planning scheme. Apply this Special Control Area to land included within identified Public Drinking Water Source Areas (PDWSA), including the Quickup and Denmark River dam catchments. Introduce provisions into the local planning scheme to restrict inappropriate land use and development.
 - c. Consider water management as appropriate at each stage of the planning approval process, demonstrating maintenance of pre-development water flows and water sensitive urban design.
 - d. Consider relevant recommendations from catchment and reserve management plans in the assessment of land use and development proposals, particularly in rural areas, and in the preparation of a new local planning scheme.
 - e. Utilise land use controls and enforceable management protocols to prevent contamination of drinking and agricultural water supplies from pollutants and nutrient export.
2. Protect, manage and rehabilitate riparian areas to maintain and enhance water quality, ecosystem function, biodiversity, recreational and scenic values.
 - a. Support the replanting of endemic species of vegetation in strategic locations such as waterways and drinking water catchments.
 - b. When assessing subdivision applications, rezonings, and structure plans which include land adjacent to a waterbody, consider the widening of foreshore reserves, or requiring the establishment of foreshore reserves.
 - c. Preserve or re-establish vegetated buffer areas adjoining rivers, watercourses and wetlands.
 - d. Consider publications, such as the DWER's Operational Policy 4.3 Identifying and Establishing Waterways Foreshore Areas, in the assessment of proposals.
 - e. Refer proposals to the DWER where the Local Government considers that a proposal would impact catchment area management.

3.3.1.3 Landscape Values

The planning framework refers to 'landscape values' as a way to describe the amenity, character, and sense of place that we ascribe to our surrounding views, scenery and environment. The role of this Strategy is to identify landscape values and help to set the objectives and policies for their protection and enhancement.

Due to the natural topography, vegetation types, and limited extent of development, the Shire is fortunate to contain a variety of unique views and landscapes which are highly valued by both the local community and visitors alike. These contribute to our sense of place as well as providing a range of social and economic opportunities. This was recognised through preliminary consultation for this Strategy and featured prominently as part of community engagement for the Shire's Sustainable Tourism Strategy.

This Strategy seeks to preserve visual landscape values as a public asset, acknowledging that this may inhibit development opportunities on private land to achieve the community's preferred outcomes.



This Strategy does not consider the preservation of a view that may be evident from private land, and how a landowner may take advantage of a view through development. This approach is consistent with the established planning framework and case law which demonstrates that a private view cannot be legally owned and is not a valid planning consideration. A private view may be incidentally preserved through planning provisions that direct a consistent approach to what constitutes appropriate development in the broader context of landscape values (e.g., boundary setbacks, height restrictions).

Identifying Values

To identify where landscape values exist within the district, the Shire commissioned the preparation of a Visual Landscape Evaluation (VLE). The VLE takes a methodological approach to identifying landscape areas that demonstrate certain types of characteristics, in accordance with the WAPC Visual Landscape Planning in Western Australia manual.

This assessment incorporates consideration of the cultural values that we ascribe to certain landscape types, view experiences and local places. This includes the landscape values that are broadly accepted within Western Australia (as described in the Visual Landscape Planning manual), those that have been put forward by our local community (including places nominated through preliminary consultation for this Strategy), and the cultural values of Traditional Custodians (through recorded heritage sites).

As outlined in Figure 7, the VLE identifies high value landscape types within the Shire and the attributes that contribute to their perceived values.

Figure 7: Landscape values within the Shire

| Landscape Feature / Character Unit | Value description |
|------------------------------------|---|
| Native vegetation | <ul style="list-style-type: none"> • Areas of highly diverse remnant vegetation with varying height, colour and species • Gradual and naturally appearing transition zones between rural land uses and surrounding remnant vegetation • Strongly defined patterns of coastal heaths, peppermint / paperbark woodlands and dune vegetation • Distinctive remnant vegetation located along drained lines, roadsides and in paddocks • The bushland is a valuable asset for the South Coast Noongar people and an intrinsic part of their cultural identity (Guilfoyle, 2011) |
| Forested Hills | <ul style="list-style-type: none"> • High degree of topographic variety • Hills, ridges and peaks that are focal points (Plate 57) • Undulating and steeply sloping terrain |
| Coastal Hills | <ul style="list-style-type: none"> • High degrees of perceived naturalness • High degree of topographic variety • Distinctive landscape features (e.g. Point Hillier) • Seascapes • Steep and irregular dunes |
| Coastal Edge | <ul style="list-style-type: none"> • Seascapes (combination of ocean, reefs, beach, dune formation, coastal rocks, coastal vegetation) |
| Waterbodies | <ul style="list-style-type: none"> • The South Coast Noongar people consider all natural water sources within the Shire to be equally important and the health of these systems are intrinsic to their culture (Guilfoyle, 2011) • Presence of water bodies (waterfalls, rivers, estuaries, oceans, lakes, inundated areas)(Plate 54) |
| Rural Hills | <ul style="list-style-type: none"> • High degree of topographic variety (Plate 55) |
| Tall Forest | <ul style="list-style-type: none"> • Unique stands of vegetation such as tall Karri and Tingle Trees (Plate 56) • Distinctive remnant vegetation located along drained lines, roadsides and in paddocks |

Shire of Denmark Visual Landscape Evaluation, Ecospace, 2022

The VLE maps areas where these high value landscape types exist.

The VLE also identifies a number of key viewpoints and routes that provide vantage points of the high value landscapes within the region.

Potential Impacts & Responses

Landscape values can potentially be impacted by a range of insensitive forms of development, including:

- Poorly located development – for example, development that blocks views or is sited within view corridors and above ridgelines.
- Incompatible development design – reflective materials, contrasting colours, inconsistency with natural landform and features (e.g., extensive cut and fill).
- Signage – inappropriate design or location, clustering of signage, inconsistency of type, imposition on visual environment.
- Inappropriate land use – for example, tree farms that may block public views or industrial development within a view corridor.
- Clearing – diminishment of natural setting, loss of diversity/ hardening of visual environment, reduced visual buffering to development, reduction in scale of natural features such as ridges.

Potential impacts on visual amenity vary according to the features of the surrounding landscape and the form of the proposed development. Impacts are likely to be more pronounced when development occurs in elevated positions within the landscape, in prominent locations and in closer proximity to viewpoints.

Insensitive development is more likely to occur on private freehold land in close proximity to the Denmark Townsite and key tourist routes due to the commercial imperatives to maximise visibility, views and accessibility.

The local planning framework can be utilised to help preserve landscape values by seeking to avoid or mitigate the impacts of changes to land use and development. This Strategy proposes a range of actions to incorporate better safeguards that achieve this outcome for the community while not unduly constraining development opportunities.

The planning responses proposed in this Strategy are targeted to locations where:

- There are clusters of high value landscapes, typically incorporating a variety of landscape types.
- Priority areas of landscape value that are visible from key public vantage points, tourist routes and recreational trails.
- Development pressures exist.
- Land use change has been identified by this Strategy.
- Land ownership is predominantly private freehold.

Strategies & Actions – Landscape Values

1. Recognise and seek to preserve the outstanding landscape values of the district by guiding appropriate forms of land use and development and promoting the retention of remnant vegetation. Prioritise key locations, tourist routes and recreational trails, and areas subject to development pressure.
 - a. Minimise the potential impacts on landscape values and visual amenity from residential growth:
 - i. Where a structure plan has not yet been prepared or is under review, require the preparation of a Visual Impact Assessment and incorporate appropriate design modifications and/or conditions as considered necessary.
 - ii. Where a structure plan is already in place, require the preparation of a landscaping plan at subdivision stage to demonstrate how remnant vegetation will be retained and how public open space and streetscapes will be developed to achieve visual landscape objectives.
 - iii. Incorporate visual buffers to recognised tourist routes, retain tree-lined entrances to the Denmark Townsite and retain remnant vegetation to provide visual relief amongst developed areas.

- b. Introduce a Landscape Values Special Control Area into the Shire's local planning scheme as shown in the Strategy mapping. This Special Control Area will be applied to all zones within this area excluding land within the Residential, Commercial, Service Commercial and Industrial zones.
- c. Prepare a local planning policy for land use and development proposals within the Landscape Values Special Control Area.
- d. Introduce provisions into the local planning scheme and/or policy establishing appropriate minimum setback distances to development from recognised tourist routes within the Rural, Environmental Conservation and Tourism zones, with site by site exceptions considered through planning assessment.
- e. Recognised tourist routes include: South Coast Highway, Denmark – Mount Barker Road, Nornalup – Tindale Road, Scotsdale Road, Mt Shadforth Road, McLeod Road, Happy Valley Road, Mt Lindesay Road, Churchill Road, Ocean Beach Road, Lights Road, William Bay Road, Parry Beach Road, Boat Harbour Road, Peaceful Bay Road, Valley of the Giants Road, Conspicuous Beach Road, Ficifolia Road, Bibbulmun Track, Munda Biddi and Denmark-Nornalup Heritage Rail Trail.
- f. Consider landscape values and reference the Visual Landscape Evaluation as part of the assessment of all relevant planning proposals.
- g. Support strategically coordinated revegetation initiatives (ecological linkages, urban greening, etc.) to prioritise landscape values.
- h. Support review of scheme and policy provisions for signage and entry statements to minimise negative impacts on identified landscape values, tourist routes and viewpoints.



3.3.1.4 Basic Raw Materials

The extraction of sand, gravel, lime, stone and other basic raw materials is essential for home building, road construction, agriculture and a range of other industries.

Basic raw material extraction can only take place where these resources naturally occur, and due to their low yield compared to volume, basic raw materials are not generally viable to transport over long distances. Provision of these materials within the district significantly reduces transport costs and supports local self-sufficiency and employment.

Maintaining these resources to meet current and future needs is an important component of land use planning for rural areas. Preserving access to these resources by avoiding the development of incompatible land uses (for example, rural living estates, significant tourism accommodation developments and other potentially sensitive land uses) is a key consideration. Further, rural subdivision may also compromise this outcome.

Land where these resources exist should not generally be developed for other permanent use until these resources are extracted, unless development is compatible with the future extraction of the resource. This principle, adopted directly from *State Planning Policy 2.5 - Rural Planning* (SPP 2.5), is potentially highly limiting to other land uses and will be considered on a case-by-case basis.

Limestone and limesand deposits within the Shire are restricted to a narrow coastal strip extending inland from the coast for a distance between 1-3km. Additionally, laterite rock distributed throughout the Shire is a potential source of gravel, as well as having potential for bauxite and clay. The Department of Mines, Industry Regulation and Safety (DMIRS) has not identified any basic raw material areas with State significance (Significant Geological Supplies) within the Shire.

While a critical resource, the extraction of basic raw materials must also be balanced with the potential impacts of their extraction on the community, natural environment and other surrounding land uses.

The mining and processing of basic raw materials can create noise, dust, visual blight, traffic and other varying concerns that impact on residential and other sensitive land uses. The implementation of appropriate controls on extractive industries to limit land use conflict and ensure appropriate rehabilitation is guided by *State Planning Policy 2.4 - Basic Raw Materials* (SPP 2.4) and detailed in *Local Planning Policy 34 - Extractive Industry*.

Strategies & Actions – Basic Raw Materials

1. Prevent the loss of access to basic raw materials through inappropriate land use and development outcomes.
 - a. Limit and avoid future sensitive land uses (such as residential development) near basic raw material and mineral extraction operations.
 - i. Ensure appropriate buffers are established and maintained surrounding extraction operations.
 - ii. Avoid the encroachment of residential, rural residential and other sensitive land uses in rural areas.
 - b. Should an extractive industry site or resource be of a significant size and/or require long term protection, consider the introduction of a Special Control Area in the local planning scheme in accordance with *State Planning Policy 2.4 - Basic Raw Materials*.
2. Minimise the impacts of the extraction, processing and transportation of basic raw materials and mineral resources on the environment, community and surrounding land uses wherever possible.
 - a. Review the Shire's Extractive Industry local planning policy provisions for extractive industries to ensure the extraction of basic raw materials occurs in accordance with best practice safeguards and protections.

3.3.1.5 Ecological Sustainability

Community feedback during preliminary consultation for this Strategy was consistent with the Shire's Strategic Community Plan in affirming a strong desire to prioritise ecological stewardship. This recognises concerns over the global environmental crises, driven by climate change and the over-consumption of natural resources, resulting in pollution, biodiversity loss and an increasing severity of natural hazards. While these crises may appear far removed or irrelevant to the Shire's local context and planning framework, many of our everyday decisions locally regarding transport, housing, food and energy have significant implications for the natural environment in local, regional and global contexts.

In March 2021, the Shire adopted a *Sustainability Strategy* (2021-2031) and Sustainability Action Plan to provide guidance for how the Shire can lead and support our community to become more ecologically sustainable. The *Sustainability Strategy* adopts the 'One Planet Living' sustainability framework, a sustainable development planning tool that takes a holistic approach to the identification and implementation of sustainability goals, developed with the following vision:

"Thriving regional economies where we meet more of our needs from local, renewable and waste resources, enabling people to live happy, healthy lives within the natural limits of the planet, leaving space for wildlife and wilderness."

The 'One Planet Living' framework recognises ecological overshoot since the 1970s, with the ecological footprint of human life consuming more energy and materials than our natural environment can sustain. Globally this footprint is currently (2022) the equivalent of using 1.75 planets to provide the resources we use and to absorb our waste. This figure is substantially higher for the average Australian (4.6 planets), reflecting global inequalities in resource use. Therefore, the 'One Planet Living' framework implies a necessity for most Australian communities to undergo a significant contraction of resource and energy demands in order to live within the earth's limits.

Recent technological developments will undoubtedly play a significant role in the Shire's transition toward ecological sustainability and 'One Planet Living'. Rooftop solar power, wind power and electric vehicles are three local examples that are now a common sight throughout the Shire, with increasing uptake and acceptance by the community. However, the ecological footprint of these technologies includes social and environmental impacts which are less obvious and not visible within our local community. Reliance on the extraction of precious metals and other minerals to produce green technology may result in an intensification of global mining, manufacturing and transport, all of which are energy and resource dependant, and can result in the destruction of natural ecosystems and precious sources of freshwater.

It is therefore important to consider the ecological and social impacts of the resource extraction and supply chains that are required for new systems of energy, transport and infrastructure, to avoid decarbonising our economy by substituting one kind of harm for another.

This Strategy acknowledges that a cultural shift is required to address levels of consumption in accordance with Earth's living systems and ecological capacity. 'One Planet Living' requires the responsible use of technology, balanced with a planned reduction of energy and resource use designed to bring levels of consumption back into balance with the living world in a way that reduces inequality and improves human well-being. Our community is well-positioned to address these challenges, with a strong culture and history of grassroots environmental protection and sustainability, and an ability to meet many of the community's needs locally.

This Strategy acknowledges that the sustainability challenges we face require innovation, forward thinking and adaptation. While this Strategy cannot address all of these challenges, it seeks to integrate a broad range of strategies and actions into the local planning framework, specifically in relation to the local economy, tourism, housing, water, renewable energy, transport, agriculture and the protection of ecosystems.

3.3.2 Natural Hazards & Resilience

As with many communities in Western Australia, the Shire is located in an area where the risk of bushfire, coastal inundation, storms, heatwaves and flooding hazards exist. With a changing climate it is expected that there will be an increase in the intensity and frequency of major weather events. The effects of climate change, population growth (including visitors) and future development within the locality will likely increase the community's vulnerability to natural hazards and changing weather patterns.

Risk from natural hazards is determined by a community's level of exposure and vulnerability to current and future hazards. The emotional, physical, and financial consequences of disasters can be immense. Local governments are the closest level of government to their communities and have access to specialised knowledge about the local environment and demographic features of their communities.

Land use planning plays an important role in reducing current and future community risk to natural hazards and can help facilitate long term resilience to the changing nature of these disaster events. Ensuring that land uses are located to minimise risk and that development incorporates safeguards that are critically important in avoiding harm to life and property.

The objective of *State Planning Policy 3.4 – Natural Hazards and Disasters (SPP 3.4)* is to include natural disasters as a fundamental element in the preparation of all statutory and strategic planning documents. The WAPC sets out the planning framework for natural hazard land use planning across Western Australia. Other key State Planning Policies of relevance to the Shire include *State Planning Policy 3.7 – Planning in Bushfire Prone Areas (SPP 3.7)* and *State Planning Policy 2.6 – Coastal Planning (SPP 2.6)*.

The following sections outline the impacts of climate change on the South West region, the most prominent natural hazards impacting the Shire, and the planning instruments, studies and strategies that contribute to minimising the adverse impacts of natural hazards on our community, economy, and environment.

This Strategy makes a number of recommendations that acknowledge the impact of natural hazards and the changing climate on our community and environment, and seeks to propose appropriate measures within the local planning framework to enhance long term community resilience.

3.3.2.1 Climate Change

Climate change is a pressing global issue that creates many challenges. Responding to climate change is a shared community and government responsibility, with action required at both individual and collective levels. Acknowledging the Shire's role in responding to the challenge, Shire Councillors passed a Notice of Motion in September 2019, declaring a climate emergency and aligning itself to 2016 Paris Agreement Targets.

The South West region is becoming warmer and drier. The State of the Climate 2020 Report released by CSIRO and Bureau of Meteorology encapsulates the most recent climate research, encompassing observations, analyses, and projections to describe year-to-year variability and longer-term changes in Australia's climate. The State of the Climate 2020 Report outlines the following data:

- Australia's climate warmed on average by 1.44 (± 0.24) degrees Celsius between 1910 when national records began and 2020, leading to an increase in the frequency of extreme heat events.
- Rainfall in South West and South East Australia has been declining in recent decades and is projected to likely decline further, especially in the cooler half of the year. There has been a decline of around 16% in April-October rainfall in the southwest of Australia since 1970. Across the same region, May-July rainfall has seen the largest decrease, by 20% since 1970.
- There has been an increase in extreme fire weather and in the length of the fire season across large parts of the country since 1950s, especially in southern Australia.
- There has also been warming across large areas of the Indian Ocean region to the southwest of Australia.
- Oceans around Australia are acidifying and have warmed by around one degree Celsius since 1910, contributing to linear and more frequent marine heatwaves.
- Sea levels are rising around Australia, including more frequent extremes, increasing the risk of inundation and damage to coastal infrastructure and communities.

While climate change is a global issue, the district can take preventative and adaptive measures necessary to build on economic, social and environmental resilience. The two main management approaches are:

- Adaptation - involves identifying the inevitable risks of climate change and developing measures to adjust and adapt to these impacts to reduce the district's vulnerability; and
- Mitigation - involves identifying the causes of climate change and progressively addressing these.

The Shire is committed to being a leader and role model within the community in sustainable practices and carbon reduction initiatives; and will act as facilitator for the community to transition to more ecologically sustainable outcomes. This Strategy seeks to implement and encourage a proactive approach to climate change adaptation and mitigation throughout the Shire's local planning framework.

3.3.2.2 Coastal Protection

The Shire has a coastline covering 84km of mostly undeveloped coast, with the majority of this land contained within Conservation Reserves or National Parks, managed by Department of Biodiversity, Conservation and Attractions (DBCA) - Parks and Wildlife. The Shire manages four major coastal reserves, located at:

- Ocean Beach (614 ha);
- Peaceful Bay (83ha);
- Parry Beach (223 ha); and
- Boat Harbour (59 ha).



The Shire's management of its coastal reserves is detailed in the Coastal Reserves Management Strategy and Action Plan 2010 – 2020. This plan prioritises management recommendations for coastal reserves relating to environmental protection, rehabilitation and future land uses.

State Planning Policy – Coastal Planning (SPP 2.6) supports a risk-management approach and provides a framework for undertaking coastal hazard risk management and adaptation planning for coastal hazards in Western Australia. Coastal hazard risk management and adaptation planning is an integral part of decision-making for sustainable development and land use in coastal zones.

Coastal Hazard Risk Management and Adaption Planning for Ocean Beach and Peaceful Bay (2018)

Recreational and tourism demands on the Shire's coastlines vary. Coastal development in the Shire is concentrated around the coastal nodes of Ocean Beach (south of Denmark Townsite) and Peaceful Bay (approximately 40km west of Denmark Townsite) which have been considered the highest value coastal reserves under the Shire's management. As such, a Coastal Hazard Risk Management and Adaption Plan (CHRMAP) was prepared for these two coastal areas, identifying adaptation responses to erosion and inundation of coastal assets.

Ocean Beach

Ocean Beach is a popular beach for residents and visitors alike. It is the Shire's main recreational beach, being used for surfing, swimming and boating. The infrastructure at Ocean Beach provides highly valued community assets. Coastal infrastructure and beach access is provided along a 400m section of the beach, including Denmark's Surf Life Saving Club (Denmark SLSC). Redevelopment of the Denmark SLSC building and associated infrastructure is planned for the future.

The following points summarise the coastal process at Ocean Beach as identified in *Coastal Hazards Issues Paper – Ocean Beach and Peaceful Bay (2018)*:

- The vegetation line has eroded about 7m, south of the Denmark SLSC since 2002. The nature of this erosion may be episodic, and there is capacity for the dunes to recover between events, however, historically this represents a net erosion trend in the order of 0.5m per year.
- Net erosion has not occurred at the Denmark SLSC due to the timber seawall.
- The beach to the north near the entrance has been relatively stable due to rock controls along the back of the beach limiting the landward extent of erosion.

Peaceful Bay

Peaceful Bay is a relatively calm swimming beach, which is also used for beach launching for recreational vessels. The coastline north of Peaceful Bay boat launching area, in Foul Bay, has eroded approximately 15 metres between 2002 and 2014, resulting in impacts on infrastructure in this location. If the current rate of erosion continues, the Shire is concerned about future threats to Peaceful Bay Road, which is an important access route to the Peaceful Bay settlement.



The following summarises the coastal processes identified at Peaceful Bay (and Foul Bay) as outlined in *Coastal Hazards Issues Paper – Ocean Beach and Peaceful Bay (2018) (Coastal Hazard Issues Paper)*:

- The swimming beach in Peaceful Bay has been relatively stable since 2002 due to rock headlands providing a stable shoreline.
- The vegetation line has eroded between 16 and 24 metres at Foul Bay, to the north of the boat launching area since 2002. Erosion and/or removal of a number of structures was evident. While erosion is associated with storms, and there is capacity for the dunes to recover between events, a net erosion trend in the order of 1.4 metres per year was observed. Progressive realignment of the shoreline and net loss of sediment may be occurring and requires consideration in the risk analysis phase.

Community consultation highlighted the high social value placed on coastal assets throughout the Shire and the importance of maintaining these assets through sensitive adaptation strategies.

A 10 year concept plan has been prepared by the Shire, in consultation with the stakeholder reference group, for the development of coastal assets at Ocean Beach and Peaceful Bay. This precinct plan follows previous coastal planning work for the *Coastal Reserves Management Strategy in 2011* and an earlier *Coastal Management Plan 2003 – 2008*. This Strategy supports the recommendations outlined within the CHRMAP for Ocean Beach and Peaceful Bay.

This Strategy acknowledges that in the longer term, coastal adaptation will require the Shire and local community to gain further understanding of the unique behaviour of the local beaches through systematic coastal monitoring, to investigate how these particular beaches may respond to future sea level rise and changing climate. In addition, coastal adaptation options and infrastructure placement will require careful consideration to provide longer term access and suitable public facilities at these highly valued coastal areas.

3.3.2.3 Flooding Risk

Flooding has a natural and important environmental role, including replenishing wetlands, transporting nutrients and triggering the life cycle stages of many plants and animals. For this reason, the natural ecological and drainage function of rivers, watercourses and floodplains must be maintained wherever possible to avoid unintended environmental impacts.

Flooding also presents a significant risk to life and property. In this respect, State and Local Governments have a responsibility to minimise the potential for flood damage caused by decisions relating to the use and development of land within areas subject to flooding. Land use and development should not increase the risk or impact of major flooding to lives or property. Therefore, land and development within the floodplain must be carefully controlled and managed.

The Shire has a number of localised issues with flooding that are managed according to the circumstances. The majority of Denmark Town Centre and nearby areas are not prone to flooding due to a combination of the majority of the town being on high undulating ground and the artificial opening of the Wilson Inlet sandbar. There are some flood prone areas adjacent to the Wilson Inlet where TPS3 currently imposes a minimum 2.5m AHD building floor height.

The water level of Wilson Inlet, and consequently the lower reaches of the Denmark River, are regulated by the Water Corporation, DWER, and the Shire. The three agencies are all party to a Wilson Inlet Sandbar Opening Protocol (last revised in 2009) which provides a detailed management regime for the monitoring of water levels and the timing and location of opening the sandbar. The Wilson Inlet Sandbar Opening Protocol is currently under a review process. The Shire will consider the release of the revised protocol and update the local planning framework accordingly.

New urban development areas should address flood management by assessing potential flood risks and setting aside sufficient areas for on-site drainage retention and utilise best practice water sensitive urban design measures.

It is also recognised that flood studies have previously been prepared for Bow Bridge and the Denmark River. Within rural environments flooding risk should be assessed on a case by case basis, to assess any flooding risk to the proposed land use posed by specific site conditions.

3.3.2.4 Bushfire Risk

Due to the Mediterranean climate, natural topography, and extent and type of remnant vegetation, most areas within the Shire have a high risk of bushfires during the November to April period. While bushfires are an inherent part of the Western Australian environment, the risk of loss of life and property has been increased because of reduced rainfall, changes in weather patterns and an increasing amount of development. Although living amongst the natural environment is a key attraction of the district, this is accompanied by an increased risk of bushfires. The frequency and intensity of bushfires in the South West of Western Australia are expected to increase due to reduced rainfall and a warming climate.

The local planning framework plays an important role in helping to reduce the vulnerability of our homes, businesses and infrastructure in the event of a bushfire. This is achieved by avoiding the establishment of developments and vulnerable land uses in high risk locations, providing appropriate access for escape, and ensuring that emergency response and risk mitigation measures are in place.

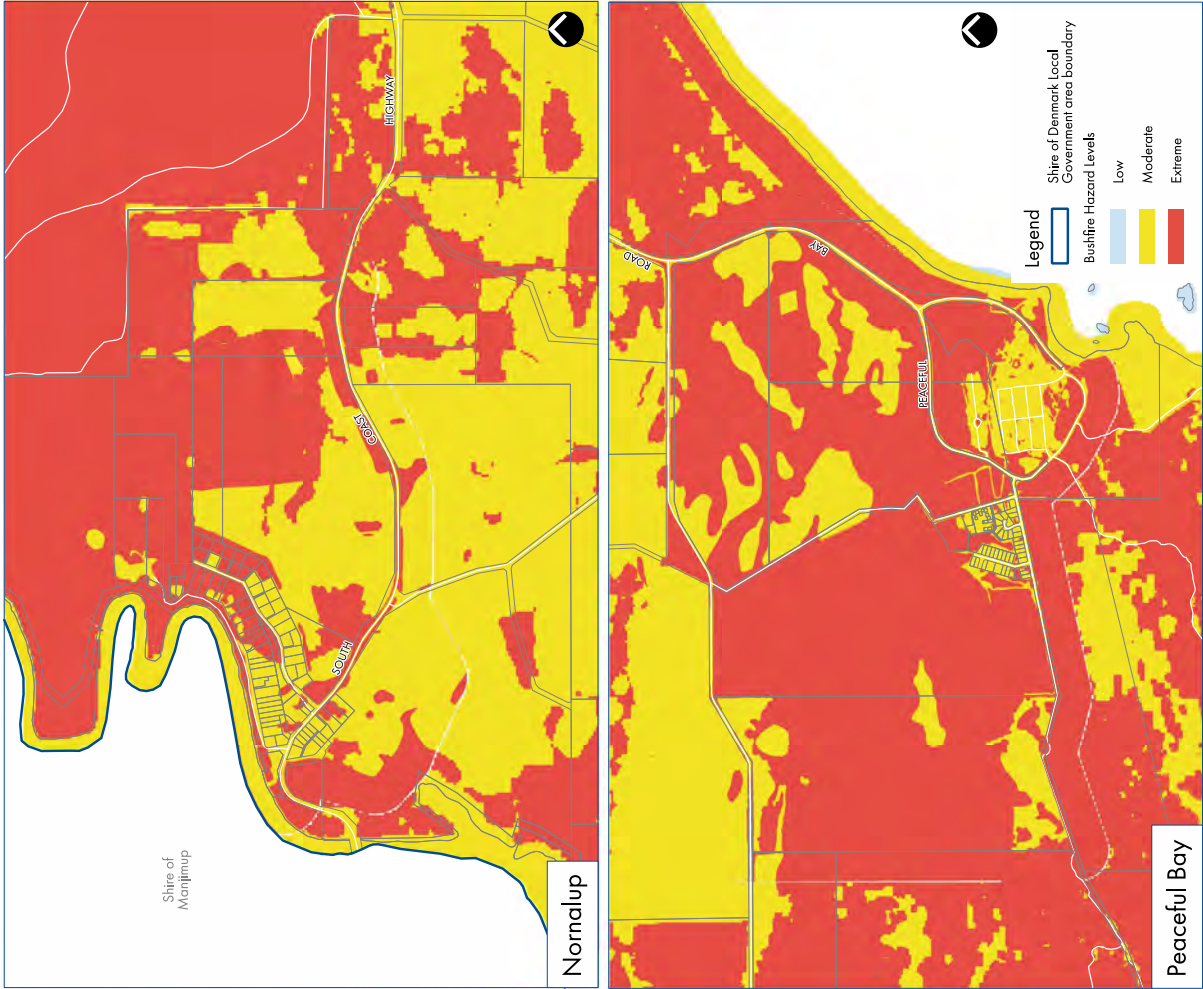
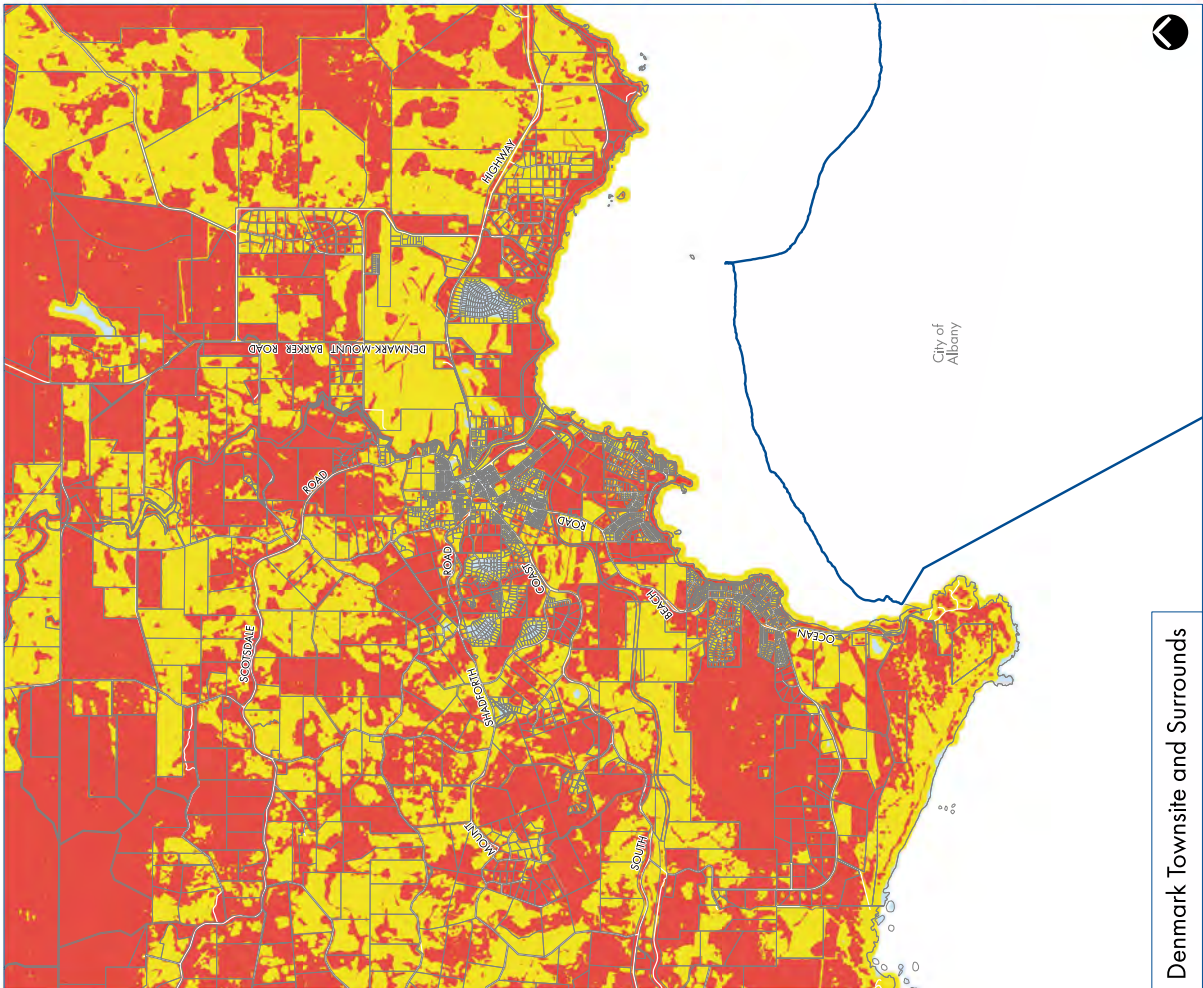
Addressing bushfire risk in land use planning is guided by SPP 3.7 and the Planning for Bushfire Protection Guidelines, which provide direction on how to approach bushfire considerations through each stage of the planning process.

Due to the extent of remnant vegetation, the majority of the Shire has been designated as being within a bushfire prone area under the Department of Fire and Emergency Services' (DFES) Map of Bushfire Prone Areas. This requires assessment of bushfire risk and development standards in accordance with established state policies, which has increased the level of complexity for a significant number of land use and development proposals.

Consistent with SPP 3.7, a Bushfire Hazard Level Assessment (BHL Assessment) has been undertaken to inform this Strategy, as seen below in Map 4. The BHL Assessment undertakes broad scale mapping of slope and vegetation to identify the potential risk to development from bushfire as low, moderate and extreme risk. A BHL Assessment is used to inform strategic-level decision making when land is assessed for potential future development.

Map 4

Bushfire Hazard Levels



Acknowledging the significance of the State Government framework for bushfire management, this Strategy intends that future growth and development be carefully guided to avoid and minimise bushfire risk wherever possible. The Strategy achieves this by promoting a consolidated settlement pattern, encouraging infill development and identifying land for housing in locations where bushfire risks and environmental impacts are lowest.

The Strategy does not support low-density sprawl of rural living estates, which can increase the number of properties potentially exposed to a fire front. These directions are consistent with the Strategy's intent to minimise impacts on the natural environment and improve the sustainability of development.

This also supports several departures from the Shire's 2011 LPS, which identified a number of landholdings as having the potential for development that are no longer considered appropriate with a contemporary understanding of bushfire risk.

In situations where development outcomes are limited by the need to minimise bushfire risks, the Shire may consider proposals to vary development standards to support development viability where this does not unduly compromise environmental or other planning considerations. For example, clustering lots of a reduced minimum size within cleared parts of a development site may improve development, bushfire risk and environmental outcomes.

At the time of preparing this Strategy, the Shire was in the process of reviewing the February 2022 Bayview Rise bushfire incident. This has included discussion with DFES, local brigades and the community to understand their experiences and the lessons learned, to inform future planning for bushfires and other emergencies. The outcomes of these discussions and investigations may inform land use planning and development processes, as well as ongoing management practices.



Past Development

With many significant changes to planning requirements over the past 10-15 years, the majority of development within the Shire preceded what we now consider to be best practice for minimising risks from bushfires. As a result, there are many instances where development lacks adequate secondary access or otherwise demonstrates vulnerability to bushfire. This Strategy acknowledges the recommendations of the BHL Assessment undertaken as part of preparing this Strategy and the Bushfire Resilience in the Great Southern (BRIGS) report and will seek to achieve these outcomes through the local planning framework where possible.

Asset Protection Zones

An Asset Protection Zone (APZ) is an area around a habitable building where potential fire fuels are reduced to limit the potential impact of a bushfire. Vegetation management within an APZ should provide defensible space and be maintained to a low threat state. The standards for APZs are prescribed in the Guidelines for Planning in Bushfire Prone Areas and apply across the entire state.

This standard includes a requirement for no more than 15% tree canopy cover within an APZ. If this requirement was enforced within the Shire, it would result in the widespread loss of Karri and Tingle trees, having a substantial impact on the environment, residential amenity and landscape values. This Strategy identifies the need for further investigation into the viability of a regional variation to standard APZ requirements to recognise the unique profile of vegetation and climate within the Shire. This should examine alternative means of mitigating bushfire risk without substantial loss of established trees, including consideration of vertical separation (the distance between ground and canopy).

Tourism & Coastal Nodes

Tourism related land uses are considered vulnerable land uses under SPP 3.7. As outlined in Section 3.2.5, tourism is a key industry within the Shire and is experiencing increasing numbers of visitors to the area. Many tourism related land uses are intrinsically linked to the natural landscape and ecological values of an area, as well as an areas remoteness. The Shire offers all three of these desirable attributes. However, despite the economic benefits of the tourism industry to the local community, this link to the natural amenity and remote location of the Shire causes challenges in disaster management, particularly in the case of bushfires.

Peaceful Bay, Parry Beach and Ocean Beach are coastal tourism nodes that are serviced by single road access and may be vulnerable in the event of a bushfire and/or flooding. Tourists and visitors to these areas often have limited knowledge of local conditions, are unfamiliar with the surroundings, and may not be aware of evacuation challenges.

This Strategy proposes to adopt a position to maintain the current footprint of both Peaceful Bay and Parry Beach. As well as being the preferred direction of the community (indicated through preliminary consultation for this Strategy), it is also acknowledged that the potential for further development is severely limited by the access requirements of SPP 3.7. Improvements to road access and community infrastructure to reduce bushfire risk should be contemplated to support the existing development in each of these locations.

Ocean Beach is identified in this Strategy as a regional recreational node but is also a significant tourist attraction. Consideration of means to mitigate bushfire risk and maintain access will form a necessary part of future development proposals.



Access Routes

Access in bushfire prone areas is defined by the ability of the residents to access and egress in alternative directions along the public road network in the event of a bushfire (or other emergency events).

The following outlines a number of possible linking public roads from the Bushfire Management Plan (2019-2024) and the BRIGS project. These roads are indicative only and further investigation is required.

- Harrington Break to South Coast Highway
- Inlet Drive to Berridge Street
- Springdale Beach subdivision to Woodward Heights
- Springdale Heights to Sea Change Close
- Peaceful Bay settlement to Ficifolia Road

The 2011 LPS identified the potential need for an additional bridge over the Denmark River to provide an alternative access in the event of an emergency. In 2017/18, detailed investigations were undertaken which concluded that current access (via South Coast Highway and alternatively via Churchill Road) was sufficient for the foreseeable future.

While acknowledging that it is relevant to periodically reassess this potential need, this Strategy notes that:

- Based on anticipated traffic and freight volumes an additional bridge is unlikely to be required during the life of this Strategy, and it is therefore not appropriate to identify the location of a potential future bridge at this time.
- As a means of supplementing the regional road network, any potential future investigations into a new bridge should be led by the State.
- Further improvements to the existing road network may provide more cost-effective outcomes in the short to medium term.

As noted in Section 3.4.4, the development of Nornalup-Tindale Road would improve regional connectivity in the event of fire, storm or flood damage to other parts of the road network.

Water Infrastructure

Responding to a bushfire emergency requires secure and strategically placed water infrastructure that meets the needs of emergency services. To reduce reliance on reticulated water supply, avoid interruptions to residential services and provide water in strategic locations for firefighting, the Shire and State Government are continuing to develop supplementary water infrastructure.

Where bushfires are considered a threat, new development should be provided with adequate water infrastructure to support emergency response. Residential development within rural and rural living areas should be supported by allocated water supply for fire-fighting purposes. Substantial development proposals may be required to provide supplementary water supplies for this purpose at the cost of the proponent or contribute towards the development of strategic water infrastructure through a development contribution plan.



Strategies & Actions – Natural Hazards & Resilience

1. Protect, conserve, and enhance coastal values and appropriately manage development and land use within coastal areas.
 - a. Ensure coastal processes and hazard risk management are considered in any future planning or proposals in close proximity to the coast and inlets, consistent with State Planning Policy 2.6 – Coastal Planning.
 - b. Implement the recommendations of the Coastal Hazard Risk Management and Adaption Plan for Ocean Beach and Peaceful Bay to ensure adaption and protection of vulnerable areas.
2. Assess flood risk and avoid land use and development in areas at a high risk of inundation during flooding events.
 - a. Monitor existing flood prone areas and any changes in flood prone mapping, to understand the development capability of the land in relation to the full range of flood risk.
 - b. Assess catchment management plans and flooding management practices to understand potential impacts on land use and development.
3. Minimise the risk to life, property and service delivery from bushfires by avoiding and mitigating risks through the local planning framework.
 - a. Assess land use and development proposals for the consideration of avoidance of bushfire risk and mitigation where appropriate, consistent with State Planning Policy 3.7 – Planning in Bushfire Prone Areas and the Guidelines for Planning in Bushfire Prone Areas.
 - b. Support residential growth in identified locations where it can be demonstrated that bushfire risks can be appropriately managed, in accordance with the direction provided by State Planning Policy 3.7 – Planning in Bushfire Prone Areas.
 - c. Support the implementation of plans and strategies that identify improvements to bushfire risk mitigation and road access, particularly for existing vulnerable areas such as coastal nodes and rural residential subdivisions.
4. Maintain community-oriented outcomes by considering flexibility within planning for bushfire protection requirements.
 - a. Investigate the potential for a regional variation to Asset Protection Zone requirements that recognises the unique profile of the predominant vegetation types in the district and their importance to the environment and community.
 - b. Seek to maintain potential development opportunities by:
 - i. Supporting strategic bushfire risk assessment and mitigation works within existing townsites.
 - ii. Considering variations to development standards where this assists to achieve optimal development outcomes with minimum bushfire risk.
5. Support improvements to community infrastructure that improves bushfire response and recovery.
 - a. New development proposed within a bushfire prone area should be provided with (or contribute towards) appropriate water infrastructure to support emergency response, including supplementary water supplies where necessary.
 - b. Support and advocate for improvements to the local and regional road network that improve accessibility during a bushfire emergency.

3.4 Infrastructure

3.4.1 Community Facilities

The local community is serviced by a wide range of community facilities and infrastructure that support social and cultural pursuits. These facilities play a key role in the delivery of community services by the Shire, State Government, not-for-profit organisations and local community groups. This Strategy examines and builds upon the aspirations of our community as expressed during preliminary consultation and within the Strategic Community Plan, identifying spatial outcomes and opportunities, including the arrangement of community facilities and services.

This Strategy plays a significant role in the provision of community facilities and servicing infrastructure, including:

- Identifying community facility requirements, planning for and facilitating the acquisition of land and supporting the collection of financial contributions for equitable cost sharing.
- Incorporating major community initiatives identified in the Strategic Community Plan, providing a mechanism to support land use change, and informing the direction of community facilities provision from a land use planning perspective.
- Identifying changes to zoning to facilitate the development of community facilities and servicing infrastructure.

It is relevant to consider any shifts in the demand for, provision of and potential upgrades to community facilities that may be anticipated within the lifetime of this Strategy and whether any changes to the planning framework are necessary to enable these. The Strategy may also inform later decisions on the development of community facilities through other strategic objectives, such as promoting the primacy and consolidation of the Denmark Town Centre.

Existing demographic trends may inform the provision of community facilities, with services designed to respond to the needs of retirees and families in particular; however, community facilities may also be an enabler of desired trends, including an intention to support the retention of young adults within the community.

3.4.1.1 Education

The district is currently serviced by three primary schools (Denmark Primary School, Golden Hill Steiner School and Kwoorabup Nature School) and two secondary schools (Denmark Senior High School & Denmark Agricultural College), with Golden Hill Steiner School proposing secondary from 2023 (refer Map 5). A small number of students commute into and out of the Shire to access schooling options in neighbouring local government areas.

Comparatively, Denmark has a competitive advantage through the existence of a range of high quality schooling options. While this ably services the existing community, acknowledging and fostering this advantage supports Denmark in attracting new families. Education also sustains a significant workforce within the community.

Tertiary education opportunities are provided via the Denmark campus of Southern Regional TAFE and through the Great Southern Universities Centre and University of Western Australia campuses in Albany.

This Strategy acknowledges the continued growth and development of educational campuses within the Shire to support families, encourage the retention of young adults within our community, and provide opportunities for life-long learning.

This Strategy also promotes further investigation into opportunities to co-locate community facilities with school campuses, acknowledging that this may provide improved facilities for schools and the wider community through the efficient use of public funds.

Projected Growth

Growth in school enrolments has varied year to year between 2016 and 2021, with primary school enrolments increasing slightly overall during this time (refer Section 7.2, Part 2).

The Shire has also experienced consistent growth in the number of school age persons over the past 20 years (refer Section 7.2, Part 2). Growth within this age group was substantially lower than the pace of overall population growth before 2011, equally paced between 2011 and 2016, and ahead between 2016 and 2021.

This suggests that an increase in the number of families is a demographic change within the Shire.

The population projections of this Strategy suggest, assuming the same proportions in each age group as at 2021, that the Shire could potentially have between 238 and 326 additional school students by 2036 (refer Section 7.2, Part 2). This could be expected to include between 116 and 160 additional primary school students and between 122 and 166 additional high school students.

Second State Primary School

Based on the projections detailed above, it is highly unlikely that a second state primary school site will be required during the 15-year outlook of this Strategy. This Strategy identifies land for urban expansion that may ultimately support an additional 3,000 residents, of which approximately 520 are estimated to be aged 5-17 years. This could potentially result in an additional 250-260 students in primary education.

As this is unlikely to require the development of a second state primary school the Shire will continue to work with the Department of Education and private school providers to ensure that expansion of existing schools can occur appropriately.

The 2011 LPS identified portions of Lot 214 on P052368 (#267) Ocean Beach Road and Lot 32 on D062910 (#15) Little River Road for a future state primary school site. The majority of this site sits on Lot 214. The Strategy notes the constraints to the development of this site due to current sewage infrastructure requirements and indicates a willingness to consider alternative land uses, which may necessitate investigation into an alternative location for a second state primary school, as required, in consultation with the Department for Education.

Golden Hill Steiner School

The Golden Hill Steiner School is located at Lot 110 on P021633 (#222) Scotsdale Road, a site zoned Special Rural (15) in TPS3 with Additional Use (12) providing for 'Educational Establishment' as a permitted land use. Golden Hill Steiner School has made a submission to the Shire regarding the potential to offer secondary education by expanding their campus into adjoining Lot 1 on D087539 (#23) Riverbend Lane, which is also zoned Special Rural but does not currently have any additional use rights.

Should the School be able to acquire Lot 1 (or portion), the Strategy supports the use of this site for an Educational Establishment. Access and other relevant planning issues may be resolved at the development application stage.

Kwoorabup Nature School

The Kwoorabup Nature School is located at Lot 952 on P039348 (#2) Inlet Drive, within the Denmark Railway Station Reserve (Reserve number 30277). This site is located in close proximity to the Denmark River, Wilson Inlet, wetlands and areas of native forest, providing the school with a nature based setting that is accessible from the Denmark town centre.

The reserve also contains the facilities of the Denmark Machinery Restoration Group, Denmark Lions Club and Denmark Men's Shed, as well as a number of heritage railway features. The co-location of multiple community and educational organisations on this reserve strengthens community connections, and encourages the collaboration and sharing of knowledge between users of the site.



3.4.1.2 Emergency Services

The district is serviced by WA Police, St John Ambulance, State Emergency Service (SES) and Volunteer Fire and Rescue Service (VFRS) facilities based in the Denmark Townsite, as well as Volunteer Bushfire Brigades based across the Shire.

The continuing operation of these services is important to the Denmark community and the Strategy acknowledges their needs and ensures the local planning framework appropriately enables these. The most appropriate zoning for emergency services facilities is Reserve – Emergency Services.

This Strategy continues to support the 2011 LPS in identifying the current site of the Denmark VFRS as a strategic site for potential commercial development. The Shire has consulted with the Denmark VFRS and DFES to identify potential alternative locations for a fire station and the appropriate land and zoning requirements.

This Strategy promotes the development of precincts where community facilities and services are co-located. The shared use of infrastructure is also identified as important.



3.4.1.3 Civic Centre

The Shire is currently serviced by a Civic Centre located within the Denmark Town Centre, incorporating a library, performing arts and public amenities. This includes a number of buildings that were historically used for other purposes and have been adapted and progressively extended over time. The Shire's Long Term Financial Plan 2021/22-2030/31 includes a refurbishment and expansion of the Civic Centre to provide additional common spaces.

The current site benefits from its location within the Town Centre but the existing buildings are not designed to promote interaction with Strickland Street. A greater emphasis on activation of this highly prominent location through both building design and operating activity should be a priority for the future of this site.

Should alternative locations for the development of new civic facilities be considered (noting this will not be determined by this Strategy) the Strategy promotes common principles for the development of community facilities within accessible, co-located and shared use precincts.

3.4.1.4 Shire Facilities

Shire operations are supported by administration and customer service offices on Lot 151 on P224101 (#953) South Coast Highway, a works depot located on Reserves 38302 & 37930 on Zimmerman Street, and a visitor information centre located at Lot 501 on P061023 (#73) South Coast Highway.

The Shire has identified the long term need for investment into improved works depot facilities. The Strategy identifies the potential relocation of the Shire's depot as a way of providing additional land for service commercial businesses and facilitating land use change within the Industrial Road/ Zimmerman Street light industrial area. Given this need, the Strategy acknowledges Lot 300 on P046811 (#832) South Coast Highway as the preferred site for the relocation of the depot in the long term.

No changes to the Shire's administration offices and visitor information centre are proposed at this time.

3.4.1.5 Developer Contributions

When new housing development occurs, the Shire experiences an increase in population and growth in demand for new and expanded community facilities and services. To support the development of new facilities and to ensure that costs are equitably shared, the State planning framework provides for the establishment of financial contributions that are collected from land developers.

This Strategy proposes the preparation of a Developer Contributions Plan to determine the need for contributions in alignment with infrastructure planning and the demands arising from new development and population growth. This aligns with the intent of the Strategy to ensure that growth contributes to and enhances the Denmark community.

3.4.1.6 Community Facility Reservations

The sites of community facilities are typically reserved for public use within TPS3. This designation appropriately reflects the unique nature and range of publicly owned community facilities, noting that additional requirements associated with the management of public reserves may also apply. In addition, the sites of a range of churches and other community organisations are similarly reserved within the TPS3.

A reserve designation is more effectively applied to public land or to enable the acquisition of land into the public estate. This designation requires planning approval for all changes in land use and development while providing little or no direction for appropriate development form – context is often more useful in planning assessment. A reserve designation can also limit the ability of community and private organisations from effectively dealing with (and realising the value of) their land and buildings.

This Strategy proposes to remove this reservation from the sites of community organisations in favour of zoning that most appropriately reflects surrounding land use while accommodating the current use of the site.

Strategies & Actions – Community Facilities

1. Acknowledge the importance of high-quality community facilities and services in supporting well-being, promoting healthy lifestyles and developing social capital.
 - a. Promote the development of precincts where community facilities and services are accessible, co-located and the shared use of infrastructure is supported.
 - b. Ensure that planning for community facilities considers population growth as well as demographic and social change occurring within the community.
 - c. Consider the preparation of a Development Contributions Plan to support the collection of financial contribution from land development for new and expanded community facilities.
2. Continue to consult with State Government, not-for-profit and other community organisations to ensure that the local planning framework enables the development of community facilities and services.
 - a. Based on compatibility with existing land use and the surrounding zoning, replace the designation of Reserve – Public Use on sites owned by community organisations to the relevant zone that more appropriately reflects the surrounding land use, while also accommodating the existing use.
 - b. Support the relocation of the Denmark Volunteer Fire and Rescue Service and Denmark State Emergency Service by supporting land tenure changes and zoning as Reserve – Emergency Services.
 - c. Identify Lot 300 on P046811 (#832) South Coast Highway for the Shire’s works depot, zone Lot 300 as a Reserve with an appropriate designation in the new Local Planning Scheme and seek a land swap with the State to enable the development of the current depot site for service commercial land.
 - d. In order to meet community expectations and demand, consider proposals to amend the local planning framework where social and health services are provided.
3. Continue to consult with the Department of Education and private school providers to enable the continued development of the education as a local service and a competitive advantage for our community.
 - a. Investigate opportunities for the co-location of sport, recreation and community facilities with the Denmark Senior High School and WA College of Agriculture, Denmark.
 - b. Assess the potential long term need for a second State primary school and availability of a suitable site at the next review of the Strategy.
 - c. Support the extension of Additional Use 12 over Lot 1 (#23) Riverbend Lane (or portion) if required to enable the expansion of Golden Hill Steiner School.
 - d. Change the purpose of the Denmark Railway Station Reserve (Reserve number 30277) at Lot 952 on P039348 (#2) Inlet Drive to Public Purpose

3.4.2 Utility Services

3.4.2.1 Potable Water Supply

Denmark Townsite

The Denmark townsite is provided with reticulated potable water service by the Water Corporation. Water is supplied from the Quickup and Denmark dams and supplemented via connection into the Lower Great Southern Towns Water Supply Scheme.

While water supply is not a constraint to further development in the Denmark townsite, the sustainability of local and regional water supplies will be increasingly challenged by the effects of climate change. The need to increase the efficiency of water use and to develop local level resilience is acknowledged by this Strategy and measures are proposed to increase the uptake of residential rainwater tanks.

Peaceful Bay

Peaceful Bay is currently serviced by a Shire managed non-potable water service, with potable water being provided by private rainwater capture and/or on-site treatment. The viability of improving the non-potable water service has been investigated but is dependent on a funding source being identified.

Potable water supply is a constraint to further development in this location and should be required to be addressed as part of any new planning proposal that intensifies land use.

Other Areas

Rural areas within the Shire and the Nornalup townsite are serviced on-property, principally through rainwater capture. Improving the resilience of on-lot water supplies may necessitate a review of water catchment and storage standards. This includes the provision of water for fire-fighting where strategic water supplies are not located within the vicinity.

Strategies & Actions – Potable Water Supply

1. Support the provision of and improvements to potable water supplies to enable development while promoting a greater level of sustainability.
 - a. Require the provision of adequate and appropriately managed potable water supply through the subdivision and development approval process.
 - b. Review local planning scheme and policy requirements to ensure the sustainability of on-lot water supplies, including requirements for use for fire-fighting.
 - c. Investigate potential means of increasing the uptake of rainwater tanks on domestic and commercial properties, including standard requirements.
 - d. Pursue the provision of a reticulated potable water supply scheme in Peaceful Bay, subject to appropriate funding arrangements.

3.4.2.2 Drainage

Waterways serve as natural drainage systems that carry rainfall runoff to low points in the landscape and groundwater sources. Development can increase the rate of natural runoff and/or the amount of nutrients, sediment or other materials in water, resulting in adverse impacts on the downstream environment. In particular, urban environments contain a large proportion of roads and other impermeable surfaces, requiring detailed consideration of how water runoff is managed.

Effectively managing the drainage of water requires consideration of the quantity of water on average and during peak rain events, as well as the treatment and management of water quality through this process. Effective stormwater management practices are of critical importance in maintaining the good health of these systems, as is the retention of remnant vegetation and revegetation in managing erosion and nutrient issues. Water sensitive urban design principles are the most effective way to manage water within an urban context and to achieve more efficient and effective use of water and better outcomes for the environment and urban form.

The preparation or review of any structure plan should consider applicable flood risk, drainage infrastructure and land requirements, as well as on-lot stormwater retention requirements. Additionally, a Local Water Management Report or Plan will be required. The location of development and the design of new drainage systems must be undertaken in a way that does not exacerbate the existing nutrient issues for rivers, watercourses, inlets and other water resources in the district.

Drainage systems managed by the Shire typically serve significant rainfall events and are supplemented by on-lot retention of drainage from minor rainfall events. Subject to further investigations and outcomes from related studies, there may be a need for the preparation of a local planning policy to outline requirements for on-lot drainage retention and management.

Rainfall runoff can also be captured and used as a valuable water source, and this Strategy advocates for further investigation into opportunities to support this outcome.

Strategies & Actions – Drainage

1. Plan strategically for the management of stormwater runoff to maximise water re-use, minimise environmental impacts, reduce flooding risk and maintain public infrastructure.
 - a. Implement water sensitive urban design principles as part of the assessment of water management within all relevant subdivision and development proposals.
 - b. Prepare a local planning policy to outline requirements for the on-lot retention and management of water runoff.

3.4.2.3 Wastewater

The majority of residential areas within the Denmark Townsite are provided with a reticulated sewerage service, operated by the Water Corporation. This service does not extend to Weedon Hill, Ocean Beach, east of the Denmark River or to any of the Special Residential and Special Rural development surrounding the townsite. Peaceful Bay, Nornalup and all other parts of the Shire are serviced by on-site wastewater treatment and disposal.

The use of on-site disposal systems servicing individual lots is not always an appropriate alternative to the use of a reticulated sewerage service. The State's Government Sewerage Policy (2019) applies requirements which limit the density of new development in the absence of a reticulated sewerage service.

Constraints

Under the Government Sewerage Policy, the entire Denmark townsite is identified as a sewerage sensitive area, mandating the connection of residential development to a reticulated sewerage service. While justified on health and environmental grounds, the lack of a reticulated sewerage service in parts of the Denmark townsite is acknowledged as a continuing constraint to development, limiting housing availability and choice.

The extension of wastewater servicing infrastructure by land developers is limited by the fragmentation of growth areas and the absence of appropriate zoning of lots that would enable the logical extension of this infrastructure. The topography of Denmark townsite can also create a need for additional infrastructure (e.g., pumping stations), the cost of which is a limitation to subdivision and development.

Infill development is also constrained in some locations due to the lack of a reticulated sewerage service, despite existing development and the availability of all other services. For example, residential land east of the Denmark River is not sewered and contains large residential lots within a walkable catchment to the Town Centre and major public services. Large residential zoned lots in Hardy Street are similarly constrained by a lack of sewerage infrastructure, limiting the capacity to develop new housing in a prime location.

This Strategy advocates for funding to extend the reticulated sewerage service to existing developed parts of the Denmark townsite, including Weedon Hill, Ocean Beach and all Residential Zoned land east of Denmark River. The Residential Zoned land to the east of the Denmark River is considered a strong priority given the adjacent civic and community land uses (Highschool, Shire Administration and Country Club). Sewer to this area would also provide significant infill potential to Residential (R5/15) zoned lots between the Lot 152 Beveridge Rd (DMK68) and the Denmark River that are currently unsewered.

In addition, this Strategy identifies a need for structure planning for urban growth areas to coordinate the extension of a reticulated sewerage service amongst landowners with the assistance of relevant government agencies.

Buffers

The reticulated sewerage system is supported by a waste water treatment plant (WWTP) located south of the Denmark Townsite, separating the townsite from residential development at Weedon Hill. The majority of land surrounding the WWTP is reserved in TPS3, with a small amount of rural and industrial land.

The Strategy acknowledges the need for the formalisation of an odour buffer around this facility in accordance with modelling prepared by the Water Corporation, in order to restrict the introduction of incompatible land uses and avoid the intensification of any existing. The applicable buffer area for Denmark's WWTP is indicated on the strategy maps.

Unsewered Areas

A significant number of residential dwellings, industrial lots and public buildings within the Shire are provided by on-site wastewater disposal systems in the absence of a reticulated sewerage service.

State Government policies have gradually increased requirements for on-site sewerage disposal, reflecting the cumulative environmental impact of these systems in close proximity to sensitive water catchments. On-site wastewater disposal from existing development is likely to be contributing to significant nutrient loading into the Denmark River, Wilson Inlet and other receiving environments.

The Strategy supports the extension of a reticulated sewerage service to existing unsewered residential areas to achieve the most appropriate environmental and settlement planning outcomes. Within locations where a reticulated sewerage service is not available, on-site wastewater disposal will be considered in accordance with the Government Sewerage Policy and the capability of the site. The density of development and setbacks from waterways will be considered accordingly.

Composting

Composting toilets offer a hygienic way to recycle human waste in a sustainable manner that avoids polluting and wasting water. Additionally, the resulting compost can be used as a valuable resource to fertilise gardens and build soil, excluding vegetable gardens.

According to the Water Corporation, the average person flushes 10,000 litres of water down the toilet every year. The contaminated water from flush toilets then goes to a wastewater treatment plant to be processed and treated. Composting toilets can have lower environmental impacts than water-efficient toilets and wastewater recycling. If appropriately designed, composting toilets conserve precious water resources and keep effluent and pollutants out of waterways and the general environment.

The WA Department of Health (DoH) has approved over 30 different models of composting toilets for household use. Each is designed to ensure the correct levels of moisture, temperature, oxygen, carbon and nitrogen required to achieve good composting. A composting toilet that is properly designed and maintained will not smell.

This Strategy supports the increased uptake of composting toilet systems that are designed and installed in accordance with the relevant planning, building and health requirements.

Wastewater Reuse

Opportunities exist for the use of post-treatment wastewater in a more sustainable way, particularly for sports ovals, golf courses, parks and other land uses with the need for large amounts of non-potable water.

The Strategy proposes that further investigation occurs into the most efficient and effective use of post-treatment wastewater. This could examine whether integration into the potable water supply network is appropriate or whether a limited non-potable water scheme could potentially be established.

Strategies & Actions – Wastewater

1. Support the provision of wastewater treatment and disposal systems that maintain public health and minimise environmental impact.
 - a. Require the provision of an adequate and appropriately managed wastewater treatment and disposal service commensurate with need through the subdivision and development approval process.
 - b. Introduce a special control area into the local planning scheme around the Denmark Waste Water Treatment Plant to restrict the introduction of incompatible land uses and avoid the intensification of any existing.
 - c. Investigate the most efficient and effective use of post-treatment wastewater, including potential subdivision and development requirements for infrastructure to support a non-potable water supply scheme.
2. Prioritise extension of the reticulated sewerage network to enable development of the Denmark Townsite.
 - a. Advocate to the State for funding to extend the reticulated sewerage service to existing developed parts of the Denmark townsite, including land east of the Denmark River, Hardy Street, Weedon Hill and Ocean Beach.
 - b. Rezone land for residential development that enables the logical extension of the reticulated sewerage network.
 - c. Work with landowners and the Water Corporation to coordinate the extension of the reticulated sewerage network to identified urban growth and infill development areas.



3.4.2.4 Energy

Electricity is provided via the South West Interconnected Network operated by Western Power, with overhead distribution lines extending from the Albany substation into the Shire. Electricity generation within the Shire consists of a wind energy facility consisting of two 79 metre high, 800 kW turbines at Wilson Head as well as dispersed rooftop solar photovoltaic systems. A reticulated gas service is not currently available in any parts of the Shire, with bottled gas supported by a number of local service providers.

A steady increase in electricity demand in the district is expected to continue as a result of ongoing population growth, requiring increases in transfer capacity within the district distribution network. The district has occasional unreliability, which may be assisted through a combination of community scale battery storage and other measures. A significant increase in demand resulting from industrial development may need to consider the capacity of the network.

Conservation of energy use is the most efficient and effective way to reduce carbon emissions, save household operating costs and avoid the need to fund major infrastructure upgrades. While the conservation of energy is not easily ensured through the planning system, this Strategy acknowledges and supports education, incentives, and other community initiatives to reduce unnecessary energy consumption in all forms. These will be supported and driven through the Shire's *Sustainability Strategy*.

Acknowledging likely continuing energy demands, a strong level of support exists for the development of further renewable energy sources within the district. The district has wide-ranging potential to generate electricity from renewable energy sources including solar, wind, wave, biofuels, bio-energy and possibly geothermal energy. If feasible, renewable energy sourced within the Shire can assist in providing an energy supply for residential, commercial and industrial development. Renewable energy production should generally be encouraged where relevant planning considerations have been suitably met.

The energy grid will need to be managed effectively and upgraded where necessary to enable a transition towards home energy generation and battery storage, as well as an anticipated shift towards electrical appliances instead of gas and other energy sources.

Strategies & Actions – Energy

1. Support the development of a reliable and sustainable energy supply network to service the district.
 - a. Support efforts to reduce energy consumption to address climate change, reduce energy costs and use existing infrastructure efficiently.
 - b. Ensure the local planning framework enables land use and development that is supported by on-site power generation and storage.
 - c. Introduce a use class for renewable energy production to the local planning scheme and appropriate policy guidance to support assessment.

3.4.2.5 Telecommunications

Effective telecommunications infrastructure, including phone and internet services, is essential for social connectivity, for households, businesses, the district economy and to ensure safety. Migration to regional areas has been supported by the availability of telecommunications services. Remote working and online businesses are a significant contributor to employment that has enabled lifestyle-driven migration into the Shire, fuelling population growth.

Mobile phone, television, radio reception and broadband in the district vary in availability and quality. The mobile network does not cover the whole of the Shire, primarily due to a combination of areas of State Forest and low population along particular transport routes. This has a major impact on current and future commercial activities along with impacting the lifestyle of residents.

New infrastructure is established by telecommunications carriers operating in a deregulated commercial environment. The Shire is required to respond to individual applications for new mobile phone towers and other 'high impact' facilities on an individual basis, without an understanding of the long term plans of telecommunications services.

While acknowledging the essential nature of this infrastructure, the Strategy supports efforts to maximise separation from sensitive land uses and minimise the visual impacts of telecommunications infrastructure.

Strategies & Actions – Telecommunications

1. Support the development of a reliable and unobtrusive telecommunications network to service the district.
 - a. Support the siting of telecommunications infrastructure to maximise separation from sensitive land uses, including residential dwellings.
 - b. Seek to minimise the visual impact of telecommunications infrastructure by requiring a high standard of design, avoiding prominent locations and considering the recommendations of the Shire's Visual Landscape Evaluation Report.

3.4.2.6 Waste

The Shire currently operates two waste management facilities which provide for the disposal of refuse and processing of recycling. A minor transfer station operates at Peaceful Bay and a major processing facility is located on East River Road in Hay. These facilities provide an essential community service.

Reducing waste generation is a strategic priority. Landfill facilities consume land (including buffers), risk environmental harms, and are a significant cost to the community to operate and develop. The *Sustainability Strategy* proposes to implement best practice waste management and adopts a target of zero waste to landfill by 2030. In addition, the *Sustainability Strategy* proposes to support the building industry in reducing waste through re-use and recycling.

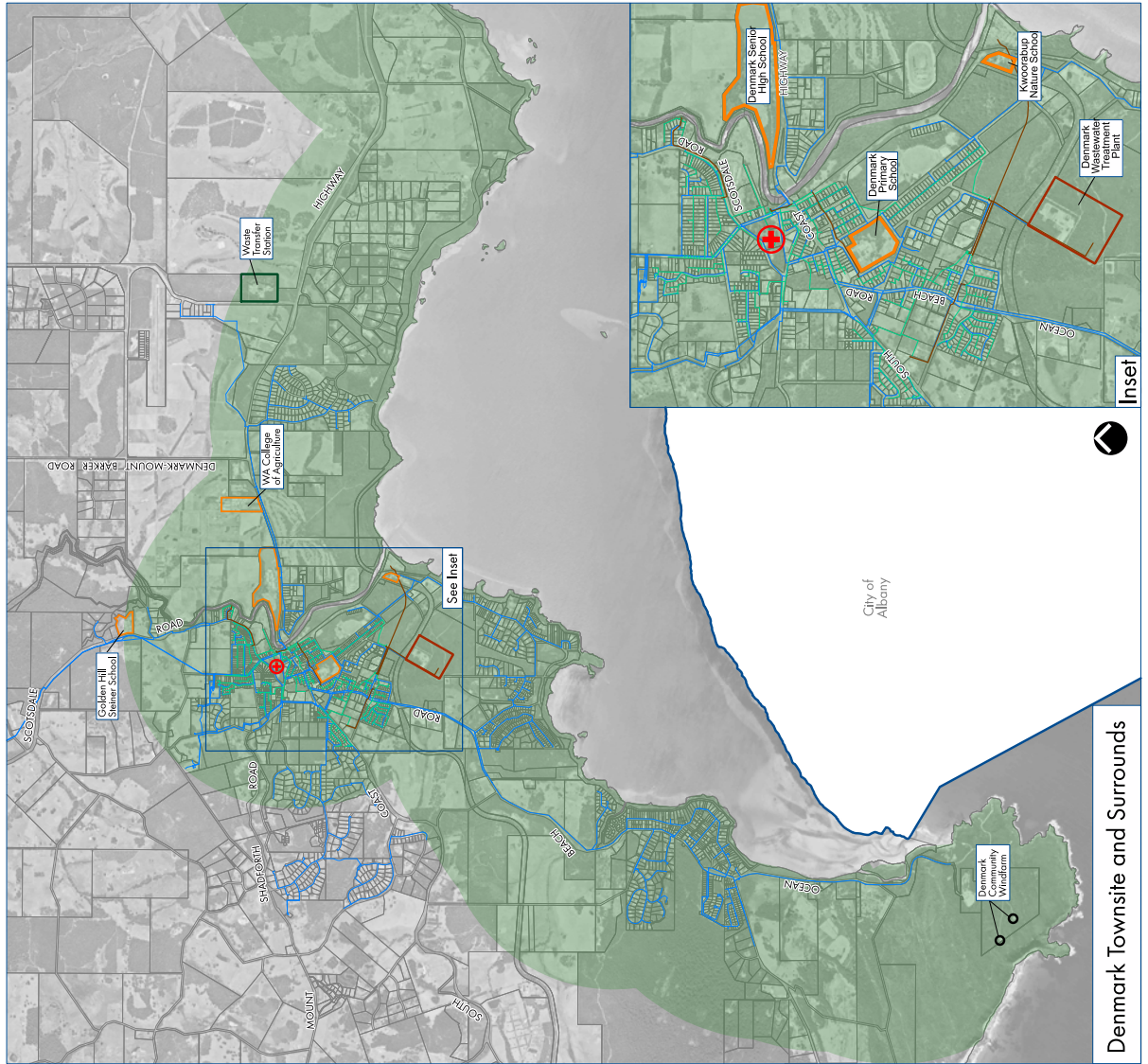
Achieving these aims will require significant change to existing practice, a combination of incentives and new regulatory standards, and regional partnerships to improve economies of scale. This Strategy supports further investigation into sustainability requirements for new land use and development that aim to minimise waste generation, assess the life cycle of building materials and incentivise improvements to practice.

Existing waste management facilities require land use buffers to manage the impacts of odour, as well as ensuring that the incursion of sensitive land uses does not limit the operation of the facility. The Environmental Protection Authority's (EPA) Guidance Statement No. 3 identifies expected buffer distances depending on the waste accepted and processed at the facility, with this Strategy nominating a 200 metre land use buffer as appropriate for the facilities operated by the Shire in Peaceful Bay and Hay.

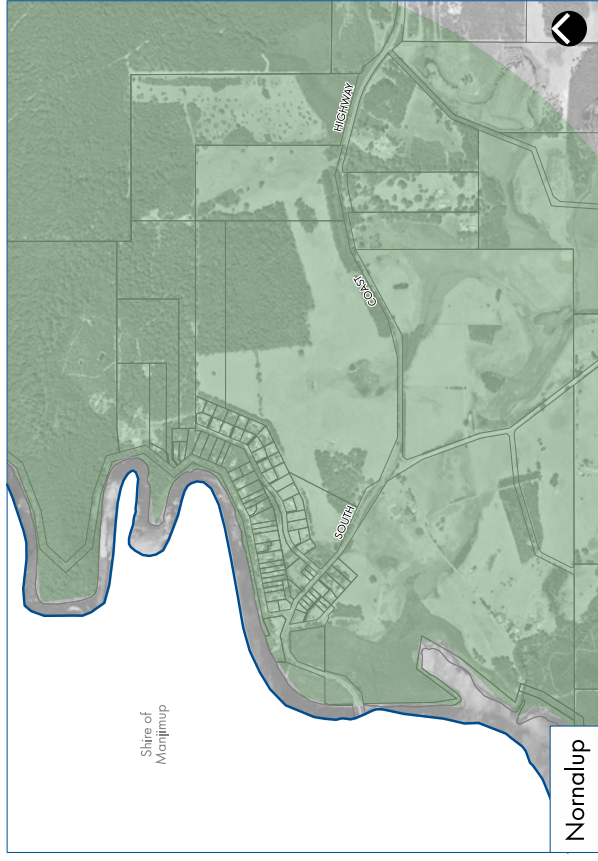
Strategies & Actions – Waste

1. Support waste minimisation through the local planning framework where possible.
 - a. Investigate regulatory and incentive based approaches to minimising waste generation from new land use and development proposals.
2. Preserve the operation of the Shire's waste management facilities through appropriate land use planning.
 - a. Introduce a Special Control Area into the local planning scheme to prevent the introduction of sensitive land uses within 200 metres of the East River Road waste management facility.
 - b. Preserve appropriate separation distances from the Peaceful Bay waste management facility as part of reserve planning and management.

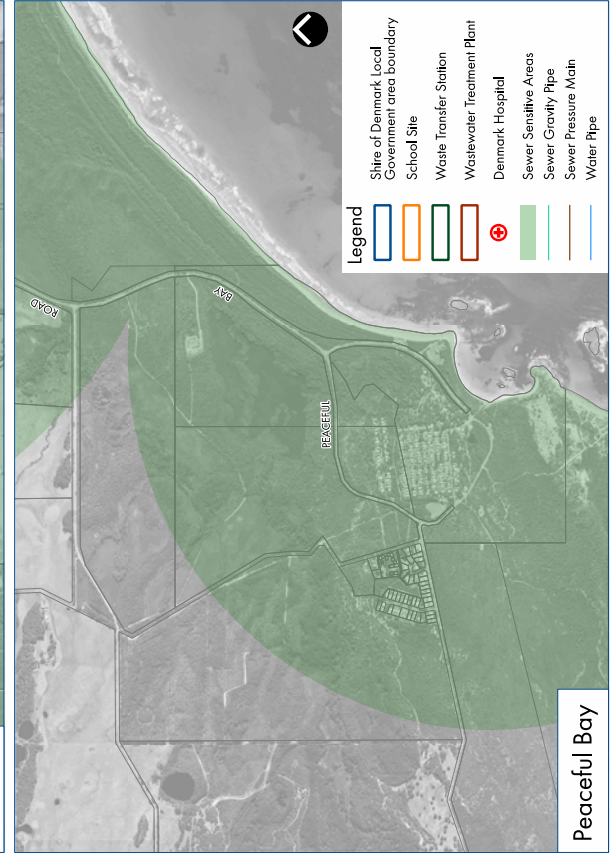
Map 5 Community Facilities and Utility Services



Denmark Townsite and Surrounds



Norralup



Peaceful Bay

Legend

| | |
|--|---|
| | Shire of Denmark Local Government area boundary |
| | School Site |
| | Waste Transfer Station |
| | Wastewater Treatment Plant |
| | Denmark Hospital |
| | Sewer Sensitive Areas |
| | Sewer Gravity Pipe |
| | Sewer Pressure Main |
| | Water Pipe |

3.4.3 Public Open Space

Public open space (POS) plays an important role in the everyday life of our community, delivering a wide range of social, health and environmental benefits. The preservation and investment in high quality POS is critical to ensuring community well-being and maintaining the character and identity of the Shire.

Local parks and reserves are used daily by Denmark's residents and highly valued for their recreational, aesthetic and environmental values. The Shire also contains an extensive network of National Parks and State reserves that incorporate some of the major attractions of the region.

The role of this Strategy is to assess the current POS network, identify future needs and outline the role of the local planning framework in securing these outcomes.

Public Open Space Analysis and background information is included in Section 9, Part 2 of this Strategy.

Objectives

The Strategy supports the continued development of a network of POS that meets the following objectives:

- A POS network that is centralised and accessible to the entire of the community.
- The provision of POS that aligns to the needs of the community and is equitably distributed.
- A POS network that is designed to provide a diverse range of facilities and experiences.
- POS and community facilities that are designed to consider safety, flexibility and sharing of use.
- A POS network that efficiently uses community and environmental resources.
- A POS network that enhances and maintains visual amenity and ecological values.
- A POS network that reflects local community culture, history and social values.

These objectives provide the criteria that the Shire will use when planning for POS development, acknowledging that this will require adapting to the circumstances and resources available.

All POS should be integrated within an accessible pedestrian network to promote active transport and improve utilisation. Barriers to the accessibility of POS within the Denmark townsites include, an incomplete footpath network, the South Coast Highway and the slope of the land. These factors should be accounted for when assessing walkable catchments around POS.

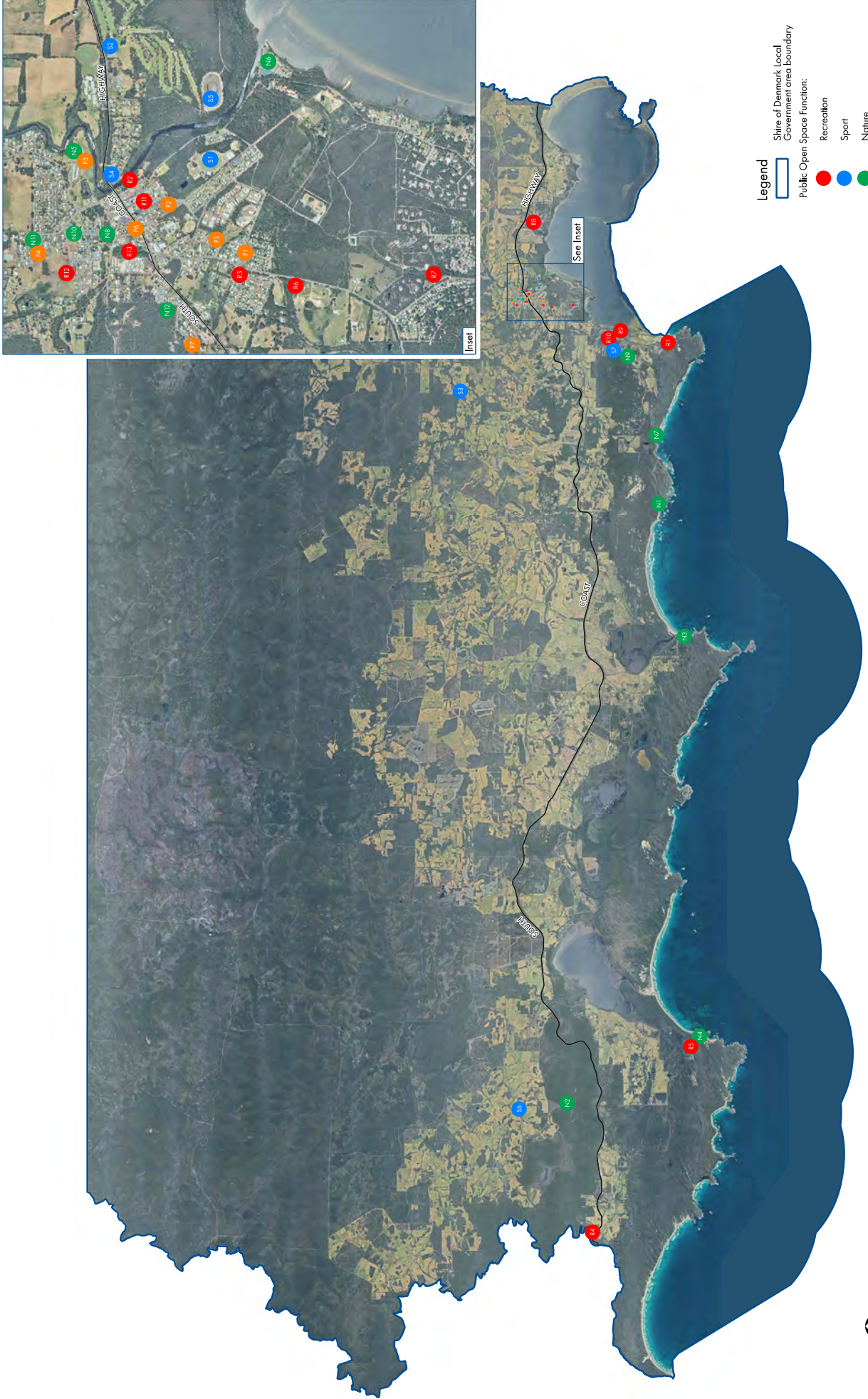
The two major demographic groups driving population growth in Denmark are retirees and families – this should be considered within the provision and design of future POS.

Figure 8: Public Open Space Network (Proposed)

| | Public Open Space Size | | | |
|------------|---|--|--|---|
| | Regional | District | Neighbourhood | Local |
| Recreation | (R1) Ocean Beach* | (R2) Berridge Park* | (R3) Hopson Park (Harlequin St) (R4) Nornalup Foreshore Park (R5) Peaceful Bay Park (R6) Liang Park (Ocean Beach Rd) (R7) Walters Reserve (Campbell Rd)* (R8) Springdale Estate Park* | (R9) Harrington Park (Minsterly Rd) (R10) Atkinson Park (Maloney Cl) (R11) Plain Tree Park (Strickland St) |
| Sport | Nil [Albany] | (S1) McLean Park (S2) Denmark SHS/ Denmark Country Club* | (S3) Scotsdale Tennis Club (S4) Riverside Bowls Club (S5) Denmark Equestrian Centre (S6) Tingle Dale Hall (S7) Mount Hallowell (east) | Nil (informal facilities incorporated into Recreation POS) |
| Nature | (N1) William Bay National Park (N2) Valley of the Giants | (N3) Parry Beach (N4) Peaceful Bay Beach | (N5) Kwoorabup Park (N6) Smith Brothers Park (Denmark River Mouth) (N7) Lights Beach | (N8) Waterfall Park (Mt Shadforth Rd)* (N9) Hallowell Park (Iluka Ave)* (N10) Smith Street Reserve* (N11) Lake View Dairy Park & Nellie Saw Reserve (Russell Rise)* (N12) Christina Crescent Reserve* |

* Aspirational – this POS may not currently provide a service level typical of this classification.

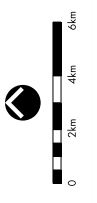
Map 6 Public Open Space



Legend

- Shire of Denmark Local Government area boundary
- Public Open Space Function:
 - Recreation
 - Sport
 - Nature
 - Proposed rationalisation

Note: Refer to Figures 8, 9 and 10 for public open space details.



3.4.3.1 Additional Public Open Space

Existing Residential Areas

In seeking to provide an adequate amount of POS and an appropriate mix of functional types, additional POS needs in existing residential areas are identified in Figure 9. This recognises shortfalls in the existing network and identifies preferred locations for providing additional POS.

The Shire will request a financial contribution towards POS development for any subdivision or grouped dwelling development within a walkable catchment of these sites (400m for local, 800m for neighbourhood), on the basis that additional development will contribute to demand for these facilities.

Figure 9: Existing Residential Areas

| Location | Reason | POS Level | POS Function | Required POS Attributes | Notes |
|---|--|---------------|--------------|--|---|
| Willow Creek Drive/ Wattle Way vicinity | No developed POS in this vicinity. Waterfall Park and Dairyview Park in excess of 400m of some residences. Lack of nearby POS for Recreation purpose. | Neighbourhood | Recreation | <ul style="list-style-type: none"> Playground Active/ kickabout space Seating, gathering space Incorporate drainage with high level of aesthetic consideration | <p>Development of Smith St reserve for Nature POS will assist shortfall.</p> <p>When subdivision of Lot 2 on D082651 (#20) Smith Street and Lot 358 (#50) on P230731 Smith Street occurs, POS should be provided at the southern extent of the site and amalgamated with appropriate portions of the Smith Street road reserve to enable the development of a suitably sized Recreation POS to service this neighbourhood.</p> <p>Contributions within the catchment of this POS will support development costs.</p> <p>Refer reference R12 in POS Map 6.</p> |
| Hardy Street vicinity | Nearby reserves managed for conservation purposes, not functional POS. Nearest reserve Waterfall Park in excess of 400m to some residences. Lack of nearby POS for Recreation purpose. | Local | Recreation | <ul style="list-style-type: none"> Walking paths Covered seating/ pergola Aesthetic focus Exercise equipment | <p>Consider development of POS on rear portion of former Shire depot site at Lot 3002 (#26) Hardy Street on P045104, supported by access via Hamilton Reserve.</p> <p>Location adjacent to seniors housing to be considered as part of POS design.</p> <p>Contributions within the catchment of this POS will support development costs.</p> <p>Refer reference R13 in POS Map 6.</p> |

New Residential Areas

Structure planning for new residential areas will provide POS according to the needs of these new estates. This will improve the overall network of POS and provide additional recreational opportunities for existing residents.

During the structure planning process, the Shire will advise the proponent and WAPC on the preferred outcomes for POS provision and development, including consideration of the functional type and size. This will consider the existing POS network, community needs, State policies and guidance provided in this Strategy.

Wherever possible, the Shire supports the consolidation of proposed POS into a reduced number of larger reserves, with a preferred minimum size of 4,000m² for local level and 10,000m² for neighbourhood level POS.

Newly developed POS should conform to the service level standards and technical specifications adopted by the Shire.

3.4.3.2 Public Open Space Rationalisation

Analysis indicates that some residential areas are over-serviced with POS, and that some existing parks are under-utilised due to their size, location, lack of service or other constraints. Areas of POS that are poorly designed and under-utilised can detract from the amenity of a neighbourhood.

This Strategy supports the consolidation of POS into larger sites that can support a wider range of uses and enable improved management outcomes. Rationalisation can provide a funding source to address POS shortfalls or gaps in other locations and enable the development of higher quality POS. The rationalisation of any POS and use of resulting funds shall be in accordance with the requirements of the WA Land Administration Act 1997 and WAPC Position Statement 'Expenditure of Cash-in-Lieu of Public Open Space'.

This Strategy proposes to investigate the rationalisation of POS as identified in Figure 10.

Figure 10: Proposed Asset Rationalisation

| POS Site | Land Parcel/ Tenure | Characteristics | Reasons for Rationalisation | Alternative Use of Site | Reinvestment To |
|--------------------|---|--|---|--|--|
| Nockolds Park (P1) | Lot 1070 (#10) Zimmerman Street Reserve 43931 | <ul style="list-style-type: none"> 754m² Local recreational park Grassed site with small playground | <ul style="list-style-type: none"> Too small for intended use – preferred minimum size of 4000m² for local level POS Poor location, passive surveillance and design Existing assets in poor condition Located adjacent to larger, attractive POS that is used instead of this park | Residential and pedestrian access way | Improved footpath network and enhancement of Hopson Park. |
| Fyfe Park (P2) | Lot 65 (#19) Brazier Street Reserve 22518 | <ul style="list-style-type: none"> 1012m² Local recreational park Grassed, partly treed (parkland cleared) | <ul style="list-style-type: none"> Too small for intended use – preferred minimum size of 4000m² for local level POS No existing POS infrastructure Located close to two larger and more attractive POS sites | Residential, truncation for road reserve | Disposal or land exchange with adjacent Lot 943 (#21) Barnett Street to provide for improvements to McLean Park. |

| POS Site | Land Parcel/ Tenure | Characteristics | Reasons for Rationalisation | Alternative Use of Site | Reinvestment To |
|---|--|---|---|--|---|
| Kingdon Park (P3) | Lot 1088 (#12) Clarke Close Portion of Reserve 45473 | <ul style="list-style-type: none"> • 2022m² • Local recreational park • Grassed site, treed along western boundary | <ul style="list-style-type: none"> • Too small for intended use – preferred minimum size of 4000m² for local level POS • Poor location/visibility • No existing POS infrastructure | Residential, drainage, pedestrian access | Disposal or land exchange with adjoining freehold to establish linear reserve/ecological linkage and buffer between industrial and residential land uses. |
| Portion/s of Lake View Dairy Park & Nellie Saw Reserve (P4) | Lots 1107 & 1108 Russell Rise, Lot 1054 Horsley Road Reserves 46543 and 33093 | <ul style="list-style-type: none"> • Lot 1107 – 934m², Lot 1108 – 1652m², Lot 1054 – 3035m² • Local recreational parks • Grassed sites, limited trees, drainage basin | <ul style="list-style-type: none"> • No existing recreational infrastructure • Slope of Lot 1107 • Management costs excessive for current functionality | Residential, drainage | Master plan required to define function, identify useable portions of reserves and identify areas suitable portions to rationalise and address in staged approach. Funds to support development of remainder of reserves as nature-based POS/ linkages. |
| Portion/s of Kwoorabup Community Park (P5) | Lots 500 & 502 (#38) Research Station Avenue Reserve 41456 | <ul style="list-style-type: none"> • 7.0052 ha • Neighbourhood nature/recreational park • Grassed and treed portions of site, including foreshore to Denmark River | <ul style="list-style-type: none"> • Area of existing recreational infrastructure is limited, some parts have natural values, other parts of the site are undeveloped • Slope and drainage are constraints to development of functional POS in some parts of site • Management costs are excessive for POS functional level and serviceability | Residential or community purpose | Master plan required to define function, identify useable portions of reserves and identify areas suitable portions to rationalise and address in staged approach. Funds to support enhancement of Kwoorabup Community Park. |

| POS Site | Land Parcel/ Tenure | Characteristics | Reasons for Rationalisation | Alternative Use of Site | Reinvestment To |
|---|---|--|---|-------------------------|---|
| Randall Park (P6) | Lot 780 (#2) Millar Street Reserve 22558 | <ul style="list-style-type: none"> 780m² Local recreational park Grassed site partly treed | <ul style="list-style-type: none"> Location not appropriate for recreational use No existing POS infrastructure Historic items remaining are not associated with the site itself | Town Centre utility | Repurpose for use for Town Centre amenities subject to needs identified in precinct planning. |
| Portion of Harry & Fred Tysoe Park (P7) | Lot 1050 Tysoe Close (PIN 1065658 only) Portion of Reserve 42724 south of Tysoe Close (only) | <ul style="list-style-type: none"> 4685m² Local recreational park Grassed site, partly treed | <ul style="list-style-type: none"> No existing POS infrastructure Poor location/ accessibility within locality Site steeply sloped | Residential | Alternative location to develop POS identified at Lot 687 (#35) Christina Crescent (portion Reserve 46688) – lower point in the landscape, more accessible location for improved serviceability to residents. |

3.4.3.3 Sporting Facilities

The Strategy supports the development of co-located sporting facilities within precincts where community infrastructure and services can benefit from co-location and shared use. This aims to maximise flexibility and the social return from infrastructure investment, supporting the viability of high-quality facilities.

Forward planning for the Shire's sporting facilities is guided by the Sport & Recreation Master Plan 2019 (SRMP). This Strategy supports the use of the SRMP as a basis for planning for development contributions.

The SRMP identifies a range of shortcomings and opportunities for the future development of sporting facilities to service the Shire, including playing fields, indoor sports courts, paths and trails, youth facilities and aquatic facilities. The SRMP highlights the need for accessible, contemporary, multi-purpose and sustainable facilities that maximise utilisation, acknowledging resource constraints.

The SRMP proposes to consolidate infrastructure at McLean Oval as the principal sporting facility servicing the district. The SRMP proposes the development of an additional playing field, new amenities building, additional indoor courts and an aquatic centre. These facilities are aspirational and are reliant on external funding support to be achieved.

The Shire currently has a shared use agreement in place with Denmark Senior High School to enable access to the school's playing fields for community sport, supplementing McLean Oval to meet the demand for junior sports. Further investigations since the preparation of the SRMP have indicated that it may not be feasible to develop a second playing field at McLean Oval due to site constraints and the cost of relocating existing infrastructure.

The SRMP requires review to consider how additional playing fields will be provided for in future, and the implications this might have for the co-location of other sporting facilities.

The sites of the Denmark Senior High School and WA College of Agriculture, Denmark provide a potential alternative location for multiple playing fields as well as indoor sporting facilities, with the potential for shared-use supporting their viability.

Strategies & Actions – Public Open Space

1. Acknowledge the importance of high-quality POS to support liveability, promote healthy lifestyles and maintain neighbourhood character and amenity.
 - a. Adopt the following objectives to guide the future development of POS within the Shire:
 - i. A POS network that is centralised and accessible to the entire of the community.
 - ii. The provision of POS that aligns to the needs of the community and is equitably distributed.
 - iii. A POS network that is designed to provide a diverse range of facilities and experiences.
 - iv. POS and community facilities that are designed to consider safety, flexibility and sharing of use.
 - v. A POS network that efficiently uses community and environmental resources.
 - vi. A POS network that enhances and maintains visual amenity and ecological values.
 - vii. A POS network that reflects local community culture, history and social values.
 - b. Consider access to POS as a key part of planning for future improvements to paths, trails and pedestrian accessibility within the Denmark Townsite.
2. Undertake strategic improvements to the POS network in residential areas in accordance with the objectives and established POS framework identified in this Strategy, and relevant State planning policies.
 - a. Utilise the recommendations identified Figures 8, 9 and 10 to guide the provision of POS to service the Shire.
 - b. Request cash in lieu contributions for all subdivision proposals of three or more lots within a walkable catchment (400m for local, 800m for neighbourhood) of identified POS sites where a deficit in land or service levels has been identified.
 - c. Provide POS within urban expansion areas through structure planning in accordance with Liveable Neighbourhoods and the following policies:
 - i. Not support a reduction to the minimum requirement of 10% of the gross subdividable area.
 - ii. Determine POS requirements within rural living subdivisions on a case by case basis.
 - d. Adopt service level standards and technical specifications to guide the development of POS within the Shire.
 - e. Prepare and update master plans for district-level POS sites within the Shire as required.
 - f. Seek external funding to support the development of regional POS attractions located within the Shire.
3. Support the continuing improvement of sporting facilities within co-located and shared-use community precincts.
 - a. Review the Sport & Recreation Master Plan to consider potential alternative sites for additional playing fields, opportunities for shared use facilities and potential development contributions requirements.
 - b. Advocate for the distribution of resources supporting the development of regional sporting and recreational facilities across the Great Southern.

3.4.4 Movement Network

The Shire is serviced by an extensive infrastructure network that supports day to day movement both within and between communities. Road transport has historically been the dominant mode within the Shire and this is likely to continue due to the rural and regional context of the district. Acknowledging that this form of transport requires high energy and infrastructure costs, this Strategy seeks to support the provision of a greater range of local services within the Denmark community, ensure infrastructure investments are appropriately targeted, promote the increased uptake of walking and cycling, and enable the provision of further public transport services. An essential component of achieving this aim is to encourage a more consolidated urban form, rather than dispersal and sprawl, reducing the need for road-based transport in the first instance. This section discusses a number of key changes to this network that are critical to achieving the overall vision of the Strategy and enhancing our connectivity. It will outline future transport needs and the role of the local planning framework in facilitating these.

3.4.4.1 Road Transport

Road transport is critical to the district's ability to function effectively and the State and regional road network play a fundamental role in catering for inter and intraregional traffic and road freight. The district's transport network needs to be capable of moving people and freight in a safe, convenient and efficient manner on a network which is easily accessible.

The Shire is serviced by the South Coast Highway as the principle east-west road linkage, the Denmark – Mount Barker Road northwards from the Denmark townsite, and a large number of rural roads that connect the remainder of the district.

Denmark Townsite & Town Centre

The Denmark Townsite is the focal point for transport movements through the Shire, connecting to several key district roads and regional movements along the South Coast Highway.

While providing passing trade, South Coast Highway transects the Townsite and directs large traffic volumes and freight movements through a sensitive environment. Several key intersections of the South Coast Highway (from Hardy Street to Horsley/ Hollings roads) experience significant congestion and frequent incidents.

The Town Centre in particular has a high volume of pedestrian movements, conflicting with daily traffic peaks and poorly catered to by the current design and speed of the Highway. Along the extent of the South Coast Highway through the Denmark Townsite there are two pedestrian refuge islands, both located in the Denmark Town Centre. Facilitating pedestrian movement across the South Coast Highway is critical to providing a more walkable Townsite and thriving Town Centre.

The potential for a bypass road to divert traffic around Denmark Town Centre has not been pursued due to the likely environmental and social impacts and cost. As such, South Coast Highway will continue to carry regional traffic through the Denmark Town Centre and Townsite. It is critical that future improvements to South Coast Highway provide a higher level of amenity and safer access.

This Strategy also notes that the Town Centre contains a number of laneways that service the rear of properties. The future function of these laneways and upgrading and contribution requirements may be explored in greater detail as part of the preparation of a precinct plan for the Town Centre.



Denmark River Crossings

The South Coast Highway crosses the Denmark River at the eastern extent of the Denmark Town Centre, providing the only major road linkage across the river. A secondary, limited access route exists some distance north of the Denmark townsite along Howe Road/Hamilton Road/Churchill Road, linking Scotsdale Road to Denmark-Mount Barker Road.

The 2011 LPS identified the potential for an additional road bridge within the Denmark townsite to support access in the event of an emergency; however, subsequent modelling has not verified this need. While it is unlikely that an additional vehicle bridge crossing over the Denmark River will be needed based on traffic or freight volumes during the life of this Strategy, it is acknowledged that this may become necessary in the longer term.

This Strategy notes that it is appropriate to investigate the potential location of a bridge at such time as the need for a bridge is justified. As a means of supplementing the regional road network any such investigations should be led by the State.

Nornalup-Tindale Road

The Nornalup-Tindale Road is a 61 km road connecting the South Coast and Muir Highways between Kentdale and Rocky Gully. The Road services a small number of rural properties to the south and traverses State managed reserves for the remainder of its extent.

The Nornalup-Tindale Road potentially provides a critical regional road connection to the Muir Highway in the event of bushfire, accident, incident or works on the South Coast or South Western Highways through the Shire of Manjimup.

The Lower Great Southern Strategy 2016 denotes the Nornalup-Tindale Road between the South Coast and Muir Highways as a secondary regional road and identifies the need to secure funding for its upgrade. This Strategy supports this designation, noting that the formalisation and upgrading of this road through State lands is dependent on State agreement and funding.

Other Significant Roads

The Shire maintains an extensive network of roads throughout the district that are critical for property access, enable access to recreational sites, and service the agricultural, forestry and tourism industries.

The Lower Great Southern Strategy recognises Peaceful Bay Road, William Bay Road, Ocean Beach Road and Denmark-Mount Barker Road as secondary regional roads. Valley of the Giants Road, Parker Road and Scotsdale Road are identified as important local roads.

The Lower Great Southern Strategy also identifies Hazelvale Road, Valley of the Giants Road, Conspicuous Beach Road, Ficifolia Road, Happy Valley Road, McLeod Road, Scotsdale Road, Mount Shadforth Road, Mount Lindesay Road and Churchill Road as scenic roads. To preserve these values, the potential visual impact of land use and development should be considered along these corridors and the retention of roadside vegetation prioritised whenever road improvements are considered.

It is acknowledged that various road improvements may require minor changes in zoning during the life of this Strategy.

Neighbourhood Connector Roads

The Denmark Townsite is serviced by a number of important local roads that connect neighbourhoods and provide links between more significant roads, helping to disperse traffic throughout the network. The Strategy identifies these significant local roads as 'neighbourhood connector roads'.

Existing and proposed future neighbourhood connector roads are identified in Map 7 to provide guidance for the provision of roads within structure planning and subdivision proposals. This designation also reflects an expected design standard that incorporates footpaths/dual use paths and potential future public transport services but does not typically accommodate heavy vehicle movements.

Public Transport

Denmark currently has limited public transport options, similar to other regional towns of its size. Existing services include a daily regional coach service linking east-west on the South Coast Highway, a locally based private taxi service and a hireable community bus.

To help enable the efficiency and viability of public transport services the Strategy supports the development of a more consolidated urban form, as well as promoting the development of a local road network that can ably accommodate public transport infrastructure.

The preparation of a precinct plan for the Denmark Town Centre provides an opportunity to consider the appropriate provision of public transport infrastructure, and how this can be prioritised.

Car Parking

The Shire provides car parking facilities for the Denmark Town Centre, community facilities and recreational reserves. Local planning policy directs the provision of car parking in association with private land use and development proposals. The ongoing review and optimisation of these policy responses is supported by the Strategy, providing for an adequate number of appropriately located car parking within development.

The supply of car parking within the Town Centre and at key attractions can fail to meet demand during peak periods, but is generally understood to be sufficient for average daily use. The Strategy recognises that providing overflow car parking areas has generally been preferred over the development of formalised parking, given that this would represent an over-supply for the majority of the year, may adversely impact amenity, and facilitate less sustainable modes of transport.

This Strategy identifies principles for the provision and management of car parking and proposes that further detailed planning for parking in the Town Centre occurs as part of the preparation of a precinct plan.

Technological Change

Road transport is expected to experience significant technological change during the life of this Strategy with the increasing adoption of alternative power sources and self-drive capabilities within vehicles. The Strategy supports the uptake of technologies which increase the sustainability of transport and potentially reduce the number of vehicles and accidents on our roads.

While residents are likely to maintain charging infrastructure for electric vehicles in their homes, tourists and visitors are likely to seek charging and servicing infrastructure at their accommodation and/or in-town facilities. The Strategy does not envisage a need to mandate the introduction of charging facilities within private car parks or accommodation, on account of this being a competitive advantage for businesses that offer this service. The introduction of a relevant use class and/or approval process should be investigated in concert with the State to enable charging stations and other relevant infrastructure to be established.

The provision of public charging facilities in prominent locations may be further considered to promote the adoption of this technology and remove potential barriers to travel to the district for electric vehicle owners.

The growing use of electric bicycles and scooters is likely to increase the use of footpaths and dual use paths, intensifying demand for upgrades to the quality and extent of the existing network.

Should technological advancements result in declining private car ownership, planning policy requirements for car parking provision may be reviewed accordingly.



Strategies & Actions – Road Network

1. Support the development of a road network throughout the district that enables safe and efficient movement, while retaining environmental and visual landscape values.
 - a. Advocate for Nornalup-Tindale Road to be designated as a regional road under the care and control of Main Roads and developed accordingly.
 - b. Maintain and improve important local roads while prioritising the preservation of visual landscape values and roadside vegetation within road corridors.
 - c. Continue to develop designated neighbourhood connector roads and ensure that structure planning and subdivision proposals contribute to the achievement of this network.
 - d. Acknowledge the potential long term need for additional road access across the Denmark River, subject to detailed investigation led by the State if/when required.
2. Actively pursue improvements to the road network within the Denmark Townsite to improve traffic safety, efficient movement and car parking management.
 - a. Prioritise investigations into the improvements to South Coast Highway through the Denmark Townsite to:
 - i. Reduce traffic conflicts at key intersections.
 - ii. Reduce pavement width and increase amenity.
 - iii. Improve pedestrian access and safety.
 - b. Review requirements for the provision and management of car parking in association with land use and development proposals in consideration of:
 - i. Requiring car parking to be provided at the rear of development or otherwise in a manner that promotes active building frontages and attractive streetscapes.
 - ii. Increasing the efficiency of car parking use through shared access car parking areas and reciprocal use arrangements.
 - iii. Promoting financial contributions in lieu of car parking provision to enable the development of consolidated parking areas at the periphery of the Town Centre and increase redevelopment opportunities on commercial land.
 - iv. Providing car parking in a way that allows for the adaptation of this area to an alternative use should requirements for parking bays decrease in future.
 - v. Providing dedicated special purpose parking bays marked exclusively for the use of motor cycles, mobility vehicles (gopher scooter), delivery and service vehicles, taxis, and buses and coaches.
 - c. Assess opportunities to increase and optimise the use of car parking within the Denmark Town Centre as part of the preparation of a precinct plan.
3. Support the development of infrastructure that enables improved sustainability within transport systems.
 - a. Consider the integration of public transport services as part of:
 - i. Development standards for designated neighbourhood connector roads and other significant roads in the vicinity of the Denmark Townsite.
 - ii. Road and infrastructure improvements that are investigated as part of the preparation of a precinct plan for the Denmark Town Centre.
 - b. Develop local active/integrated Transport Infrastructure Plan for the Shire.
 - c. Seek financial contributions for road upgrading and construction of shared paths through the subdivision and planning approval process and the adoption of a Developer Contributions Plan.
 - d. Support the development of electric vehicle charging infrastructure and remove barriers within the local planning framework.
 - e. Continue to assess technological change and proactively support the development of transport infrastructure that increases the sustainability of the Shire's movement network.

3.4.4.2 Paths & Trails

Denmark Townsite

The Denmark townsite is relatively well serviced by footpaths and dual use paths that support walking and cycling as a means of local transport between neighbourhoods, services and the town centre. Developing a high quality footpath network is one of the most important ways to promote sustainable transport choice, healthy/ active lifestyles, and improve accessibility for the aged, families and persons with a disability.

This Strategy considers footpaths and dual use paths as essential transport infrastructure that should be planned for and secured through the approval processes applicable to structure planning, subdivision and development proposals.

This Strategy recommends that more detailed planning occur to identify necessary improvements in this network to guide planning assessment and infrastructure development. Within the Denmark Town Centre further detailed planning to guide infrastructure improvements may occur as part of the preparation of a precinct plan.

Recreational Trails

The Shire is well serviced by a variety of recreational trails that support walking, horse riding and cycling, including sections of the Bibbulmun Track, Munda Biddi Trail and Denmark-Nornalup Heritage Rail Trail. Planning for the future development of recreational trails in the Shire is addressed in the Great Southern Regional Trails Master Plan (2020-29). In addition, a number of significant trail developments/improvements are being progressed within State managed reserves.

This Strategy acknowledges the role these trails play in promoting tourism and supporting recreation within the district. This Strategy also seeks to promote the preservation of landscape and ecological values on adjoining land to ensure the values of these areas are sustained.



Strategies & Actions – Paths & Trails

1. Support the development of a high quality, integrated recreational trails network within the Shire.
 - a. Support necessary changes to land use, tenure and road infrastructure to enable the development of recreational trails in accordance with the Great Southern Regional Trails Master Plan.
 - b. Develop a sustainable transport infrastructure plan to guide improvements to footpaths, dual use paths, cycle lanes and way-finding signage, considering the identified road hierarchy, public open space and key social/ community services.
 - c. Seek to preserve landscape and ecological values within the vicinity of regional recreational trails.
 - d. Seek financial contributions for the development and upgrading of paths and trails paths through the subdivision and planning approval process and the adoption of a Developer Contributions Plan.

3.4.4.3 Air Services

The Denmark Airfield provides infrastructure utilised by emergency services, tourism and recreation, and a small number of business and charter flights. The Albany Regional Airport provides a critical transport facility, servicing the district. Given the relative proximity of the Albany airfield, it is likely that it will remain the predominant use into the future.

Development is guided by the Denmark Airfield Land Use Strategy (2010). The Denmark Airfield Land Use Strategy identifies the need for a buffer area to avoid the potential establishment of incompatible land uses in the vicinity of the airfield. This Strategy proposes the introduction of a special control area in the local planning scheme with appropriate restrictions on residential and other noise-sensitive land uses.

This special control area should consider the proximity of development to the airfield according to the impact zones identified in the Denmark Airfield Land Use Strategy, within limitations increasing where potential noise impacts are highest. Compatible and complementary land uses (for example, industry and rural) that are not sensitive to aircraft noise should not be limited by this special control area.

Strategies & Actions – Air Services

1. Preserve the Denmark Airfield as critical transport infrastructure and promote complementary land uses that enhance its functions.
 - a. With reference to the Denmark Airfield Land Use Strategy, introduce a Special Control Area into the local planning scheme to restrict the introduction of noise-sensitive land uses within close proximity to the Denmark Airfield.
 - b. Consider rezoning, land use and development proposals within the vicinity of the Denmark Airfield that are complementary to, or enhance the function of the airfield.

3.4.4.4 Marine Infrastructure

Boating and water sports are highly valued recreational pursuits throughout the Shire, supported by marine infrastructure in various locations across the district. This infrastructure also supports a small number of tourism operators and commercial fishing businesses.

In 2007, the *Denmark Strategic Boating Plan* was prepared to guide the development of boating facilities to 2025. As this plan focuses on existing facilities and reserves there are no proposed outcomes that would necessitate any change to the local planning scheme. The Department of Transport (DoT) is the responsible authority for marine related infrastructure and licencing.

A range of opportunities exist for the development of new public and private marine facilities that are not reflected in the Denmark Strategic Boating Plan. Any major proposals for marine facilities should either initiate or be incorporated as part of review of the Denmark Strategic Boating Plan to ensure that they are appropriately planned and meet a demonstrated community need.

Additionally, proposals should be consistent with the principles identified in this Strategy to ensure compatibility with the strategic vision of the community for land use and development.





Strategies & Actions – Marine Infrastructure

1. In meeting recreational and commercial demand, support the development of marine infrastructure that also protects the environment and visual landscape values.
 - a. Consider minor proposals for marine infrastructure where:
 - i. Coastal processes and potential environmental impacts are appropriately addressed.
 - ii. Compatibility with land tenure and zoning can be achieved.
 - iii. Support from the Department of Transport is attained.
 - b. Consider major proposals for marine infrastructure subject to review of the Denmark Strategic Boating Plan and the principles of this Strategy.
 - c. All new proposals for marine infrastructure will be assessed for compatibility with the following principles:
 - i. That are small in scale and with minimal impact on visual landscape values.
 - ii. Are sensitive to ecological values on site and minimise impacts on the surrounding environment.
 - iii. Are situated in locations where no cultural heritage values are compromised.
 - iv. That enhance public access to waterways.
 - v. That minimise potential risks to public safety.
 - vi. That meet all relevant legislative and licensing requirements.
 - vii. That are supported by adequate land-based servicing.

4 Strategy Maps

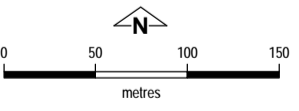
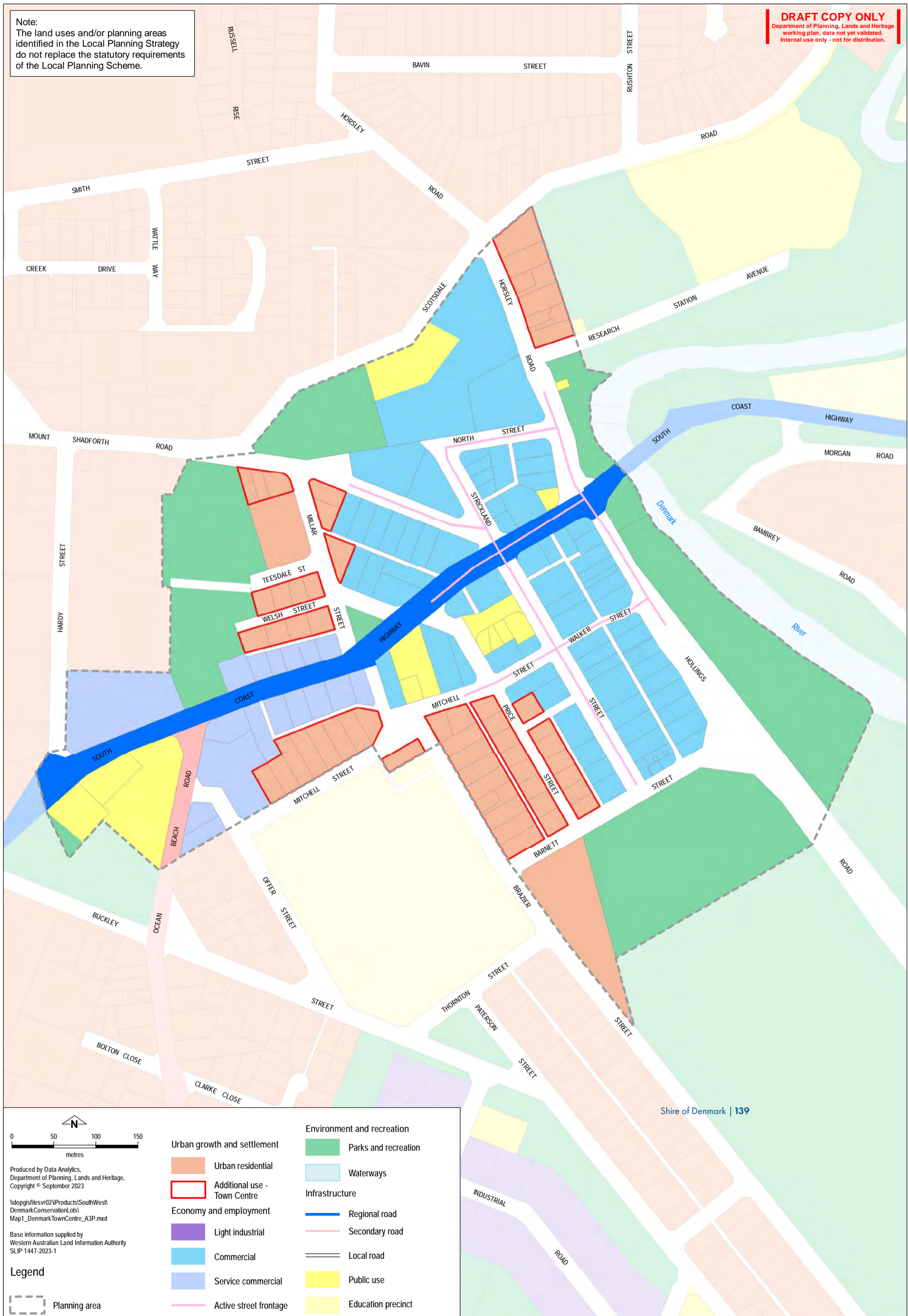
The purpose of the strategy maps is to spatially represent, where possible, the actions and planning identified in this Strategy.

The Local Planning Strategy Maps are not zoning maps, but rather a conceptual representation of broad planning intentions to assist with the review and preparation of an updated Local Planning Scheme. Therefore, the planning areas and future land use designation on the maps are indicative only and require further detailed investigation to formalise land use planning arrangements for these areas.



Note:
The land uses and/or planning areas identified in the Local Planning Strategy do not replace the statutory requirements of the Local Planning Scheme.

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Legend

Planning area

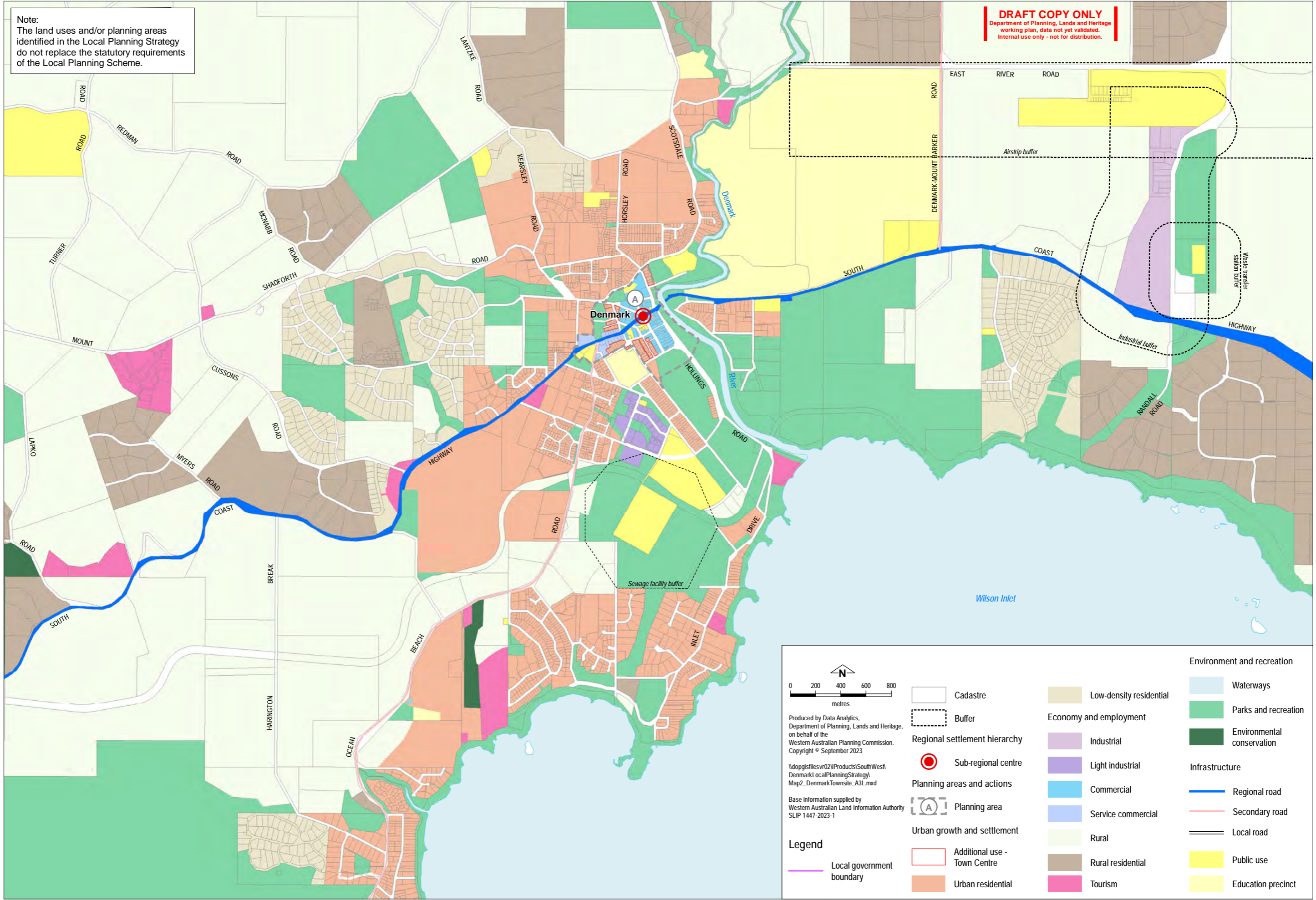
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|------------------------------------|-----------------------------------|
| Urban growth and settlement | Environment and recreation |
| Urban residential | Parks and recreation |
| Additional use - Town Centre | Waterways |
| Economy and employment | Infrastructure |
| Light industrial | Regional road |
| Commercial | Secondary road |
| Service commercial | Local road |
| Active street frontage | Public use |
| | Education precinct |

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Shire of Denmark Local Planning Strategy – Denmark Town Centre (Planning Area A)

Note:
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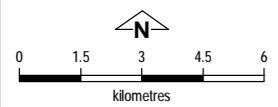
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Legend

- Local government boundary
- Cadastre
- Buffer
- Regional settlement hierarchy
 - Sub-regional centre
- Planning areas and actions
 - Planning area
- Urban growth and settlement
 - Additional use - Town Centre
 - Urban residential
- Environment and recreation
 - Waterways
 - Parks and recreation
 - Environmental conservation
- Economy and employment
 - Industrial
 - Light industrial
 - Commercial
 - Service commercial
- Infrastructure
 - Regional road
 - Secondary road
 - Local road
 - Public use
 - Education precinct
- Rural residential
- Tourism
- Rural

Shire of Denmark Local Planning Strategy – Denmark Townsite and Surrounds



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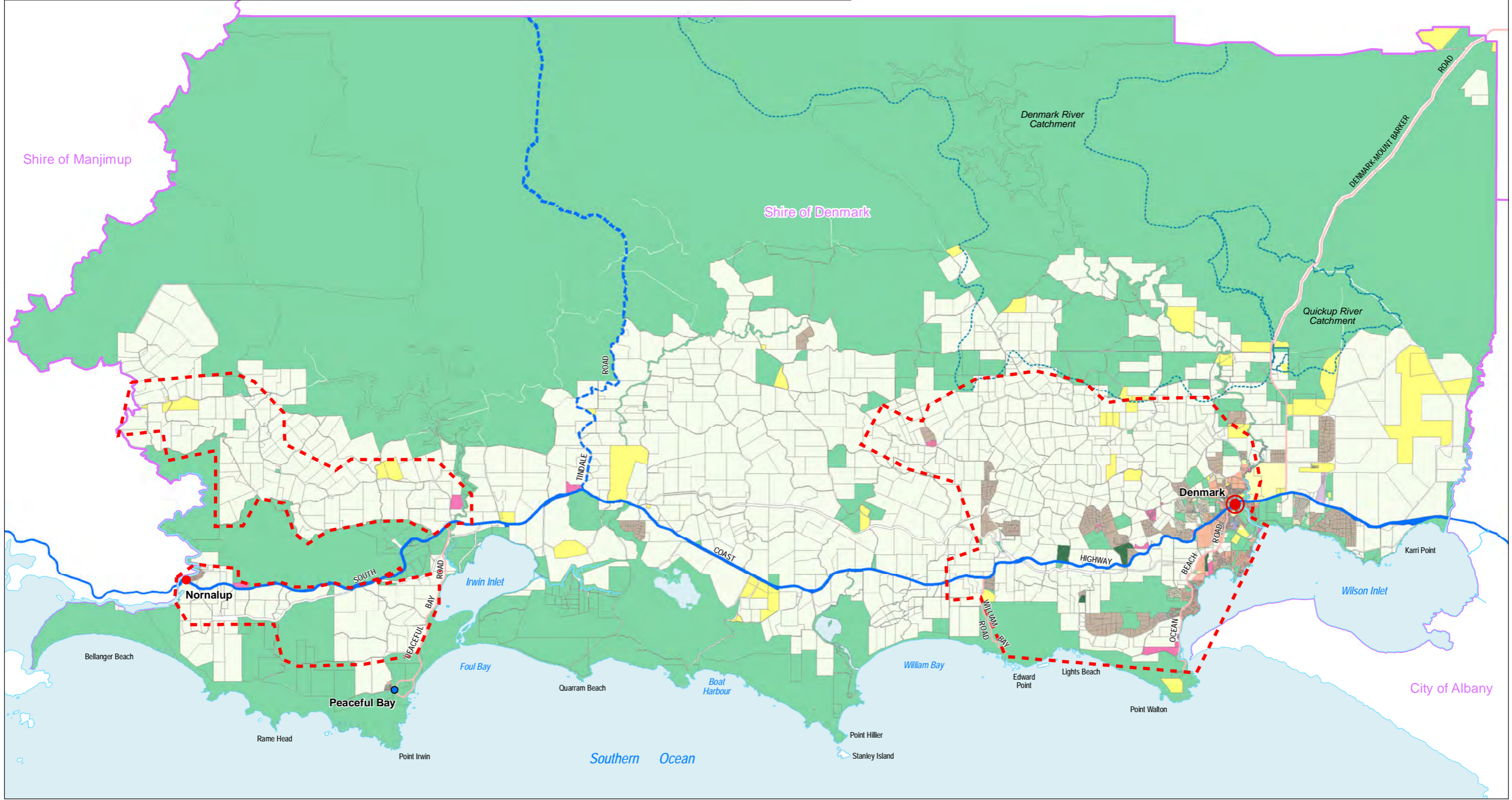
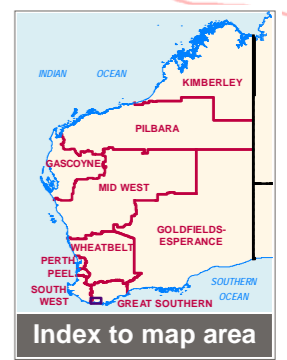
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Legend

- | | | | |
|--|---|---|--|
| <ul style="list-style-type: none"> Local government boundary Public Drinking Water Source Area boundary Special Control Area - Visual Landscape | <p>Urban growth and settlement</p> <ul style="list-style-type: none"> Additional use - Town Centre Urban residential Low-density residential | <ul style="list-style-type: none"> Service commercial Rural Rural residential Tourism | <ul style="list-style-type: none"> Waterways |
| <p>Regional settlement hierarchy</p> <ul style="list-style-type: none"> Sub-regional centre Local centre (rural village) Specialised centre (tourism node) | <p>Economy and employment</p> <ul style="list-style-type: none"> Industrial Light industrial Commercial | <p>Environment and recreation</p> <ul style="list-style-type: none"> Environmental conservation Parks and recreation | <p>Infrastructure</p> <ul style="list-style-type: none"> Regional road Secondary road Future regional road Public use Education precinct |

Note:
The land uses and/or planning areas identified in the Local Planning Strategy do not replace the statutory requirements of the Local Planning Scheme.

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Shire of Denmark Local Planning Strategy

5 Planning Areas

This section provides more detailed planning directions and actions for specific planning areas. The Strategy identifies one planning area, Planning Area A - Denmark Town Centre (refer to the Shire of Denmark Local Planning Strategy – Denmark Town Centre (Planning Area A) map).

5.1 Planning Area A – Denmark Town Centre

The Denmark Town Centre is the central business district within the Shire, providing a range of services including commercial, retail, restaurants and cafes, community services and organisations (ambulance service, community resource centre, churches, RSL and museum). The co-location of these businesses and services creates a centre that has a high level of activity, in turn attracting more businesses and services, resulting in more reasons to visit.

The Strategy seeks to prioritise and promote the consolidation of the Denmark Town Centre, aiming to increase activity, vibrancy and viability for the community and businesses. As such, future commercial development should be directed towards enhancing and activating the Town Centre.

The Strategy identifies the need for the preparation of a Precinct Plan for this planning area, enabling the integration of land use controls, built form guidance, public realm design and infrastructure coordination. Figure 11 below provides an overview of the planning directions and actions for Planning Area A – Denmark Town Centre.

Figure 11: Planning Area A – Denmark Town Centre: Planning Directions and Actions

| Planning Area A – Denmark Town Centre | | |
|--|---|---|
| Planning Direction | Action | Rationale |
| Adopt the area delineated as Planning Area A – Denmark Town Centre as the extent of the Denmark Town Centre for planning purposes. | 1. Implement actions identified in section 3 of this Strategy that are relevant to Planning Area A – Denmark Town Centre. | Integration of applicable Strategy actions. |
| | 2. Prepare a Precinct Plan for the extent of Planning Area A – Denmark Town Centre. | To examine planning and infrastructure design matters within the Town Centre in detail. |
| | 3. Acknowledge designated ‘main street’ frontages in the Planning Area A – Denmark Town Centre map for the purposes of planning assessment. | Designations identify locations where relevant actions of the Strategy will be applied (note: may be amended by Precinct Plan). |
| | 4. Implement the zoning changes detailed in the Planning Area A – Denmark Town Centre map within the local planning scheme. | Provides detail of proposed zoning changes to support amendment of local planning scheme. |

6 Implementation and Review

Implementation of the actions within this Strategy are intended to cover a 15 year period. The Strategy should not to be viewed as a fixed plan but as a guiding document which requires regular review and updates.

To ensure the Strategy remains relevant, it is intended that the Strategy will be reviewed every five years, and that the review will consider changes in development trends, community aspirations and key modifications to State and Regional planning frameworks.

Any proposals to amend the Strategy will be subject to public consultation, in accordance with the Regulations.



Part 2 – Background Information

Introduction

The purpose of Part 2 is to provide background and supporting information to the content and strategies and actions included in Part 1 of the Local Planning Strategy.

Section 7 presents the Shire’s local government profile which includes background information and statistical data in relation to demographics, population forecasts, housing, education and commercial land uses.

Section 8 contains detailed information concerning the Shire’s Tourism Sites and Tourism Precincts.

Section 9 includes supporting background information in relation to the Shire’s Public Open Space requirements, classifications, assessment and service levels.

Sections 10 and 11 provide overviews of the applicable State, Regional and Local planning frameworks.



7 Local Government Profile

7.1 Demographic Profile

7.1.1 Population Growth & Distribution

The Shire had an estimated 6,422 residents in 2021 (Australian Bureau of Statistics (ABS) Estimated Resident Population (ERP)), having grown 6.72% from the population of 6,018 recorded in 2016. Historical population growth is shown in Figure 12 below.

Figure 12 – Historical Population Growth

| Year | Population (ABS Census) | Population (ABS ERP) | Annual Growth Rate | 5 Year Average Annual Growth Rate | Regional WA Annual Growth Rate |
|------|-------------------------|----------------------|--------------------|-----------------------------------|--------------------------------|
| 2006 | 4797 | | | | |
| 2007 | 4858 | | 1.27% | | 0.85% |
| 2008 | 4987 | | 2.66% | | 2.34% |
| 2009 | 5153 | | 3.33% | | 2.47% |
| 2010 | 5248 | | 1.84% | | 1.76% |
| 2011 | 5373 | | 2.38% | 2.30% | 1.99% |
| 2012 | 5593 | | 4.09% | 2.86% | 2.50% |
| 2013 | 5804 | | 3.77% | 3.08% | 2.13% |
| 2014 | 5872 | | 1.17% | 2.65% | 0.07% |
| 2015 | 5957 | | 1.45% | 2.57% | -0.45% |
| 2016 | 6018 | | 1.02% | 2.30% | -1.00% |
| 2017 | | 6128 | 1.83% | 1.85% | -0.08% |
| 2018 | | 6154 | 0.42% | 1.18% | -0.13% |
| 2019 | | 6215 | 0.99% | 1.14% | 0.02% |
| 2020 | | 6371 | 2.51% | 1.35% | 0.53% |
| 2021 | | 6422 | 0.80% | 1.31% | 0.35% |

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The Shire’s population grew at an average rate of 2.3% per year between 2006 and 2011 and again between 2011 and 2016, reducing to 1.3% between 2016 and 2021. A population of 6,506 residents could be assumed at June 2022 based on the average annual growth rate between 2016 and 2021.

Population growth in the Shire has long outstripped averages for regional Western Australia but has generally reflected growth trends for Western Australia overall. The Shire has grown in line with broader trends supporting lifestyle-driven migration to regional coastal areas, including the retiring baby-boomer generation.

Various statistics test the validity of the Estimated Resident Population (ERP), particularly in relation to a spike in population growth that was experienced post COVID-19. For example, a significant increase in school enrolments (+75, assumed 98% of cohort) and aged pension recipients (+53, assumed 64% of cohort) between July 2020 and June 2021. This suggests an increase of 156 persons in these two age groups (44.4% of population in 2016), and a potential overall increase in population of approximately 350 persons in this single year.

Other measures of growth such as planning and building approvals and real estate transactions, have all demonstrated a significant spike in development activity and housing development over this period.

The Shire's population is relatively urbanised, with a significant proportion of residents housed within the Denmark townsite. Including the localities surrounding the Town Centre (Ocean Beach, Shadforth, Scotsdale and Hay), approximately 84.7% of the resident population live within the south eastern corner of the Shire (ABS 2021) (refer Figure 13). The outlying rural settlements of Peaceful Bay and Nornalup have relatively few residents (accounting for 2.5% of the Shire's total population) with a high proportion of unoccupied dwellings reported in those locations (89.8% and 56.8% respectively) (ABS 2021)).

Figure 13 – Urbanisation of Population

| | Person 2021 | Percentage (%) | Person 2016 | Percentage (%) | Persons 2011 | Percentage (%) |
|--|----------------|-------------------|-------------------------|-------------------|-----------------|-------------------|
| Denmark SSC 50403 Denmark SAL50404 (2021) | 2,691 | 41.90 | 2,636 | 45.12 | 2,281 | 43.87 |
| Ocean Beach SS 51165 Ocean Beach SAL51175 (2021) | 1,014 | 15.79 | 946 | 16.19 | 990 | 19.04 |
| Shadforth (WA) SSC 51331 Shadforth (WA) SAL51342 (2021) | 715 | 11.13 | 687 | 11.76 | 514 | 9.88 |
| Scotsdale SSC 51321 Scotsdale SAL51332 (2021) | 529 | 8.24 | 456 | 7.81 | 497 | 9.56 |
| Hay (WA) SSC 50616 Hay (WA) SAL50618 (2021) | 493 | 7.68 | 329 | 5.63 | 293 | 5.63 |
| Locations not separately identified in 2022 | 980 | 15.26 | 788 | 13.49 | 918 | 17.65 |
| Total | 6422 | 100.00 | 5,842 (5850) | 100.00 | 5,200 | 100.00 |

Reference: Australia Bureau of Statistics (2011, 2016 and 2021) Census data, <https://www.abs.gov.au/census>.



7.1.2 Age & Household Profile

The 2021 ABS Census data reveals that the Shire's population has two prominent demographic groups – families with school aged children, and empty nesters/retirees from the 'baby boomer' generation.

The south coast is an attractive location for empty nesters/retirees and this demographic group, generally aged between 55 and 74 years, makes up approximately 33.2% of the total population of the Shire (refer Figure 14). By comparison, this same group comprises 21.1% of the Western Australian population.

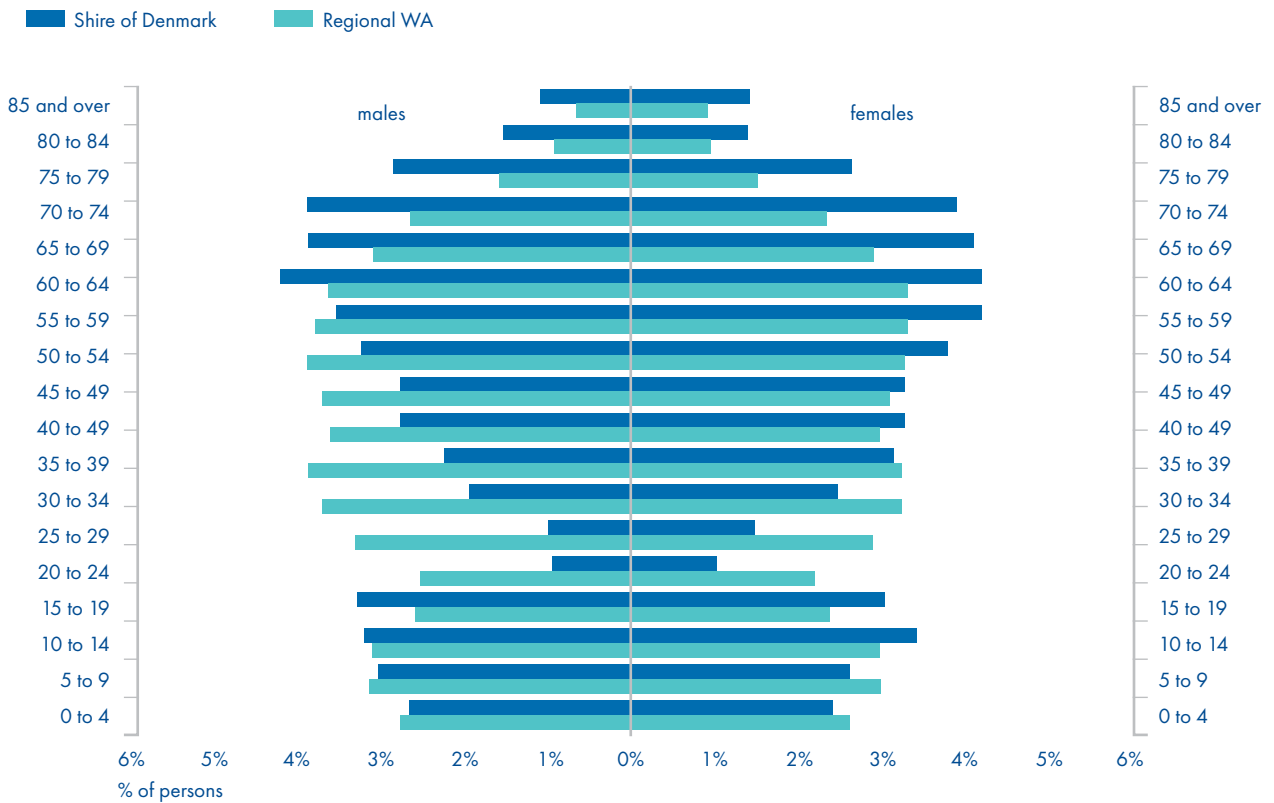
According to Census data the 'baby boomer' generation has been a dominant population group in the Shire since at least 1991. With the 'baby boomer' generation aging, the Shire's median age has grown to 50 years, which is notably higher than the Western Australian median of 38 years.

The Shire contains a relatively stable population aged 5 to 19 years (18.6%), consistent with averages for Western Australia overall (18.7%). This reflects anecdotal evidence of the popularity of the district for families with children and the local availability of schooling choices. This is also reflected in the rebounding of the population aged between 35 and 54 years (24.1%).

The Shire experiences an under-representation of persons aged 20 to 34 years in the district (8.2% compared to 20.5% for Western Australia). This is a common characteristic of many regional areas in Western Australia, often attributed to young adults moving to larger population centres for tertiary education, employment, and cultural opportunities.

Figure 14 – Age-Sex Pyramid (2021)

AGE-SEX PYRAMID, 2021

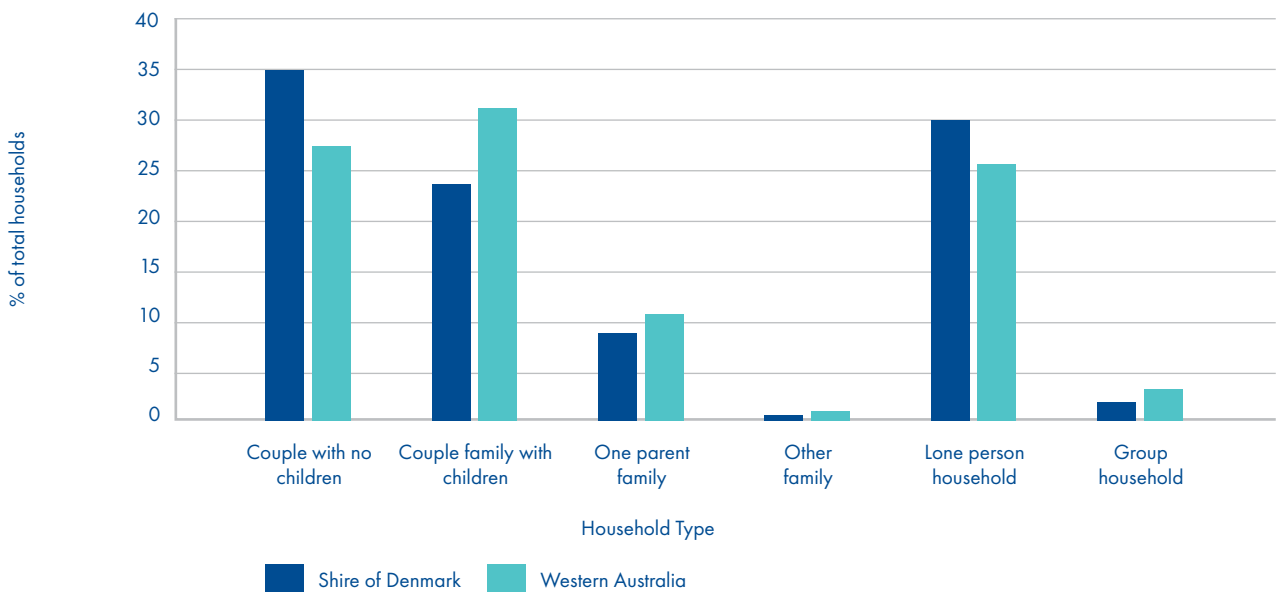


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The age profile of the Shire is reflected in household and family types, with higher than average proportions of couples without children and lone person households (refer Figure 15). Notwithstanding, there has been continuing growth in the number of households comprised of couples with children.

The average household size in 2021 was 2.3 persons per dwelling, a figure remaining steady from 2006, but lower than and Western Australian (2.5 persons) averages.

Figure 15 – Household Type (2021)



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Approximately 27.7% of dwellings in the Shire were unoccupied at the time of the 2021 Census, reflecting a high number of holiday/second homes in the district compared to 10.9% unoccupied dwellings in Western Australia overall. Many of these unoccupied dwellings are used for private or commercial holiday accommodation, as well as providing for seasonal workforce during peak tourism seasons. It is projected that the total population can peak at between 12,000 and 14,000 during holiday periods, doubling the usual resident population. The seasonal population has a major impact on existing infrastructure as well as both public and business service delivery during holiday periods.

7.1.3 Migration & Cultural Diversity

The Shire’s population growth has largely resulted from intra-state migration, with significant gains being made from a number of northern Perth suburbs, Manjimup and Kalgoorlie. The Shire’s greatest population losses were to the larger regional centres of Albany and Busselton. A significant proportion of population movements were to Albany, reflecting its function as a regional service centre for Denmark.

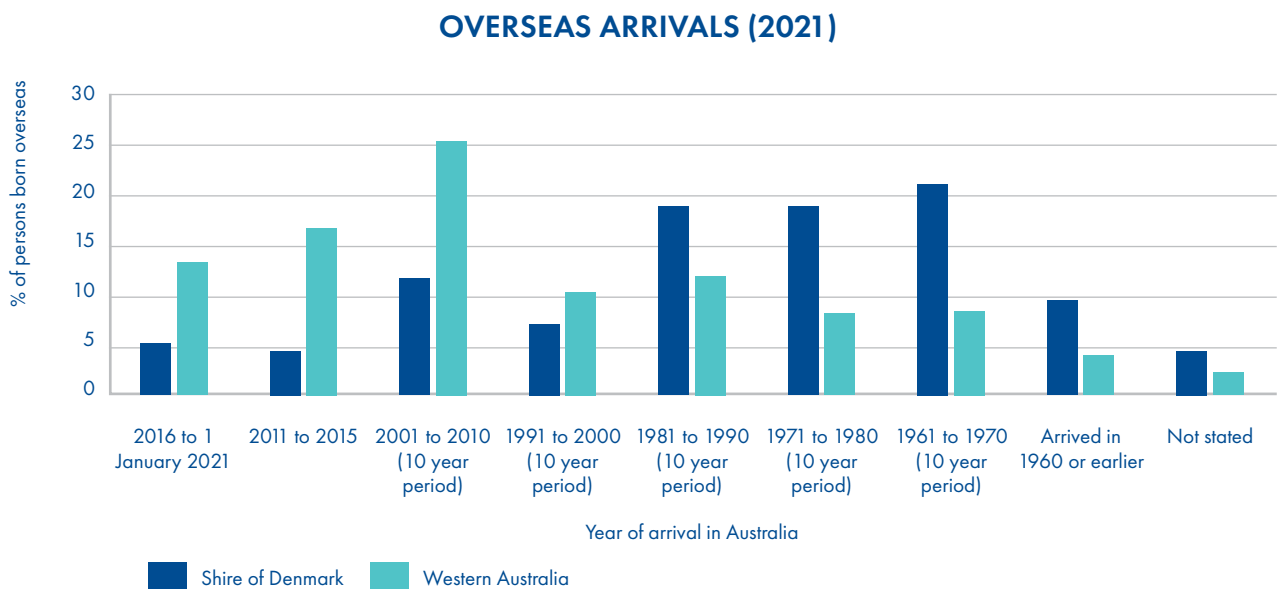
Low levels of overseas migration are reflected in a relatively low degree of cultural diversity, with 22.8% of residents born overseas compared to the Western Australian average of 32.8% (refer Figure 16) (ABS 2021). A significant proportion of the Shire’s residents born overseas originate from the United Kingdom, representing to 10.3% of the resident population compared to the Western Australian average of 7.4% (ABS 2021).

Within the Shire, 71.1% of overseas-born residents arrived prior to 1990, twice the comparable Western Australian figure of 35.5%.

Approximately 1.2% of the Shire’s residents are of Aboriginal and/or Torres Strait Islander origin, noting the Shire encompasses the traditional lands of the Bibbulmun and Minang Noongar people (ABS 2021).

An estimated 5.2% of residents speak a language other than English at home, significantly lower than the Western Australian average of 21.2% (ABS 2021).

Figure 16 – Overseas Arrivals (2016)



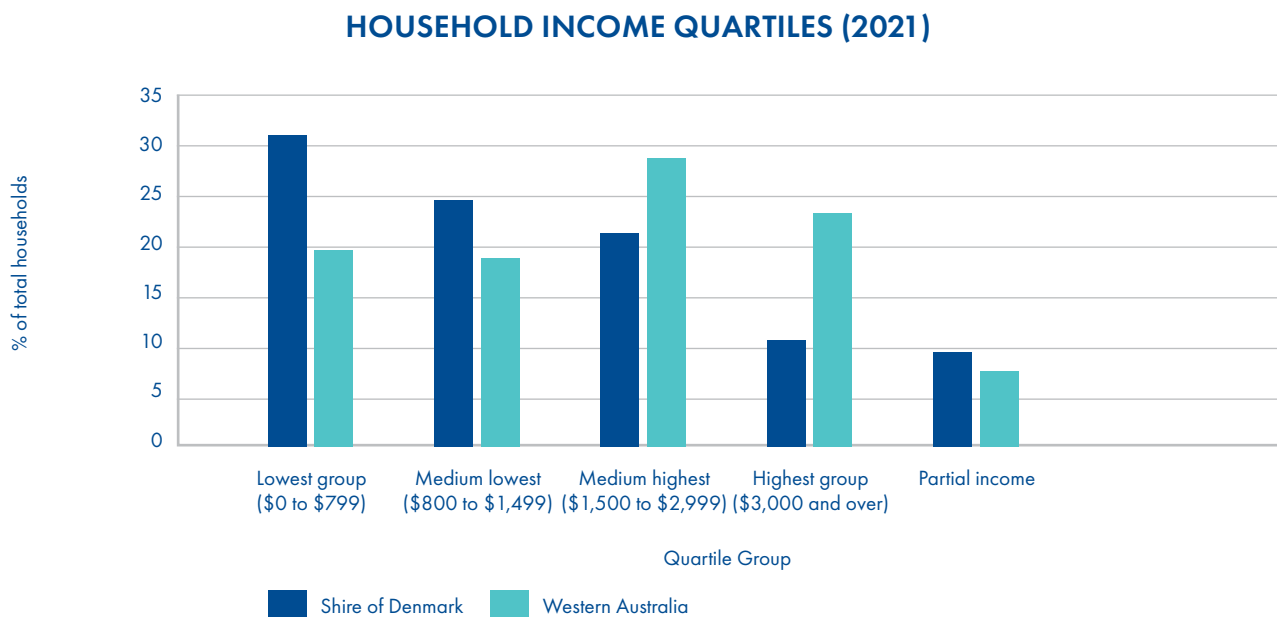
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7.1.4 Income

The Socio-Economic Indexes for Areas (SEIFA) measures relative socio-economic advantages and disadvantage. The SEIFA scores Denmark at 1003, indicating that the Shire does not demonstrate a significant advantage or disadvantage overall (scores relative to 1000). This is also a higher score than surrounding local government areas (Albany – 989, Manjimup – 964, Plantagenet – 947).

As demonstrated in Figure 17, the Shire has a greater proportion of low income earners (31.0% and 20.1% respectively) and a notably lower portion of high income earners in comparison to Western Australia (11.5% and 23.3% respectively). The high proportion of retirees and prevalence of part-time and seasonal work in the district is likely to account for these disparities.

Figure 17 – Household Income Quartiles (2021)



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The Census also demonstrates that the Shire has a higher proportion of residents that own their homes outright (without a mortgage) (46.8%) compared to both Western Australia (29.2%) (ABS 2021). This more commonly occurs later in life and amongst people with higher levels of wealth, factors that are broadly consistent with the Shire’s high proportion of residents from the ‘baby boomer’ generation.

It is acknowledged that there remain contrasts in levels of income and economic capacity within the Shire, and that while the figures discussed here are broadly representative of the Shire, there is a continuing need to provide support for individuals and families experiencing difficult circumstances.

7.1.5 Employment

The Shire has a relatively diverse range of employment, with Education and Training, Accommodation and Food Services, and Agriculture, Forestry and Fishing accounting for the largest industries within the Shire (ABS 2016).

The Shire's workforce is highly mobile, with approximately 22.7% of employed residents working outside of the Shire. When including these external sources of employment, the most common industry sectors are Education and Training, Health Care and Social Assistance, and Construction (ABS 2016). The three most common occupational groups are Managers, Professionals and Technicians and Trades Workers (ABS 2016). A significant proportion of work is part-time (55.2%) compared to the Western Australian average (36.3%), generally representing the availability of work but also reflecting lifestyle aspirations. An estimated 2,393 jobs existed across approximately 742 local businesses (ABS 2016).

Unemployment in the Shire was most recently recorded at 3.3% in December 2021 (ABS 2021 and Department of Employment, Small Area Labour Markets – economy.id). The Shire has historically had variable levels of unemployment but has maintained a low level of unemployment relative to regional, State and National figures since late 2017.

7.1.6 Population Forecast

The Shire's population growth has been driven by intra-state migration, linked to lifestyle trends (tree change/ sea change) and retirees. The influence of the retiring baby-boomer generation is significant and likely to support continued population growth for the lifetime of the Strategy. Lifestyle-driven migration has been supported by technological and cultural shifts towards online and other remote forms of working, accelerated by COVID-19, as well as the relative affordability of housing in regional areas compared to cities.

These trends are advanced and unlikely to be significantly impacted by broader Australian migratory trends, while Western Australia's relatively strong economic performance is likely to support their continuation. As a result, there is a high likelihood of the Shire experiencing sustained levels of population growth similar or greater than what has been experienced in the recent past.

There are currently no major developments, industries or regional-level influences that are expected to accelerate or slow population growth significantly away from current trends.

On this basis, the Shire is forecasting continued population growth for the lifetime of this Strategy. The Strategy will seek to find a balance between adopting higher and lower projections as conservative measures – ensuring that there is an adequate supply of land in the event of high growth, and that investments in services and infrastructure are not made prior to viability.

7.1.6.1 WA Tomorrow

WA Tomorrow is a series of trend-based population forecasts for Western Australia and its regions prepared by the WAPC. These forecasts provide an estimate of future population size and age-sex structure based on assumed State-level trends in fertility, mortality and migration. These forecasts are divided into five 'bands' - bands A and B contain lower forecasts, band C is the median forecast, and bands D and E represent the higher forecasts.

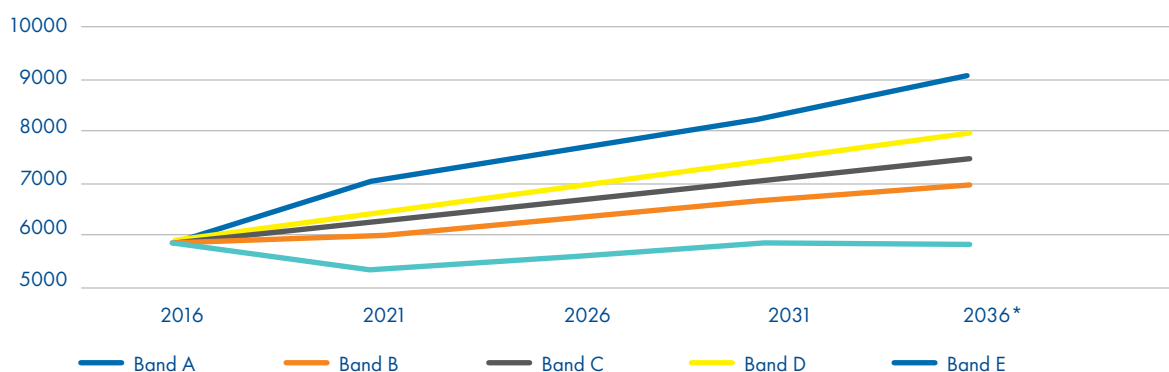
The most recent WA Tomorrow population forecasts were prepared in 2019 (Population Report No. 11) and identify expected population growth from 2016 to 2031. Figures 18-19 outline the five population forecast scenarios provided in the WA Tomorrow projections for the Shire up to 2031. Additional figures to 2036 in Figure 20 are based on extrapolated average annual growth from the WA Tomorrow projections, in accordance with the methodology supported by the Department of Planning, Lands and Heritage (DPLH).

Figure 18-19: WA Tomorrow 2019 – Population Projections

| Year | Band A | Band B | Band C | Band D | Band E |
|-------|--------|--------|--------|--------|--------|
| 2016 | 5,940 | 5,940 | 5,940 | 5,940 | 5,940 |
| 2021 | 5,435 | 6,000 | 6,245 | 6,465 | 7,065 |
| 2026 | 5,570 | 6,300 | 6,610 | 6,910 | 7,690 |
| 2031 | 5,900 | 6,740 | 7,090 | 7,390 | 8,250 |
| *2036 | 5,885 | 7,005 | 7,475 | 7,875 | 9,020 |

Current WA Tomorrow Report No.11 population forecasts for the Shire of Denmark. *2036 projections based on DPLH methodology for average annual growth rates

PROJECTED POPULATION GROWTH - WA TOMORROW 2019



Current WA Tomorrow Report No.11 population forecasts for the Shire of Denmark. *2036 projections based on DPLH methodology for average annual growth rates

These projections equate to the following assumed rates of population growth:

Figure 20: WA Tomorrow 2019 – Assumed Average Annual Population Growth

| Year | Band A | Band B | Band C | Band D | Band E |
|---------|--------|--------|--------|--------|--------|
| 2016-21 | -1.76% | 0.20% | 1.01% | 1.71% | 3.53% |
| 2021-26 | 0.49% | 0.98% | 1.15% | 1.34% | 1.71% |
| 2026-31 | 1.16% | 1.36% | 1.41% | 1.35% | 1.41% |
| 2031-36 | -0.05% | 0.77% | 1.06% | 1.28% | 1.80% |

Current WA Tomorrow Report No.11 population forecasts for the Shire of Denmark. *2036 projections based on DPLH methodology for average annual growth rates

The Band C (median) projection is ordinarily assumed as the most likely; however, the Shire has observed that recorded growth to 2021 has most closely aligned to the Band D projection. The Shire is expecting steadily continuing growth given this course, historic growth patterns and the likely continuation of the reasons why population growth is occurring,

7.1.6.2 Projected Population

Given the evident variation from the WA Tomorrow forecasts, the Shire has prepared a range of population projections based on three potential population growth rates:

- Assumed growth rates from WA Tomorrow Band C between 2021 and 2031, in addition to an assumed growth rate 2031 to 2036 (extrapolation based on DPLH advised formula).
- Assumed growth rates from WA Tomorrow Band D between 2021 and 2036 (formulated as per Band C above).
- Assumed growth rates from WA Tomorrow Band E between 2021 and 2036 (formulated as per Band C above).

Figure 21 outlines the population projections for the Shire to 2036 resulting from this methodology. These forecasts suggest that the Shire is likely to have a population between 7,700 and 8,200 in 2036.

Figure 21: Population Growth Projections to 2036

| Forecasts | Band C | Band D | Band E |
|-----------|--------|--------|--------|
| 2021 | 6,422 | 6,422 | 6,422 |
| 2026 | 6,799 | 6,864 | 6,990 |
| 2031 | 7,293 | 7,340 | 7,497 |
| 2036 | 7,688 | 7,822 | 8,196 |

The Shire has also considered an outlying scenario based on an accelerated population growth rate of 2.3% per year, resulting in a population of approximately 9,032 at 2036. This could potentially occur if the Shire experienced significant industry growth and represents a conservative approach to land use planning by providing the opportunity to consider the potential outcomes for land and housing availability, utility infrastructure and community facilities in a more demanding scenario.

It is noted that population projections serve as an estimate only and their accuracy is subject to many differing variables. These projections can be reviewed as further data becomes available and responses reconsidered as part of five-yearly review of this Strategy.



7.1.7 Dwelling Yield Analysis

7.1.7.1 Housing Requirements

Figure 22 includes forecasted housing needs based on the Shire's population projections presented in this Strategy. This identifies a requirement for between 755 and 1,100 additional houses over the next 15 years, an average of between 53 and 78 additional houses per year.

Figure 22: Population and housing demand projections.

| | Band C | Band D | Band E |
|------------------------------------|--------|--------|--------|
| Additional Residents at 2036 | 1,266 | 1,400 | 1,774 |
| Residential Homes Needed (2.3 ppd) | 550 | 609 | 771 |
| Second Homes (27% of total) | 204 | 225 | 285 |
| Total Additional Homes | 754 | 834 | 1,057 |

These forecasts assume no changes to the average number of persons per occupied dwelling (2.3) and a continued reduction in the proportion of unoccupied dwellings (including holiday/ second homes), given that this proportion has been declining since 2011 as shown in Figure 23.

Figure 23: Percentage (%) of unoccupied dwellings and average household size.

| Year | % Unoccupied Dwellings | Average Household Size |
|------|------------------------|------------------------|
| 2001 | 27.5% | 2.5 |
| 2006 | 32.2% | 2.3 |
| 2011 | 33.2% | 2.3 |
| 2016 | 29.2% | 2.3 |
| 2021 | 27.7% | 2.3 |

The potential outlying scenario assessing higher rates of population growth would result in a need for approximately 1,550 additional houses by 2036 (103 per year).

7.1.7.2 Lot Yield

In 2017, the DPLH prepared the Denmark Regional Land Supply Assessment to identify the available stock of land for the development of residential housing. As the rate of land development and lot release in the Shire is relatively slow, much of the information in this report is still applicable. Notwithstanding, this Strategy provides an updated assessment given the approved planning proposals, completed developments and changes to State policies (notably including bushfire and sewerage issues) that have occurred since this time.

The Shire's existing and potential lot supply includes:

- Approximately 400 vacant lots across the Shire (all zones).
- 1,428 potential additional lots on land currently zoned for residential and rural residential development.

This predicted lot yield is hypothetical and subject to a range of variables that will influence the timing and actual number of lots created in the future. These figures do not account for additional lots that may be created through small-scale infill development within the Denmark Town Centre. Although an assessment completed as part of the Denmark Regional Land Supply Assessment (2017) did not determine a potential infill development yield, it is anticipated that an additional 100 to 200 dwellings could be readily realised

These figures indicate that the existing supply of land zoned for residential and rural residential development can sufficiently provide for housing demand in all of the WA Tomorrow forecast population growth scenarios to 2036. If the outlying population growth scenario were to occur the existing residential land supply may be exhausted by 2036 and review prior to this time would be necessary to ensure continuing supply.

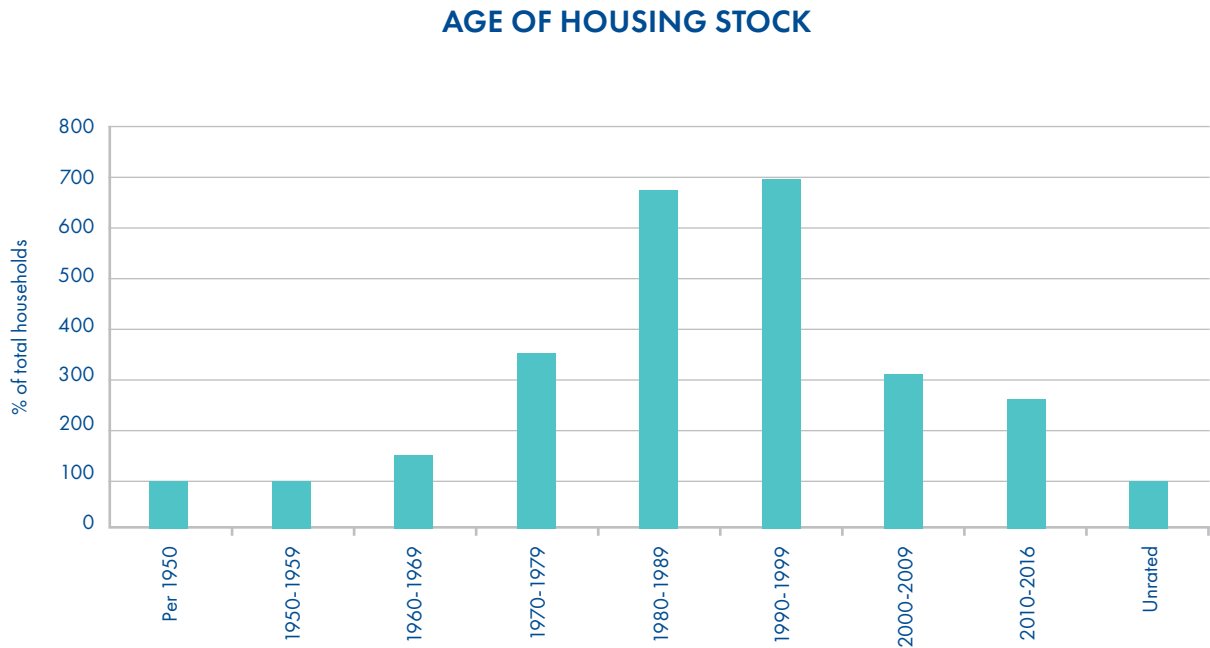
7.1.8 Housing

7.1.8.1 Profile

At the time of the 2021 Census, there were 3,263 private dwellings recorded within the Shire (ABS 2021). This was approximately an additional 185 dwellings between 2016 and 2021 (ABS 2016 and 2021).

Housing stock in the Shire is relatively new, with 61% of homes constructed since 1990 (refer Figure 24). The majority of older housing stock is located within the Denmark townsite, reflecting a limited historical pattern of development, while newer housing has largely been supported by residential and rural residential expansion of the Denmark townsite.

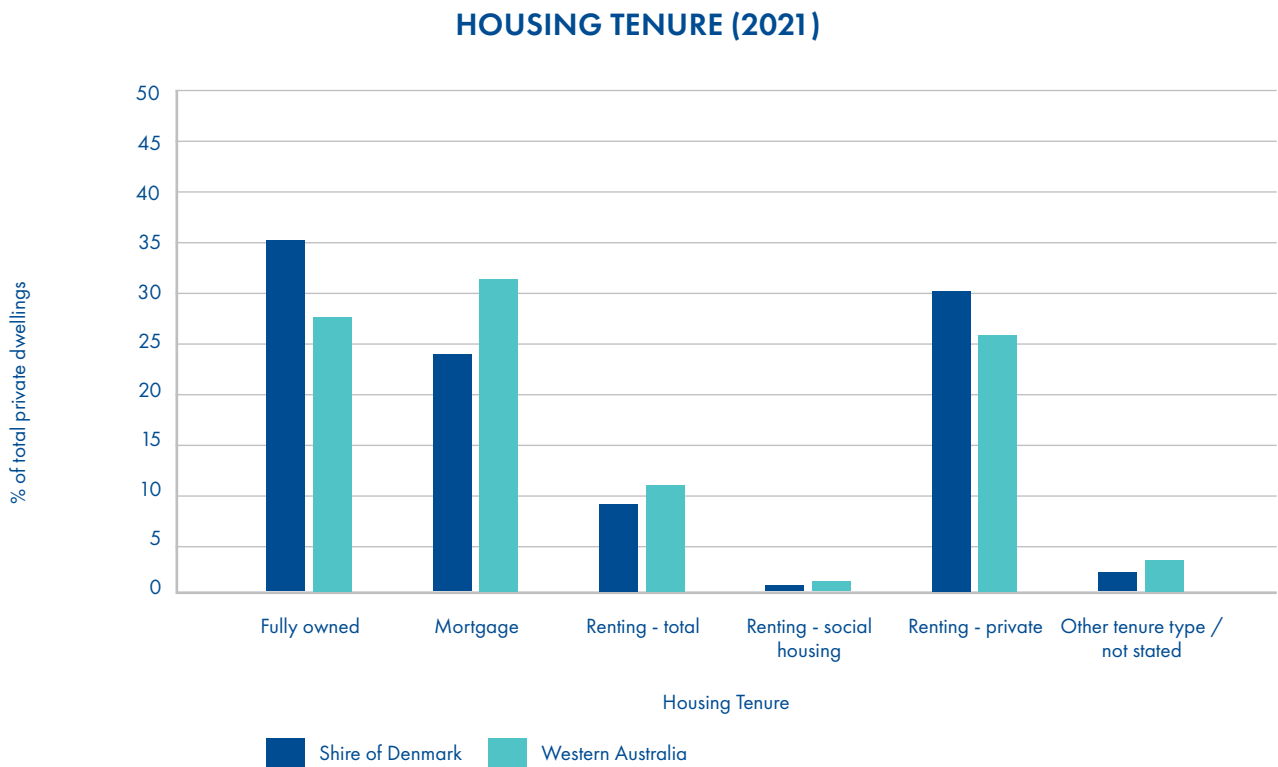
Figure 24: Age of Housing Stock



Source: Department of Planning, Lands and Heritage (2017), *Integrated Regional Information System*

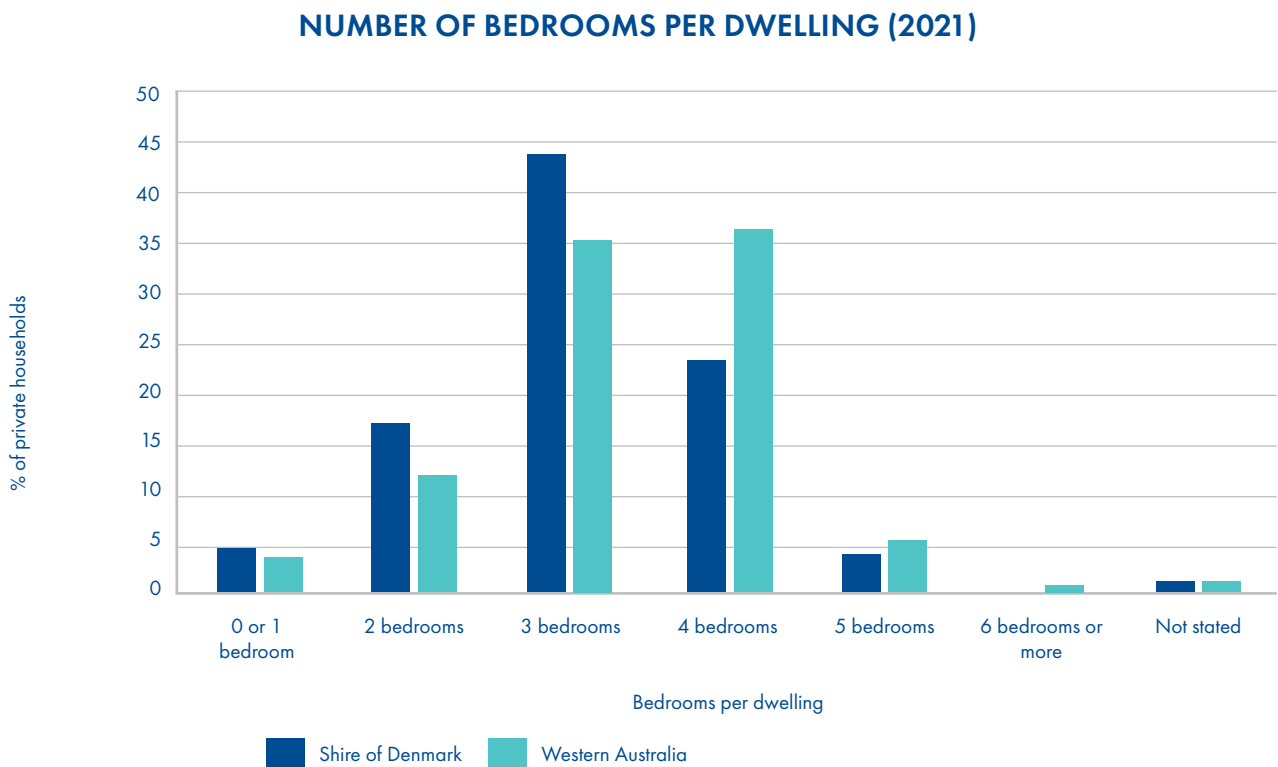
Housing tenure varies from averages for Western Australia, with a higher proportion of homes fully owned (representing 46.8% dwellings within the Shire) (suggesting empty nesters and retirees) and lower proportion of homes rented (representing 20.5% dwellings within the Shire) (ABS 2021) (refer Figure 25).

Figure 25: Housing Tenure (2021)



At the time of the 2021 Census, the majority of dwellings in the Shire were detached houses (66.3%, compared to 71.0% for Western Australia) with three-bedroom dwellings the most common size (42.4%) (refer Figure 26).

Figure 26: Number of bedrooms per dwelling (2021)



7.1.8.2 House Prices

Recent figures from the Real Estate Institute of Western Australia (REIWA) suggest relatively stable housing prices between 2017 and 2020 and a marked jump in the median price in 2021 (refer Figure 27).

Figure 27: Housing prices (2017-2020)

| | Shire of Denmark | Regional WA |
|------|------------------|-------------|
| 2017 | \$380,000 | \$347,000 |
| 2018 | \$380,000 | \$330,000 |
| 2019 | \$342,500 | \$330,000 |
| 2020 | \$391,000 | \$355,000 |
| 2021 | \$457,500 | \$395,000 |

Source: Real Estate Institute of Western Australia (REIWA) - <https://reiwa.com.au/suburb/denmark/>

As shown in Figure 28, residential rental prices were relatively consistent over the 2014 to 2018 period; however, recent figures suggest a current median rent of \$420 per week.

Figure 28: Median Weekly Rental (Houses)

| | Shire of Denmark | Regional WA | Western Australia |
|------|------------------|-------------|-------------------|
| 2014 | \$330 | \$360 | \$420 |
| 2015 | \$350 | \$380 | \$410 |
| 2016 | \$353 | \$350 | \$380 |
| 2017 | \$350 | \$340 | \$350 |
| 2018 | \$325 | \$330 | \$350 |

Source: Hometrack 2014-2018, Automated Valuation System, via <https://economy.id.com.au/denmark>

These figures generally reflect anecdotal evidence from local real estate agents and property managers confirming a high volume of sales and increased purchase and rental prices resulting from high levels of demand. It is expected that this will be more clearly indicated as further data becomes available.

7.2 Education

The following figures support the information included in Section 3.4.1.1, Part 1 of this Strategy which considers projected growth of school aged population.

Figure 29: School Enrolments in the Shire of Denmark 2016-2021

| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|-------------------------------------|-------|-------|-------|-------|-------|-------|
| Denmark Primary School | 414 | 397 | 388 | 372 | 380 | 401 |
| Golden Hill Steiner School | 93 | 97 | 89 | 84 | 80 | 106 |
| Kwoorabup Nature School | 42 | 37 | 50 | 62 | 68 | 68 |
| Total Primary | 549 | 531 | 527 | 518 | 528 | 575 |
| Denmark Senior High School | 409 | 416 | 429 | 437 | 431 | 458 |
| WA College of Agriculture - Denmark | 126 | 130 | 138 | 142 | 138 | 139 |
| Total Secondary | 535 | 546 | 567 | 579 | 569 | 597 |
| Total | 1,084 | 1,077 | 1,094 | 1,097 | 1,097 | 1,172 |

Enrolment numbers sourced from Myschool, Schoolsonline and directly from schools.

Figure 30: Total School Age Population in the Shire of Denmark 2001-2021

| | 2001 | 2006 | 2011 | 2016 | 2021 * |
|--|-------|-------|-------|-------|--------|
| Babies and pre-school age (0 to 4 years) | 285 | 231 | 294 | 265 | 306 |
| Primary school age (5 to 11) | 480 | 453 | 483 | 524 | 538 |
| Secondary school age (12 to 17) | 451 | 420 | 444 | 520 | 562 |
| Total school age | 931 | 873 | 927 | 1044 | 1,100 |
| Total population | 4,367 | 4,511 | 5,194 | 5,835 | 6,422 |

Figure 31: Forecast School Age Population (5-17 years)

| | Band C | Band D | Band E |
|------|--------|--------|--------|
| 2021 | 1,117 | 1,117 | 1,117 |
| 2026 | 1,183 | 1,194 | 1,216 |
| 2031 | 1,269 | 1,277 | 1,304 |
| 2036 | 1,338 | 1,361 | 1,426 |

Assumes consistent proportion of aged group 5-17 years as 2016 Census (17.4%). 2036 projections for WA Tomorrow are extrapolated based on average annual growth rates.

7.3 Commercial and Industrial Floorspace - Historical Change and Growth Projections

The following sections provide statistical information to support the overview of the historic changes and growth projections for commercial and industrial floorspace included in Part 1, Section 3.2.1.4 Commercial and Industrial Floorspace Analysis, of this Strategy.

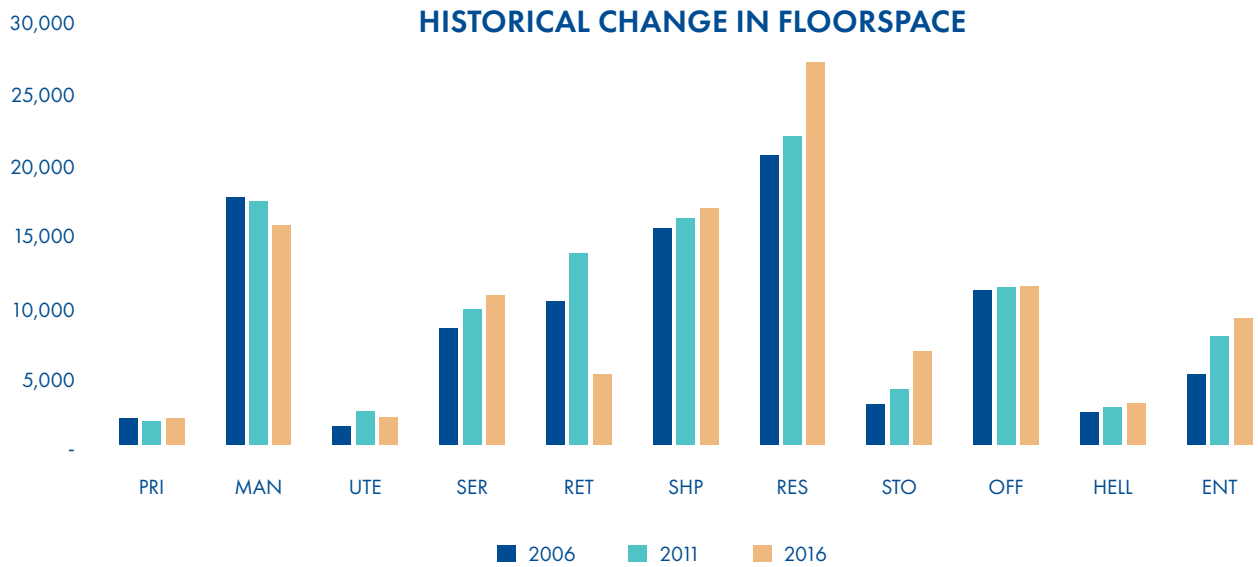
Historical Change

Figures 32 and 33 demonstrate historic change in commercial and industrial floorspace, by type.

Figure 32: Historical Change in Floorspace (2006 – 2016) (m²)

| PLUC Code | Employment Sector | 2006 | 2011 | 2016 |
|---|--|--------|--------|---------|
| Primary/Rural (PRI) | Agriculture, Forestry and Fishing Mining | 1,724 | 1,526 | 1,680 |
| Manufacturing/ Processing/Fabrication (MAN) | Manufacturing | 17,061 | 16,928 | 15,195 |
| Utilities/ Communications (UTE) | Electricity, Gas, Water and Waste services Information, Media Telecommunications | 1,044 | 2,088 | 1,670 |
| Service Industry (SER) | Construction Administrative and Support Services Other Services | 7,959 | 9,180 | 10,220 |
| Other Retail (RET) | Wholesale Trade | 9,807 | 13,076 | 4,670 |
| Shop/Retail (SHP) | Retail Trade | 14,926 | 15,515 | 16,250 |
| Residential (RES) | Accommodation and Food Services | 20,024 | 21,324 | 26,525 |
| Storage/Distribution (STO) | Transport, Postal and Warehousing | 2,540 | 3,629 | 6,290 |
| Office/Business (OFF) | Financial and Insurance Services Professional, Scientific and Technical Services Rental, Hiring and Real Estate Services Administrative and Support Services | 10,535 | 10,734 | 10,800 |
| Health/Welfare/ Community Services (HEL) | Public Administration and Safety Education and Training Health Care and Social Assistance Information Media and Telecommunications | 1,942 | 2,303 | 2,680 |
| Entertainment/ Recreation/Cultural (ENT) | Arts and Recreation Services | 4,635 | 7,298 | 8,630 |
| Total | | 86,099 | 95,383 | 104,610 |

Figure 33: Historical Change in Floorspace (2006 – 2016) (m²)



Source: Department of Planning, Lands and Heritage (2019), ABS Census 2006, 2011, 2016, Pracsys 2021

Growth Projections

Projecting future commercial and industrial floorspace needs depends on assessment of population growth as well as trends in tourism and other commercial industries. Figure 34 provides an indication of future floorspace needs.

Figure 34: Future commercial and industrial floorspace projections (m²)

| PLUC | % POPULATION | 2019 | 2021 | 2026 | 2031 | 2036 | 2041 | Gap |
|-------|--------------|--------|--------|--------|--------|--------|--------|--------|
| UTE | 75% | 1,253 | 1,304 | 1,393 | 1,490 | 1,594 | 1,704 | 451 |
| SER | 75% | 7,665 | 7,978 | 8,527 | 9,119 | 9,753 | 10,430 | 2,765 |
| SHP | 50% | 8,125 | 8,456 | 9,039 | 9,666 | 10,338 | 11,056 | 2,931 |
| OFF | 25% | 1,350 | 1,405 | 1,502 | 1,606 | 1,718 | 1,837 | 487 |
| HEL | 100% | 2,680 | 2,789 | 2,981 | 3,188 | 3,410 | 3,647 | 967 |
| ENT | 50% | 4,315 | 4,491 | 4,800 | 5,134 | 5,490 | 5,872 | 1,557 |
| RES | 75% | 19,894 | 21,770 | 25,728 | 29,562 | 33,968 | 39,031 | 19,137 |
| Total | | 45,281 | 48,193 | 53,970 | 59,766 | 66,270 | 73,576 | 28,295 |

8 Tourism

8.1 Tourism Sites

Part 1 of the Strategy assessed and made recommendations for existing Tourist zoned sites. This is summarized in Figure 35 below.

Figure 35: Recommendations for Tourism Sites

| Location | Name | Existing Land Use/s | Recommendation | Rationale |
|---|-----------------------------|------------------------------------|--|--|
| Lots 209 (#45) Payne Road, Denmark | The Cove | Chalets | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 211 (#259) Ocean Beach Road, Denmark | Gum Grove Chalets | Chalets | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 215 (#263) Ocean Beach Road, Denmark | - | Chalets, former caravan park | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 1-15 (#63) Inlet Drive, Denmark | Pelicans | Hotel | Retain Tourism zoning | Operating tourism business |
| Lot 1084 (#1) Inlet Drive, Denmark | Rivermouth Caravan Park | Caravan Park | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Portion of Lot 9011 on DP424797 | Springdale Beach | Undeveloped | Modify zoning to low-density Residential, as per Amendment No. 149 to TPS3 | Site is within a residential area, undeveloped, isolated from proposed Tourism Precincts |
| Lot 21 (#678) Ocean Beach Road, Ocean Beach | Spring Bay Villas | Chalets | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 11 (#694) Ocean Beach Road, Ocean Beach | Winniston Lodge | Guesthouse | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 1 (#738) Ocean Beach Road | - | Non-tourism use | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 2238 (#770) Ocean Beach Road, Ocean Beach | Ocean Beach Caravan Park | Caravan Park | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 51 & 52 (#766-768) Ocean Beach Road, Ocean Beach | Ocean Beach Hideaway | Chalets | Retain Tourism zoning | Part of proposed Tourism Precinct |

| Location | Name | Existing Land Use/s | Recommendation | Rationale |
|--|------------------------------------|---------------------------------------|-------------------------------|--|
| Lot 20 (#133) and 21 (#135) South Coast Highway, Denmark | Denmark Tavern/ Kwoorabup Motel | Tavern & Motel | Retain Tourism zoning | Operating tourism business |
| Lot 3 (#93) Rudgyard Place, Hay | - | Caravan Park (former) | Modify to Rural zoning | Site is not currently being operated for tourism purposes and is unlikely to meet bushfire planning requirements to enable reinstatement or alternative tourism use. |
| Lot 1643 (#40) Riverbend Lane, Denmark | Riverbend Caravan Park | | Retain Tourism zoning | Operating tourism business |
| Lot 21 (#21) Mairet Rise, Shadforth | - | Undeveloped | Modify to Rural zoning | Site is currently undeveloped and isolated from tourism precincts |
| Lot 9001 (#4) Cussons Rd, | - | Undeveloped for tourism purposes | Retain Tourism zoning | Prominent site with highway frontage, previous development approvals in place and existing commercial/ industrial buildings. |
| Lot 2 (#429) Mount Shadforth Road, Shadforth | Karri Mia | Multiple tourism and associated uses. | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 2 (#390) Mount Shadforth Road, Shadforth | Castelli Estate | Multiple tourism and associated uses | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 1 (#1572) South Coast Highway, Shadforth | Karma Chalets | Chalets | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 550 (#2048) South Coast Hwy, Shadforth | - | Undeveloped for tourism purposes | Modify to Conservation zoning | Site is currently undeveloped and isolated from tourism precincts. |
| Lot 24 & 25 (#2020 & 2022) Scotsdale Rd, Kordabup | Casa Libelula | Bed & Breakfast | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 18 (#21) Tindale Rd, Bow Bridge | NewFarm | Chalets | Retain Tourism zoning | Operating tourism business |

| Location | Name | Existing Land Use/s | Recommendation | Rationale |
|---|----------------------------------|---------------------------------------|--|--|
| Lot 1 (#1597) Valley of the Giants Road, Bow Bridge | - | Non tourism use | Consider alternative zoning – Conservation/ Rural | Previous approvals for tourism development but alternative zoning may be considered with landowner agreement. |
| Lot1 1-13 (#11) Peppermint Way, Peaceful Bay | Peaceful Bay Chalets | Chalets | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 82 (#6686) South Coast Highway, Nornalup | Nornalup Riverside Chalets | Chalets | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lots 20 & 83 (#12 & 8) Riverside Drive, Nornalup | - | Residential use | Retain Tourism zoning | Part of proposed Tourism Precinct |
| Lot 1839 (#6400) South Coast Highway, Nornalup | Valley of the Giants Ecopark | Caravan Park/ Camping Ground | Propose Tourism zoning | Existing tourism development, while not in a precinct this site is in a strategic location adjacent to a regional attraction. Retention of caravan parks/camping grounds through Tourism Zone preferred. |



8.2 Tourism Precincts

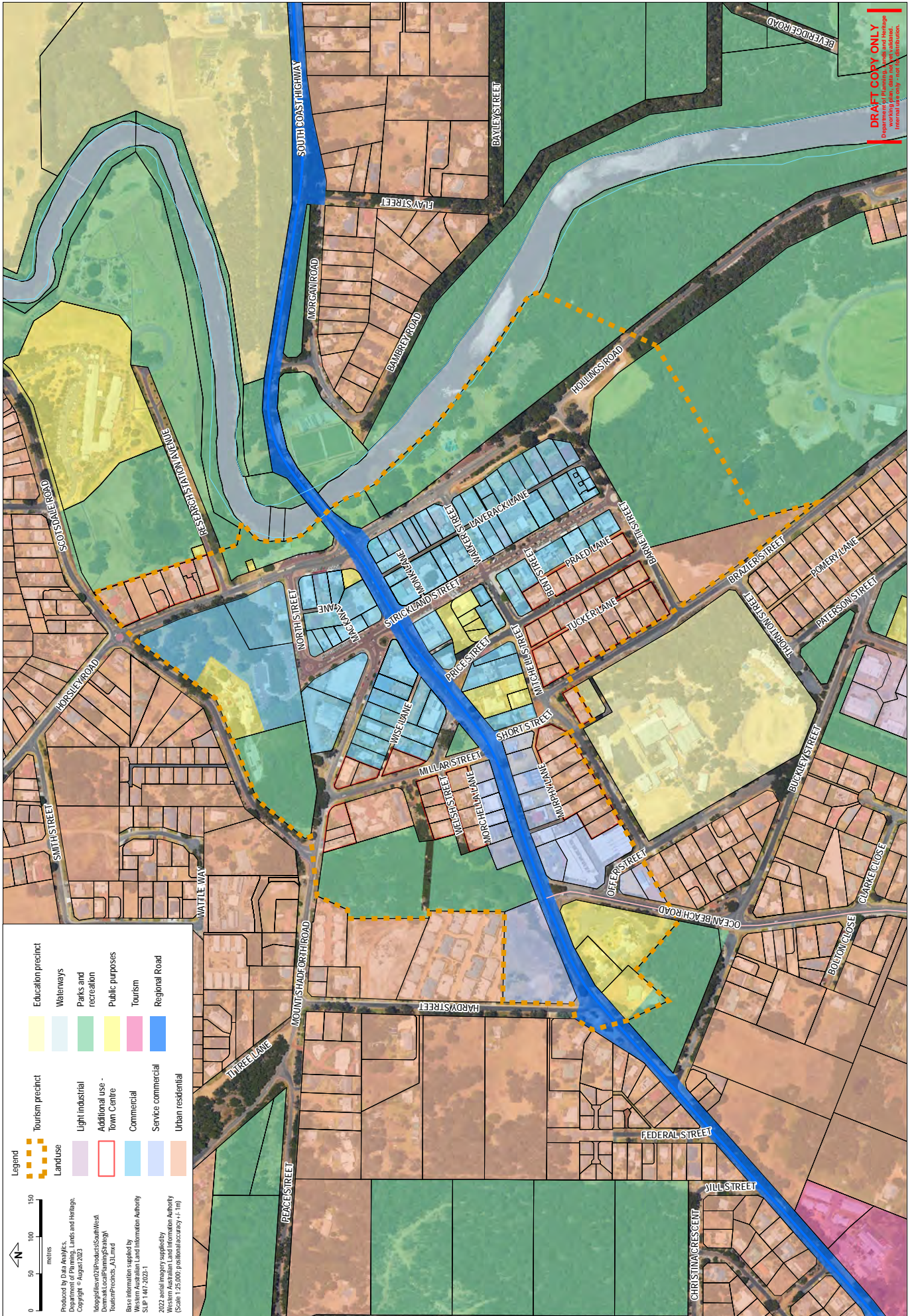
Tourism precincts proposed by the Strategy are identified in Figure 36 below.

Denmark Town Centre

Figure 36: Recommendations for Tourism Precincts

| | |
|---|--|
| Precinct Name | Denmark Town Centre Planning Area A |
| Location | Please see page 167 |
| Tourism Assessment | <p>The Denmark Town Centre scores highly against all measures for a successful tourism precinct. Services, facilities and attractions are located within close proximity. Tourism land uses are compatible with existing land uses, with some tourist accommodation already established, including a motel, hostel, bed and breakfast, and self-contained apartments.</p> <p>The Town Centre environment and parklands alongside the Denmark River each provide amenity.</p> <p>Small scale tourism attractions are likely to be based on retail, entertainment and hospitality experiences, with potential for additional accommodation as part of the existing mix of land uses.</p> |
| Recommendations & Considerations | <p>Underlying zoning to be retained and tourism land uses provided for.</p> <p>Tourism and residential accommodation may be combined within mixed use development – no limitations on length of stay are required.</p> <p>Measures should be taken as part of development to protect tourist accommodation from environmental noise.</p> <p>Tourism accommodation to be appropriately located away from main street frontages on the ground floor of buildings.</p> |

Denmark Town Centre Tourism Precinct (Planning Area A)



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8.2 Tourism Precincts (cont.)

Denmark River Mouth

Figure 36: Recommendations for Tourism Precincts

| | |
|---|---|
| Precinct Name | Denmark River Mouth |
| Location | Please see page 169 |
| Tourism Assessment | <p>The Denmark River Mouth contains existing accommodation and a high level of amenity provided by the Denmark River and Wilson Inlet.</p> <p>Access to several walking trails, river side parks and boat launching facilities is available in the immediate vicinity.</p> <p>The River Mouth is accessed by Inlet Drive and dual use path (north/south) to services and facilities in the Town Centre (1.5km).</p> |
| Recommendations & Considerations | <p>Primary use for tourism purposes or proposed rezoning to Tourism Zone may be supported.</p> <p>Maximum 15% unrestricted length of stay may be supported.</p> <p>Potential location for additional marine infrastructure (public and private) and improved water access for recreation.</p> <p>Development to include detailed assessment of:</p> <ul style="list-style-type: none"> • Bushfire risks, while preserving remnant vegetation. • Impact on landscape values/ visual amenity. • Buffer distance to wastewater treatment plant. • Flooding and coastal protection for low-lying or waterside landholdings. |

Denmark River Mouth Tourism Precinct



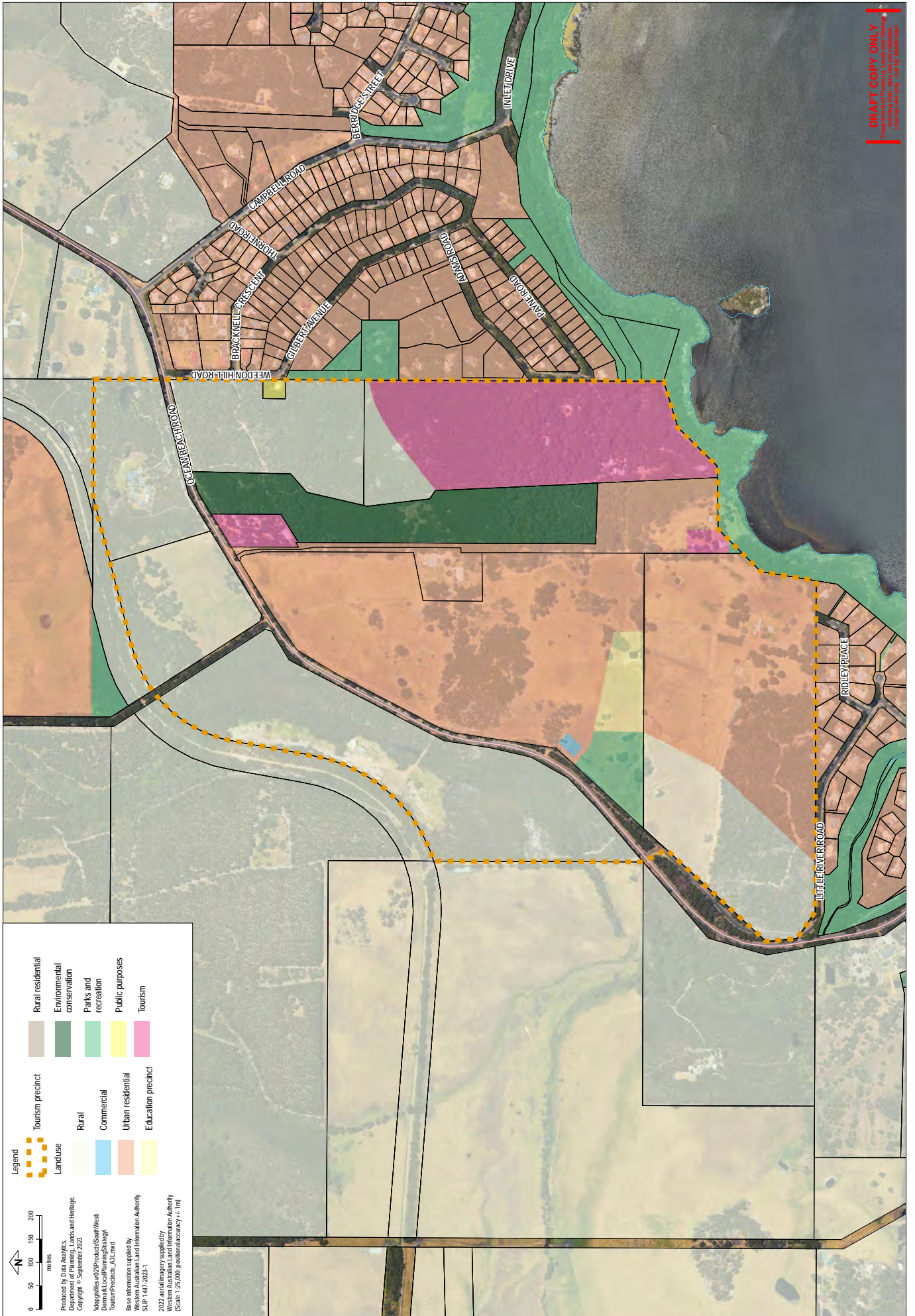
8.2 Tourism Precincts (cont.)

Weedon Hill

Figure 36: Recommendations for Tourism Precincts

| | |
|---|--|
| Precinct Name | Weedon Hill |
| Location | Please see page 171 |
| Tourism Assessment | <p>The Weedon Hill precinct provides a high level of amenity and relatively good accessibility to the townsite, Ocean Beach and Wilson Inlet. The site contains three existing tourist accommodation developments.</p> <p>The site contains large areas of undeveloped land and represents a relatively unique opportunity for a large scale tourism development in an accessible location.</p> <p>Residential development is unlikely to be realised during the life of this Strategy due to infrastructure and viability constraints and the forecast need for land (see further discussion in Section 3.1 of this Strategy). Use of this land for tourism purposes is one of the potential alternative land uses contemplated by this Strategy.</p> |
| Recommendations & Considerations | <p>Primary use for tourism purposes or proposed rezoning to Tourism Zone may be supported.</p> <p>Maximum 15% unrestricted length of stay may be supported.</p> <p>Footpath network should be provided to enable access from development to dual use path.</p> <p>Development to include detailed assessment of:</p> <ul style="list-style-type: none"> • Provision of wastewater servicing. • Bushfire risks, while preserving remnant vegetation. • Impact on landscape values/ visual amenity – buffering to Ocean Beach Road may be required. • Flooding and coastal protection for low-lying or waterside landholdings. • Interface to residential development. |

Weedon Hill Tourism Precinct



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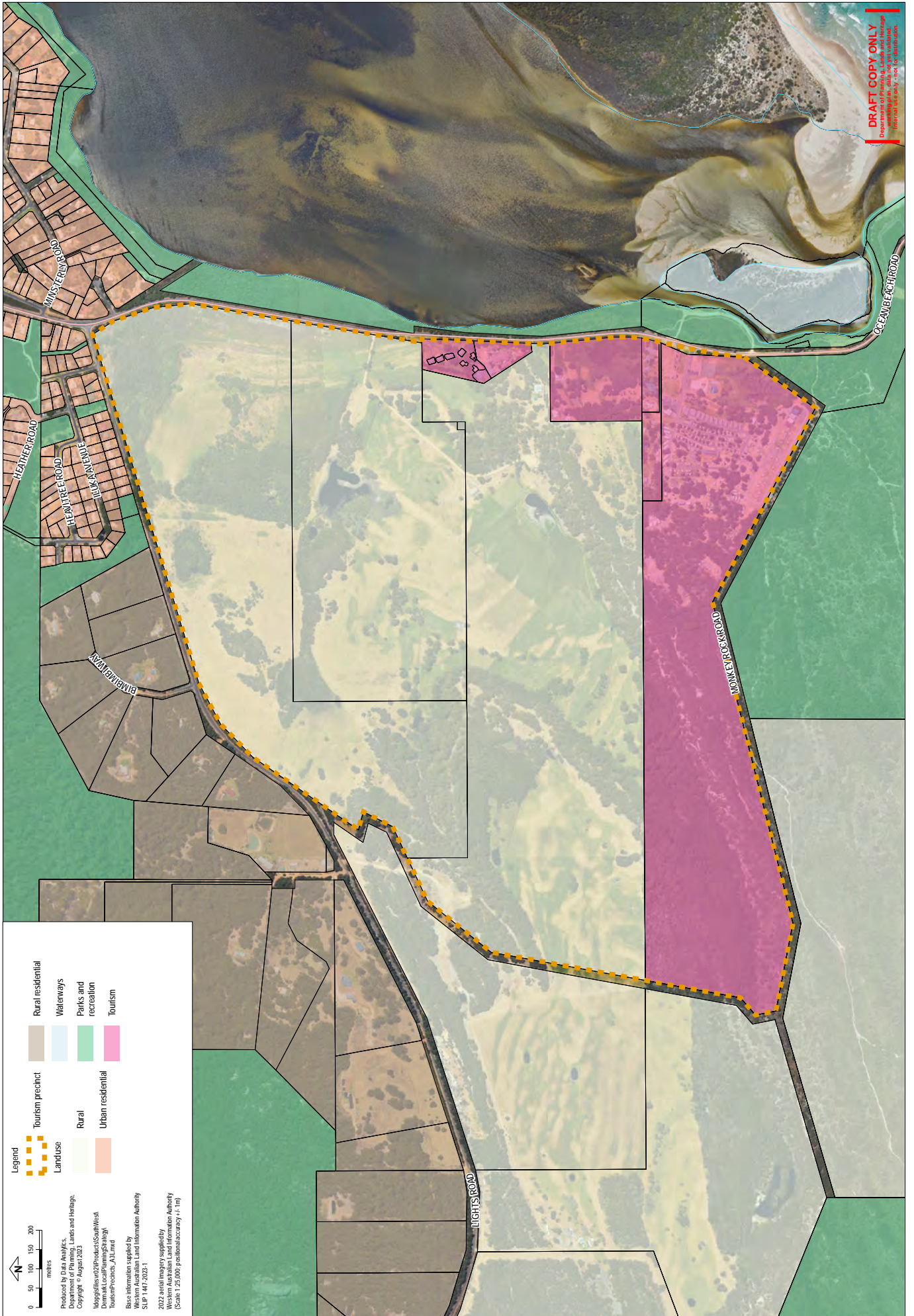
8.2 Tourism Precincts (cont.)

Ocean Beach

Figure 36: Recommendations for Tourism Precincts

| | |
|---|--|
| Precinct Name | Ocean Beach |
| Location | Please see page 173 |
| Tourism Assessment | <p>The Ocean Beach precinct includes Ocean Beach, Prawn Rock Channel and the Wilson Inlet within the immediate proximity, providing a high level of amenity and attractions.</p> <p>Further tourism development would be consistent with existing land uses, which includes a large scale caravan park and three other accommodation businesses.</p> <p>Ocean Beach is the most appropriate coastal location for development of larger scale tourist accommodation, accessible to services and facilities in the Denmark townsite and a regional recreational node.</p> |
| Recommendations & Considerations | <p>Primary use for tourism purposes or proposed rezoning to Tourism Zone may be supported.</p> <p>Maximum 15% unrestricted length of stay may be supported.</p> <p>Footpath network should be provided to enable access from development to dual use path.</p> <p>Significant public infrastructure improvements are proposed that will support recreational pursuits within the Ocean Beach precinct.</p> <p>Development to include detailed assessment of:</p> <ul style="list-style-type: none"> • Provision of wastewater servicing. • Bushfire risks and access, while preserving remnant vegetation. • Impact on landscape values/ visual amenity – views from Ocean Beach Road/ Lights Road. • Flooding and coastal protection for low-lying or waterside landholdings. • Cultural values. |

Ocean Beach Tourism Precinct



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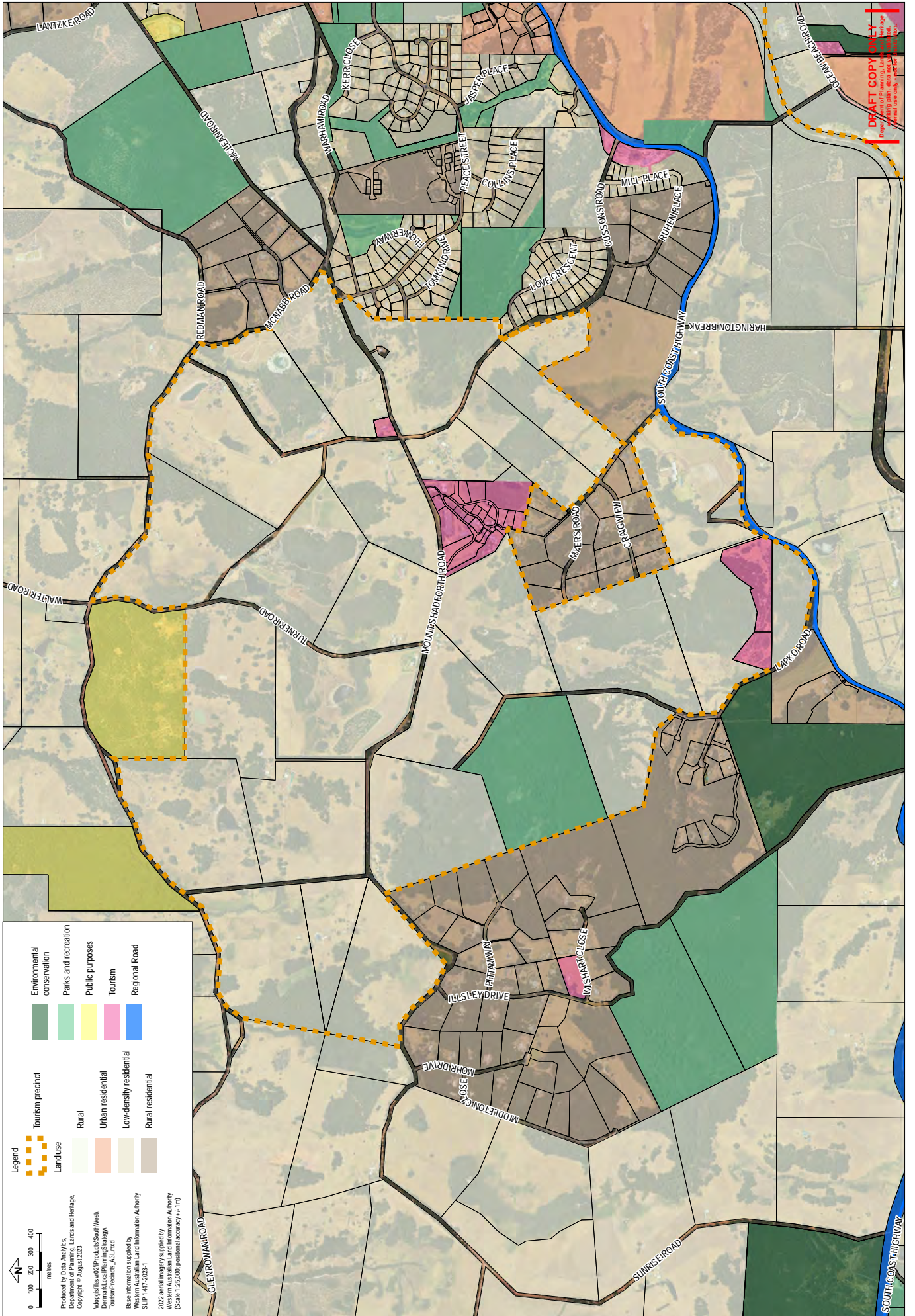
8.2 Tourism Precincts (cont.)

Mount Shadforth

Figure 36: Recommendations for Tourism Precincts

| | |
|---|---|
| Precinct Name | Mount Shadforth |
| Location | Please see page 174 |
| Tourism Assessment | <p>The Mount Shadforth precinct is an extensive area where a range of tourism related land uses exist. Some are included in the Tourism Zone while others are retained in the Rural Zone (including chalets, bed and breakfast, winery, restaurant, maze, adventure park).</p> <p>Mount Shadforth Road is a prominent scenic drive due to these attractions as well as the long range views over rural landscapes that extend to the Wilson Inlet and coastline.</p> <p>The precinct scores highly against most measures for a successful tourism precinct but is within a rural context and is only accessible by road at present. The precinct represents a prime location for further rural-based tourism development to consolidate existing co-location.</p> |
| Recommendations & Considerations | <p>Primary use for tourism purposes or proposed rezoning to Tourism Zone may be supported.</p> <p>Maximum 15% unrestricted length of stay may be supported.</p> <p>Development to include detailed assessment of:</p> <ul style="list-style-type: none"> • Bushfire risks and access, while preserving remnant vegetation. • Impact on landscape values/ visual amenity – minimising impact on views from Mount Shadforth Road and South Coast Highway in particular. • Interface to low-density residential and rural residential development. |

Mount Shadforth Tourism Precinct

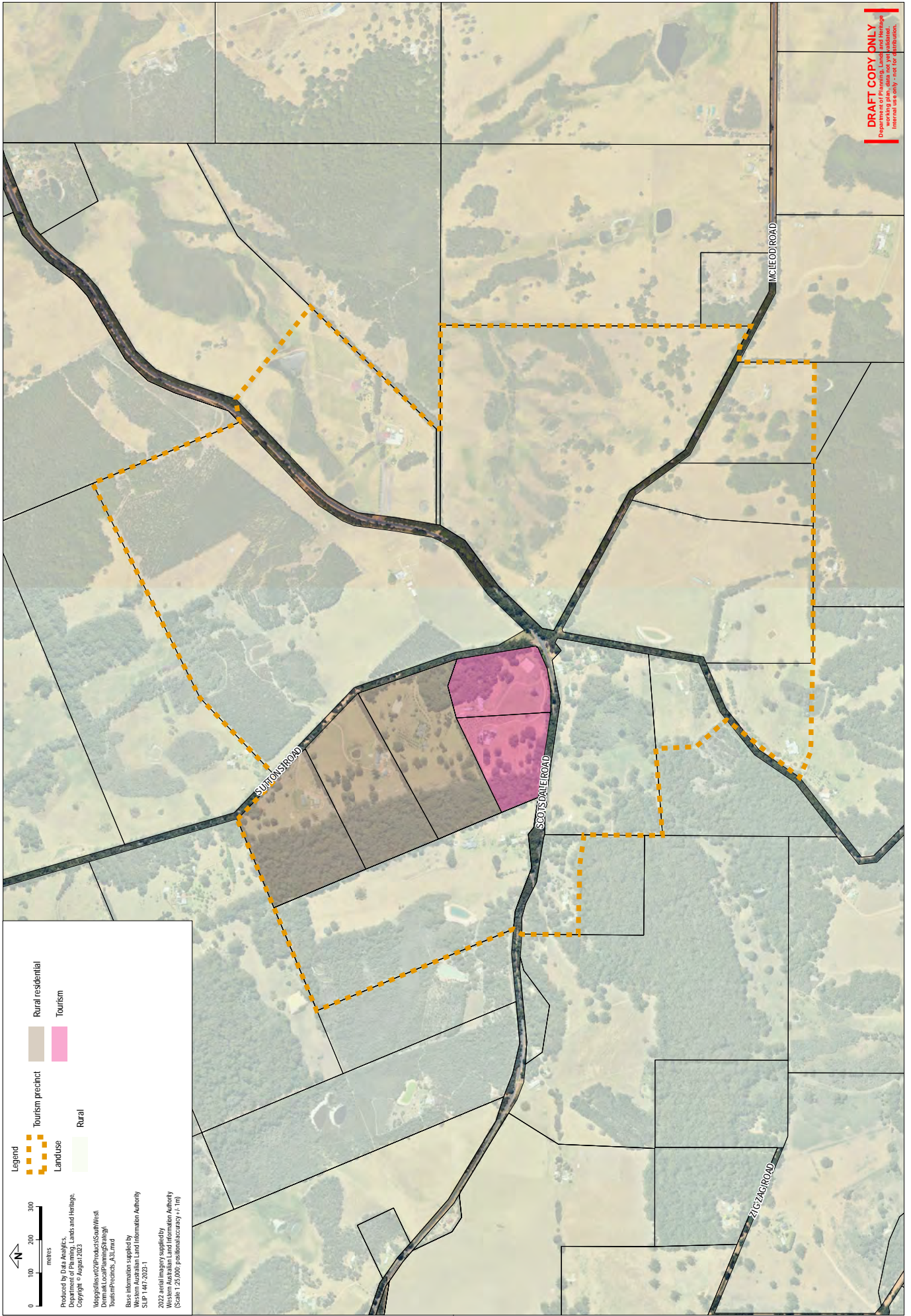


8.2 Tourism Precincts (cont.)

Scotsdale / McLeod

Figure 36: Recommendations for Tourism Precincts

| | |
|---|--|
| Precinct Name | Scotsdale / McLeod |
| Location | Please see page 176 |
| Tourism Assessment | <p>The Scotsdale/ McLeod precinct is located at the intersection of Scotsdale, McLeod and Suttons Roads in Kordabup.</p> <p>Scotsdale and McLeod Roads are important tourist drives with high visual amenity. The precinct contains a prominent tourism attraction (animal farm/ petting zoo), winery and bed and breakfast, with other wineries and accommodation in the vicinity.</p> <p>The precinct has moderate existing attributes and lacks sustainable transport options but represents an opportunity for the consolidation of rural tourism enterprises around existing ones. In particular, this precinct is a suitable location for the development of further attractions.</p> |
| Recommendations & Considerations | <p>Primary use for tourism purposes or proposed rezoning to Tourism Zone may be supported.</p> <p>As the precinct is isolated from a townsite no unrestricted length of stay accommodation units are supported (caretaker/ manager only).</p> <p>Tourism development should provide for footpath access to the public road network. Development to include detailed assessment of:</p> <ul style="list-style-type: none"> • Bushfire risks and access, while preserving remnant vegetation. • Impact on landscape values/ visual amenity – minimising impact on views from Scotsdale Road and McLeod Road. • Interface with agricultural land uses. • On site utility servicing. |



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Legend

- Landuse
- Rural residential
- Tourism
- Rural
- Tourism precinct

0 100 200 300 metres

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 Denmark Local Planning Strategy
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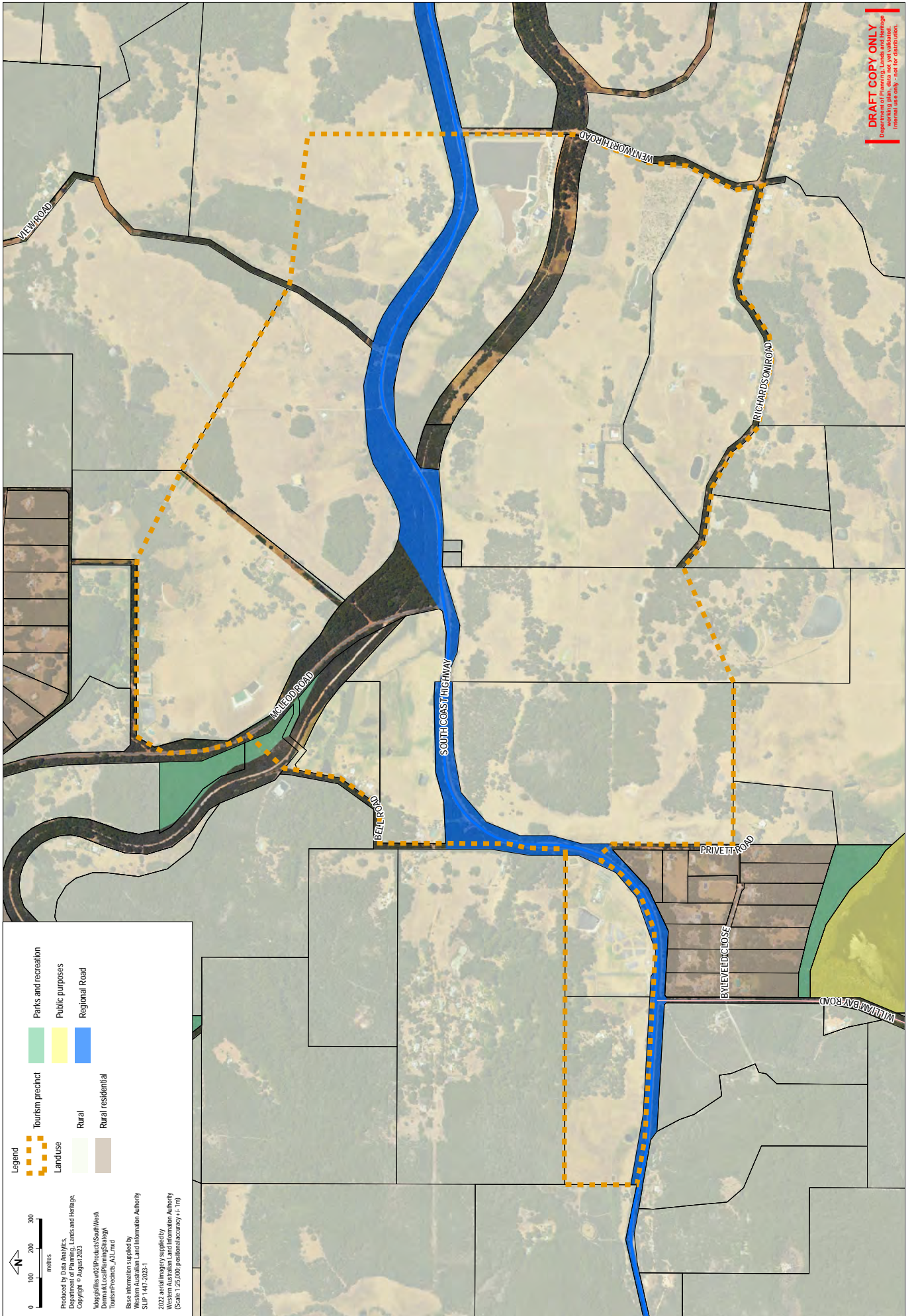
8.2 Tourism Precincts (cont.)

William Bay

Figure 36: Recommendations for Tourism Precincts

| | |
|---|--|
| Precinct Name | William Bay |
| Location | Please see page 178 |
| Tourism Assessment | <p>The William Bay precinct is located at the entrance to the William Bay National Park and a number of other attractions also exist within a few kilometres.</p> <p>The precinct contains a significant proportion of rural living land but has also been the subject of two substantial proposals on rural land for tourism development, including a caravan (transit) park.</p> <p>The precinct is isolated from a townsite but accessible by road or via the intersecting the Munda Bididi Trail or Heritage Rail Trail. The surrounding environment provides a high level of visual amenity but may also be sensitive to development.</p> |
| Recommendations & Considerations | <p>Primary use for tourism purposes or proposed rezoning to Tourism Zone may be supported.</p> <p>As the precinct is isolated from a townsite no unrestricted length of stay accommodation units are supported (caretaker/ manager only).</p> <p>Tourism development should provide for footpath access to the trails network where possible. Development to include detailed assessment of:</p> <ul style="list-style-type: none"> • Bushfire risks and access, while preserving remnant vegetation. • Impact on landscape values/ visual amenity – minimising impact on views from South Coast Highway, William Bay Road and McLeod Road. • Interface to low-density residential and rural residential development. |

William Bay Tourism Precinct



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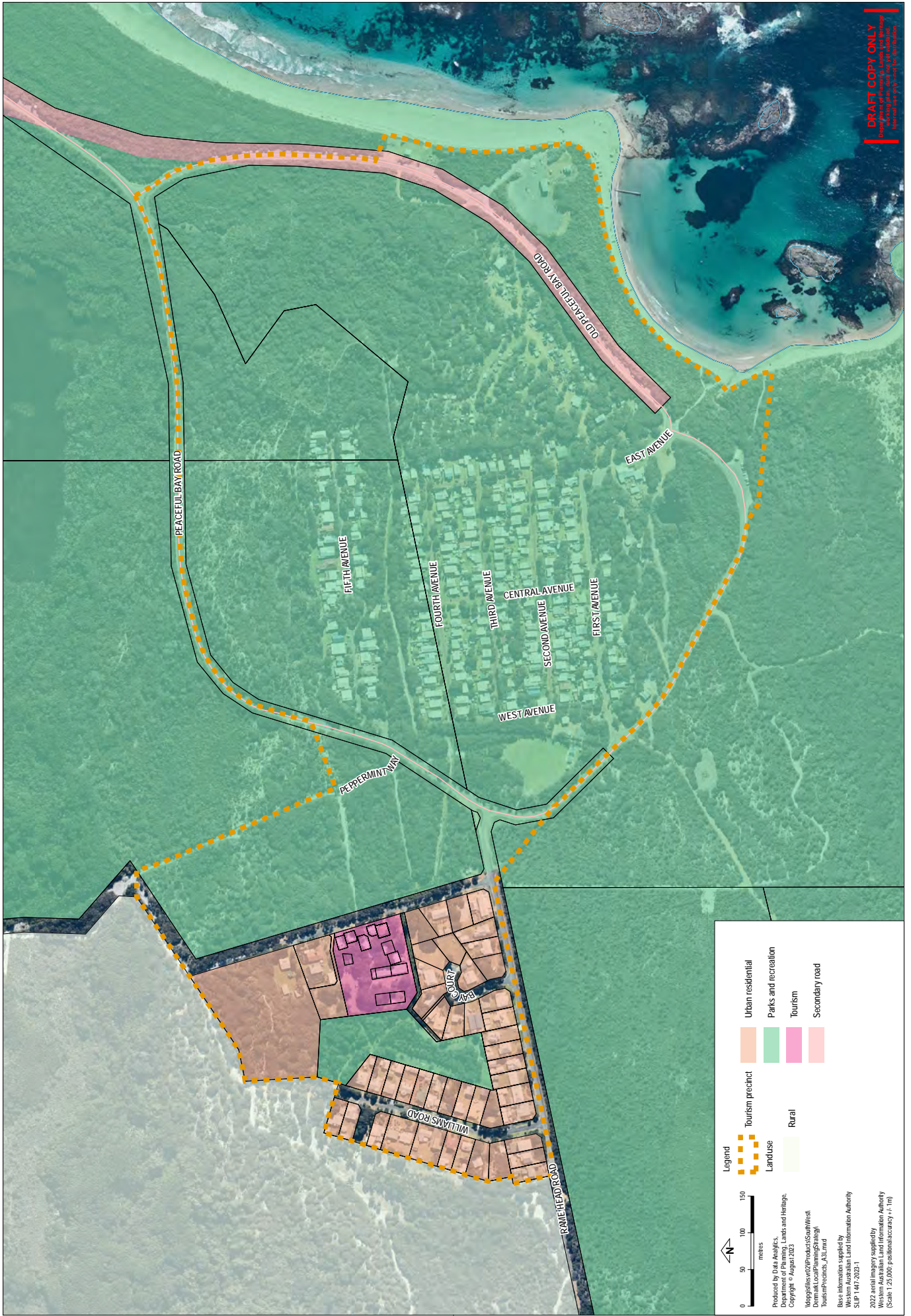
8.2 Tourism Precincts (cont.)

Peaceful Bay

Figure 36: Recommendations for Tourism Precincts

| | |
|---|---|
| Precinct Name | Peaceful Bay |
| Location | Please see page 181 |
| Tourism Assessment | <p>The Peaceful Bay precinct incorporates the existing freehold and leasehold settlement. This area includes a caravan park, general store/café, boat launching and beach access, public open space, chalets and residential development.</p> <p>Peaceful Bay is unique as a settlement located directly on the coastline within the Shire, while the adjoining National Park also provides for nature-based activities and a high level of amenity.</p> <p>While the precinct contains existing residential development and functions as its own node, it is isolated from other settlements and day-to-day services and facilities.</p> |
| Recommendations & Considerations | <p>No additional land has been identified for intensive tourism development or inclusion within the Tourism Zone due to existing constraints, including:</p> <ul style="list-style-type: none"> • Water supply infrastructure. • Wastewater disposal. • Bushfire risk, including secondary road access. • Remnant vegetation and landscape values. <p>As the precinct is isolated from a fully serviced townsite no unrestricted length of stay accommodation units are supported (caretaker/ manager only) within the Tourism Zone.</p> |

Peaceful Bay Tourism Precinct



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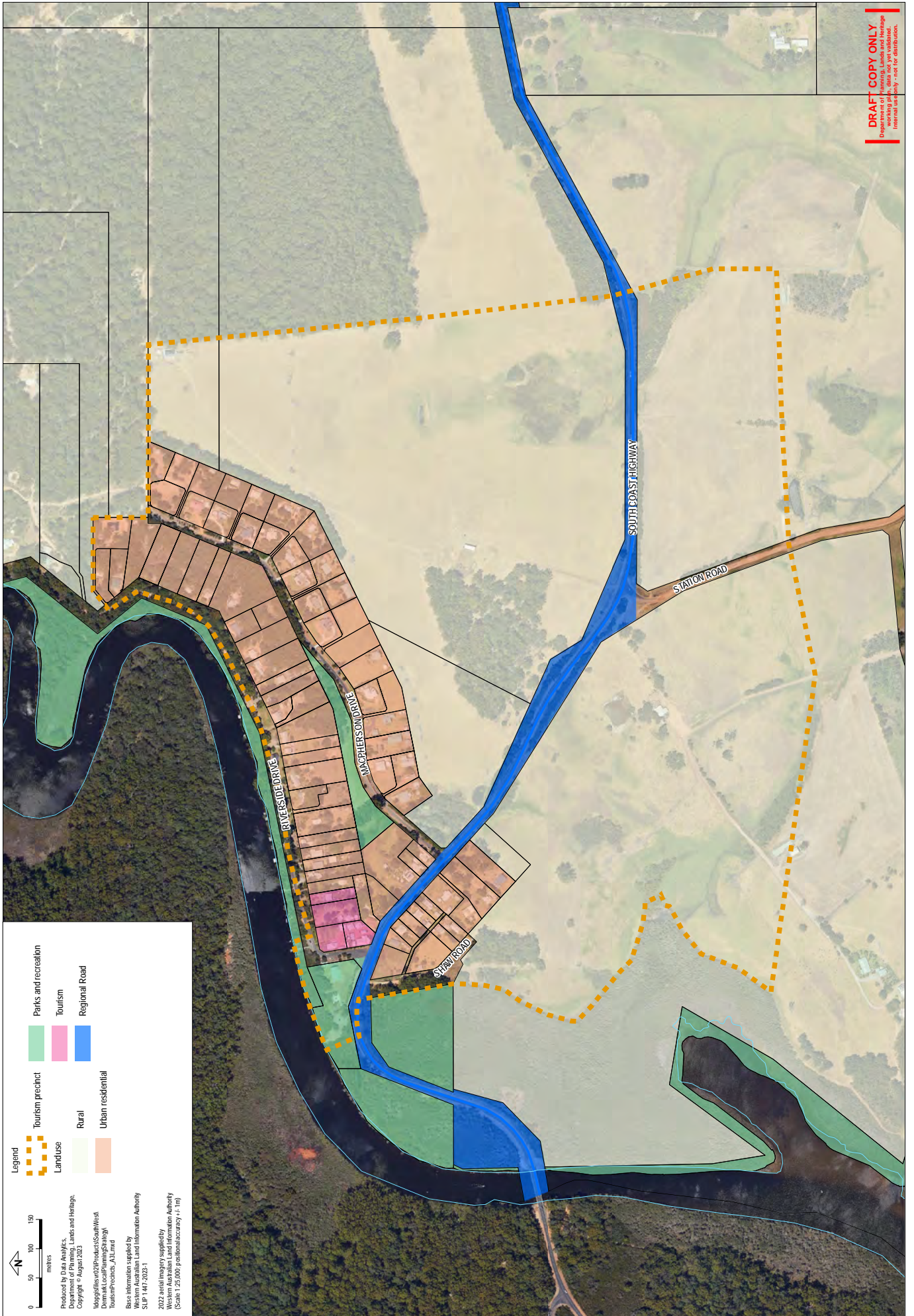
8.2 Tourism Precincts (cont.)

Nornalup

Figure 36: Recommendations for Tourism Precincts

| | |
|---|---|
| Precinct Name | Nornalup |
| Location | Please see page 183 |
| Tourism Assessment | <p>The Nornalup precinct incorporates the existing settlement, residential lots and immediately adjoining rural land. This includes an existing chalet development, holiday homes, boat and canoe launching, park and restaurant.</p> <p>This location has a high level of amenity and is close to the Valley of the Giants, a major regional attraction, with improved connections from Nornalup to trails within adjoining National Parks planned.</p> <p>The precinct is isolated from other settlements that provide day-to-day services and facilities – tourism development would ideally support further service provision.</p> <p>The Nornalup precinct is a prime location for eco-tourism businesses and accommodation.</p> <p>The precinct lacks scheme utility services and is constrained by bushfire risk and land capability/ slope.</p> |
| Recommendations & Considerations | <p>Primary use for tourism purposes or proposed rezoning to Tourism Zone may be supported.</p> <p>As the precinct is isolated from a townsite no unrestricted length of stay accommodation units are supported (caretaker/ manager only).</p> <p>Footpaths should be provided within the property connecting to the road network, and contributions to the local path/ trail network provided.</p> <p>Development to include detailed assessment of:</p> <ul style="list-style-type: none"> • Provision of water supply and wastewater disposal. • Bushfire risks and access, while preserving remnant vegetation. • Impact on landscape values/ visual amenity – minimising impact on views from South Coast Highway. • Interface to existing rural development. • Access by walk/cycle to Frankland River foreshore. |

Nornalup Tourism Precinct



9 Public Open Space

9.1 Public Open Space Requirements

When an urban residential subdivision takes place, the Planning and Development Act 2005 requires that 10% of the gross subdividable area is developed as POS and transferred into public management. Although this has been a long-standing principle in town planning in WA since the 1950s, the density of residential development has gradually increased since this time. This has placed greater emphasis on the provision of high quality POS, particularly when servicing higher density development where open space on private lots is more limited.

This Strategy generally supports the provision of POS as outlined in Liveable Neighbourhoods (2015) (WAPC), with design and infrastructure considerations to be addressed as part of the structure planning process. Although Liveable Neighbourhoods identifies the potential for a variation in the provision of POS to 5% within regional areas, this Strategy does not support any variation to the 10% minimum requirement. This position acknowledges the community's interest in maintaining the established character of the Denmark Townsite. The Strategy promotes enhancing the Denmark Townsite character, in particular the retention and re-establishment of remnant vegetation.

The provision of a financial contribution in lieu of the ceding of land is supported where subdivision is small scale and the resultant area of POS will be impractical, poorly located or inconsistent with the adopted direction of this Strategy. Consistent with the Planning and Development Act 2005, the Shire should request a contribution where subdivision proposes three or more lots, as small scale infill development will be a significant part of increased demand for high quality POS.

Liveable Neighbourhoods also provides guidance for provision of playing fields, recommending 6.5 square metres of active playing surface per resident as an appropriate guide. Rates of provision are often higher in rural and regional areas due to higher participation rates per capita as well as the need to provide a minimum level of facilities to enable an appropriate range of sporting and cultural opportunities, despite a lower population base.

Rural living estates are not required to be provided with POS within the local area due to the provision of 'private' open space on-lot, and typically lower demand. In such estates, there is sometimes a need for POS to preserve remnant vegetation and other natural features of the landscape, and as such, POS requirements are assessed on a site by site basis.

9.2 Classification of Public Open Space

Type

The State planning framework provides a standardised approach to classifying POS in Western Australia, through the Classification Framework for Public Open Space (2012) and Liveable Neighbourhoods. This includes the following broad functional types:

- Recreation – informal play and physical activity, relaxation, and social interaction.
Typically includes gardens and open parklands, community gardens, corridor links, amenity spaces, community use facilities, civic commons or squares.
- Sport – venue for formal structured sporting activities, such as team competitions, physical skill development and training.
Typically includes a playing field surface, buffer zones and other specific infrastructure requirements. May also be accessed by community for informal sport and recreation, or may have restricted access for management purposes.
- Nature – setting where people can enjoy nearby nature and protect local biodiversity and natural area values.
Typically provides for key recreational activities within the natural environment such as, walking, cycling, picnicking, playing, watching, or exploring natural features. Does not include land that is predominantly managed for conservation purposes and/or lacks a minimum level of infrastructure to enable recreation.

Some areas of POS provide multiple functions – for example, while McLean Oval provides district-level sporting facilities, it also serves as a local park. This is a highly desirable approach to POS provision, providing multi-faceted spaces that can be used for different purposes and benefit from the co-location of infrastructure.

This Strategy aims to provide balanced provision of POS that enables sport, recreation and nature-based opportunities across the Shire's townsites.

Size

The State's framework also identifies a hierarchy for POS according to size, acknowledging differences in the size and service level provided:

- Local Open Space – usually small parklands that service the recreation needs of the immediate residential population. Typically, 0.4ha to 1ha in size and accessible within a 300 metre or four minute walk of each residence.
- Neighbourhood Open Space – the recreational and social focus of a community, with a variety of features and facilities. Typically, 1ha to 5ha and within an 800 metre or 10 minute walk.
- District Open Space – services several neighbourhoods, including facilities for organised formal sport, substantial recreation space and some nature space. Typically, 5ha to 15ha+ and located appropriately to service the district catchment (approximately 2km).
- Regional Open Space – provides substantial facilities for organised sport, play, social interaction, relaxation, and enjoyment of nature. Serves one or more regions, provides multiple sporting facilities and other uses, and is typically 20ha+ in area.

District and Regional open space should consider the entire catchment it is likely to service, including residents within surrounding rural areas. For this reason, POS within the Shire's rural villages may have a higher service level than would otherwise be supported by the townsite's population itself.

9.3 Assessment of Existing Public Open Space

Areas of POS within the Shire has been categorised in Figure 8 (Part 1) using the State's classification framework. Figure 8 identifies POS across the Shire and within the Denmark Townsite, demonstrating the extent of State-owned land that is managed for conservation and recreational purposes. These areas of POS have been spatially represented in Map 6 (Part 1).

Regional Public Open Space

The Shire contains a diverse range of forested reserves and coastal assets that serve as nature-based destinations for both local and regional visitors. This includes the following key sites identified as regional-level POS:

- Ocean Beach (Recreation) – a widely known and multifunctional site where natural and heritage values are co-located with infrastructure supporting recreational and sporting pursuits. Several points of access provide for a variety of recreational needs, including Prawn Rock Channel. The 10-year concept plan prepared for Ocean Beach highlights the enhancement of facilities and infrastructure to support ongoing recreational use of this site.
- William Bay National Park and Walpole – Nornalup National Park (Nature) – each of these State-managed National Parks contains coastal and recreational sites and trails that are significant nature-based regional attractions.

The Shire does not currently contain any regional-level POS for sporting purposes. These facilities have generally been centralised in Albany to service the wider Great Southern region. This approach to facilities development has created a significant disparity in the quality of sporting and recreational facilities available outside of Albany. This Strategy advocates that regional level planning considers alternative approaches that consider how resources can be more equitably utilised. This may include, for example, the development of 'centres of excellence' for specific sports within sub-regional centres.

District Public Open Space

The following sites have been identified as servicing the district:

- Berridge Park (incorporating Norm Thornton Park and Annie Harrison Park) – the Shire’s district-level POS for recreational purposes. Berridge Park occupies a prime location between the Town Centre and the Denmark River, providing for occasional markets and events as well as being a destination for recreational use. The preparation of a Master Plan to guide future development will allow for the Shire and community to consider the level of facilities and infrastructure that are desired in this park.
- McLean Oval – While a variety of facilities serve to support sporting pursuits, McLean Park is identified as the primary multi-sport centre for the Shire. As McLean Park has constraints to its ongoing development, alternative sites for additional sporting facilities may need to be investigated as demand grows.
- Denmark Senior High School / Denmark Country Club – a cluster of sporting facilities that service district needs for golf, tennis, and supplementary playing fields. These two sites may be further developed as precincts for sporting infrastructure given constraints at McLean Park and the opportunity for shared use with two secondary schools.
- Parry Beach and Peaceful Bay – coastal recreational and tourism nodes that support a variety of nature-based pursuits, supported by beach access, walk trails and camping facilities.

Sporting Facilities

POS identified for sporting purposes can include land or facilities that are leased to sporting clubs and, therefore, have restrictions on open public access (without permission, hire fees or membership for example). This is an accepted part of the practice for providing these types of facilities, acknowledging the need for appropriate management structures to provide for these services. Community buildings or sites leased for other clubs or associations for non-sporting purposes are not included in this assessment, although these are often (and ideally) co-located with POS.

Formal sporting facilities are not provided for at a local level given the need for a significant population catchment to support sporting competition. Informal sporting facilities such as, basketball half-courts, and tennis hit-up are typically incorporated as part of POS with a recreational function.

Conservation and Nature Public Open Space

The natural environment is highly valued by the local community for both ecological, social and cultural reasons, and a variety of the Shire’s environmental assets and natural settings are enjoyed by both residents and visitors to the region.

The Denmark Townsite includes a significant number of conservation reserves that contribute to the character of the town and provide visual relief to development but otherwise have a low level of accessibility and limited recreational functions.

This Strategy has identified Nature POS where significant infrastructure has been developed to enable or enhance interaction with a predominantly natural setting. This does not include reserves that are managed primarily for conservation purposes. While some existing sites demonstrate limited distinctions between the two, this Strategy identifies Nature POS and conservation reserves according to the intended direction of future management.

Where gaps in the network of POS have been identified, some reserves may be considered for further development that would enable their use for nature-based recreation. This will consider ecological functions alongside the need for infrastructure to promote liveability, social interaction and encourage appreciation of the natural environment.

This Strategy does not address any potential improvements to access and facilities within conservation reserves, which are appropriately considered as part of reserve management plans.

9.4 Service Levels

The Shire's existing POS is varied in the level of infrastructure provided and the maintenance spend required, even where two areas of POS might be expected to be comparable.

This Strategy acknowledges the need to develop service level standards to help translate the POS classifications identified in Figure 8 (Part 1) into clear expectations of the level and type of facilities that are provided. The development of service level standards will enable the Shire to understand and prioritise investment in POS facilities and infrastructure where it is most needed.

Service level standards should promote diversity in the design and functionality of POS while ensuring they are relatively equitable in their size and cost. POS of the same type and functional level should be distinct in order to promote a sense of place and provide different opportunities, increasing the inherent value of each asset.

A higher level of facility provision might only be supported within POS that services a higher number of residents within its catchment (for example, in a medium density area where infill development is promoted).

The preparation of master plans to guide the future development of district-level POS is supported by this Strategy. Future planning for these parks should consider the appropriate level of investment in facilities and infrastructure given its prominence and role in servicing the Shire, and additional service as regional attractions.



10 State and Regional Planning Context

10.1 State Planning Strategy 2050

The State Planning Strategy provides the strategic context and basis for the coordination and integration of land use planning and development across state, regional and local jurisdictions. It proposes that diversity, liveability, connectedness and collaboration must be central to achieving the vision of sustained prosperity, and establishes principles, strategic goals and directions to ensure the development of the State progresses towards this vision.

The State Planning Strategy divides Western Australia into three sectors. The South West sector includes Perth, Peel, South West, Wheatbelt, and the Great Southern which incorporates the Shire. This Strategy acknowledges the key challenges for the South West sector including competition for land and water resources from urbanisation and other industry sectors. In particular, the need to balance land development and the maintenance of conservation values is a key challenge.

The State Planning Strategy identifies the following six interrelated and interdependent principles which underpin and inform this Strategy:

1. Community: Enable diverse, affordable, accessible and safe communities.
2. Economy: facilitate trade, investment, innovation, employment and community betterment.
3. Environment: Conserve the State's natural assets through sustainable development.
4. Infrastructure: ensure infrastructure supports development.
5. Regional Development: Build the competitive and collaborative advantages of the regions.
6. Governance: Build community confidence in development processes and practices.

10.2 State Planning Policies

State Planning Policies (SPPs) are prepared under Part 3 of the Planning and Development Act 2005 and provide the highest level of planning policy control and guidance in Western Australia. SPPs considered to be specifically relevant to the Shire's Strategy are outlined and described in Figure 37.

Figure 37: State Planning Policy Overview

| State Planning Policy | Policy Overview | Local Planning Strategy Implications and Responses |
|---|---|--|
| <p>State Planning Policy 1 – State Planning Framework (SPP 1.0) (November 2017)</p> | <p>SPP 1 restates and expands on the key principles of the State Planning Strategy in planning for sustainable lands use and development. It brings together existing State and regional policies, strategies and guidelines within a central State Planning Framework, which provides a context for decision making on land use and development in Western Australia.</p> <p>The Framework informs the Western Australian Planning Commission (WAPC), local government and others involved in the planning process on State level planning policy which is to be taken into consideration, and given effect to, in order to ensure integrated decision-making across all spheres of planning.</p> <p>The Framework identifies relevant policies and strategies used by the WAPC in making decisions and may be amended from time to time. The framework is the overarching SPP. Additional SPPs set out the WAPC’s policy position in relation to aspects of the State Planning Strategy principles.</p> | <p>SPP 1 has been addressed in the preparation of this Strategy.</p> <p>The review of the Shire’s local planning scheme will need to address the vision and principles of the State Planning Strategy.</p> |
| <p>State Planning Policy 2.0 – Environment and Natural Resources Policy (SPP 2.0) (June 2003)</p> | <p>SPP 2.0 is a broad sector policy and provides guidance for the protection, management, conservation and enhancement of the natural environment. The policy promotes responsible planning by integrating environment and natural resource management with broader land use planning and decision-making.</p> <p>SPP 2.0 outlines general measures for matters such as water, air quality, soil and land quality, biodiversity, agricultural land and rangelands, basic raw materials, marine resources, landscapes and energy efficiency. These general measures should be considered in conjunction with environmentally based, issue-specific State planning polices which supplement SPP 2.0.</p> | <p>The Strategy outlines a large number of strategies and actions that address SPP 2.0. These include efforts to protect and enhance the natural environment, visual landscape and human settlements in a sustainable manner.</p> |
| <p>State Planning Policy 2.4 – Planning for Basic Raw Materials (SPP 2.4) (July 2021)</p> | <p>SPP 2.4 seeks to ensure basic raw materials (BRM) and extractive industries matters are considered during planning and development decision-making, to facilitate the responsible extraction and use of the State’s BRM resources. The policy establishes objectives relating to recognising the importance of BRM early in the planning process; protecting BRM through avoiding encroachment from incompatible land uses; efficient use of BRM; identifying BRM extraction opportunities through sequential land use and ensuring BRM extraction avoids, minimises or mitigates impacts on the community and the environment.</p> | <p>The Strategy acknowledges the economic and civil importance of basic raw materials in the development of housing, roads and other infrastructure within the community. While limited, the Strategy recognises and recommends that extraction of basic raw materials must be undertaken with best practice safeguards, ensuring that appropriate buffers are established and maintained surrounding extraction operations.</p> |

| State Planning Policy | Policy Overview | Local Planning Strategy Implications and Responses |
|---|--|---|
| <p>State Planning Policy 2.5 – Rural Planning (SPP 2.5) (December 2016)</p> | <p>SPP 2.5 applies to rural land and rural land uses as well as land that may be impacted by rural land uses. SPP 2.5 seeks to protect and preserve Western Australia’s rural land assets due to the importance of their economic, natural resource, food production, environmental and landscape values. SPP 2.5 includes policy measures aimed at protecting rural land while encouraging a diversity of compatible rural land uses.</p> | <p>The Strategy recognises the importance of preserving all rural land within the Shire for agricultural production to maintain regional food security. The Strategy also supports the adaptation and diversification of agriculture to maintain its sustainability, including the development of value-adding processing, agri-tourism and other rural industries.</p> |
| <p>State Planning Policy 2.6 – State Coastal Planning (SPP2.6) (July 2013)</p> | <p>SPP 2.6 provides for the long-term sustainability of Western Australia’s coast and is relevant to those local governments that contain coastal areas. The purpose of the policy is to provide guidance for decision-making within the coastal zone including managing development and land use change, establishment of foreshore reserves and protecting, conserving and enhancing coastal values.</p> <p>SPP 2.6 outlines criteria for the consideration of development and settlement arrangements, including building height limits within local planning frameworks and management of water resources. It further acknowledges the importance of coastal planning strategies, coastal hazard risk management approaches, coastal foreshore reserves and community participation in coastal planning.</p> | <p>The Strategy recognises the importance of coastal hazard risk management and adaption planning for coastal locations within the Shire.</p> <p>The Strategy recommends the protection, conservation, and enhancement of coastal values and appropriately managed development within coastal areas. Coastal development within the Shire is concentrated at Ocean Beach and Peaceful Bay and have the highest value coastal infrastructure under the Shire’s management.</p> |
| <p>State Planning Policy 2.7 – Public Drinking Water Source (SPP 2.7) (June 2003)</p> | <p>The purpose of SPP 2.7 is to inform decision-makers of those aspects of state planning policy concerning the protection of Public Drinking Water Supply Areas throughout the State. It is intended that this be implemented through the preparation of strategic plans, regional and local planning schemes, conservation and management strategies, and other relevant plans or guidelines, as well as through decision-making on subdivision and development applications.</p> | <p>The Strategy’s direction is to protect the Shire’s public drinking water resources and proposes the introduction of a ‘Public Drinking Water Source’ Special Control Area into the Shire’s local planning scheme. The objective of the special control area is to restrict inappropriate land use and development within the close proximity of the Shire’s drinking water supplies.</p> |
| <p>Draft State Planning Policy 2.9 – Planning for Water (SPP2.9) (August 2021)</p> | <p>SPP 2.9 seeks to ensure that planning and development considers water resource management and includes appropriate water management measures to achieve optimal water resource outcomes. The policy establishes objectives relating to improving environmental, social, cultural and economic values of water resources; protecting public health through appropriate water supply and waste water infrastructure; sustainable use of water resources and managing the risk of flooding and water related impacts of climate change on people, property and infrastructure.</p> | <p>The Strategy aims to protect and conserve the quality and quantity of the Shire’s surface and groundwater resources. It also proposes to protect manage and rehabilitate riparian areas to maintain and enhance water quality, ecosystem function, biodiversity, recreational and cultural values associated with waterways.</p> |

| State Planning Policy | Policy Overview | Local Planning Strategy Implications and Responses |
|---|---|--|
| <p>State Planning Policy 3.0 – Urban Growth and Settlement (SPP 3.0) (May 2006)</p> | <p>SPP 3.0 is a broad sector policy that sets out the principles and considerations which apply to planning for urban growth and settlement in Western Australia. The purpose of the policy is to facilitate sustainable patterns of urban growth and settlement by setting out the requirements of sustainable settlements and communities and the broad policy for accommodating growth and change.</p> <p>SPP 3.0 outlines general measures to create sustainable communities, plan liveable neighbourhoods, coordinate services and infrastructure, manage rural-residential growth and plan for aboriginal communities. These general measures should be considered in conjunction with issue-specific urban growth and settlement state planning policies which supplement SPP 3.0.</p> | <p>The adopted approach to settlement planning in this Strategy is reflective of the community’s vision to pursue improved sustainability and manage growth for the benefit of the community.</p> <p>This Strategy accepts that the Shire is likely to experience population growth and acknowledges opportunities that growth provides while ensuring that negative impacts on our existing community values and attributes is minimised.</p> |
| <p>State Planning Policy 3.4 – Natural Hazards and Disasters (SPP 3.4) (April 2006)</p> | <p>SPP 3.4 encourages local governments to adopt a systemic approach to the consideration of natural hazards and disasters. The objectives of this policy are to include planning for natural disasters as a fundamental element in the preparation of planning documents, and through these planning documents, minimise the adverse impacts of natural disasters on communities, the economy and the environment.</p> <p>SPP 3.4 sets out considerations for decision makers in relation to hazards including flood, bush fire, landslides, earthquakes, cyclones and storm surges. Consideration of these hazards should be undertaken in conjunction with issue-specific state planning policies which supplement SPP 3.4.</p> | <p>The strategy acknowledges the impacts of natural hazards and the changing climate on our community and environment and therefore, appropriate measures must be in place to enhance community resilience.</p> <p>While the Strategy acknowledges SPP 3.4, the primary natural hazards for the Shire are bushfires and coastal processes. These are addressed under SPP 2.6 and SPP 3.7 within this table.</p> |
| <p>State Planning Policy 3.5 – Historic Heritage Conservation (SPP 3.5) (May 2007)</p> | <p>SPP 3.5 sets out the principles of sound and responsible planning for the conservation and protection of Western Australia’s historic heritage. The policy seeks to conserve places and areas of historic heritage significance and to ensure development does not adversely affect the significance of heritage places and areas.</p> <p>SPP 3.5 primarily relates to historic cultural heritage noting that aboriginal heritage and natural heritage are protected by other legislative instruments. Historic cultural heritage includes heritage areas, buildings and structures, historic cemeteries and gardens, manmade landscapes and historic or archaeological sites with or without built features.</p> <p>The policy contains development control principles and considerations for decision-makers for where development is proposed within a heritage place and heritage area. The policy also states that care should be taken by decision-makers to minimise the extent to which land use zoning and other planning controls conflict with, or undermine, heritage conservation objectives.</p> | <p>The Strategy recognises the Minang and Bibbulmun people of the Noongar nation as the traditional custodians of the land within the Shire and supports the establishment of strong working relationship with the proposed Wagyl Kaip Regional Corporation. The Strategy supports working with traditional custodians towards the development of a shared vision for land use planning and management.</p> <p>The Strategy promotes the improved protection and interpretation of areas and places with heritage importance, including sites, buildings, structures and landscapes.</p> |

| State Planning Policy | Policy Overview | Local Planning Strategy Implications and Responses |
|---|---|---|
| <p>State Planning Policy 3.7 – Planning in Bushfire Prone Areas (SPP 3.7) (December 2015)</p> | <p>SPP 3.7 provides a framework in which to implement effective, risk-based land use planning and development outcomes to preserve life and reduce the impact of bushfire on property and infrastructure. The policy emphasises the need to identify and consider bushfire risks in decision-making at all stages of the planning and development process whilst achieving an appropriate balance between bushfire risk management measures, biodiversity conservation and environmental protection.</p> <p>The policy applies to all land which has been designated as bushfire prone by the Fire and Emergency Services Commissioner as well as areas that may have not yet been designated as bushfire prone but is proposed to be developed in a way that introduces a bushfire hazard.</p> | <p>The Strategy acknowledges the significant threat bushfires has on the Shire’s community. The local planning framework must aim to minimise the risk to life, property and service delivery from bushfires by avoiding and mitigating risks.</p> <p>Land use and development proposals must demonstrate appropriate bushfire risk mitigation strategies consistent with SPP 3.7 and the <i>Guidelines for Planning in Bushfire Prone Areas</i>.</p> |
| <p>State Planning Policy 4.1 – Industrial Interface (SPP 4.1) (July 2022)</p> | <p>Draft SPP 4.1 guides planning decisions with the aim of protecting the long-term future operation of industry and infrastructure facilities, by avoiding encroachment from sensitive land uses and potential land use conflicts. The policy encourages the use of statutory buffers; facilitating industrial land uses with offsite impacts within specific zones and compatible interface between strategic/general industry zones and sensitive zones.</p> <p>Draft SPP 4.1 supports land use conflict being addressed as early as possible in the planning process. It is also expected that land use conflict will be subsequently considered at each stage of the planning framework, increasing in detail at each level.</p> <p>The policy recognises the overlap of various environmental, health and safety regulations and guidelines and outlines considerations for decision-makers in this regard.</p> | <p>Demand for industrial land must be located within appropriate locations to support and respond to emerging industries, accommodate local services and provide opportunities for local businesses and employment.</p> <p>This strategy aims to consolidate industrial land uses and ensure that the expansion of industrial areas incorporate appropriate buffers to minimise impacts on visual amenity and sensitive land uses.</p> |
| <p>State Planning Policy 5.2 – Telecommunications Infrastructure (SPP 5.2) (September 2015)</p> | <p>SPP 5.2 recognises telecommunications infrastructure as an essential service and aims to balance the need for this infrastructure and the community interest in protecting the visual character of local areas. The policy aims to provide clear guidance pertaining to the siting, location and design of telecommunications infrastructure and sets out specific exemptions for where the policy requirements do not apply.</p> <p>Decision-makers should ensure that telecommunications infrastructure services are located where it will facilitate continuous network coverage and/or improved telecommunications services to the community whilst not comprising environmental, cultural heritage, social and visual landscape values.</p> | <p>Telecommunication infrastructure is essential for social connectivity, for households and businesses, the local economy, and to ensure safety. While acknowledging the importance of such infrastructure, this Strategy supports efforts to ensure appropriate separation from sensitive land uses and visual impacts of telecommunication infrastructure are to be minimised.</p> |

| State Planning Policy | Policy Overview | Local Planning Strategy Implications and Responses |
|---|--|--|
| <p>State Planning Policy 5.4 – Road and Rail Noise SPP 5.4 (September 2019)</p> | <p>SPP 5.4 provides guidance for the performance-based approach for managing and mitigating transport noise associated with road and rail operations.</p> <p>This policy applies where noise sensitive land uses are located within a specified distance of a transport corridor, new or major road or rail upgrades are proposed or where works propose an increase in rail capacity resulting in increased noise. The policy also sets out specific exemptions for where the policy requirements do not apply.</p> <p>SPP 5.4 supports noise impacts being addressed as early as possible in the planning process to avoid land use conflict and achieve better land use planning outcomes. Considerations for decision-makers include ensuring that the community is protected from unreasonable levels of transport noise, whilst also ensuring the future operations of transport corridors.</p> <p>SPP 5.2 is supplemented by the Road and Rail Noise Guidelines.</p> | <p>South Coast Highway is identified as a significant freight/traffic route and directs large traffic volumes through the Shire. This traffic flow and dominance of motor vehicles creates a negative pedestrian experience.</p> <p>The Shire acknowledges that South Coast Highway will continue to carry regional traffic through the Townsite. It is critical that future improvements to this road provide a higher level of amenity and safer access for pedestrians.</p> |
| <p>State Planning Policy 7 – Design of the Built Environment (SPP 7.0) (May 2019)</p> | <p>SPP 7 is a broad sector policy relevant to all local governments. The policy sets out the objectives, measures, principles and processes which apply to the design and assessment of built environment proposals through the planning system. It is intended to apply to activity precinct plans, structure plans, local development plans, subdivision, development and public works.</p> <p>The policy contains 10 design principles which set out specific considerations for decisionmakers when considering the above proposals. These include, context and character, landscape quality, built form and scale, functionality and build quality, sustainability; amenity, legibility, safety, community and aesthetics. The policy also encourages early and on-going discussion of design quality matters and the use of design review.</p> <p>These principles should be considered in conjunction with the range of supporting State Planning Policies that provide design quality guidance for specific types of planning and development proposals.</p> | <p>The Strategy adopts the ten design principles outlined in SPP 7 as the basis for the assessment of new development proposals and preparation of more detailed guidance within the Shire’s local planning framework.</p> |

| State Planning Policy | Policy Overview | Local Planning Strategy Implications and Responses |
|--|--|--|
| <p>State Planning Policy 7.2 – Precinct Design (SPP 7.2) (February 2021)</p> | <p>SPP 7.2 provides guidance for precinct planning with the intent of achieving good planning and design outcomes for precincts within Western Australia. The policy recognises that there is a need to plan for a broader range of precinct-based contexts and conditions to achieve a balance between greenfield and infill development. Objectives of the policy include ensuring that precinct planning, and design processes deliver good-quality built environment outcomes that provide social, economic and environmental benefit to those who use them.</p> <p>Precinct types include activity centres, station precincts, urban corridors, residential infill and heritage precincts. These areas are recognised as requiring a high-level of planning and design focus in accordance with a series of precinct outcome considerations as outlined in the policy. The policy also encourages the use of design review.</p> | <p>This Strategy proposes the preparation of a precinct plan for the Denmark Town Centre. The preparation of this precinct plan will be in accordance with SPP 7.2</p> |
| <p>State Planning Policy 7.3 – Residential Design Codes Volumes 1 (July 2021) and 2 (May 2019) (SPP 7.3)</p> | <p>SPP 7.3 – Residential Design Codes Volume 1 and 2 provides the basis for the control of residential development throughout Western Australia for single houses, grouped dwellings and multiple dwellings. The purpose of the policy is to address emerging design trends, promote sustainability, improve clarity and highlight assessment pathways to facilitate better outcomes for residents. They are also used for the assessment of residential subdivision proposals.</p> <p>The policy outlines various objectives for residential development, planning governance and development process and sets out information and consultation requirements for development proposals. The policy also makes provision for aspects of specified design elements to be varied through the local planning framework.</p> | <p>This Strategy supports SPP 7.3 as the base assessment criteria for relevant development applications.</p> |



10.3 Regional Planning Context

The WAPC prepares various regional planning instruments to guide land use and development at the regional and sub-regional level, including:

- Regional and Sub-regional planning strategies and structure plans
- Regional Planning Schemes

Regional planning instruments considered to be specifically relevant to the Shire are outlined and described in Figure 38.

Figure 38: Regional Planning Overview

| Regional Planning Instrument | Regional Planning Instrument Overview | Local Planning Strategy Implications and Responses |
|---|--|--|
| Lower Great Southern Planning Strategy | <p>The Lower Great Southern Planning Strategy provides direction and guidance on future development or review of planning instruments (e.g., local planning scheme) by providing future strategic direction and context of the area. The region is a major residential, tourism and agricultural area which provides a range of land uses.</p> <p>This strategy provides guidance for the use of land to balance social, economic and environmental considerations as well as ensuring there is adequate land available for regional infrastructure, housing, tourism, agriculture, water sources and economic growth.</p> | <p>The Lower Great Southern Planning Strategy identifies Denmark as a subregional centre, with Albany as the regional centre. Peaceful Bay, Nornalup and Bow Bridge are identified as villages. The Strategy identifies Nornalup as a 'rural village', recommending that further development be pursued in Nornalup only, with Peaceful Bay retained as a 'tourism node' and no further development progressed at Bow Bridge.</p> <p>The Strategy implements The Lower Great Southern Planning Strategy's directions for Denmark in relation to housing, tourism, primary production, environment and economy.</p> |
| Great Southern Regional Planning and Infrastructure Framework (December 2015) | <p>The Great Southern Regional Planning and Infrastructure Framework provides guidance on land use, land supply, land development, environmental protection, infrastructure and priorities for the delivery of physical and social infrastructure for the Great Southern region.</p> <p>The framework informs the decisions of the WAPC by establishing the regional context for the preparation of sub-regional and local planning strategies and outlines the WAPC's position on planning for population growth, transport, agriculture, conservation estate, remnant vegetation and tourism for the Great Southern.</p> | <p>This Strategy provides detailed direction regarding the provision of infrastructure required to serve the local community in alignment with regional infrastructure initiatives and priorities.</p> |

10.4 Other Relevant State or Regional Strategies, Plans and Policies

Other State or regional strategies, plans and policies that have relevance to and implications for the local planning strategy are outlined below (refer Figure 39).

Figure 39: Other relevant state or regional strategies, plans and policies

| Name of strategy, plan, policy | Purpose | Local Planning Strategy Implications and Responses |
|---|---|---|
| Western Australian Climate Policy (November 2020) | The Western Australian Climate Policy sets out the State Government’s plan for a climate resilient community and a prosperous low-carbon future. The policy underscores a commitment to adapting to climate change and working with all sectors of the economy to achieve net zero greenhouse gas emissions by 2050. The policy sets out the high-level priorities the State Government will implement to support a more climate-resilient community. The approach to climate adaptation recognises exposure to climate impacts, the diversity of the regions and the existing capability to manage and adapt to climate change. The policy outlines actions to guide the response by business, the community, local governments and State Government agencies to develop well-informed, timely and practical adaptation responses. | The Shire acknowledges that climate change impacts are from human induced greenhouse gas emissions and that there is a government responsibility at all tiers to contribute to climate change mitigation through climate change adaption strategies. The Shire’s Sustainability Strategy is supported by a Sustainability Action Plan (2021) which details, prioritises, and orders the work to be done. |



11 Local Planning Context

11.1 Strategic Community Plan

The Strategic Community Plan (Our Future 2033) was adopted by Council at the 27th June 2023 Special Council Meeting. Key community priorities and feedback are outlined in Figure 40.

Figure 40: Strategic Community Plan Summary

| Community Priority | | Community Feedback |
|---------------------------|---|---|
| Service Delivery | Local roads and storm water drainage | <p>We want:</p> <ul style="list-style-type: none"> • Increased levels of regular maintenance • Issues to be repaired quickly • Upgrades, including bituminising gravel roads • Roads prioritised across the whole Shire (not just in Denmark) • Better drainage management |
| | Services and facilities for youth | <p>We want:</p> <ul style="list-style-type: none"> • Places where youth can hang out, socialise, and be active • Young people to feel part of the community • Youth to have easy access to quality support services |
| | Environmental conservation and protection | <p>We want:</p> <ul style="list-style-type: none"> • To safeguard our natural reserves, national parks, coastline, flora and fauna • Protection of wild, untouched places that set Denmark apart • Action on climate change and investment in renewable energy • Improved recycling and waste options |
| Advocacy and Partnerships | Economic development | <p>We want:</p> <ul style="list-style-type: none"> • Less bureaucracy, red tape and restrictions • More funding opportunities and support for business ideas • Improved infrastructure to support business, including worker accommodation, better roads, more parking and toilets • To attract new industry to Denmark • A more vibrant CBD |
| | Housing availability and affordability | <p>We want:</p> <ul style="list-style-type: none"> • To reduce the impact of short stay rentals • More low-cost residential housing for rent and purchase • More social housing • Alternate housing options, including tiny homes • To reduce the level of homelessness • Downsizing and retirement options for seniors |
| Organisational | Engagement and decision-making | <p>We want:</p> <ul style="list-style-type: none"> • To feel heard • Decisions that reflect majority community sentiment • Rates to represent value for money and funds to be spent wisely • The reasons for decisions to be explained and transparent |

11.2 Previous Local Planning Strategy

Prior to the WAPC's endorsement of this document, the local planning strategy for the Shire was the Local Planning Strategy 2011 (LPS 2011) which will be revoked once this Strategy is endorsed.

The Strategy differs from the 2011 LPS in its approach to several areas, including

- Prioritising consolidated urban growth and placing a greater emphasis on infill development to accommodate a proportion of additional housing.
- Reducing the extent of land identified for urban growth and increasing the expected yield from zoned land acknowledging our community's desire to contain unnecessary sprawl.
- Emphasising the need for housing diversity and encouraging smaller format housing to promote affordability and sustainability.
- Emphasising the need to plan for sustainable transport modes and minimising infrastructure costs.
- Reducing the expectation that expansion of the Shire's rural villages is required to accommodate growth, acknowledging that they are isolated from community services and further development is highly constrained.
- Acknowledging that large lifestyle lot subdivisions are inherently unsustainable because they increase public infrastructure costs, depend on cars for transport, consume more land and compete with other productive land uses.
- Acknowledging the potential need for an additional bridge over the Denmark River to provide alternative access in an emergency is not required as the current access is considered sufficient for the foreseeable future.

11.3 Local Planning Scheme

The Town Planning Scheme No.3 (TPS3) was adopted on 25th March 1994. TPS3 is the statutory tool that controls land use and development within the Shire. The separately gazetted deemed provisions for Local Planning Schemes as prescribed under Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 (Regulations) and have automatic statutory effect as part of the Scheme.

A comprehensive review of the TPS3 will be undertaken to align the Shire's Local Planning Scheme with this Strategy and the applicable provisions contained within the Regulations.

11.4 Local Planning Policies

Local planning policies (LPPs) can be prepared by the Shire in accordance with Division 2 of Schedule 2 of the Regulations in respect of a particular class or classes of matters specified in the policy; and may apply to the whole Scheme area or part of the Scheme area. An overview of the Shire's existing local planning policies is provided in Figure 41.

A comprehensive review of all existing LPPs will need to be undertaken given the age of these policies and updates to the State planning framework, to align with this Strategy and state, regional and local planning framework.

Figure 41: Local planning policies

| Name of Local Planning Policy | Date of Adoption/ Last Amendment | Purpose of Local Planning Policy |
|--|-------------------------------------|---|
| Town Planning Scheme Policy No. 1 - Dieback Disease Management | September 1997 | This Policy recognises that dieback disease poses a significant threat to the conservation, cultural and economic values of land within its boundaries, and in neighbouring municipalities including impacts on horticulture, native fauna, tourism and biodiversity. The policy includes a series of seven actions, together with a range of management strategies and management tactics to provide guidance on identifying the problem and controlling it. |
| Town Planning Scheme Policy No. 5 – Minimum Setbacks | June 1998 | This policy sets out the minimum front, side and rear setbacks within the Tourist, Industrial, Special Rural and Rural zones. |
| Town Planning Scheme Policy No. 6 – Guidelines for the Management of Vineyards within Special Rural Zones | June 1998 | This policy applies to vineyards located within appropriate Special Rural Zones (as defined in appendix 6 of TPS3) to ensure the management of vineyards does not have a detrimental effect on the amenity of the adjoining properties. |
| Town Planning Scheme Policy No. 7 – Second Dwellings / Additional Houses and Chalet Developments on Rural Zoned Lots | June 1998 | This policy sets out the expectations and specific requirements to all approvals for Secondary Dwelling/Additional Houses and Chalet Developments within Rural zoned lots. |
| Town Planning Scheme Policy No. 9.1 – Private Tree Plantations | March 2001 | <p>This policy aims to assist Council in determining applications for private tree plantations within the Shire district. The objective of this policy is to:</p> <ul style="list-style-type: none"> • Reduce the potential adverse impacts of inappropriate siting and development of private tree plantations. • Encourage the integration of private tree plantations in conjunction with traditional rural areas. • Encourage the establishment of permanent tree cover on steep slopes and along watercourses. • Encourage the preparation of management plans for harvesting of private tree plantations. |
| Town Planning Scheme Policy No. 13 - Outbuildings & Water Tanks | July 2023 | The objective of this policy is to identify standards for the development and use of outbuildings and water tanks that balance the needs of landowners with the protection of visual amenity, environment and streetscape character. |
| Town Planning Scheme No. 15 – Townscape Policy | June 1998 | This policy provides broad guidelines for appropriate development within the townscape, taking into consideration the Shire’s unique environment. The policy has regard to town entries, the natural environment, building guidelines, colour schemes, lighting, franchise outlets, traffic calming, car parking, heritage values, public open space, and landscaping. |

| Name of Local Planning Policy | Date of Adoption/ Last Amendment | Purpose of Local Planning Policy |
|---|-------------------------------------|---|
| Town Planning Scheme No. 17.1 – Alfresco Dining & Trading in Public Places | January 1999 | The objective of this policy is to enhance the functions, appearance, and character of the Denmark Town Centre as a retail and tourist centre and encourage these services to be presented in a manner which will add colour, life, diversity and interest to the town centre. The policy aims to allow for the operation of trading activities in public places in such a manner and location that they do not conflict with, or act prejudicially towards Denmark’s retail and service base, of any other function of the town centre. |
| Town Planning Scheme No. 18 – Tourist Development other than “Bed & Breakfast” uses within the Residential Zone | June 1998 | The purpose of this policy to enable Council to consider the provision of limited small-scale uses (such as attached studios) to be established and used within the Residential Zone, provided the nature and scale of the proposals are considered compatible and complementary to the existing adjacent residential living environment and amenity. |
| Town Planning Scheme Policy No. 19.5 – Holiday Homes | August 2015 | <p>The objectives of this policy are to:</p> <ul style="list-style-type: none"> • support a diverse accommodation base within the Shire. • minimise negative impacts of holiday homes on the amenity of adjoining residents through appropriate planning approval conditions and associated regulations that apply. • encourage the provision of good quality, well managed holiday homes. • ensure that holiday homes are managed and maintained to a high standard. |
| Town Planning Scheme Policy No. 25.1 – Denmark Airfield & Airpark | December 2010 | This policy is applicable to the Denmark Airfield and Airpark and is to be read in conjunction with <i>Denmark Airfield Land Use Strategy</i> . The objective of the policy is to provide for airfield related operations at the Denmark Airfield and Airpark and to ensure all development and land uses are carried out and managed to protect and enhance the purpose and function of the airfield and surrounding land uses. |
| Town Planning Scheme Policy 26.1 – Commercial Development on South Coast Highway | August 2001 | This policy aims to maintain the essential character of Denmark and preserve the attractive entrance to the Denmark Townsite by providing strict guidelines on the form of development along this major arterial road. The objective of this policy is to facilitate an efficient and socially acceptable development of the town centre land by appropriate and sensitive design. The policy outlines a number of design and controls that relate to amenity, development standards, car parking and delivery area, vehicular and pedestrian access/egress, landscaping and vegetation protection, external lighting control, and water supply/effluent disposal/ stormwater runoff. |
| Town Planning Scheme Policy 28 – Settlement Strategy for Denmark | December 1998 | The Settlement Strategy established the Council’s position for the provision of residential land to cater for urban growth to the year 2020. It applies to the Denmark townsite and nodal village settlements. The Settlement Strategy addresses population growth and projections, land availability, environmental considerations, bushfire management, commercial land, industrial land, educational facilities, community facilities, public open space, transportation, and servicing infrastructure. It provided a strategy for accommodating future growth across the Shire and within the town centre and structure planning, providing a number of recommendations. |

| Name of Local Planning Policy | Date of Adoption/ Last Amendment | Purpose of Local Planning Policy |
|--|-------------------------------------|---|
| Town Planning Scheme Policy 29 – Rural Settlement Strategy | March 1999 | The Rural Settlement Strategy provides for a sustainable pattern to accommodate growth over the Shire. The policy aims to coordinate land use planning and the management of all natural resources in order to provide for long term sustainable rural land uses, retain and enhance rural character and lifestyle, protect and improve natural resources, guide the development of urban settlement, special rural development and landscape protection area, and minimise any adverse impact of development on valuable rural land and the environment. |
| Town Planning Scheme Policy 31 – Commercial Strategy | February 1999 | The Commercial Strategy provides for long term strategic growth and development of the Denmark central business district. The Commercial Strategy includes a number of recommendations, with some identifying areas for additional commercial development in which was captured in the 2011 LPS. |
| Town Planning Scheme Policy 32 – Signs | May 2001 | The aim of this policy is to provide clear direction on the design, materials and siting of advertising structures and signs in the Shire that build upon the distinctive character of the district. The policy outlines what signs are acceptable and guidance on the application process for new signage and alterations to existing signage. |
| Town Planning Scheme Policy No. 34 – Extractive Industries | August 2002 | The purpose of this policy outlines the requirements of a development application for extractive industries. The policy aims to protect environmental and landscape values and qualities of the Shire’s diverse economy, prioritise appropriate locations and operations of extractive industries, and clearly set out the application requirements. |
| Town Planning Scheme Policy No. 35 – Peaceful Bay Conservation Plan Development Guidelines | April 2004 | The objective of this policy is to ensure that any future development is in keeping with the heritage value of the Peaceful Bay precinct as a relaxed, informal, low key holiday location. The policy provides guidance on the appropriate forms of development to ensure the character is maintained. This policy relates to leasehold lots only. |
| Town Planning Scheme Policy No. 37 – Dams and Water Features | August 2009 | The objectives of this policy are to set standards for dam and water feature construction within the Shire, ensuring construction, location and size of dams and water features are appropriate and consistent with the site capability, and maintaining the landscape amenity. |
| Town Planning Scheme Policy No. 39 – Public Open Space | July 2010 | This policy was developed to provide criteria against which Council will assess the quality, size, type, and distribution of public open space proposed at Structure Plan and subdivision stages. This policy applies to land that is to be vested in the Shire contributed free of cost by the developer through the subdivision process within areas zoned Residential. |
| Town Planning Scheme Policy No. 41 – Renewable Energy Systems | June 2010 | This policy was prepared to encourage landowners, developers, and builders to incorporate renewable energy systems. The objectives of this policy are to improve the environmental sustainability of housing and other developments within the Shire by lowering consumers’ individual ‘carbon footprint’, encourage the installation of renewable energy for residential developments, ensure the preservation of streetscape and local amenity values, and introduce standards for the siting and development of renewable energy systems. |

| Name of Local Planning Policy | Date of Adoption/ Last Amendment | Purpose of Local Planning Policy |
|---|-------------------------------------|--|
| Town Planning Scheme Policy No. 42 – Public Art | August 2010 | The objective of this policy is to enhance the natural and built assets and appearance, character, and amenity of public spaces and developments through the inclusion of high-quality public art. The policy requires developers to integrate public art within new substantial developments within the Shire through the development approval process and establishes an equitable system for the provision of public art by developers. |
| Town Planning Scheme Policy No. 43 – Nornalup Development Guidelines | March 2011 | This policy aims to preserve the special characteristics of Nornalup and help guide future development. The objective of this policy is to protect and enhance the unique special character of the Nornalup settlement as defined by the associated the Character Study and provide guidance to both Council and the community as to appropriate forms of development to ensure the character is maintained. |
| Town Planning Scheme Policy No. 44 – As-of-Right Development | August 2012 | The purpose of this policy is to provide for the various legitimate developments that are considered to be incidental and/or essential development that would not affect the amenity nor have impacts on neighbours, a street, a neighbourhood, locality or the Shire as a whole. |
| Town Planning Scheme Policy No. 45 – Planning Application Process for Heritage Places | November 2013 | The aim of this policy is to provide guidance in relation to the assessment process of planning applications for heritage places such that heritage significance is given due weight in the planning application decision making process. |
| Town Planning Scheme Policy No. 46 – Karri Mia Tourist Zone Design Guidelines | June 2015 | The objectives of this policy are to ensure development proposals within the Karri Mia Tourist Zone are sympathetic to the existing natural and built environment landscape in terms of locations, scale, height, building, materials, and colours. It also aims to ensure an appropriate form of holiday accommodation (chalets) and permanent residential development (grouped dwelling) occurs on-site in recognition of the overall strategic tourist function of the Karri Mia Tourist Zone precinct. |
| Town Planning Scheme Policy No. 47 – Town Centre Parking and Transportation | April 2020 | The objectives of this policy are to promote business activity, guide appropriate redevelopment and development in the town centre and assist in creating a vibrant town centre that is increasingly resilient. It also aims to facilitate the provision of adequate parking facilities within the town centre, providing guidelines relating to the rate of providing car parking bays for redevelopment, new development and change of use applications, and where the Council may vary parking provisions of the Scheme for a development within the town centre. The policy also promotes sustainable transportation, including walking and cycling. |
| Town Planning Scheme Policy No. 48 – Inlet Drive and Ministerly Road Precincts | December 2019 | This policy applies to lots within the Inlet Drive and Ministerly Road Precincts and provides variations to relevant deemed-to-comply provisions of the R-Codes within the precincts to assist in implementing appropriate development to meet the local context. The policy provides further interpretation of the R-Codes assessment of residential developments, outbuildings, side setbacks, and retaining walls. It also aims to secure the privacy and amenity of the locality through appropriate development requirements while noting the precinct's context including lot shapes. |

| Name of Local Planning Policy | Date of Adoption/ Last Amendment | Purpose of Local Planning Policy |
|---|-------------------------------------|--|
| Town Planning Scheme Policy No. 49 – Ancillary Dwellings & Detached Habitable Rooms | February 2023 | This policy provides direction for the development of Ancillary Dwellings and Detached Habitable Rooms associated with residential dwellings. The policy aims to promote the development of Ancillary Dwellings as a type of small-format housing that contributes to housing diversity and preserve the amenity of all areas from inappropriate development. The policy identifies what the Shire considers to be an Ancillary Dwelling and a Grouped Dwelling and outlines the development standards that the Shire will apply to proposals for Ancillary Dwelling where the R-Codes do not apply. |
| Town Planning Scheme Policy No. 50 – Building Envelopes | February 2023 | This policy provides detail on the purpose and intent of designating building envelopes, guidance for the assessment of proposed modifications to building envelopes, and promotes the designation of building envelopes that are sensitive to environmental, visual landscape, bushfire risk and other relevant planning considerations. |
| Town Planning Scheme Policy No. 51 – Caravan Parks & Camping Grounds | June 2023 | The purpose of this policy is to provide guidance for applications for Caravan Parks in the Rural and Tourist zones. The policy aims to enable the approval of small-scale caravan parks and camping grounds, identify development standards, and clarify interpretations and facility requirements relating to ‘nature based’ parks. |

11.5 Structure Plans

Structure plans (including standard structure plans and precinct structure plans) can be prepared in accordance with Division 2 of Schedule 2 of the Regulations for land within the Scheme area. Structure Plans provide the basis for zoning and subdivision of land. Structure plans can also be used to inform built form outcomes and the design of public open spaces. Figure 42 provides an overview of the Shire’s current structure plans.

An approved structure plan is valid for 10 years from the date of approval, unless otherwise specified in the approval or another period determined by the WAPC. Under the Regulations, a structure plan that was approved before 19 October 2015 is taken to have been approved on that day. As such, the majority of the Shire’s structure plans will expire within the coming years and will be required to be reviewed and updated under the current planning framework.

Figure 42: Shire of Denmark Structure Plan Overview.

| Name | WAPC Approval | Purpose |
|---|---------------|--|
| West Denmark Structure Plan | 1996 | This structure plan has been the basis from which all subsequent subdivision guide plans, scheme amendments and subdivision proposals have been approved/endorsed. |
| Wishart Place Structure Plan and Amendment No. 1 | December 2002 | <p>Provides guidance for subdivision and development relating to access and road alignment, remanent vegetation, public open space, conservation, fire management, subdivision criteria, screening, proximity to vineyards and Residential and Special Residential land use designation.</p> <p>This structure plan has been the basis from which all subsequent subdivision guide plans, scheme amendments and subdivision proposals have been approved/endorsed.</p> |
| McLean Road/Kearsley Road Structure Plan for Lots 348, 349 & 350 McLean/Kearsley & Mt Shadford Roads | August 2023 | <p>Provides guidance for subdivision and development relating to Residential and Special Residential lots, remnant vegetation and tree retention, bushfire and stormwater management, and access.</p> <p>This Structure Plan has been the basis from which the subsequent scheme amendment and subdivision proposals have been approved/endorsed.</p> |
| Horsley Road/Rockford Road Local Structure Plan | May 2012 | <p>Residential development of 343 lots, with densities ranging from R20 – R30. Lot layout, public open space, building setback, pedestrian movement, drainage, fencing, access, and landscaping.</p> <p>This structure plan has been the basis from which subsequent subdivision guide plans, scheme amendments and subdivision proposals have been approved/endorsed.</p> |
| Lot 5 South Coast Highway Local Structure Plan | December 2009 | <p>Provides guidance for subdivision and Residential development in relation to landscaping, bushfire management, public open space, access and movement, and significant tree retention.</p> <p>This structure plan has been the basis from which subsequent subdivision proposals have been approved.</p> |
| Weedon Hill Outline Development Plan | March 2002 | <p>Residential and Special Residential development of 27 lots, ranging between R5, R10 and R15. Addressing matters relating to access, drainage, location of retail, primary school, and public open space, and bushfire management.</p> <p>This structure plan has been the basis from which subsequent scheme amendment and subdivision proposals have been approved/endorsed.</p> |
| Peaceful Bay Structure Plan | June 2001 | Outlines provisions for village settlement areas, existing leasehold area, conservation areas, conservation lots, landscape protection area, and rural residential lots. This Structure Plan has been the basis for subsequent proposals. |



Acronyms

| | | | |
|--------|--|----------|--|
| APZ | Asset Protection Zone | LPP | Local Planning Policy |
| BAL | Bushfire Hazard Level | 2011 LPS | Local Planning Strategy 2011 |
| BHL | Bushfire Hazard Level | NatHERS | Nationwide House Energy Rating Scheme |
| BRM | Basic Raw Materials | NCC | National Construction Codes |
| BRIGS | Bushfire Resilience in the Great Southern | PDWSA | Public Drinking Water Source Areas |
| CHRMAP | Coastal Hazard Risk Management and Adaption Planning | POS | Public Open Space |
| DBCA | Department of Biodiversity, Conservation and Attractions | SES | State Emergency Services |
| DLPH | Department of Planning, Lands and Heritage | SPP | State Planning Policy |
| DMIRS | Department of Mines, Industry Regulation and Safety | SRMP | Sport & Recreation Master Plan |
| DoT | Department of Transport | STS | Sustainable Tourism Strategy |
| DWER | Department of Water and Environmental Regulations | THOW | Tiny House on Wheels |
| DWSP | Drinking Water Source Protection Plans | TPS3 | Town Planning scheme No. 3 |
| ESD | Ecologically Sustainable Development | VLE | Visual Landscape Evaluation |
| LCA | Life Cycle Assessment | VFRS | Volunteer Fire and Rescue Services |
| LIA | Light Industrial Area | WAPC | Western Australian Planning Commission |
| | | WSUD | Water Sensitive Urban Design |
| | | WWTP | Waste Water Treatment Plant |



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| Schedule of Modifications | | Reason | | | | | | | | | | | | | | |
|---------------------------|--|---|-------------------|--|---|--|-------|----------------|------------------|--------------|---------------------------------|---------|--|---|--|--|
| <p>3.1.4.1</p> | <p>Incentivising Infill - Reticulated Sewerage Infrastructure</p> <p><i>Amend first sentence to read as follows:</i> Some parts of the Denmark townsite are not currently provided with a reticulated sewerage service, and the achievement of infill development is therefore constrained by the Government Sewerage Policy (2019) and Draft State Planning Policy 2.9 (2021).</p> <p><i>Amend third sentence to read as follows:</i> In particular, the development of a reticulated sewerage service in residential areas within an 800 metre catchment of the Town Centre (refer Map 1) should be prioritised.</p> <p>Strategies & Actions – Infill & Consolidation</p> <p><i>Add a new action as 1(a)(viii) to read as follows:</i> Retention and enhancement of heritage places and buildings.</p> <p><i>Replace actions as 2(a)(i) & (ii) with the following text:</i> Increase residential density 800 metre walkable catchment of the Denmark Town Centre within a range of R30-R60, prioritising higher densities for corner lots and large consolidated infill sites.</p> <p><i>Add a new action as 2(a)(iv) to read as follows:</i> Review residential density codings within the Denmark Townsite and surrounding residential areas during the local planning scheme review, to ensure that codings reflect existing lot sizes and fit for purpose development standards in alignment with contemporary state and local land use planning frameworks.</p> | <p>Reference to Draft SPP 2.9 suggested by DWER.</p> <p>Reference to Map 1 suggested by DWER.</p> <p>Modification to add the consideration of heritage to local planning policy for infill development.</p> <p>Modification to remove specified densities and instead refer to a range that should be determined in preparation of a new local planning scheme.</p> | | | | | | | | | | | | | | |
| <p>3.1.4.2</p> | <p>Strategies & Actions - Urban Expansion</p> <p><i>Fix spelling of McLean Road in Figure 2.</i></p> <p><i>Add a row to Figure 2: Considerations for sites identified for future urban expansion, as follows:</i></p> <table border="1" data-bbox="226 1157 1547 1465"> <thead> <tr> <th>Location</th> <th>Identifier Number</th> <th>Lots</th> <th>Indicative Yield*</th> <th>Sewerage</th> <th>Notes</th> <th>Recommendation</th> </tr> </thead> <tbody> <tr> <td>Ocean Beach Road</td> <td>DMK46 (part)</td> <td>Lot 56 Ocean Beach Rd (D043841)</td> <td>Unknown</td> <td>Site is located approximately 300m from Sewer Treatment Plant.</td> <td> <ul style="list-style-type: none"> Zoned Rural </td> <td>Support the rezoning of the land to Urban Development Zone. A structure plan is required</td> </tr> </tbody> </table> | Location | Identifier Number | Lots | Indicative Yield* | Sewerage | Notes | Recommendation | Ocean Beach Road | DMK46 (part) | Lot 56 Ocean Beach Rd (D043841) | Unknown | Site is located approximately 300m from Sewer Treatment Plant. | <ul style="list-style-type: none"> Zoned Rural | Support the rezoning of the land to Urban Development Zone. A structure plan is required | <p>Typographical error.</p> <p>Modification in response to a submission received from the landowner (S78), expressing the intention to pursue residential subdivision, as per the designation in the Shire’s 2011 Local Planning Strategy.</p> <p>It is also noted that this lot is at the lowest point in the landscape within the surrounding area and is the logical site for a sewerage pump station (as identified in</p> |
| Location | Identifier Number | Lots | Indicative Yield* | Sewerage | Notes | Recommendation | | | | | | | | | | |
| Ocean Beach Road | DMK46 (part) | Lot 56 Ocean Beach Rd (D043841) | Unknown | Site is located approximately 300m from Sewer Treatment Plant. | <ul style="list-style-type: none"> Zoned Rural | Support the rezoning of the land to Urban Development Zone. A structure plan is required | | | | | | | | | | |

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| | | | | | <p>Connection to reticulated sewer is required.</p> | | <p>prior to subdivision to and should address the following issues:</p> <ul style="list-style-type: none"> • Connection to reticulated sewerage and coordination of servicing • Creekline preservation and water sensitive urban design • Interface with vegetated areas and management of bushfire risk • Diversity of lot sizes • POS provision | <p>the Denmark Regional Land Supply Study 2017), which is infrastructure essential for the servicing of surrounding urban development areas.</p> |
| <p><i>Amend action 2(b) to read as follows:</i> Wastewater management, including connection to reticulated sewerage where required by relevant State policies.</p> | | | | | | | | |

Modification to reflect need to connect to a reticulated sewerage services where this is required by the Government Sewerage Policy and Draft State Planning Policy 2.9, based on feedback from DWER. The modifications recommended by DWER have not been proposed verbatim as this may have suggested a requirement for connection to sewerage in areas where subdivision approvals exist for residential

Add Lot 56 Ocean Beach Rd (D043841) to Map 2 with the label DMK46 (part).

In Figure 1, insert additional column titled ‘Bushfire Assessment’ with text to read as follows:

| Location | Bushfire Assessment |
|---|--|
| Wattle Way (DMK05) | Minimal landscape scale bushfire risk constraints to potential and use intensification. Site specific issues including appropriate setbacks to the reserve on eastern boundary of the site are to be addressed at subsequent planning stages. |
| Smith St (DMK03 & DMK04) | Minimal landscape scale bushfire risk constraints to potential and use intensification. Site specific issues including setbacks to retained vegetation to be addressed at subsequent planning stages. Coordination of subdivision design required to provide access/ egress in two directions. |
| Kearsley Rd to Horsley Rd (DMK06, DMK29, DMK30) | Minimal landscape scale bushfire risk constraints to potential and use intensification. Site specific issues to be addressed at subsequent planning stages. |
| West of Kearsley Rd (DMK07) | Existing approved structure plan responds to bushfire risk constraints and fuel management as part of lot design. Prior to subdivision the preparation of a Bushfire Management Plan and variation from the annual Firebreak and Fuel Management Notice may be required. |
| Buckley St to Kemsley Pl (DMK38) | Minimal landscape scale bushfire risk constraints to potential and use intensification. Site specific issues including setbacks to retained vegetation to be addressed at subsequent planning stages. Structure plan/ subdivision design to incorporate access via Harlequin St and DMK14. |
| Lot 5 South Coast Hwy (DMK14) | Existing approved structure plan responds to bushfire risk constraints. Connection to the south to Ocean Beach Road and to DMK45 required to achieve compliance to the BPC access requirements. Perimeter roads required to Extreme BHL areas. |

lots without connection to reticulated sewerage.

Change in mapping to reflect the lots inclusion in Figure 2.

More specific reference to bushfire risk assessment for individual urban growth areas is proposed based on feedback from DFES and to achieve conformance with the *Guidelines for Planning in Bushfire Prone Areas*.

Modifications to the Bushfire Hazard Level assessment report are also under consideration.

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| Ocean Beach Rd and Little River Rd (DMK37, DMK47) | Intensification of land use in areas with an extreme bushfire risk identified is not recommended, noting extent of expected impact on remnant vegetation. Intensification of land use in areas with a moderate bushfire risk identified is subject to review of the existing structure plan to respond to bushfire risks. Incorporation of secondary access via adjoining growth areas required (DMK 37, DMK 47 and Little River Road). | | |
| Springdale Beach (DMK19) | Existing approved structure plan responds to bushfire risk constraints and provides for through-access via Woodward Heights. Interface with areas of extreme bushfire risk and multiple access routes should be demonstrated as acceptable prior to any further subdivision. | | |
| Hardy St (DMK28) | Existing zoned land with site specific issues including appropriate setbacks to the reserve on western boundary of the site and the retention of vegetation on the site to be addressed at subsequent planning stages. | | |
| Ocean Beach Rd (DMK50) | Site specific issues to be addressed at subsequent planning stages. Limited infill potential due to required setbacks to reserve on southern boundary of the site and existing remnant vegetation on the site. | | |
| Beveridge Rd (DMK68) | Site specific issues to be addressed at subsequent planning stages, including the retention of existing remnant vegetation on the site. | | |

In Figure 2, insert additional column titled 'Bushfire Assessment' with text to read as follows:

| Location | Bushfire Assessment |
|------------------------------------|---|
| Horsley Rd to Scotsdale Rd (DMK1) | Minimal landscape scale bushfire risk constraints to potential and use intensification. Site specific issues including the retention of vegetation to be addressed at subsequent planning stages. Approved structure plan appropriately achieves access/egress in multiple locations. |
| McLean Rd and Scotsdale Rd (DMK49) | Minimal landscape scale bushfire risk constraints to potential and use intensification. Site specific issues including the retention of vegetation to be addressed at subsequent planning stages. Connection of access to Scotsdale Road and to development areas to the south |

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| | | (DMK1) should be incorporated into structure plan/ subdivision design. | | |
| | Kemsley Pl to South Coast Hwy (DMK45) | Minimal landscape scale bushfire risk constraints to potential and use intensification. Site specific issues including the retention of vegetation on the site to be addressed at subsequent planning stages. Structure plan/ subdivision design to incorporate access via Harlequin St and DMK14. | | |
| | Ocean Beach Rd (part DMK51) | Interface with areas of extreme bushfire risk requires further investigation and resolution through the structure planning process. Road connection to west (DMK14) required to be incorporated in structure plan/ subdivision design. | | |
| | Inlet Dr (DMK73) | Further intensification of land use subject to detailed assessment of bushfire risk in the context of the site, vegetation to be retained on Lot 2 and the interface with adjoining reserved land. | | |
| | Ocean Beach (part DMK46) | Interface with areas of extreme bushfire risk requires further investigation and resolution through the structure planning and subdivision process. Site specific issues including the retention of vegetation on the site to be addressed at subsequent planning stages. | | |
| 3.1.4.3 | Rural Living Estates <i>Modify the last sentence to read as follows:</i> The Strategy recommends expanding land use permissibility to enable more functional and productive uses of rural residential land that are low impact, of a suitable scale, and appropriately located. | | | Modification to include disclaimers regarding the proposed expansion of permissible uses needing to be low impact and of a suitable scale. |
| 3.1.4.5 | Strategies & Actions – Housing <i>Amend action 1(a) to read as follows:</i> Require new and revised structure plans for residential growth areas to demonstrate alignment with the following aspirational housing diversity targets: <ul style="list-style-type: none"> i. A minimum of 10% of total housing lots are high density (R60 or above). ii. A minimum of 25% of total housing lots are medium density (R30 to R60). iii. A minimum of 25 dwellings per hectare net residential density. <i>Amend action 1(b)(ii) to read as follows:</i> | | | Modification of wording to change the housing diversity targets to become aspirational and therefore increase the scope for flexibility in meeting the targets during structure planning. Modification to reflect the Shire’s intention to facilitate the permanent use of tiny |

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| | Facilitate the legitimate use of tiny houses on wheels as a form of permanent dwelling and tourist accommodation. | homes on wheels where all relevant requirements can be met. |
| 3.1.5.1 | <p>Strategies & Actions - Denmark Town Centre <i>Amend action 1(a) to list additional considerations (vi) to (viii):</i></p> <ul style="list-style-type: none"> vi) Interpretive guidelines and design palette for infrastructure and public works to reflect local environment, values and culture. vii) Heritage. viii) Laneways. <p><i>Amend action 1(c) to read as follows:</i> Identify improvements to public reserves, streetscapes, laneways and car parking, as part of the preparation of a Town Centre masterplan, promoting the connection of the Town Centre to the Denmark River parklands.</p> | Modifications to add interpretive guidelines, heritage, laneways and car parking, as key considerations to be included in future masterplan for the Denmark Town Centre. |
| 3.1.5.2 | <p>Strategies & Actions – Residential Areas <i>Add a new action as 1(i) to read as follows:</i> The proposed subdivision of a Residential lot adjoining a laneway should provide a frontage to the laneway where practical, to avoid the creation of battle-axe lots.</p> | Modification to encourage positive streetscape outcomes in the Denmark Town Centre in locations where laneway access is available. |
| 3.1.5.4 | <p>Strategies & Actions – Public Art & Interpretive Materials <i>Add a new action as 1(d) to read as follows:</i> Review the Shire’s Interpretive Guidelines to provide contextual and sympathetic outcomes for the use of colours and materials in the design of public spaces, infrastructure and signage.</p> | Modification to ensure that public infrastructure and signage are designed to be sympathetic to the local context in a consistent and contemporary manner. |
| 3.1.6.1 | <p>Rural Settlements – Nornalup <i>Add the following text above the last sentence in this sub-section:</i> It should be noted that the Nornalup townsite is currently unsewered and is entirely located within a sewerage sensitive area, as designated under the WA Government Sewerage Policy (2019).</p> <p>Strategies & Actions – Rural Settlements <i>Amend action 1(b) to read as follows:</i> Investigations into the potential expansion of the Nornalup Townsite should address the provision of reticulated water and wastewater services and access to community and commercial services, including potential funding mechanisms.</p> | <p>Modification to emphasise the significance of Nornalup townsite’s sewerage sensitive area status under state government policy.</p> <p>Modification to include reference to requirement for reticulated water and wastewater services as requested by DWER. Consistent with part 3.1.6.1 of the Draft Strategy.</p> |
| 3.1.6.2 | <p>Rural Land Uses – Agricultural Impacts <i>Change the last sentence under the sub-heading to read as follows:</i> Local planning policies should also provide guidance on the appropriate level of information and assessment for agricultural pursuits according to their scale, removing unnecessary approval</p> | Modification removes ambiguous terminology ‘backyard orchards’ and provides clarity by replacing it with low impact horticulture. |

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| | <p>requirements for low impact cottage industries and horticulture, while promoting best practice management.</p> <p><i>Insert additional paragraph below at the end of this section:</i> Management of the potential environmental impacts of these land uses needs to be considered, particularly the potential for nutrients, pesticides and herbicides to contaminate land, waterways or wetlands offside, and of native fauna habitat loss and secondary salinisation.</p> <p>Strategies & Actions – Rural Land Uses <i>Add a new action as 2(b) to read as follows:</i> Limit permissibility for non-compatible uses.</p> <p>Other Rural Land Uses – Tree Plantations & Forestry <i>Modify the last sentence in the second paragraph of this sub-section to read as follows:</i> Tree plantations can also pose significant environmental risks in relation to the removal of remnant native vegetation, loss of biodiversity, impacts on soil biology caused by non native monocultures, impacts on water catchment and resulting runoff, and threats to water and soil quality posed by pesticides, herbicides and excess nutrients. <i>Add the following text above the last sentence in this sub-section:</i> The potential impact of tree plantations and forestry on visual landscape values should also be assessed under Section 3.3.1.3 Landscape Values.</p> <p>Strategies & Actions – Conservation Lots <i>Amend action 1(d)(ii) to read as follows:</i> Proposals that include contiguous remnant vegetation directly adjoining national parks, local reserves, conservation reserves, riverine or wetland systems or other environmental features, where they demonstrate significant capacity to contribute to a local-level ecological linkage;</p> | <p>Additional wording as recommended by DWER to refer to other potential agricultural impacts that may require consideration as part of planning assessment.</p> <p>Additional action to clarify that uses considered as non-compatible shall be limited in permissibility.</p> <p>Modifications to acknowledge the potential impact of tree plantations and forestry proposals on water catchments, and the need to assess potential impacts on visual landscape values.</p> <p>Additional reference to wetlands recommended by DWER.</p> |
| 3.1.8.2 | <p>Strategies & Actions – European History <i>Modify action 1(c) to read as follows:</i> Review the Shire’s local planning policy for heritage to provide guidance on development application requirements, assessment criteria, preferred outcomes and the use of planning incentives to preserve heritage streetscapes and sites included on the Local Heritage Survey and Heritage List.</p> | <p>Modification to refer to existing policy and add reference to heritage streetscapes as an element to also be preserved by using planning incentives.</p> |
| 3.2 | <p>Strategies & Actions – Economy & Employment <i>Modify action 1(d) to read as follows:</i> Support home-based businesses in residential and rural residential areas at a scale and in a manner that minimises negative amenity impacts on residential development.</p> | <p>Modification to remove home office as this use is already permitted.</p> |

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| <p>3.2.2</p> | <p>Denmark Town Centre <i>Replace this section with the revised text contained in Attachment D.</i></p> <p>The key changes to this section are summarised as follows:</p> <ol style="list-style-type: none"> 1. Acknowledgement that Lot 50 (#82-90) South Coast Hwy is the only undeveloped, unconstrained and sufficiently sized landholding within a reasonable distance to the Denmark Town Centre that is capable of accommodating a major supermarket development. 2. Require any supermarket development at Lot 50 to provide pedestrian links to the Town Centre to maximise connectivity, and appropriately assess traffic impacts and provision for improvements to the surrounding road network. 3. Acknowledge the need for activation, placemaking and urban design enhancements to the Denmark town centre, to support the viability and vitality of the town’s main street commercial environment. 5. Introduce Restricted Use designations into the new Scheme to prevent ‘shop’ land uses from being established on Commercial zoned land west of Millar and Short Streets, except for the greenfield site at Lot 50. | <p>Feedback received during public advertising has indicated that the constraints and risks associated with assembling and developing a sufficiently sized land parcel within the core of the Denmark Town Centre to accommodate a new or expanded supermarket are significant, and the Draft Strategy’s approach may therefore not sufficiently enable the development of a supermarket within the next 15 years.</p> <p>It is understood that there is both significant latent demand (i.e. past population growth that has not been met by the expansion of services) and a tourist and seasonal population that may support investment in new and/or expanded supermarkets in the near term. Officers therefore recommend that the Strategy maintains an opportunity for the potential development of a supermarket as this is a key commercial service to our community.</p> <p>Acknowledging that this may not be feasible within close proximity to the centre of town, a position on the periphery may need to be supported. Lot 50 (#82-90) South Coast Hwy is the only undeveloped, unconstrained and sufficiently sized landholding within a reasonable distance to the Denmark Town Centre that is capable of accommodating a major supermarket development. Proposed modifications to the Strategy therefore seek to retain the ability for a supermarket to be developed on Lot 50 (#82-90) South Coast Hwy.</p> |
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| | | <p>Other than allowing for the development of a supermarket, it is recommended that the Strategy maintain support for the existing main street 'village' precinct and avoid the potential undesirable social and economic impacts that would result from the fragmentation of commercial land uses. It is proposed that the Strategy does not support the establishment of any shop or supermarket land uses on other commercial lots to the west of Short Street and Millar Street, identifies the need for improved connectivity between Lot 50 and the existing main street 'village' precinct, and recommends initiatives to maintain and enhance the vitality of the precinct.</p> <p>Modifications seek to maintain the primacy and integrity of the Denmark Town Centre by keeping shops and supermarkets within a consolidated main street, 'village' environment.</p> |
| <p>3.2.2.2</p> | <p>Mixed Use and Activation <i>Modify action 2(a) to read as follows:</i> Introduce development requirements within the local planning scheme and policies to facilitate the activation of designated main street frontages, including the exclusion of residential or tourist accommodation uses from ground floor frontages.</p> | <p>Modification to enable the action to be more explicit regarding intentions for ground floor frontages in the Denmark town centre.</p> |
| <p>3.2.3</p> | <p>Other Commercial Areas <i>Replace this section with the revised text contained in Attachment D.</i> The key changes to this section are summarised as follows:</p> <ol style="list-style-type: none"> 1. All lots within the Denmark Town Centre designated Service Commercial on the draft Strategy maps shall revert to a Commercial designation. 2. All lots within the existing Light Industrial Area being designated for Service Commercial uses. | <p>The lots designated for Service Commercial land use in the Draft Strategy are proposed to change back to Commercial, in response to submissions received from affected landowners that objected to this change. The abovementioned modification regarding the acknowledgement of a potential supermarket development on Lot 50 (#82-90) South Coast Hwy also influenced the decision to remove the</p> |

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| | | <p>Service Commercial Designation along the South Coast Highway.</p> <p>Reverting to a Commercial designation along South Coast Hwy will correspondingly reduce Service Commercial land availability. This includes the availability of development sites for larger businesses, which the Draft Strategy had proposed Lot 50 could accommodate. In response, it is proposed to modify the Draft Strategy to designate the Denmark Light Industrial Area (LIA) for Service Commercial uses. Compared to the Light Industrial designation in the Draft Strategy this will allow for a wider range of business opportunities and provide stronger commercial impetus for the transition of the LIA to land uses more compatible with its surroundings.</p> <p>The consolidation and uplift of the LIA is recommended over the establishment of an entirely new service commercial area. The existing LIA has opportunities for expansion, major development sites, and for the potential extension of a reticulated sewerage service to the area. Changes to the LIA will be enabled by the availability of land within the East Denmark Industrial Estate, which will provide for industrial businesses to relocate.</p> |
| <p>3.2.4</p> | <p>Industrial Areas</p> <p><i>Replace this section with the revised text contained in Attachment D.</i></p> <p>The key changes to this section are summarised as follows:</p> | <p>The initial stages of land release in the East Denmark Industrial Estate have been sold and the estate is expected to extend to the south. The Draft Strategy broadly identified the land to the south of the existing estate</p> |

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| | <ol style="list-style-type: none"> 1. Pursue further subdivision and release of Industrial and Light Industrial lots as a southern extension of the East River Industrial Estate. 2. Land use designations over the proposed extension of the East River Industrial Estate to reflect a graduation of Light Industrial uses at the southern end, transitioning to Industrial in the northern portion, to ensure that necessary buffers can be achieved to existing sensitive land uses in the surrounding area. | <p>for ‘industrial’ uses, without acknowledging the transition of land uses that has formed part of previous planning for the southern portion of this area. Consistent with feedback received through submissions it is proposed to modify the Strategy to better reflect this transition and to provide necessary buffers.</p> |
| <p>3.2.5</p> | <p>Tourism</p> <p><i>Replace this section with the revised text contained in Attachment C.</i></p> <p>The key changes to this section are summarised as follows:</p> <ol style="list-style-type: none"> 1. Remove all tourism precincts and provide a set of detailed criteria for the assessment of tourism development and rezoning proposals. 2. Expanded discussion on the impacts associated with tourism, including the concept of ‘carrying capacity’. 3. Specifying some of the tourism-related land uses that may currently be permitted in the Rural Zone that are intended to be removed when a new planning scheme is prepared (a rezoning would then be required for these land uses to occur). 4. Identifying the portion of unrestricted occupancy units (no length of stay restriction) that may be permitted on a site by site basis (instead of on a precinct basis). <p><i>Delete all references throughout the draft Strategy to ‘Tourism Precincts’.</i></p> | <p>The most common issue raised in public submissions was concern with the proposed designation of tourism precincts and/or concern that the Draft Strategy was too accommodating of new tourism development. Relating submissions expressed, in summary, that increasing tourist numbers have placed pressure on local services, housing, infrastructure and environment, and thereby affected the quality of life of residents.</p> <p>This revised approach aims to address key pressure points and to strike a balance between the negative and positive impacts of tourism that are experienced within our community, acknowledging that this will likely remain a subjective and debated topic.</p> <p>References to Tourism Precincts throughout the document need to be removed to reflect the proposed modification to replace the precincts with a detailed set of criteria.</p> |
| <p>3.3.1.1</p> | <p>Strategies & Actions – Natural Environment & Biodiversity</p> <p><i>Modify action 2(b) to read as follows:</i></p> | <p>Modified action to account for circumstances where clearing within the Rural Zone is exempt.</p> |

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| | <p>Introduce provisions into the local planning scheme that adopt a presumption against the clearing of remnant native vegetation to accommodate proposed land uses and development on land in the Rural Zone, effectively limiting clearing to circumstances where it is exempt under applicable legislation.</p> | |
| <p>3.3.1.2</p> | <p>Water Resources Replace reference to ‘swamps’ and ‘swampland’ with ‘wetlands’.</p> <p>Inlets & Wetlands <i>Modify the first paragraph to read as follows:</i> The Wilson Inlet covers an area of approximately 48km², 14km long, and 4km wide (refer Map 3) and is fed by the catchments of the Hay and Denmark Rivers. The health of the Wilson Inlet faces threats from increasing nutrient flows from intensive agriculture, grazing and urban land uses in the surrounding catchments. The Wilson Inlet Management Strategy provides identifies strategies and actions for protecting and enhancing the environmental and community values of the Inlet and tributaries within its catchment.</p> <p>Groundwater <i>Modify the second sentence of the last paragraph of this section to read as follows:</i> There are currently no groundwater areas proclaimed under the <i>Rights in Water and Irrigation Act 1914</i> within the Shire.</p> <p>Strategies & Actions – Water Resources <i>Amend action 1(a)(i) to read as follows:</i> Ensure that new dams are only located in existing cleared areas and off-stream so that unrestricted flow is maintained. <i>Amend action 1(e) to read as follows:</i> Utilise land use controls and enforceable management protocols to prevent contamination of drinking and agricultural water supplies and aquatic ecosystems from pollutants and nutrient export. <i>Amend strategy 2 to read as follows:</i> Protect, manage and rehabilitate waterways and their foreshore areas and wetlands and their buffers to maintain and enhance water quality, ecosystem function, biodiversity, recreational and scenic values. <i>Amend action 2(a) to read as follows:</i> Support the replanting of endemic species of vegetation in strategic locations such as waterways, wetlands and drinking water catchments. <i>Amend action 2(b) to read as follows:</i> When assessing subdivision applications, rezonings and structure plans which include land adjacent to waterways, coastal areas or wetlands, consider the establishment and widening of waterway or coastal foreshore reserves and wetland buffers. <i>Amend action 2(c) to read as follows:</i></p> | <p>Modification recommended by DWER.</p> <p>Modification proposed based on feedback from DWER, including addition of reference to the Wilson Inlet Management Strategy.</p> <p>Rewording as recommended by DWER.</p> <p>Modified action to also prevent dams from being located in areas of remnant vegetation.</p> <p>Addition of reference to aquatic ecosystems as recommended by DWER.</p> <p>Rewording as recommended by DWER.</p> <p>Addition of reference to wetlands as recommended by DWER.</p> <p>Modification proposed based on feedback from DWER.</p> |

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| | <p>Preserve or re-establish vegetated buffer areas adjoining waterways and wetlands.</p> | <p>Modification proposed based on feedback from DWER.</p> |
| <p>3.3.1.3</p> | <p>Landscape Values</p> <p><i>Retitle Section 3.3.1.3 to ‘Visual Landscape’</i></p> <p><i>Amend paragraphs 1-3 to read as follows:</i></p> <p>The planning framework refers to visual landscape character and views that are most valued by the community, highlighting their amenity and sense of place that we ascribe to our surrounding views, scenery and environment. The role of this Strategy is to identify the particular landscape characteristics and views most in need of protection, and to help to set the objectives and policies to achieve this.</p> <p>The Shire’s inland landscape of tall forest on hilly terrain with scattered granite peaks and other outcrops, contrasts strongly with the flatter plains, inlets and cleared rural land closer to the coast, edged by tall coastal dunes adjacent to a varied coastline of sweeping sandy bays with inlet openings, punctuated by rock outcrops and headlands. The Shire is fortunate to contain this wide variety of unique views and landscapes which are highly valued by both the local community and visitors alike. They contribute to our sense of place as well as providing a range of social and economic opportunities. This was recognised through preliminary consultation for this Strategy and featured prominently as part of community engagement for the Shire’s Sustainable Tourism Strategy.</p> <p>This Strategy seeks to preserve visual landscape values as a public asset, with the intention of balancing opportunities for private development with the social/ cultural, economic and environmental values that these visual landscapes provide.</p> <p>Identifying Values</p> <p><i>Amend paragraph 1 to read as follows:</i></p> <p>To assess landscape values and provide advice on how the shire’s planning framework may respond to preserve the Shire’s unique natural landscapes, the Shire commissioned the preparation of a Visual Landscape Evaluation (VLE). The VLE takes a methodological approach to identifying landscape areas, features and views that demonstrate characteristics that the community tends to value more highly, as outlined in the WAPC Visual Landscape Planning in Western Australia manual.</p> <p><i>Amend paragraph 3 to read as follows:</i></p> <p>The VLE identifies and maps highly valued landscape character units within the Shire. The attributes that contribute to their perceived values are outlined in Figure 7 below.</p> | <p>Minor wording/ description changes recommended by DPLH based on peer review of visual landscape section of Draft Strategy.</p> |

Amend Figure 7 to read as follows:

Figure 7: Valued landscape character units within the Shire

| Landscape Character Unit | Valued Characteristics |
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| Native vegetation | <ul style="list-style-type: none"> • Areas of highly diverse remnant vegetation with varying height, colour and species • Gradual and naturally appearing transition zones between rural land uses and surrounding remnant vegetation • Strongly defined patterns of coastal heath, peppermint / paperbark woodlands and dune vegetation • The bushland is a valuable asset for the South Coast Noongar people and an intrinsic part of their cultural identity (Guilfoyle, 2011) |
| Forested Hills | <ul style="list-style-type: none"> • High degree of topographic variety • Hills, ridges and peaks that are focal points (Plate 57) • Undulating and steeply sloping terrain • Features such as rock outcrops |
| Coastal Hills | <ul style="list-style-type: none"> • High degrees of perceived naturalness • High degree of topographic variety • Distinctive landform features (e.g. Point Hillier) • Seascapes • Steep and irregular dunes |
| Coastal Edge | <ul style="list-style-type: none"> • Seascapes (combination of ocean, reefs, beach, inlet mouths, dune formation, coastal rocks, cliffs, headlands, coastal vegetation) |
| Waterbodies | <ul style="list-style-type: none"> • The South Coast Noongar people consider all natural water sources within the Shire to be equally important and the health of these systems are intrinsic to their culture (Guilfoyle, 2011) • Presence of water bodies (rivers, streams, inlets, ocean, dams) |

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| | (Plate 54) |
| Rural Hills | <ul style="list-style-type: none"> • High degree of topographic variety (Plate 55) • Features such as rock outcrops • Distinctive remnant vegetation located along drainage lines, roadsides and in paddocks |
| Tall Forest | <ul style="list-style-type: none"> • Unique stands of vegetation such as tall Karri and Tingle trees (Plate 56) |

Insert paragraph below after Figure 7:

The Shire's valued landscapes are easily observed from a variety of tourist routes, from the busy South Coast Highway, to scenic routes through hilly forested areas, to spur roads that access coastal recreation sites, as well as long distance walk and cycle trails of national importance. Inlets and rivers provide views from watercraft. These routes, and the land seen from them, are mapped in the VLE. They provide a wide variety of view types, from enclosed and canopied views in the tall forests and along treelined roads in rural areas, to panoramic views across the open coastal plain, inlets and along the coastline and out to sea. River crossings and granite peaks provide additional unique views. The VLE identifies individual key views from these routes and other locations that the community is likely to value highly.

The VLE includes maps of land that is potentially visible from the most sensitive travel routes, if vegetation was removed. These maps enable identification of the skyline as seen from tourist routes, as well as indicating areas that are most sensitive due to proximity to roads, and position in the landscape.

Potential Impacts & Responses

Amend section to read as follows:

Landscape values can potentially be impacted by a range of insensitive forms of development, including:

- Poorly located development – for example, development that blocks valued views or is prominently sited within view corridors, or on ridges and skylines as seen from tourist routes.
- Incompatible development design – reflective materials, contrasting colours, inconsistency with natural landform and features (e.g., extensive cut and fill).
- Signage – inappropriate location or design, clustering of signage, inconsistency of type, imposition on visual environment.
- Inappropriate land use – for example, tree farms that may block views, or commercial development within

Additional wording recommended by DPLH (verbatim).

Amended wording recommended by DPLH (modified).

rural character areas or a visually sensitive location.

- Clearing of bushland and individual trees – reduced natural landscape character, loss of visual diversity/hardening of visual environment, reduced visual screening of development, reduction in scale of natural features such as the height of ridges, loss of enclosed and canopied views.

Potential impacts on visual amenity vary according to the character of the surrounding landscape, the form of the proposed development and proximity to the viewers' location. Impacts are likely to be more pronounced when development occurs in elevated positions within the landscape, in other prominent locations and close to public viewpoints.

Insensitive development is more likely to occur on private freehold land close to the Denmark Townsite and on key tourist routes due to the commercial imperatives to maximise visibility, private views and accessibility.

The local planning framework can be utilised to help preserve landscape values by seeking to avoid or mitigate the impacts of changes to land use and development. This Strategy proposes a range of actions to incorporate better safeguards that achieve this outcome for the community while not unduly constraining development opportunities.

The planning responses proposed in this Strategy are targeted to locations where:

- The landscape and views are highly valued, typically incorporating a variety of valued landform and vegetation features such as rock outcrops, steep slopes and tall forest trees with panoramic views across the hilly terrain or along canopied, winding roads.
- Priority areas of landscape value that are visible from key public vantage points, tourist routes and recreational trails, and other areas and individual sites that are visually sensitive due to their open character and prominent position.
- Development pressures exist, often in valued, prominent landscapes.
- Land use change has been identified by this Strategy.
- Land ownership is predominantly private freehold.

Insert paragraphs below under this heading after the above text:

Development proposed for areas or sites that are valued for their inherent character, seen from tourist routes and close to viewers, requires specific planning measures that address values. Planning measures focus on areas that are most highly valued for their inherent character, as well as those areas that are most visible (for example, from main transport thoroughfares).

Revised wording recommended by DPLH.

Strategies & Actions – Visual Landscape

Modify strategy 1 to read as follows:

Recognise and seek to preserve the outstanding valued landscapes, landscape features and views of the district by providing guidance for land use and development and promoting the retention of remnant vegetation. Prioritise identified key values and prominent locations including public vantage points, key transport corridors, recreational trails and sites, and other prominent areas, including areas subject to development pressure.

Modify action 1(a)(iii) to read as follows:

Incorporate visual buffers and screening planting on transport corridors and recognised tourist routes, retain and enhance the natural, tree-lined entrances to the Denmark Townsite, and retain remnant vegetation to provide visual relief within developed areas.

Modify action 1(b) to read as follows:

Introduce a Landscape Values Special Control Area into the Shire’s local planning scheme as shown in the Strategy mapping. The Special Control Area will be applied to all land within this area excluding lots with Urban Residential, Commercial, Service Commercial and Industrial land use designations.

Modify action 1(c) to read as follows:

Prepare a local planning policy to provide guidance for the siting, design and assessment of land use and development proposals within the Landscape Values Special Control Area and locations where visual landscape is a relevant planning consideration.

Replace references in actions 1(b) and 1(c) to the title of the proposed Special Control Area to refer to ‘Visual Landscape Protection’.

Inclusion of additional area within proposed Special Control Area – Visual Landscape Protection identified on Strategy mapping in the Kentdale locality.

Modified strategy reflecting feedback from DPLH.

Modified action reflecting feedback from DPLH.

This modification of terminology from ‘zone’ to ‘land use designation’ enables the SCA to be applied to the Shire’s existing Special Rural zoned land, which will be zoned Residential in the new Planning Scheme, to seek alignment with State policy.

Modified action reflecting feedback from DPLH.

Modified reference for clarity reflecting feedback from DPLH.

Proposed inclusion of additional area into SCA based on feedback from DPLH, noting that this area is identified as having significant values in the Visual Landscape Evaluation undertaken in support of the Strategy. Initial mapping of the proposed SCA reflected large and contiguous areas of identified landscape values only, but as this area aligns with a key transport corridor it is considered appropriate to be included.

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| <p>3.3.1.4</p> | <p>Strategies & Actions – Basic Raw Materials <i>Add a new action as 2(b) to read as follows:</i> Extractive industries are not considered to be appropriate in locations where they are likely to negatively impact surrounding landscape values, as detailed in section 3.3.1.2.</p> | <p>Additional action to ensure that impacts on landscape values are considered and assessed as part of any proposal for extractive industries.</p> |
| <p>3.3.2.4</p> | <p>Bushfire Risk - Asset Protection Zones <i>Add the following text to the end of this section:</i> The Denmark townsite contains a variety of public reserves with remnant vegetation, sometimes in a natural state with unmanaged fuel loads. In some circumstances this can result in increased Bushfire Attack Level (BAL) ratings on adjoining private land.</p> <p>The Shire has adopted a position not to support the management of fuel loads within reserves as a means of establishing asset protection zones that enable development or reduce BAL ratings on adjoining private land. This considers the contribution of reserves to Denmark’s community values (including visual amenity, neighbourhood character, the localised climate and fauna habitat) and the resource implications associated with the ongoing requirement to maintain fuel loads to a sufficient standard.</p> <p>Similarly, proposed subdivisions that create new public reserves should not be based on the ongoing management of fuel loads within any reserve without an appropriate funding mechanism in place to support any such works.</p> <p>This Strategy supports the broad-scale assessment of bushfire risks within the Denmark townsite and surrounds and the implementation of fuel management and other measures of risk mitigation on public reserves that form part of a strategic approach to reducing bushfire risk.</p> <p>Access Routes <i>Replace the second paragraph and following list to read as follows:</i> The BRIGS report and the Shire’s Bushfire Risk Management Plan (BRMP) recommend that additional accessways are developed to provide a secondary means of escape for existing subdivisions that currently only have one road in/out. The Strategy recognises this retrospective need and supports further detailed investigation into the establishment of additional access in these circumstances, including (but not limited to) the following areas:</p> <ul style="list-style-type: none"> • Harrington Break • Anning Road/ Braidwood Elbow • Springdale Heights/ Randall Road/ Seachange Close • Peaceful Bay • Panorama Rise • Middleton Close/ Illsley Drive | <p>More specific guidance provided to support Natural Hazards & Resilience Actions 3 and 4, based on feedback from DFES.</p> <p>Modification proposed based on feedback from DFES and for conformance with the <i>Guidelines for Planning in Bushfire Prone Areas</i>.</p> <p>Notes additional existing residential/ rural residential areas that do not have secondary access.</p> |

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| | <p>In circumstances where it is not possible to practically establish secondary access, additional bushfire risk mitigations or the establishment of places of refuge (e.g. Peaceful Bay) may be investigated.</p> <p>Strategies & Actions – Natural Hazards & Resilience <i>Modify strategy 4 to read as follows:</i> Maintain an appropriate level of flexibility within planning for bushfire protection requirements.</p> | <p>Strategy modified to remove unnecessary and ambiguous wording regarding community-orientated outcomes.</p> |
| 3.4.1 | <p>Strategies & Actions – Community Facilities <i>Modify action 2b. to read as follows:</i> 2(b) amend - Support the relocation of the Denmark Volunteer Fire and Rescue Service and Denmark State Emergency Service by supporting land tenure changes and appropriate Reserve designation under the new Planning Scheme.</p> <p><i>Modify action 2(c) to read as follows:</i> Identify Lot 300 on P046811 (#832) South Coast Highway for the Shire’s works depot, zone Lot 300 as a Reserve with an appropriate designation in the new Local Planning Scheme and seek a land swap with the State to enable the potential future development of the current depot site for service commercial land.</p> | <p>Modification to reflect modifications proposed by the Consistent Local Planning Schemes Report (2023).</p> <p>Modification of inserting the words ‘potential future’ to acknowledge that the depot relocation is medium-long term aspiration.</p> |
| 3.4.1.1 | <p>Education <i>Delete the last paragraph under the Second State Primary School sub-heading as follows:</i> The 2011 LPS identified portions of Lot 214 on P052368 (#267) Ocean Beach Road and Lot 32 on D062910 (#15) Little River Road for a future state primary school site. The majority of this site sits on Lot 214. The Strategy notes the constraints to the development of this site due to current sewage infrastructure requirements and indicates a willingness to consider alternative land uses, which may necessitate investigation into an alternative location for a second state primary school, as required, in consultation with the Department for Education.</p> <p><i>Strategy maps to show the whole of Lot 214 on P052368 (#267) Ocean Beach Road as Urban Residential designation.</i></p> | <p>Modifications to align with the recommended outcomes of the Urban Expansions Section (3.1.4.2) for Lot 214 and Lot 32, including a change in zoning to Urban Development and the need for a new structure plan.</p> |
| 3.4.1.2 | <p>Emergency Services <i>Delete the following wording from the second paragraph:</i> The most appropriate zoning for emergency services facilities is Reserve – Emergency Services.</p> | <p>Modification to reflect modifications proposed by the Consistent Local Planning Schemes Report (2023).</p> |
| 3.4.1.4 | <p>Shire Facilities <i>Amend the first paragraph to read as follows:</i> Shire operations are supported by administration and customer service offices on Lot 151 on P224101(#953) South Coast Highway, a works depot located on Reserves 38302 & 37930 on Zimmerman Street, recreation centre on Reserve 15513 on Brazier Street, civic centre and library on Reserve 25985 on Strickland Street, and a visitor information centre located at Lot 501 on P061023 (#73) South Coast</p> | <p>Modified text to also include the Denmark Recreation Centre, Civic Centre and Library.</p> |

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| | Highway. The Shire also manages a range of sporting facilities, community halls, leased buildings and other assets. | |
| 3.4.2.3 | <p>Wastewater <i>Add the following paragraph to the end of the Unsewered Areas sub-heading:</i> The Strategy also identifies the need for the extension of reticulated sewerage services to Denmark’s existing Light Industrial Area, to better manage wastewater outflows and to help enable the transition of this area from industrial to service commercial land uses. The provision of reticulated sewerage for these lots will open up new business opportunities that are currently constrained, including food and beverage manufacturing which provides significant opportunities for the Shire’s agricultural sector to add value to their local produce. <i>Retitle subsection title from ‘Composting’ to ‘Composting Toilets’.</i> <i>Include reference to Draft State Planning Policy 2.9, which will supersede the Government Sewerage Policy</i> Add “and Draft State Planning Policy 2.9” after reference to the Government Sewerage Policy throughout this section.</p> <p>Strategies & Actions – Wastewater <i>Add a new action as 2(d) to read as follows:</i> Work with landowners and the Water Corporation to coordinate the extension of the reticulated sewerage network to the Denmark Light Industrial Area.</p> | <p>Modification based on feedback from DWER, including their preference for the establishment of food and beverage manufacturing to take place on land that is provided with a reticulated sewerage service instead of on rural land.</p> <p>Rewording as recommended by DWER.</p> <p>Reference recommended by DWER.</p> <p>Modification based on feedback from DWER</p> |
| 3.4.2.4 | <p>Strategies & Actions – Energy <i>Modify action 1(c) to read as follows:</i> Introduce a renewable energy production use class and corresponding development provisions into the local planning scheme, as well as appropriate policy guidance to support the assessment of applications.</p> | Modified action to clarify that scheme and policy may both have development requirements for the renewable energy production use class. |
| 3.4.3.2 | <p>Public Open Space Rationalisation <i>Remove Kingdon Park from Figure 10 and Map 6.</i></p> | Modification to reflect the Council's decision not to proceed with the rationalisation of Kingdon Park (30 January 2024). |
| 3.4.4.1 | <p>Strategies & Actions – Road Network <i>Add a new action as 1(e) to read as follows:</i> Identify possible future upgrades to improve the accessibility and legibility of a secondary evacuation route from the Denmark townsite via Churchill Rd.</p> | Modification to encourage the enhancement of the existing road network to increase emergency evacuation capability. |
| 3.4.4.2 | <p>Strategies & Actions – Paths & Trails <i>Modify action 1(a) to read as follows:</i></p> | Modifications to capture a recently finalised regional cycling strategy. |

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| | <p>Support necessary changes to land use, tenure and road infrastructure to enable the development of recreational trails in accordance with the Great Southern Regional Trails Master Plan and the Great Southern Cycling Strategy.</p> | |
| <p>4</p> | <p>Strategy Maps</p> <p>a) Update maps to reflect all subdivisions and rezonings that have been finalised since the advertised version of the Strategy was initially prepared.</p> <p>b) Change designation of Lot 414 (#1676) South Coast Highway Shadforth from Environmental Conservation to Rural.</p> <p>c) Change part of the designation of Lot 550 (#2048) South Coast Highway Shadforth to:</p> <ul style="list-style-type: none"> - <i>Rural Residential</i> for the portion in the southeastern portion of the lot indicated as new lots proposed by the preliminary subdivision plan included as part of a submission (S2) from the landowner’s planning consultant. - <i>Additional Use</i> over the cleared southern area of the area currently zoned Tourist, to carry over existing tourism related provisions in Appending xiii of TPS3. <p>d) Change the designation of the section of Reserve number 23067 outlined in red below to Parks and Recreation.</p> | <p>Modification to ensure that mapping is up to date.</p> <p>Modification in response to a submission from the landowner, asking to retain current Rural Zoning. Shire wide analysis and detailed consideration of which lots should be included within the Environmental Conservation zone may be provided at a future date by the creation of a Biodiversity Strategy.</p> <p>Modifications to reflect requests made by the landowner and their consultant to pursue future subdivision and development of tourism uses, in balance with contemporary planning requirements concerning bushfire risk and clearing of native vegetation.</p> <p>Modification to rectify historical mapping anomaly.</p> |



e) Change the designation of Lot 36 (#77) Illsley Drive Shadforth from Tourism to Rural Residential.

f) Fix the misalignment of mapping colours that do not match up with cadastre in the area around Maloney Close and Jack Ricketts Drive, as circled in red below:

The location, site constraints, and current land use of this lot (single dwelling) and the surrounding area (Special Rural Zone under TPS3) make this site unsuitable for any significant tourism development in the future. The current Tourism zoning was brought about by a historical subdivision guide plan, but no tourism use was ever proposed by the landowners. This modification is to reflect the introduction of a recommendation for this lot in Figure 35.

Modification to rectify historical mapping anomaly.



- g) Change the designation of lot 702 of P073129 Nornalup to from Rural to Urban Residential.***
- h) Change the designation of Lot 56 Ocean Beach Rd (D043841) from Rural to Urban Residential.***
- i) Add Strategy maps for Nornalup and Peaceful Bay.***
- j) Change the designation of Lot 305 Wentworth Rd (P075450) from Rural to Tourism.***
- k) Change the designation of all Service Commercial lots along South Coast Highway (between Hardy St and Millar/Short Street) to Commercial.***
- l) Change the designation of all Light Industrial lots to Service Commercial.***
- m) Change the designations over Lot 9001 South Coast Highway (P413953) to a mix of Special Use, Light Industrial and Industrial, and update the related industrial buffer, as per the designations and buffer indicated on the map contained in Figure 5 of public submission number S43.***

Mapping update to reflect historical subdivision.

Mapping update to reflect the modification to Figure 2: Considerations for sites identified for future urban expansion.

Land use designations for these areas are not easily visible from the Shire wide strategy map and the Tourism Precinct maps that included this detail are to be removed.

Update to reflect recent rezoning.

Mapping change to reflect the modifications made to Section 3.2.3.2 (South Coast Highway).

Mapping change to reflect the modifications made to Section 3.2.4.1 (Light Industrial Area).

Mapping change to reflect the modifications made to Section 3.2.4.2 (Light Industrial Area).

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| | <p><i>n) Swap the shades of purple used for the Industrial and Light Industrial designations, so that the darker shade is used for the Industrial designation.</i></p> | <p>Intuitively, a darker tone should represent a more intense land use. This issue was raised by public submission S43 and Shire officers agree that it would make maps easier to interpret.</p> |
| <p>5.1</p> | <p>Planning Areas</p> <p><i>Change all references to ‘Precinct Plan’ to ‘Town Centre Masterplan’, within this section as well as all cross-references throughout the Strategy.</i></p> | <p>A Town Centre Masterplan is considered to be better suited to Denmark’s regional context and existing built form than a Precinct Structure Plan. Precinct Structure Plans seem to be intended for ‘Activity Centres’ in a Perth metro context.</p> |
| <p>7.1</p> | <p>Demographic Profile</p> <p><i>Move the last paragraph of section 7.1.2 (Age & Household Profile) into section 7.1.1 (Population Growth & Distribution) and revised as follows:</i></p> <p>Seasonal Population</p> <p>Approximately 27.7% of dwellings in the Shire were unoccupied at the time of the 2021 Census, compared to 10.9% unoccupied dwellings in Western Australia overall. The majority of unoccupied dwellings in the Shire are used as private holiday homes/ second homes and a proportion are used as commercial holiday homes. During peak periods the majority of these dwellings are occupied by a seasonal, non-resident population.</p> <p>To understand the potential need for infrastructure and services the Shire has prepared estimates of the non-resident population and visitors accommodated within the Shire at seasonal high and low points. These estimates suggest that Denmark accommodates a total population (residents and overnight stay of visitors combined) of approximately 16,100 – 16,500 people during peak periods and approximately 7,600 during off-peak periods, with this figure likely to vary significantly in between these times. These figures demonstrate that the effective population of Denmark and the servicing required is substantially more than the resident population alone.</p> <p><i>Add the following text to the end of this section 7.1.6.2 Population Growth & Distribution:</i></p> <p>Accounting for the non-resident population and overnight visitation the effective population of the Shire in 2036 during peak periods is expected to be 17,150 – 17,650 during peak periods and 8,650 – 9.150 during off-peak periods. These estimates assume growth in resident population only and a maintenance of the estimated non-resident population and overnight visitation figures from 2023.</p> | <p>Proposed modification to respond to submissions discussing the seasonal and visitor population in Denmark and the capacity of community and commercial infrastructure and services that provide for population peaks. Estimates have been prepared based on the capacity of all forms of accommodation to understand the cumulative population.</p> |

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| 7.1.8.1 | Housing Profile <i>Make corrections to data within Figure 25: Housing Tenure (2021).</i> | There is an error in the data used to produce this graph. |
| 8.1 | Tourism Sites <i>Modify Figure 35: Recommendations to Tourism Sites as per table in Attachment C.</i> | Updates to the table include an additional site that has been rezoned since the draft Strategy was publicly advertised, another that was initially missed, and the addition of guidance concerning length of stay accommodation restrictions for all tourism sites, as was previously determined for each Tourism Precinct (section now removed). |
| 8.2 | Tourism Precincts <i>Delete section 8.2.</i> | Modification to reflect the removal of tourism precincts from the Strategy, as per modifications to the Tourism section (3.2.5). |
| 10.2 | State Planning Policies <i>Add the Planning for Tourism and Short-term Rental Accommodation Position Statement and Guidelines (2023) into Figure 37: State Planning Policy Overview.</i> | Update the table to include recently adopted State policy with strong relevance to the Shire's local context. |
| 10.3 | Regional Planning Context <i>Add the Great Southern Cycling Strategy to Figure 38: Regional Planning Overview.</i> | Acknowledgement of a regional strategy that has been recently finalised. |
| n/a | <i>Include list of maps, figures and tables in contents of Strategy.</i> | Requested by DWER, supported modification to add legibility to the document. |

Tourism

Tourism is a significant industry within the Shire and has experienced substantial growth in recent years. The district is serviced by a wide range of tourism businesses, including accommodation ranging from low-cost camping through to hotels.

The Shire's local economy is supported by a relatively high proportion of visitor expenditure compared to local resident expenditure, with a further increase in recent years. This tourism driven demand supports many accommodation, food and retail businesses that would not otherwise be viable.

Although tourism is a significant characteristic of the district, there are inherent tensions between the tourism industry, visitors and the local community. The Strategy acknowledges these tensions and seeks to provide the basis for a planning approach to managing and mitigating apparent points of conflict.

At a regional level, tourism is acknowledged as a significant growth industry, with opportunities in food, culture and nature-based tourism promoted in the Great Southern Regional Investment Blueprint, Great Southern Regional Planning & Infrastructure Framework and the Lower Great Southern Strategy. In acknowledgement, this Strategy seeks to address a range of tourism related issues within the context of land use planning.

Sustainable Tourism

In September 2021, the Shire adopted the Sustainable Tourism Strategy (STS) to provide a vision and direction for the future of tourism in the Shire.

The STS adopts the following definition of sustainable tourism developed by the United Nations World Tourism Organization (UNWTO):

Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities.

The STS identifies that in 2019 approximately 160,000 people made day trips to the Shire and another 167,000 people made overnight visits, staying a total of 591,000 nights. Most visitor expenditure in the Shire is generated by Australian residents (domestic visitors) who account for 91% of total visitors. Visitor numbers grew by 17.6% over the five years prior to June 2019 and average annual visitor expenditure was approximately \$76 million per annum over the same period.

The STS recognises that tourism has contributed to economic growth, job creation and an expanded array of lifestyle amenities for residents. It extends the scope and scale of built attractions and hospitality that would not normally be available if these services were solely reliant on local patronage. In effect, tourism helps to make the Shire a more vibrant and attractive place to live, work and visit.

While tourism brings many advantages, it is also responsible for increased pressure on local services and infrastructure during peak visitor periods, distortion of the local housing market, and impacts on social cohesion within our community. Given the Shire's unique natural environment and biodiversity, tourism can also lead to the potential overuse of sensitive landscapes and environments. For this reason, it is essential that tourism provides net benefits that are reflective of the values and needs of our community.

The STS provides a detailed profile and holistic review of the tourism industry, including accommodation availability and future needs. The STS also provides an over-arching vision, proposing that sustainable tourism within the Shire should:

- Make optimal use of environmental resources that constitute a key element in tourism development, maintaining essential ecological processes and helping to conserve natural heritage and biodiversity.
- Respect the socio-cultural authenticity of host communities, conserve their built and living cultural heritage and traditional values, and contribute to inter-cultural understanding and tolerance.
- Ensure viable, long-term economic operations, providing socio-economic benefits to all stakeholders that are fairly distributed, including stable employment and income-earning opportunities and social services to host communities, and contributing to poverty alleviation.

This vision builds on established tourism offerings in the Shire, supporting the further development of eco-tourism and balancing development with the needs of the local community. This vision does not rule out further tourism growth but establishes that further tourism development is conditional on meeting the expectations of the community.

This Strategy acknowledges and adopts the vision for tourism expressed in the STS and seeks to address matters relevant to the local planning framework, including responses required at a strategic level to cumulative concerns, and providing detailed guidance on how further tourism development will be assessed.

Environmental Stewardship

The Shire's natural landscapes and unique biodiversity are a significant drawcard for visitors and new residents alike, with much of the district classified as national parks and nature reserves. While all reserves may be subject to pressure from increasing visitor numbers during peak periods, some high profile sites such as Ocean Beach and the William Bay National Park have experienced seasonal congestion beyond the capacity of existing infrastructure, leading to impacts on visitor experience and environmental values. The Shire's Coastal Reserves Management Plan seeks to balance the need for infrastructure and facilities to accommodate visitation with community expectations, available resources, and environmental landscape and heritage values.

The future of tourism within the Shire depends heavily on the management of natural attractions and their associated cultural values. Visual and environmental degradation has the potential to undermine the value of the Shire of Denmark as a tourism destination, as well as compromising key drivers of community wellbeing and intergenerational equity.

New tourism developments must recognise the potential impact of their development and operation, and be responsively scaled and designed to protect the inherent values of both their site and context. Development proposals should align with the relevant social and environmental criteria contained within this Strategy, the local planning scheme and local planning policies.

The Shire is well suited for sensitively designed genuine eco-tourism experiences, which engage and educate visitors through our rich local environment, culture and history. This Strategy seeks to encourage applicants to go beyond the traditional paradigm of sustainable development (balancing environment, social and economic factors) and embrace a regenerative approach that not only sustains existing resources, but also increases the health, function and capacity of our, biodiversity, natural systems and local community.

Social and Cultural Impacts

Community consultation undertaken as part of the Shire's Sustainable Tourism Strategy (STS) indicated that some residents have concerns about the negative aspects of the contrasting seasonal variations in visitor numbers, reflecting on the impacts of traffic congestion, crowding and reduced service availability during seasonal peaks. However, some residents also appreciate the positive aspects of tourism, such as the year-round availability of restaurants, cafes, attractions and events that would be uneconomic otherwise.

While it is widely recognised that roads and car parking become more congested during seasonal peak periods, extending infrastructure to cope with the highest points of demand may create infrastructure assets that are otherwise underutilised for the majority of the year, and draw community resources away from other priorities. While continued investment in public infrastructure is required to respond to demand, this must be carefully considered and maintain flexibility so as to account for the varying levels of seasonal use. This Strategy also aims to enable the provision of additional commercial services that may be necessary to service the community and visitors during seasonal peaks.

The purchase of housing for use as private or commercial holiday homes has increased competition in the local housing market and contributed to price increases. The preference of investors for higher returns from short stay renting, as well as the complimentary benefit of private use, has contributed to the supply of private long-term rentals reducing and prices increasing. While not the only factors influencing the housing market, these influences are often highlighted as concerns within the community.

Where concentrations of houses are owned by absentee landowners or operated as commercial holiday homes, some local residents have observed a reduced sense of community connectedness and social cohesion within the neighborhood.

As a community, Denmark experiences a high degree of population turnover, with almost 30% of residents not living in the area 5 years ago (ABS 2021 Census). Many residents first experience Denmark as visitors themselves, with their experience of Denmark's attractions supporting their migration. When high population turnover is combined with a transient tourist population this can result in a lack of social cohesion within a community. It is therefore important to support initiatives that develop and enhance community capacity and help residents to understand and thrive within these circumstances. Therefore, early and proactive engagement prior to any development application is important in forming a social licence.

Carrying Capacity

In the context of tourism planning, the concept of carrying capacity acknowledges that both natural and man-made environments have limits and capacities that when overstepped are likely to result in environmental damage and lower levels of visitor and resident satisfaction. Carrying capacity can be broken down and represented in various ways, including:

- Physical capacity - is typically seen as a measurement of actual space and infrastructure, such as the number of parking spots linked to tourist facilities and destinations.
- Ecological capacity - is the amount of usage that the local environment or ecosystem can endure before causing damage.
- Social capacity - in the case of tourists, may be experienced in the level of crowding that a visitor will tolerate before they decide a location is too full and relocates elsewhere. In the case of residents, it relates to the capacity of the local

community to maintain and enhance its well-being and social harmony, balanced against community dissatisfaction and the social impacts caused and exacerbated by seasonal overcrowding and increases in peak season visitor numbers.

Although Denmark does not have the same levels of visitation experienced in other places, particularly on the east coast of Australia, it is acknowledged that domestic tourism has increased substantially in Denmark and other similar coastal towns following the COVID-19 pandemic. Whether Denmark experiences 'overtourism' is subjective and depends on the degree and perception of the type of tourism, level of development, environmental outcomes, visitor behaviours, and the personal and social values of the host community.

The carrying capacity of the Shire to accommodate tourism will fluctuate over time in response to variations in the availability of affordable housing, commercial services, community infrastructure, attractions and recreational opportunities, as well as changes in community sentiment.

Community consultation undertaken as part of the Shire's Sustainable Tourism Strategy asked respondents about their views on optimal visitor load at different times of the year. The following summary of community feedback to the STS reflects community sentiment at the time regarding the Shire's carrying capacity for tourism:

- Sixty percent of respondents wanted visitor numbers maintained at current levels during the Peak Season (school holidays periods in December-January, March-April and September-October).
- Over a quarter (27.4%) wanted to see numbers reduced during the peak season.
- Seventy percent indicated they would be happy to see visitation numbers grow in the off-peak periods.
- Approximately 9% of respondents wanted visitor numbers to decrease in the shoulder and off-peak seasons.

These views reflect the highly seasonal nature of tourism in Denmark, which align with holiday periods and seasonal weather variations.

While acknowledging these views, the Strategy also notes that the broader trends that have underpinned growth in tourism in Denmark (eg. population growth in WA, increasing population of retirees, growth in tourism in the south west tourism region) are likely to continue and that demand cannot be significantly influenced by actions undertaken at a local level.

Given these circumstances, this Strategy aims to manage growth in a way that minimises the potential negative impacts of tourism while also maximising the potential positive benefits. It is recommended that all substantial tourism land use or development proposals are subject to detailed assessment, with this Strategy providing relevant criteria.

Acknowledging that growth in the amount of tourist accommodation may increase the number of visitors staying within the Shire during peak periods, it is recommended that the cumulative supply of accommodation is closely monitored and carefully managed. This Strategy aims to support the development of a local planning scheme and policies that can address key points of conflict and minimise the potential impacts on the experience of residents and visitors when development occurs.

Strategies & Actions – Sustainable Tourism

- I. Acknowledge the vision and aims for tourism expressed in the Shire's Sustainable Tourism Strategy and seek alignment within the local planning framework.
 - a. Respond to the recommendations of the Sustainable Tourism Strategy at each stage of review of the local planning framework.
 - b. Review the range of opportunities for the development of new tourist accommodation within the local planning scheme and policies.
 - c. Identify key points of conflict between tourism and other land uses and provide guidance with the local planning scheme and policies.
 - d. Develop and maintain methods for monitoring and managing the cumulative amount of tourist accommodation and visitation within the Shire.
 - e. Support proposals to improve community infrastructure, commercial services, environmental management and social capital to help to address shortfalls in carrying capacity.

Rural Tourism

The extensive rural areas of the Shire play a key role in the success of tourism within the region. In particular, high value agricultural production is connected to food tourism, and dramatic natural and rural landscapes provide a visual experience and setting for eco-tourism. The growth in demand for these experiences is noted within State and regional planning documents and could potentially translate into development pressures within the Shire's rural areas.

A significant number of tourism enterprises currently exist on land zoned Rural in TPS3, and in some cases on land zoned Tourism that is otherwise isolated within a rural area. The reasons for this typically vary between the amenity provided by rural landscapes and views, diversification of agricultural or rural production businesses, and the availability of larger land parcels. Tourism land uses can be highly complementary to agriculture and add value to produce grown or reared on site; however, tourism can also compete with agriculture for access to land as well as creating conflict between the desire for amenity and common agricultural practices – which can produce odours, noise, and spray drift.

This Strategy seeks to preserve agricultural production and environmental conservation as the primary land uses within rural areas. Secondary land uses, such as tourism, will only be supported where they do not compromise these primary land uses, unnecessarily fragment landholdings and increase land costs, and can meet the sustainability objectives of this Strategy. This position is consistent with relevant State planning policies.

Some landholdings within rural areas are predominantly vegetated and may have limited agricultural potential. In these instances, conservation is considered the primary use of the land and support for tourism development may be considered where compatible with the preservation of ecological values

A wide range of tourism land uses can potentially be permitted within the Rural Zone in TPS3; however, there is currently a lack of guidance in the local planning framework on the appropriate scale of development and assessment criteria to assist in reducing potential impacts. Outside of the Tourism zone, tourism land uses are required to be a secondary, incidental use of the land, relatively small scale and low impact on the site and surrounding land uses. The Strategy proposes a review of the local planning framework to reflect this intent, including policies that determine the number and location of tourist accommodation units that may be permitted on rural lots. The range of tourism uses permitted within the Rural zone under TPS3 will be reviewed during the preparation of a new local planning scheme, including the removal of permissibility for several high-intensity tourism land uses including Hotel, Motel, and Caravan Park, which are considered to be better suited to the Tourism or Commercial zones.

Many forms of tourist accommodation are considered vulnerable land uses under State Planning Policy – Planning in Bushfire Prone Areas (SPP3.7). All proposals for tourist accommodation and attractions need to address the requirements of SPP3.7 on an individual basis. This Strategy acknowledges that the continuing development of tourist accommodation and attractions in less accessible parts of the Shire where landscape scale bushfire risks exist is undesirable and will increase pressure on emergency services. The development of unhosted tourist accommodation and other vulnerable land uses may not be supported by the Shire in these circumstances. Acknowledging the contribution that rural and natural landscapes provide to tourism, this Strategy also seeks to preserve visual landscape values in locations of importance and prominence. While many tourism businesses rely on directional and advertising signage, excessive and poorly designed signage can detract from the values that tourism relies upon, and the local planning framework may consider appropriate limits to preserve local character, landscape values and visual amenity.

Strategies & Actions – Rural Tourism

- I. Support rural tourism as a secondary, incidental land use only while preserving agricultural production and conservation as the primary uses of land within the Shire's rural areas.
 - a. Review the local planning scheme and policies to establish tourism as a secondary, incidental land use within rural areas, providing guidance for the development of tourism at an appropriate scale so that it does not compromise agricultural production and conservation as the primary uses of rural land.
 - b. Support measures to minimise the impact of tourism development on visual landscape values in locations of importance and prominence.
 - c. Reduce the range of tourist accommodation land uses that may be permitted in the Rural Zone, including removing permissibility for Hotel, Motel, Caravan Park and other similar land uses.
 - d. Avoid the development of unhosted tourist accommodation and other vulnerable land uses in rural areas where this would represent a significant bushfire risk to occupants and/or pressure on local emergency services.

Tourism Sites & Assessment

Tourism Sites

TPS3 recognises important tourism sites by including relevant lots within the Tourist Zone, excluding Commercial zoned land within the Denmark Town Centre. These sites have either substantial existing tourism infrastructure or demonstrate the qualities and attributes of a suitable site for tourism and are therefore zoned to facilitate their preservation for tourism purposes in future.

This Strategy assesses and makes recommendations for existing Tourist zoned sites in Part 2, Section 8.1.

The 'Tourist' Zone in TPS3 will be replaced by the 'Tourism' Zone in the Shire's new Local Planning Scheme, for consistency with the current Model Scheme Text.

It is acknowledged that tourism attractions may also be located on State managed lands where a range of unique natural assets exist. This Strategy supports tourism development on State lands subject to the resolution of relevant planning issues, consistency with the STS, and consideration of how public tourism assets will contribute to the local community and visitor experience.

Criteria for the Assessment of Tourism Proposals

This Strategy outlines a preferred direction for tourism and identifies assessment criteria to guide the assessment of tourism-related land use and development proposals.

This approach allows for rezoning proposals to be considered on a case by case basis, relying on robust criteria and detailed assessment of the unique circumstances of each proposal to inform decision making.

The criteria contained in **Figure X** aim to inform the appropriate siting and design for tourism rezoning proposals and tourism developments of a significant scale. These criteria evaluate whether a site is suitable for tourism development, as well as informing design and land use planning assessments. In evaluating development proposals, the Shire will apply the criteria in **Figure X**, with additional guidance from section 3.2.5 (Tourism) and any other relevant subsections within this Strategy. Applicable State tourism planning documents including the Planning for Tourism and Short-term Rental Accommodation Guidelines (2023) should also be given due regard as part of the assessment of tourism proposals.

Assessing future tourism development proposals requires careful consideration of appropriate scale, sensitivity to the local context and natural environment, infrastructure capacity, off-site impacts, and preservation of the surrounding visual landscape. It is acknowledged that both visitors and tourism businesses benefit from the agglomeration of the five A's of tourism (accommodation, access, attractions, activities, and amenities) and certain areas will be generally preferred for these reasons.

There is a presumption against supporting large scale tourism development within the Rural or Environmental Conservation zones. This approach aligns with the goals of preserving agricultural land for rural production and conservation areas for environmental protection and ecological regeneration. Balancing the desire for tourism with the protection of unique agricultural, social, cultural, and environmental aspects is essential before proceeding with rezoning or development approvals in rural or conservation areas.

Tourism development in remote areas, away from existing or planned urban centres, should be sensitive to the local context to ensure minimal disruption to the environmental, social and cultural landscape. Particular attention should be paid to factors such as development density, scale, local infrastructure suitability, and the magnitude of impact that may be caused by related infrastructure upgrades.

The introduction of Additional Use designations within the local planning scheme may be considered where necessary to support the continuation and limited expansion of existing established tourism businesses within the Rural zone.

Development Approval Requirements

The STS identifies a need to clarify and streamline planning requirements and processes for tourism land use and development proposals. While acknowledging that improvements can be made, this Strategy notes that finding a balance between facilitating development proposals and safeguarding the range of other interests is a complex challenge.

The actions recommended within this Strategy are intended to assist in providing greater clarity for proponents of tourism development, and will be enacted through review of an updated local planning scheme and policies. This may be further assisted with information sheets and self-service information that enables proponents to better understand approval requirements and processes.

In reviewing TPS3, it is recommended that land use permissibility is examined and opportunities identified to reduce approval and application requirements. However, it is noted that tourism development is typically unique (both accommodation and attractions) and a need for planning assessment in many circumstances is likely. It is recommended that additional local planning policy guidance is also established to support the preparation and assessment of tourism development applications.

Strategies & Actions – Tourism Sites & Assessment

1. Strategically manage the development of Tourism zoned sites.
 - a. Retain the Tourism Zone (retitle from Tourist Zone) within the local planning scheme consistent with the objectives of the Planning and Development (Local Planning Schemes) Regulations 2015.
 - b. Retain existing Tourist zoned sites within the Tourism Zone as outlined in Figure 35 – Recommendations for Tourism Sites (Part 2).
2. Provide a framework for the assessment of tourism proposals that improves clarity for proponents while appropriately addressing potential impacts and community values.
 - a. Assess proposals for tourism rezoning or development against the Planning for Tourism and Short-stay Accommodation Guidelines (2023), the criteria provided in Figure X, and the objectives of this Strategy.
 - b. Provide local planning policy guidance for the preparation and assessment of tourism-related development proposals as required.
 - c. Where appropriate, remove unnecessary approval and application requirements for minor development.

Figure X: Criteria for the Assessment of Tourism Proposals

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| Accessibility | Appropriate levels of access exist or are proposed to be provided to the site, relative to the scale and intensity of the proposed land use and development. This includes considerations such as the capacity of road infrastructure as well as provisions for pedestrian and bike paths/trails. |
| Built Form | The scale, design and quality of the built form reflects local conditions, character and aesthetics. |
| Bushfire | The site is not located in an area of extreme bushfire risk, is capable of compliance with the applicable planning requirements for bushfire protection, and does not result in significant additional pressure on local emergency services. |
| Co-location | The site is co-located with or adjacent to a range of other complementary tourism activities, attractions and/or accommodation facilities. The site has ready access to community and commercial services in an existing node (eg. Denmark, Peaceful Bay/Bow Bridge and Nornalup). |
| Ecologically Sustainable Development | The proposal demonstrates high sustainability credentials within the design, development process and ongoing operation, in alignment with the principles and intent of sections 3.1.7 and 3.3.1.5. |
| Environmental Impact | The site can accommodate the proposed tourism development and associated services within the carrying capacity of the local environment, in a manner that does not detract from the area's natural attributes or result in environmental degradation on the development site or surrounding area. |
| Infrastructure | The site possesses the carrying capacity to support the envisioned scale of development and associated infrastructure. The proposed development appropriately contributes to the provision of utilities and community infrastructure off site in cases where the carrying capacity of existing public infrastructure is likely to be exceeded due to an increase in visitor numbers directly resulting from the proposed development. |
| Land Use Compatibility | The proposed land use/ development does not introduce expectations of amenity that compromise the primary purposes and uses of surrounding land, or result in substantial adverse impacts on sensitive land uses within the surrounding area. |
| Social Impact | The proposed development demonstrates the ability to provide a net positive benefit to the local community, with consideration given to social and cultural carrying capacity, taking into account both resident satisfaction and visitor experience. |
| Visual Landscape Values | The siting and design of development appropriately preserves and enhances the evident visual landscape values. |

Length of Stay

The Strategy acknowledges State policies and reflects the restriction on occupancy of tourist accommodation units to a maximum length of stay of three months in any 12 months.

Notwithstanding, the Strategy acknowledges that unrestricted (or long stay) units are often sought by proponents as a means of supporting the viability of tourism development projects or providing key worker accommodation.

Any proposal that includes unrestricted units must be carefully considered and needs to demonstrate the capacity to address potential conflict between long and short stay units, preservation of the tourism function of the development, and management arrangements that enable continuing investment into common facilities. Appendix I of the Planning for Tourism and Short-term Rental Accommodation Guidelines outlines relevant factors that will be required to be addressed by proponents.

The Strategy identifies the proportion of unrestricted accommodation units that will be supported within existing tourism developments in Figure 35 (Recommendations for Tourism Sites).

The Strategy does not support the inclusion of unrestricted accommodation units in new developments that are outside of the Denmark Townsite.

Unrestricted accommodation units should be subsidiary to the tourism component of the development, minimise conflict between long and short stay accommodation, and avoid areas of the site providing the highest tourism amenity.

The provision of a single residence for a caretaker or manager may be considered where adequately justified.

Strata Title Subdivision

The subdivision of tourism developments into strata titles can provide a means of promoting investment, offering the potential to raise capital for improvement in aging tourism facilities while providing a 'holiday home' investment opportunity within a tourism (rather than residential) setting. However, fragmenting ownership of tourism developments can also result in complex management arrangements, inconsistent maintenance standards within a tourism development and a lack of reinvestment in common facilities.

The Strategy recommends the adoption of a position against supporting strata title subdivision in tourism developments except in limited circumstances, seeking to preserve the interests of the development as a tourism business first and foremost.

With reference to relevant State policies, this Strategy acknowledges the need for management arrangements prior to strata titling within any tourism development to facilitate decision making, maintain standards of tourism product and provide for ongoing reinvestment into common facilities.

Strategies & Actions – Length of Stay and Strata Title Subdivision

- I. Provide direction for length of stay and strata titling of tourism developments to encourage investment while protecting the primacy and long term viability of the tourism use.
 - a. Support an unrestricted length of stay in accommodation units within existing Tourism Zoned sites as outlined in Figure 35 – Recommendations for Tourism Sites (Part 2).
 - b. Support unrestricted length of stay for future Tourism Zoned sites within the Denmark townsite only.
 - c. Adopt a presumption against any further strata title subdivision of tourism developments within the Shire other than built strata applications in the following circumstances:
 - i. Where associated with accommodation units that have been allowed an unrestricted length of stay (consistent with this Strategy)
 - ii. Where associated with accommodation units that have a restricted length of stay, only within tourism developments that:
 - Were in operation prior to this Strategy;
 - Demonstrate consistency with the directions expressed in this Strategy;
 - Demonstrate that subdivision is necessary to facilitate an improved tourism outcome, such as major redevelopment, additional accommodation or a new attraction; and
 - Are supported by adequate management arrangements to preserve the interests of the development as a tourism business first and foremost.
 - iii. Require an ongoing Maintenance Plan and Reserve Fund for all built strata tourism developments to ensure appropriate management of common infrastructure is in place prior to subdivision.

Contributions

The STS recommends investigating opportunities for tourism-related businesses and visitors to contribute towards the ongoing costs of services and infrastructure for visitors. There are a number of ways to achieve this outcome, including through the adoption of a developer contributions plan that requires financial contributions from new development.

Should the Shire prepare a developer contributions plan for community facilities and infrastructure, a detailed assessment of the proportional use of these assets by tourists should be undertaken to inform an appropriate contribution rate for new tourism development. This mechanism would only apply to new tourism accommodation on a per unit basis and existing operations would not be levied.

Strategies & Actions – Contributions

- I. Identify and promote opportunities to secure infrastructure contributions from tourism land use and development within the Shire.
 - a. Incorporate tourism proposals within the consideration of a future developer contributions plan for community facilities and infrastructure.

Tourism Accommodation

Caravan Parks

Caravan parks provide a range of accommodation types including low-cost options, supporting a way of travelling that is strongly connected to our Australian cultural identity. The Shire is well serviced with formalised options for caravan parks, with eight existing facilities spread across the district providing opportunities for travellers seeking this form of accommodation. Three of these facilities are located on publicly managed land, facilitating their long-term retention as community assets.

State planning policies generally recommend the retention of caravan parks within a Special Use Zone to preserve this land use; however, the Shire has not experienced challenges relating to the longevity of caravan parks or land use competition as experienced in metropolitan and larger regional centres. This Strategy recommends that caravan parks are retained or established within the Tourism Zone to allow for the development of multi-faceted tourism businesses, while being responsive to industry trends.

The Strategy recommends the introduction of limits on the number of open sites that are retained for caravans and camping within a caravan park, ensuring that diversification into other accommodation types (e.g. cabins / park homes) does not represent an effective change of use.

Camping Grounds

The STS identifies a need for the development of additional low-cost and nature-based camping options, particularly given demand in peak periods. Many campers seek low-service, low-cost options, particularly as caravans and recreational vehicles are increasingly self-contained.

The Shire regularly receives enquiries from landowners proposing to develop small-scale camping businesses (both with limited services and fully serviced 'glamping'). It is also acknowledged that online platforms have facilitated the unregulated leasing of small-scale, low-service campsites on private properties – similar to the trends in recent decades that have given rise to the private holiday home industry.

This Strategy supports the introduction of a 'Camping Ground' use class into the local planning scheme to facilitate the development of private camping grounds. The intent of this use class would be to facilitate small scale, low-service, hosted camping grounds in appropriate zones.

While this land use can be enabled through the local planning framework, all caravan parks and camping grounds are also required to be licensed through the Caravan Parks and Camping Grounds Regulations 1997. The Caravan Parks and Camping Grounds Regulations set requirements for the provision of servicing facilities for camping grounds and caravan parks that are inflexible and unfeasible for many small-scale parks. This Strategy advocates for review of the Caravan Parks and Camping Grounds Regulations to promote flexibility and consider servicing arrangements that reflect the changing nature of this industry.

Strategies & Actions – Caravan Parks & Camping Grounds

- I. Maintain the variety of caravan park and camping ground accommodation options within the Shire and support limited, low impact development only.
 - a. Maintain existing Caravan Parks within the proposed Tourism Zone and require rezoning for any new Caravan Park proposals.
 - b. Support the diversification of tourism accommodation types within caravan parks subject to the retention of a minimum of 50% of sites remaining for short-stay use by caravans and camping.
 - c. Introduce a 'Camping Ground' use class into the local planning scheme to facilitate proposals for hosted, small scale, low impact camping grounds.
 - d. Advocate for review of the Caravan Parks and Camping Grounds regulatory framework to better enable the development of small scale, low service, hosted camping grounds.

Holiday Homes/Accommodation

The 2021 Census recorded 905 vacant dwellings in the Shire, approximately 27.7% of the total number of residences (refer Figure 6). It is estimated that between 75% and 80% of vacant residences are used as private holiday homes, 17% as commercial holiday homes, and the remaining 5% to 10% are vacant for other reasons.

Figure 6: Unoccupied Dwellings

| | 2001 | 2006 | 2011 | 2016 | 2021 |
|-------------------|-------|-------|-------|-------|-------|
| Shire of Denmark | 27.5% | 32.2% | 33.2% | 29.2% | 27.7% |
| Western Australia | 10.0% | 10.7% | 12.1% | 13.3% | 10.9% |

Approximately 160 residences in the Shire are currently approved to operate as holiday homes (as of April 2024), with the likelihood that other holiday homes are also operating commercially without approval. This figure does not include hosted bed and breakfasts, chalets and other forms of tourist accommodation approved under other land use classes, which often also utilise the same booking platforms.

Holiday homes are an important component of tourist accommodation within the district, providing a wide range of self-contained accommodation options in a variety of locations. They enable visitation to the Shire and generate income and employment within the local community. However, holiday homes in the Shire are regularly criticised for their impacts on:

- Residential amenity, due to noise and anti-social behaviour.
- Community capital, resulting from a high proportion of absentee landowners who have less social connections within the community.
- Housing affordability and availability, due to the effect of inflated demand (particularly for more affordable housing) within a small housing market.

The local planning framework aims to ensure that appropriate development requirements and management practices are enforced to minimise the adverse impacts of holiday homes.

Number of Holiday Homes

Acknowledging concerns expressed by our community about the growing number of holiday homes, this Strategy supports further investigation of means to maintain a sustainable number of short-stay accommodation properties.

The Strategy acknowledges that privately used holiday homes are far greater in number than commercial holiday homes. The Shire does not currently have a means of distinguishing between these and permanent residences within the local planning framework, nor do any reference points exist within the State planning framework.

The Strategy supports continued investigation and advocacy with the State for means to limit the number of residences within the Shire that are not permanently occupied, acknowledging that this trend reflects an inefficient and inequitable use of land, housing and natural resources.

The Strategy also proposes a review of the Shire's local planning framework for holiday homes, to consider opportunities to limit the impact of holiday homes on the availability of affordable housing.

Hosted and Unhosted Accommodation

The 'Levelling the Playing Field – Managing the Rapid Increase of Short-Term Rentals in Western Australia' parliamentary report released in 2019 made a range of recommendations for changes to regulatory processes for short term holiday accommodation, including the differentiation of hosted and unhosted forms of tourist accommodation.

In November 2023, the WAPC published the Planning for Tourism and Short-term Rental Accommodation Position Statement and Guidelines, including proposed new and amended land use terms providing clearer distinctions between different types of hosted and unhosted holiday accommodation. This Strategy supports the adoption of these amended land use classifications.

Hosted accommodation that has on-site management typically has less noise, behaviour and car parking issues, better management responses, and supports community outcomes through locally based operators and associated services. Unhosted accommodation is serviced remotely and typically results in adverse effects being experienced more frequently.

This Strategy adopts a preference for the provision of hosted accommodation over unhosted forms of accommodation and recommends that changes are considered to the local planning framework that encourage and enable the retention of affordable housing stock in existing residential areas for permanent accommodation.

Management and Compliance

The Shire's local planning framework is proactive in managing the impacts of short-stay accommodation through the requirement for approval and for the implementation of a property management plan. This aims to ensure that a nominated property manager responds to complaints, a code of conduct is in place for occupants, fire and emergency responses are clearly understood, and amenity and management issues with car parking, pets and anti-social behaviour are adequately addressed.

The State Government is working towards implementing a registration scheme for hosted and unhosted short-term rental accommodation, which will alter the way that the Shire manages and undertakes related planning administration and compliance. The aims of the registration scheme are to:

- Enhance levels of compliance by ensuring that all accommodation providers are aware of local laws and planning controls;
- Provide the community with information about what short-term rental accommodation exists in their area; and
- Produce accurate data to assist State and Local Governments obtain a better understanding of the short-term accommodation sector, leading to more informed policy and regulatory responses.

It is recommended that the Shire continue to work with the State on the design and implementation of management and compliance options and reduce unnecessary requirements within the local planning framework.

Strategies & Actions – Holiday Homes/Accommodation

1. Monitor and adjust the local planning framework as required to minimise the negative impact of holiday homes within the community.
 - a. Continue to record the number and location of commercially operated holiday homes within the Shire.
 - b. Investigate options to restrict commercial unhosted holiday homes within established residential areas in and around the Denmark Townsite.
 - c. Seek assistance from the State to investigate potential means both within and outside of the planning framework to limit the number of private holiday homes (second homes).
 - d. Retain requirements for planning approval for holiday accommodation (hosted and unhosted forms).
 - e. Work with the State on the design and implementation of management and compliance options for holiday accommodation.
2. Reflect in the planning framework support for hosted forms as the preferred type of tourism related accommodation.
 - a. Review land use classes in the local planning scheme to differentiate between hosted and unhosted forms of tourist accommodation, aligning with State guidance wherever possible.
 - b. Amend the local planning scheme to preference the development of hosted forms of accommodation, reducing requirements relative to unhosted forms of accommodation.

Part 2 – Background Information

8.1 Tourism Sites

Part 1 of the Strategy assessed and made recommendations for existing Tourist zoned sites. This is summarized in Figure 35 below.

Figure 35: Recommendations for Tourism Sites

| Location | Name | Existing Land Use/s | Unrestricted Length of Stay | Recommendation | Rationale |
|--|---------------------------------------|------------------------------|--|--|--|
| Lots 209 (#45) Payne Road, Denmark | The Cove | Chalets | As previously approved or maximum 15% (whichever is greater) | Retain Tourism zoning | Operating tourism business |
| Lot 211 (#259) Ocean Beach Road, Denmark | Gum Grove Chalets | Chalets | As previously approved or maximum 15% (whichever is greater) | Retain Tourism zoning | Operating tourism business |
| Lot 215 (#263) Ocean Beach Road, Denmark | - | Chalets, former caravan park | As previously approved or maximum 15% (whichever is greater) | A change from Tourism to Urban Development zoning may be considered | Site constrained by significant bushfire and related access issues |
| Lots 6 (#55), 140 (#63) and 73 (#65) Inlet Drive, Denmark | Denmark Waterfront Lodge and Pelicans | Hotel | As zoned | Retain Tourism zoning, consider additional small bar land use | Operating tourism business |
| Lot 1084 (#1) Inlet Drive, Denmark | Rivermouth Caravan Park | Caravan Park | As previously approved or maximum 15% (whichever is greater) | Retain Tourism zoning | Operating tourism business, existing long stay component |
| Portion of Lot 9011 on DP424797 | Springdale Beach | Undeveloped | - | Modify zoning to low-density Residential, as per Amendment No. 149 to TPS3 | Undeveloped site within a residential area, subject of rezoning proposal |
| Lot 21 (#678) Ocean Beach Road, Ocean Beach | Spring Bay Villas | Chalets | As previously approved or maximum 15% (whichever is greater) | Retain Tourism zoning | Operating tourism business |
| Lot 11 (#694) Ocean Beach Road, Ocean Beach | Winniston Lodge | Guesthouse | As previously approved or maximum 15% (whichever is greater) | Retain Tourism zoning | Operating tourism business |
| Lot 1 (#738) Ocean Beach Road, Ocean Beach | - | Non-tourism use | As zoned | Retain Tourism zoning | Recently rezoned, pending development |
| Lot 2238 (#770) Ocean Beach Road, Ocean Beach | Ocean Beach Caravan Park | Caravan Park | As previously approved or maximum 15% (whichever is greater) | Retain Tourism zoning | Operating tourism business |
| Lot 51 & 52 (#766-768) Ocean Beach Road, Ocean Beach | Ocean Beach Hideaway | Chalets | As previously approved or maximum 15% (whichever is greater) | Retain Tourism zoning | Operating tourism business |

| Location | Name | Existing Land Use/s | Unrestricted Length of Stay | Recommendation | Rationale |
|---|---------------------------------|--------------------------------------|---|--|---|
| Lot 20 (#133) and 21 (#135) South Coast Highway, Denmark | Denmark Tavern/ Kwoorabup Motel | Tavern & Motel | Caretaker/ Manager only | Retain Tourism zoning | Operating tourism business |
| Lot 3 (#93) Rudgyard Place, Hay | - | Caravan Park (former) | - | Modify to Rural zoning | Site is not currently being operated for tourism purposes and is unlikely to meet bushfire planning requirements to enable reinstatement or alternative tourism use |
| Lot 1643 (#40) Riverbend Lane, Denmark | Riverbend Caravan Park | Caravan Park | As previously approved or maximum 15% (whichever is greater) | Retain Tourism zoning | Operating tourism business |
| Lot 21 (#21) Mairet Rise, Shadforth | - | Undeveloped | - | Modify to Rural zoning | Site is currently undeveloped, contains significant vegetation and slope, and is not contiguous with the townsite |
| Lot 9001 (#4) Cussons Rd, Shadforth | - | Undeveloped for tourism purposes | Caretaker/ Manager only | Retain Tourism zoning | Prominent site with highway frontage, previous development approvals in place and existing commercial/ industrial buildings |
| Lots 1 (#443), 83 (#427), 85 (#467), and survey Strata lots on plan SP72562 Mount Shadforth Road, Shadforth | Karri Mia and Karri Aura | Multiple tourism and associated uses | As zoned | Retain Tourism zoning | Operating tourism businesses |
| Lot 2 (#390) Mount Shadforth Road, Shadforth | Castelli Estate | Multiple tourism and associated uses | Caretaker/ Manager only | Retain Tourism zoning | Operating tourism business |
| Lot 1 (#1572) South Coast Highway, Shadforth | Karma Chalets | Chalets | Caretaker/ Manager only | Retain Tourism zoning | Operating tourism business |
| Lot 550 (#2048) South Coast Hwy, Shadforth | - | Undeveloped for tourism purposes | Caretaker/ Manager only (within the Tourism designated portion) | Modify the southeast portion of the site proposed to be subdivided to Rural Residential zoning, and the balance of the site to be zoned Environmental Conservation. An Additional Use designation is also to be applied over the site's southwestern cleared area, carrying over existing Tourism provisions under TPS3. | Site is largely vegetated and currently undeveloped for any tourism purposes. |

| Location | Name | Existing Land Use/s | Unrestricted Length of Stay | Recommendation | Rationale |
|---|------------------------------|--------------------------------------|-----------------------------|---|--|
| Lot 305 Wentworth Road, Ocean Beach | The Dam | Multiple tourism and associated uses | Caretaker/ Manager only | Update to Tourism designation to reflect change in zoning | Site was recently rezoned to enable the growth and diversification of tourism uses |
| Lot 36 (#77) Illsley Drive, Shadforth | - | Residential use | - | Modify to Rural Residential zoning | Site constraints include access issues, location and surrounding non-tourism uses |
| Lot 24 & 25 (#2020 & 2022) Scotsdale Rd, Kordabup | Casa Libelula | Bed & Breakfast | Caretaker/ Manager only | Retain Tourism zoning | Operating tourism business |
| Lot 18 (#21) Tindale Rd, Bow Bridge | NewFarm | Chalets | Caretaker/ Manager only | Retain Tourism zoning | Operating tourism business |
| Lot 1 (#1597) Valley of the Giants Road, Bow Bridge | - | Undeveloped for tourism purposes | As zoned | Retain Tourism zoning | Approved tourism proposal |
| Lots 1-13 (#11) Peppermint Way, Peaceful Bay | Peaceful Bay Chalets | Chalets | Caretaker/ Manager only | Retain Tourism zoning | Operating tourism business |
| Lot 81 & 82 (#4 & 6686) South Coast Highway, Nornalup | Nornalup Riverside Chalets | Chalets | Caretaker/ Manager only | Retain Tourism zoning | Operating tourism business |
| Lots 20 & 83 (#12 & 8) Riverside Drive, Nornalup | - | Residential use | Caretaker/ Manager only | Retain Tourism zoning | Prime location adjoining existing chalet development |
| Lot 1839 (#6400) South Coast Highway, Nornalup | Valley of the Giants Ecopark | Caravan Park/ Camping Ground | Caretaker/ Manager only | Propose Tourism zoning | Existing tourism development in a strategic location adjacent to a regional attraction. Retention of caravan parks/camping grounds through Tourism Zone preferred. |

Denmark Town Centre

Primacy & Consolidation

The Denmark Town Centre is the primary retail and commercial centre within the Shire, providing premises for a range of shops, offices, cafes and other businesses to service the district. This includes major supermarket shopping as well as an array of public services (police, post office, civic centre, library, parks, toilets, meeting places) and community organisations (ambulance service, community resource centre, churches, RSL, museum).

The co-location of these businesses and services creates a centre that has a high level of activity, in turn attracting more businesses and services and more reasons to visit. This is critical for the viability of many businesses, as well as for creating a vibrant and interesting centre for the community. Future commercial development should be directed towards enhancing and activating the Town Centre.

This Strategy seeks to prioritise and promote the consolidation of the Denmark Town Centre, intending to generate increased activity, vibrancy and viability for both businesses and community. The development of general retail shops, supermarkets and other similar land uses outside of the core of the Town Centre would disperse this activity and is therefore not supported by the Strategy.

In the Lower Great Southern Land Use and Employment Survey (2019) completed by DPLH, the Denmark Town Centre was assessed as having a total of 29,365m² of commercial floorspace (all categories). Excluding commercial forms of residential accommodation, the district is projected to require an additional 5,900m² of commercial floorspace between 2021 and 2036. The Town Centre has capacity to accommodate additional commercial development and with appropriate planning can adequately provide for commercial floorspace needs during this period. This will be facilitated by the consolidation and redevelopment of land within the Town Centre, limited expansion of the Town Centre footprint and the gradual movement of low yield land uses (e.g., showrooms) out of the Town Centre.

The primary commercial area of the Denmark Town Centre is defined in Planning Area A (as shown on the Shire of Denmark Local Planning Strategy – Denmark Town Centre (Planning Area A) map). Section 5.1 contains an overview of additional actions to be implemented within the boundary of Planning Area A.

Supermarket Developments

Denmark is currently serviced by a mid-sized supermarket, a convenience supermarket, and a range of specialty retailers. Commercial floorspace projections suggest that demand for an additional supermarket is unlikely to be generated by growth expected over the next 15 years; however, this does not account for latent consumer demand or other commercial drivers having influence (e.g. competition, development availability, seasonality). It is recognised that during peak periods Denmark's supermarkets and some other commercial services can struggle to keep pace with demand. The viability of an additional supermarket may also be affected by the remote servicing from supermarket retailers based in the City of Albany.

This Strategy will not be able to accurately predict when a commercial decision is made on the expansion of any existing supermarket or the development of a new supermarket; however, it is important that appropriate land is identified, that is capable of accommodating services that are needed by our community when commercial thresholds are met. It is acknowledged that the Denmark Town Centre is constrained by small, fragmented and developed landholdings that would require significant assembly to enable major commercial development to occur. Although the potential relocation of the Denmark Volunteer Fire & Rescue Service may provide an opportunity for commercial development in future, this is dependent on funding and other factors, including the consideration that the size of the site (approx. 3000m²) may not be capable of accommodating a full-format supermarket and sufficient on-site parking.

Lot 50 on D098777 (#82-90) South Coast Highway is a large undeveloped Commercial zoned site. Several approvals for the development of a supermarket have historically been granted for this site which have now lapsed. These previous approvals intended to facilitate the re-location and expansion of Denmark's existing large IGA supermarket, currently located on the corner of Strickland Street and Mount Shadforth Road. The Strategy acknowledges that Lot 50 is the only undeveloped, unconstrained and sufficiently sized landholding within a reasonable proximity to the Denmark Town Centre that is capable of accommodating a major supermarket development.

A supermarket developed on Lot 50 would be located approximately a 500m uphill walk from Strickland Street, the heart of Denmark's main street shopping precinct. Any future supermarket development on Lot 50 will be required to provide strong pedestrian links to the core of the Town Centre, maximising pedestrian connectivity with Strickland Street. Additionally, any future application to develop a supermarket on the site should address traffic impacts and provide necessary modifications and upgrades to the surrounding road network to address the resulting increase in traffic flows,

including the construction of a roundabout at the Ocean Beach Road intersection. Specific assessment of visual impact will also be required for any development on Lot 50 to ensure that building design and screening minimises the prominence of development to views of the site from along the South Coast Highway, being the main western entrance to Denmark's Town Centre.

It is acknowledged that any supermarket development on Lot 50 risks splitting and diluting the Denmark Town Centre's existing main street commercial activity and its current level of vibrancy into two separate nodes of activity. This risk of fragmentation is of particular concern given the significant 500 metre uphill walk between Strickland Street and Lot 50, which will discourage pedestrians from walking between these two distinct commercial nodes, resulting in the increased use of cars. The potential division threatens to harm existing small businesses as well as the vibrancy and long-term economic viability of the Town Centre's main street commercial precinct, which is currently concentrated along Strickland Street, Hollings Road, Mount Shadforth Road, and on South Coast Highway between Price Street and the Denmark River.

To minimise negative economic impacts on the Town Centre's existing traders and social impacts from a drop in the activation and vibrancy of the Town Centre, this Strategy recommends against the inclusion of any specialty tenancies within a future supermarket development at Lot 50, as this outcome would pull additional economic activity away from the main street environment and be at odds with the community's strong desire to maintain the Town Centre's village feel. For the same reasons, this Strategy also opposes any other 'shop' land uses on other Commercial zoned lots situated west of Millar and Short Streets. This Strategy proposes the introduction of a Restricted Use designation over Commercial zoned land to the west of Millar and Short Streets to safeguard the primacy and consolidation of the Town Centre's main street commercial precinct.

In the event of a Supermarket development on Lot 50 the prioritisation of place-making and other initiatives to maintain and enhance the primacy, vibrancy and economic viability of the Town Centre's main street commercial precinct will become necessary. Such initiatives should ideally be co-designed and implemented collaboratively with the local community, business owners, the Denmark Chamber of Commerce, local community groups and not-for-profit organisations.

Strategies & Actions – Primacy & Consolidations

- I. Prioritise the consolidation of the Denmark Town Centre as the primary centre for commercial activity within the Shire, with particular regard to retaining land uses that attract high levels of foot traffic and activity into the main street commercial core.
 - a. Expand the Commercial Zone as follows:
 - i. Include Lot 97 on P222379 (#1) Short Street and Lot 257 (#2) Hollings Road within the Commercial Zone.
 - ii. Include a portion of Lot 228 on P217468 (#2) Strickland Street within the Commercial Zone, as identified in the maps accompanying this Strategy.
 - b. Review the range of permitted and discretionary uses in the Commercial Zone:
 - i. Accommodate a wide range of commercial land uses that attract high levels of foot traffic and activity (shops, entertainment and hospitality) and mixed-use development.
 - ii. Prohibit the development of drive-through facilities and restrict commercial land uses that do not create high levels of activity and foot traffic, including offices and bulky goods retailing, from being located on the ground floor of buildings located along designated active street frontages, as identified in Planning Area A.
 - iii. Reduce planning requirements for changes in land use and less complex development proposals that are consistent with development and policy standards.
 - c. Work with landowners to facilitate the consolidation of landholdings and redevelopment of under-utilised sites within the Town Centre to facilitate the delivery of new commercial floorspace.
 - d. Limit the impact of any major commercial development proposed on Lot 50 D098777 (#82-90) South Coast Highway on the existing Town Centre and the surrounding environment generally by requiring:
 - i. The development of pedestrian linkages and connectivity to the existing Town Centre;
 - ii. Assessment of traffic impacts and provision for improvements to the road network, including the need for a roundabout at the intersection of South Coast Highway and Ocean Beach Road;
 - iii. Assessment of visual amenity and mitigation of impacts on the western entrance to Denmark Town Centre;
 - iv. Assessment of commercial and social impacts to inform an appropriate limitation on the number of small specialty tenancies, noting that it is expected that a significant number of small tenancies would impact on the commercial primacy of the Town Centre main street environment.
 - e. Introduce Restricted Use designations into the new Scheme to prevent 'shop' land uses from being established on Commercial zoned land west of Millar and Short Streets, except for the greenfield site at Lot 50 D098777 (#82-90) South Coast Highway.
 - f. Facilitate place-making initiatives to enhance the primacy, vibrancy and economic viability of the Town Centre's main street shopping environment, in collaboration with the local community and businesses.

Mixed Use & Activation – No modifications to this sub-section

Flexible Building Design – No modifications to this sub-section

Transition Areas – No modifications to this sub-section

Other Commercial Nodes

TPS3 includes Commercial zoning for the following two commercial nodes at points along Ocean Beach Road:

- *Portion of Lot 214 on P052368 (#267) Ocean Beach Road, within the area included in the Weedon Hill Outline Development Plan (ODP) (now referred to as Local Development Plans (LDP)).*

Lot 214 Ocean Beach Road and adjoining lots within the Weedon Hill ODP are zoned for future urban development, but this is unlikely to occur during the life of this Strategy due to the cost of providing necessary infrastructure. The Strategy recommends that an alternative land use outcome is pursued in negotiation with the landowner, and as such the development of a local commercial node anticipated in the ODP may not be realised. Should residential development occur, this commercial node is poorly located and this Strategy does not consider it imperative that this is maintained.

- *Portion of Lot 55 on P006685 (#571) Ocean Beach*

Approximately 3,600m² of Lot 55 Ocean Beach Road is currently zoned Commercial and 8,100m² zoned Residential (R5). While conceived as a suitable location for local convenience services, the viability of development for this purpose is affected by the high proportion of seasonally occupied dwellings and tourist accommodation in the vicinity. The development of this site with a residential or tourism component is also restricted by the requirement for connection to reticulated sewerage.

The Strategy supports the retention of Commercial zoning over a portion of Lot 55 to accommodate the future development of this site as a local village node for the Ocean Beach locality. This would likely be enabled by the extension of a reticulated sewerage service to this location.

- *Nornalup Townsite*

As discussed in Section 3.1.6.1, any potential future expansion of the Nornalup townsite should consider the provision of (or access to) commercial and community services. Structure planning should consider whether a need exists to identify land for the development of commercial and tourism-related services.

The Strategy does not support the inclusion of additional land within the Commercial Zone in any other location, for the purpose of encouraging the consolidation of the Denmark Town Centre and the other smaller commercial nodes listed above. Small-scale commercial land uses may be contemplated within several other zones.

Strategies & Actions – Other Commercial Nodes

- I. Manage the development of other commercial nodes to promote the primacy of the Denmark Town Centre.
 - a) Investigate alternative land use outcomes for the Commercial zoned portion of Lot 214 on P052368 (#267) Ocean Beach Road to accommodate other land use outcomes.
 - b) Support the retention of Commercial zoning over a portion of Lot 55 on P006685 (#571) Ocean Beach Road.
 - c) Subject to the outcomes of structure planning, support the development of a commercial centre within Nornalup and rezone land if appropriate.
 - d) Not support the inclusion of any other additional land within the Commercial Zone outside of the Denmark Town Centre.

Service Commercial Land Uses

Service commercial land uses include bulky goods retail and wholesale businesses that require large premises and direct car access (e.g., showrooms, wholesale suppliers, hardware, storage facilities) as well as low-impact services and industries (e.g., car mechanics, equipment hire, food processing, sign manufacturing). Service commercial uses typically benefit from co-location, transport accessibility and high visibility, yet are generally incompatible with a mixed-use, main street, Town Centre environment due to high traffic generation and the large amount of low-yield floorspace required.

The Shire currently has a range of service commercial land uses spread between the Denmark Town Centre, South Coast Highway and the existing Light Industrial Area (LIA). Service commercial land uses are not easily distinguished by the categories used in the Land Use and Employment Survey, and it is therefore difficult to identify the current amount of floorspace and potential future growth.

Demand for additional floorspace for bulky goods retail and wholesale businesses is likely to be limited given the Shire's proximity to the regional centre of Albany where a much greater range of comparison goods retailing exists. This is reflected in the relatively high proportion of escape expenditure. However, this is also influenced by the need for some businesses to be ideally located closer to their customer base, some businesses being multi-faceted instead of specialised, and a consumer preference for buying local. This Strategy acknowledges the need to provide opportunities for local businesses and services to be established as Denmark grows and new commercial thresholds are reached.

Demand for additional floorspace for low-impact services and industries is expected to increase as a result of population and visitor growth. This would result in an increased demand for service commercial floorspace which is less dependent on visibility, but more on transport access and price sensitivity. As a result, it is envisioned that a small number of service commercial land uses will relocate out of the Town Centre, potentially increasing the projected demand for service commercial premises beyond what has been forecast.

This Strategy proposes that the predicted modest growth and movement of service commercial uses can be accommodated within the LIA and Commercial zoned land along the South Coast Highway to the west of Millar and Short Streets. The LIA is located close to the Town Centre and has the capacity for expansion and road connectivity upgrades to assist in a gradual transition over the medium to long term from general industry to a combination of light industry and service commercial uses.

This transition will be enabled by the introduction of a dedicated Service Commercial Zone for the LIA. Commercial land uses with active frontages and high levels of foot traffic such as shops, restaurants, supermarkets and similar will not be supported within the Service Commercial zone, in order to maintain the primacy of the Town Centre.

This is considered the most viable and sustainable approach, reducing the need for the extension of public infrastructure and supporting existing commercial and industrial precincts. This approach also reflects community feedback during preliminary consultation for the visibility of commercial and industrial premises to be minimised.

To provide additional land for service commercial development and to seek to resolve land use conflicts, the Strategy also proposes to extend Service Commercial zoning to the northern portion of Lot 672 on P230743 (#15) Zimmerman Street. Over the longer term, the potential exists for the Shire depot to be relocated to accommodate additional service commercial land uses at such time as the need arises.

This would be supported by the extension of Middleton Street to Zimmerman Street, enabling a more connected road network through the LIA, subject to the resolution of land tenure. Upgraded directional signage should also be provided by the Shire in strategic locations to increase the LIA's visual exposure and enhance the legibility of the local transport network.

The establishment and maintenance of appropriate buffers between the Service Commercial Zone and adjoining residential development is an important consideration that this Strategy seeks to address in consultation with affected landowners. All new development should consider means to mitigate impacts on visual amenity and the creation of vegetated buffers adjoining residential areas.

To improve the management of wastewater and enable the transition of the LIA from industrial to service commercial land uses, this Strategy advocates for the extension of a reticulated sewerage service to all existing and proposed future lots.

Proposed Service Commercial Park

The 2011 LPS proposed to investigate the development of Lot 300 on P046811 (#832) South Coast Highway (corner of Denmark-Mount Barker Road) as a service commercial estate. Lot 300 is currently zoned Public Use under the Shire's TPS3 but leased to three industrial/ commercial businesses, effectively providing additional industrial land in lieu of past shortfalls.

Investigation into potential development of Lot 300 presented conflicts between desired commercial visibility and impacts of visual amenity, as well as the retention of remnant vegetation.

Based on the forecast need for service commercial floorspace and the desire to consolidate and promote land use change in the LIA, this Strategy does not propose to pursue investigations for the development of a Service Commercial Park on Lot 300. The gradual relocation of current lessees to the East Denmark Industrial Estate is encouraged.

Strategies & Actions – Service Commercial Land Uses

- I. Support the consolidation of service commercial land uses within existing developed areas, encouraging a transition of the existing Light Industrial Area away from historic industrial land uses, and address transport, servicing and visibility constraints.
 - a) Introduce the Service Commercial Zone into the local planning scheme with objectives consistent with the Planning and Development (Local Planning Schemes) Regulations 2015.
 - b) Zone all existing developed lots within the existing Light Industrial Area on Zimmerman Street, Hodgson Street, Industrial Road, Middleton Street and Hockley Close as Service Commercial, as shown in the Strategy maps.
 - c) Support the rezoning of the northern portion of Lot 672 on P230743 (#15) Zimmerman Street to Service Commercial, as shown in the Strategy maps. Matters to be considered at future planning stages include (but are not limited to) drainage and water management, lot sizes, environmental features, road connections and contributions, bushfire, land tenure, and servicing.
 - d) Support the potential development of Lot 139 on P080498 (#32) Zimmerman Street subject to addressing drainage, water management, lot sizes, environmental features, road connections and contributions, bushfire, land tenure, servicing and any other relevant planning matters.
 - e) Investigate the potential extension of Middleton Street to Zimmerman Street and Zimmerman Street to Brazier Street to enable a more connected road network through the LIA, subject to the resolution of land tenure, environmental considerations and other relevant planning matters.
 - f) Provide upgraded directional signage in strategic locations to increase commercial exposure and improve the legibility of the local transport network.
 - g) Support the relocation of the Shire's works depot in the long term to provide additional opportunities for service commercial development.

Industrial Areas

Industrial areas provide for businesses involved in manufacturing and processing, as well as an array of other services. By the nature of their operation, industrial land uses often produce emissions of noise, dust and odour and are ideally separated from residential and other sensitive land uses. Some industrial land uses also have requirements for large landholdings and bulk transport access.

Although the Shire contains a number of small industrial businesses that service the district, major industrial land uses servicing the region are based in the City of Albany and supported by extensive road, rail and maritime infrastructure. The Strategy supports the further development of local businesses, services and employment but does not support the development of any heavy or extensive industrial land uses within the Shire.

The Lower Great Southern Land Use and Employment Survey identified 17,340m² of existing industrial floorspace within the Shire, as detailed in Figure 5.

Figure 5: Industrial Floorspace by Type

| Floorspace Classification | PLUC Code | Industrial Floorspace (2019) | % of Total of Category |
|----------------------------|-----------|------------------------------|------------------------|
| Health/ Welfare/ Community | HEL | 200m ² | 7% |
| Manufacturing/ Processing | MAN | 3,170m ² | 21% |
| Office/ Business | OFF | 1,140m ² | 11% |
| Other Retail | RET | 920m ² | 20% |
| Service Industry | SER | 5,730m ² | 56% |
| Shop/ Retail | SHP | 200m ² | 1% |
| Storage/ Distribution | STO | 3,520m ² | 56% |
| Utilities/ Communication | UTE | 850m ² | 51% |
| Total Occupied | | 15,730m ² | |
| Unoccupied | | 1,610m ² | |
| Total | | 17,340m² | |

Department of Planning, Lands and Heritage, 2019

The majority of industrial land uses are driven by industry demands and trends rather than servicing a localised population, so projections of potential growth in industrial floorspace needs are complex.

This Strategy forecasts between 1,200m² and 1,500m² of industrial floorspace will be required by 2036 to support expected population growth. However, demand for industrial land could increase in the event of growth within the agri-business and food processing industries, particularly given the ability to produce high-value agricultural products within the district. If the Shire was to achieve aspirational benchmarks for the development of these industries, based on the averages of other Local Government areas, this could result in demand for up to 10,000m² of additional industrial floorspace.

Maintaining a ready supply of industrial land is necessary to allow the Shire to respond to emerging industries, accommodate local services and provide opportunities for local businesses and employment.

Existing Light Industrial Area (LIA)

The existing LIA is located within the Denmark townsite, providing premises for a wide range of services supporting the district.

Although the LIA has been in this location for many years, encroaching residential development and increasing requirements for buffers to industrial land uses now present a challenging land use conflict. In addition, all developed lots within the LIA are currently occupied and a lack of suitable alternative sites has resulted in a shortfall in business opportunities and some industrial and service land uses being pursued in rural locations.

With the recent development of the East Denmark Industrial Estate, industrial land uses are now provided in an alternative location and the future of the existing LIA can be reconsidered. Given its proximity to residential housing, the Strategy acknowledges the need for the LIA to transition from an area with predominantly industrial land uses into a Service Commercial area.

Changes to the local planning scheme will be made to remove the opportunity for offensive industrial land uses to be established and encourage the relocation of existing industrial land uses. This will be supported by increasing the range of service commercial land uses that are permitted, providing for demand from this sector as well as incentivising the relocation of industrial land uses (which are typically lower yield).

East Denmark Industrial Estate

The East Denmark Industrial Estate was developed as a partnership between multiple landowners, the Shire and Development WA (previously LandCorp) as a response to the shortage of industrial land in the Shire and the desire to relocate heavier industrial land uses out of the existing LIA.

The first release of lots between 6,879m² and 1.4 hectares took place in mid-2018 and a further 17.3 hectares of land provides for the future expansion of the East Denmark Industrial Estate in a southerly direction over Lot 9001 (#652) South Coast Highway, Hay. The Strategy mapping establishes a graduation of land use intensity over this 17.3 hectare portion to protect the amenity of the existing residents within the adjoining Special Use Zone located to the south, as well as a neighbouring business to the west that includes a brewery, vineyard and restaurant. Most of the 17.3 hectares are designated for light industrial land uses, which then transitions in a northerly direction to the Industrial zone at the point where a 300m Industrial buffer can be achieved to the existing sensitive land uses to the south.

The estate is expected to sufficiently provide for demand for additional industrial floorspace during the life of this Strategy, noting that this area will also potentially accommodate the relocation of a number of existing businesses.

To accommodate this transition in land uses a Light Industry Zone will be introduced as part of the preparation of a new planning scheme. A Light Industry Zone would aim to accommodate appropriate land uses while restricting the development of offensive industries that may conflict with existing sensitive land uses on adjoining properties.

Strategies & Actions – Industrial Areas

- I. Support the expansion and diversification of the East Denmark Industrial Estate, with attention to managing land use conflicts and maintaining a high standard of development.
 - a. Introduce a Light Industry Zone within the local planning scheme generally consistent with the objectives of the Planning and Development (Local Planning Schemes) Regulations 2015.
 - b. Encourage and enable the subdivision and development of Lot 9001 (#652) South Coast Highway, Hay into a mix of light industrial and industrial lots, ensuring that the amenity of existing sensitive land uses is protected by buffers and a graduation of land use intensity from south to north.
 - c. Prepare policy guidance to encourage a high standard of industrial development, the appropriate development of factory units and strata-titles and identifying how development proponents are expected to demonstrate that impacts/emissions (including noise, dust and other impacts) meet the relevant environmental and regulatory standards.

SCHEDULE OF SUBMISSIONS
Shire of Denmark Draft Local Planning Strategy

Submissions Received from Public

| Ref No. | Submitter Details | Verbatim Submission | Planning Services Comment | | | | |
|--|--|---|---------------------------|-------------------|--|--|---|
| S1 | <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px;"></div> | <p>This submission relates to the Wolery Ecological Community (Inc) and is requesting</p> <ol style="list-style-type: none"> 1. Each Dwelling on the Community to be considered as an approved single house with the potential to have an associated Ancillary Dwelling 2. The Wolery can expand as needed the number of house sites from 15 to 18 during the life of Town Plan Scheme 4. <p>The Community is currently zoned 'Multiple Occupancy' and we understand this Zoning may change to 'Rural' with special conditions under the new Strategic Plan.</p> <p>My wife and I have lived as members on the Wolery Ecological Community (Inc) for 45 years.</p> <p>Our two boys, daughter in law and two grandchildren are now also living on the Wolery as Wolery members.</p> <p>A glimpse at our demographic history</p> <p>The Wolery currently has 15 house sites.</p> <p>Since the 1980's as members have aged the community has experienced a decline of 30% in the number of members and children living on the property. This decline in our population due to ageing has not resulted in more housing becoming available.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: left;">In the 1980's there were</th> <th style="width: 50%; text-align: left;">In 2023 there are</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> • 3 households with 2 or less occupants • 4 members over 55 years old • no members over 65 years old </td> <td> <ul style="list-style-type: none"> • 11 households of 2 or less occupants • 12 members over 65 years old </td> </tr> </tbody> </table> | In the 1980's there were | In 2023 there are | <ul style="list-style-type: none"> • 3 households with 2 or less occupants • 4 members over 55 years old • no members over 65 years old | <ul style="list-style-type: none"> • 11 households of 2 or less occupants • 12 members over 65 years old | <p><i>Zoning</i></p> <p>The Shire has been directed by the Department of Planning, Lands & Heritage to remove the Rural Multiple Occupancy Zone when a new Local Planning Scheme is prepared. A new zoning and accompanying provisions will be proposed that retains the existing rights granted by Town Planning Scheme No. 3.</p> <p><i>Ancillary Dwellings</i></p> <p>This property has been treated consistently with all other grouped dwellings, which have not been permitted to have an Ancillary Dwelling because this was excluded from the definition adopted by the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i> and the <i>Residential Design Codes</i>. With changes to the definition of an Ancillary Dwelling that were enacted by the State Government on 8 April 2024, the Shire now has the ability to review <i>Local Planning Policy 49: Ancillary Dwellings & Detached Habitable Rooms</i> and allow for Ancillary Dwellings to be developed as part of Grouped Dwellings. This will be subject to a future report to and decision of the Council.</p> <p>No changes to the Strategy are required to address this request.</p> |
| In the 1980's there were | In 2023 there are | | | | | | |
| <ul style="list-style-type: none"> • 3 households with 2 or less occupants • 4 members over 55 years old • no members over 65 years old | <ul style="list-style-type: none"> • 11 households of 2 or less occupants • 12 members over 65 years old | | | | | | |

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| | | <p>The Wolery age profile closely matches national statistics that shows that 29% of Australia's population is now over 55.</p> <p>1. Ancillary dwellings - Allowing ancillary dwellings on the Wolery under the new town planning scheme would mean:</p> <ul style="list-style-type: none"> • older members could move out of their existing large family homes into adjacent smaller, newer and more manageable independent living spaces and still remain on their house site. • young families with children who are now struggling to find affordable accommodation can move to the family home <p>House site ancillary accommodation also has the following benefits:</p> <ul style="list-style-type: none"> • makes it easy for grandparents to provide childcare. • older people can have the support of their younger neighbours and extended family so can remain at home longer as they age thus taking pressure off the health and aged care system. • children will have the opportunity of growing up with all the benefits of inter generational living <p>2. Ability to increase the number of house sites in the future Ancillary dwelling approval alone may not completely address the shortage of housing for our young families on the Wolery as it only suits some residents. Thus the opportunity to expand the number of house sites from 15 to 18 is requested.</p> <p>To sum up – Permission for 3 extra house sites plus possible Ancillary Dwellings attached to sites would likely bring the total population of the Wolery back to 1980's levels and in a small way help with the current national housing crisis.</p> | <p>This property is zoned as Rural Multiple Occupancy in Town Planning Scheme No. 3, with Appendix VIII allowing for the development of a maximum of 15 dwellings.</p> <p>Based on the primary land use and density of development this is considered a rural residential land use.</p> <p>The zoning provisions applicable to this property can be reviewed when a new Local Planning Scheme is prepared following the adoption of the Strategy. No changes to the Strategy are required to address this request. The content of this submission will be taken into consideration during the scheme review process.</p> |
| S2 | <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 150px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 150px; height: 15px;"></div> | <p>Thank you for encouraging an input into the Shires new Strategic Community Plan. During our meeting on the 25th May you stated that in the new Town Planning Scheme 4 the Wolery Ecological Community will be re-zoned from Multiple Occupancy to Rural with special conditions. It was stated at the meeting that all the present conditions would be transferred to the new zoning.</p> | <p><i>Zoning</i> The Shire has been directed by the Department of Planning, Lands & Heritage to remove the Rural Multiple Occupancy Zone when a new Local Planning Scheme is prepared. A new zoning and</p> |

We would like the new Town Planning Scheme to allow two new conditions for the Wolery Ecological Community:

- Each Dwelling on the Community to be considered (treated like) as an approved single house with the potential to have an Ancillary Dwelling
- The Wolery can expand as needed the number of house sites from 15 to 18 during the life of Town Plan Scheme 4

We feel that these two changes will give us the ability to contribute to the objective below in the Draft Strategic Community Plan:

“Housing availability and affordability

We want: • to reduce the impact of short stay rentals • more low-cost residential housing for rent and purchase • more social housing • alternate housing options, including tiny homes • to reduce the level of homelessness • downsizing and retirement options for seniors.”

The first change will give equity to The Wolery compared to other residences when planning permission is sought for an Ancillary Dwelling. We note the following sentence from the new Ancillary dwellings policy:

“An Ancillary Dwelling can potentially be approved on any lot with an existing, approved single house.”

The second change will give the Wolery the ability to better manage our age profile and contribute to the options quoted from the Draft Strategic Community Plan above.

Background information regarding this request to consider these changes

The Wolery Ecological Community has, for over 40 years, successfully managed a rural property as a Multiple Occupancy property. In contrast to many subdivisions of similar size we have sited our dwellings in cleared areas and retained all the existing bush and most of the productive land. We estimate that the production on the property in fruit trees (>500) and productive intensive vegetable gardens would more than equal the economic productivity

accompanying provisions will be proposed that retains the existing rights granted by Town Planning Scheme No. 3.

Ancillary Dwellings

This property has been treated consistently with all other grouped dwellings, which have not been permitted to have an Ancillary Dwelling because this was excluded from the definition adopted by the *Planning and Development (Local Planning Schemes) Regulations 2015* and the *Residential Design Codes*. With changes to the definition of an Ancillary Dwelling that were enacted by the State Government on 8 April 2024, the Shire now has the ability to review *Local Planning Policy 49: Ancillary Dwellings & Detached Habitable Rooms* and allow for Ancillary Dwellings to be developed as part of Grouped Dwellings. This will be subject to a future report to and decision of the Council.

No changes to the Strategy are required to address this request.

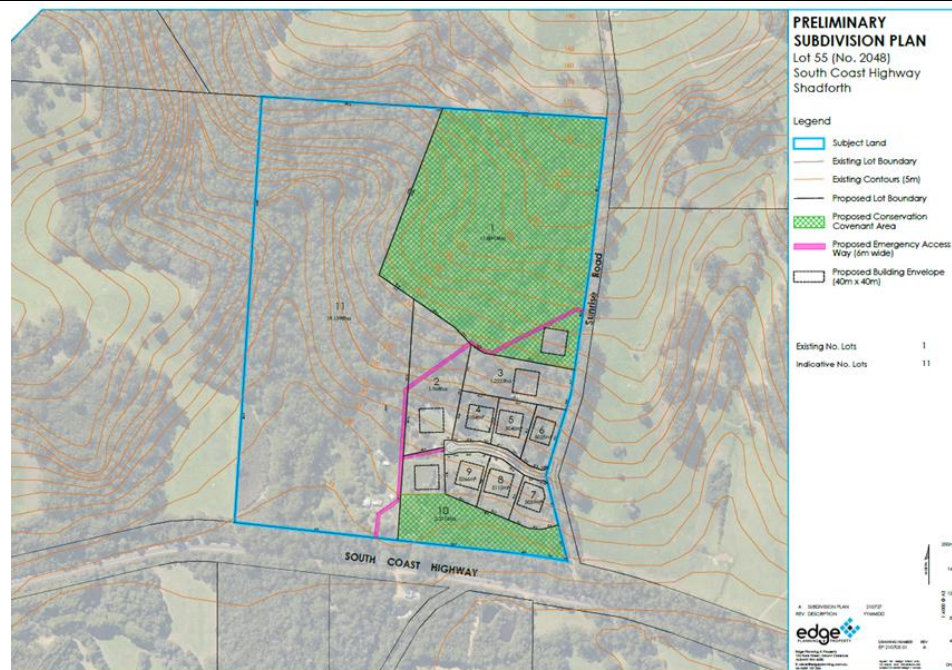
This property is zoned as Rural Multiple Occupancy in Town Planning Scheme No. 3, with Appendix VIII allowing for the development of a maximum of 15 dwellings.

Based on the primary land use and density of development this is considered a rural residential land use.

The Strategy supports infill of rural residential areas subject to relevant planning considerations being addressed.

The zoning provisions applicable to this property can be reviewed when a new Local Planning Scheme is

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| | | <p>from the cattle farm when the Wolery Ecological Community purchased the land in 1976. None of the development on the property is visible from the South Coast Hwy tourist route.</p> <p>The age profile on the Wolery has evolved over time because few residents move on. Many couples that resided on the Wolery with young children in 1980's continue to reside in the family home. For that reason - as with Australia's population as a whole – the Wolery has an ageing population. We have Community policies that try to address these population dynamics but inclusion of the two points requested above would greatly assist in this endeavour.</p> <p>The Wolery's social history and development since 1978 have provided its members with a huge store of stories, anecdotes, observations and knowledge. I won't document any more in this short submission but we are willing to meet with the Planning Department, Shire Officers and Councillors to progress our requests and maybe share a few of these stories.</p> | <p>prepared following the adoption of the Strategy.</p> <p>No changes to the Strategy are required to address this request. The content of this submission will be taken into consideration during the scheme review process.</p> |
| S3 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>[REDACTED] object to the proposed zoning changes to the above property (2048 South Coast Hwy, Shadforth) under the new planning scheme.</p> <ol style="list-style-type: none"> 1. We have a property developer and are currently in the process of subdividing. This will separate all current owners, so we can all manage our own piece of land. This would also allow for the sale of some smaller blocks near Sunrise Road which would enable us to finance a tourist venture. 2. We have been paying higher land rates to maintain these zonings. 3. We have lived on the property for 27 years and need zonings to remain for our families financial future. 4. There are other tourist ventures close by, e.g. Denmark Chocolate Company and The Dam. | <p>Noted.</p> <p>Modification to strategy mapping is required, to preserve the potential for subdivision and tourism development.</p> |
| S4 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>I have been assisting [REDACTED] and his family with preparation for proposed subdivision of their lot at 2048 South Coast Highway, as per below.</p> | <p>Noted.</p> <p>Refer to response to submission S3.</p> |



This process is under due diligence currently, with servicing costs and input by electrical and civil engineering. An application would be submitted next year (2024). There will be a staged approach, with the subdivision and sale of the smaller lots first, to release funds to develop the tourist zone portion of the site second into an income generating asset.

The owner, [REDACTED], has run out of money- he has spent the last few years assisting his son to treat an aggressive brain cancer, which he has now survived. [REDACTED] is now a full time carer for him, and is unable to generate income. [REDACTED] has consequently sought my assistance as a funding partner for this development to get him out of the woods. The future income generated from the tourist zone portion enterprise will comprise his retirement and lifestyle funding. Sale of the lots lots from stage 1 will fund the development of the enterprise here, this and will pay our remaining debts and duties to other consultants and family members.

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| | | <p>We note there is a draft Local Planning Strategy which proposes 'downzoning' [REDACTED] land to 'Environmental Conservation'; The Tourist zoning is also proposed to disappear.</p> <p>This would throw a considerable spanner in the works, as it were.</p> <p>Based on the landowners intent and efforts with the above plan showing he intends to make substantial conservation efforts, we respectfully request that proposed rezoning of his lot does not proceed in line with the new strategy, rather that the current structure plan for the lot be assimilated into the forward strategy so he can complete his development ambitions.</p> | |
| S5 | [REDACTED] | <p>I don't support this strategy. Kingdon park is a very utilised park when is maintained properly. Unfortunately it is often neglected by council. This strategy is obviously to fix a council issue and certainly not in the interests of any residents or users of the local area.</p> | <p>The public open space recommendations contained in the Strategy will be updated to reflect the Council resolution of 30 January 2024 not to proceed with the land exchange affecting Kingdon Park.</p> |
| S6 | [REDACTED] | <p>I support pursuing strategies that look to reasonably increase housing yield in 'Rural Residential' areas. I think it is important that any increase in housing density be moderate, and that both sight and sound lines relative to existing dwellings be considered in proposed new dwellings. I particularly see potential for this strategy to open up opportunities for extended family and intergenerational sharing of properties. I also support legalising Tiny Houses on Wheels as a form of permanent housing. Not only will it promote more small scale affordable housing, it can do so very quickly as it bypasses the current bottlenecks in the local construction industry, as completed Tiny homes can be transported from anywhere.</p> <p>I recently conducted thorough due diligence on building an 'Ancillary Dwelling' under the current planning policy, I wish to put forward the following feedback;</p> <ul style="list-style-type: none"> - I found it restrictive that even though I have 5 acres of land, I was beholden to the same development restrictions as a 1000sqm block in town. I think any housing strategy looking to promote yield and density must allow for variations in land holding size. - The shortage of local builders means higher construction prices and longer lead times; ultimately this made the project financially | <p>Ancillary dwellings are currently permitted on lots in Special Rural zoned areas (to become Rural Residential), subject to meeting the development standards in Shire and State planning policies. The definition and development standards for Ancillary Dwellings are applied consistently across the State and are necessary to distinguish between an Ancillary Dwelling and a Grouped Dwelling (ie. a second house that has no dependent relationship).</p> <p>The Strategy supports a range of different approaches to infill development as a key part of promoting affordable housing. This potentially will potentially allow for additional lots and/or grouped dwellings in existing rural residential areas, where appropriate. Any such proposals are to be addressed strategically and must appropriately address relevant planning considerations, including the</p> |

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| | | <p>unviable. A Tiny House on Wheels strategy could fix this. - Given the relatively high cost to develop and build new housing in the Shire of Denmark, it quickly becomes financially unviable when coupled with commercial interest rates. Perhaps the shire could work with Federal and State government bodies to facilitate low interest loans for landowners willing to develop new affordable housing.</p> | <p>relationship between existing and new development.</p> <p>Acknowledging that the Shire must work within the constraints of existing State Government legislation, the Strategy supports further investigation into means of facilitating the use of Tiny Homes on Wheels as a legitimate form of accommodation.</p> |
| S7 | <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>I haven't got the energy to read the draft strategy, but a few things do concern me. The first is bright reflective roofs being allowed in the town, when they aren't allowed in rural/lifestyle properties. I don't think they should be allowed in town either. I can't sit outside in the morning as the new neighbors roof is too bright. It's reflective white, which is great for the environment but not for my health. Mine and my other neighbors roofs are white/cream but are dull and it makes a huge difference. The other thing is the amount of white concrete being used in the shire, it looks very sterile and doesn't suit our more natural environment here. Please at least colour it with some red or yellow ochre. I also think it would be great to allow some tiny house developments, and somehow encourage more flats or units to be built. Thanks!</p> | <p><i>Building Colours & Materials</i></p> <p>The Strategy does not propose to introduce new controls in existing, established residential areas where there is already extensive development, and where many forms of development are already exempt from planning approval requirements in State legislation.</p> <p>Town Planning Scheme No. 3 contains controls over external building materials and colours within Special Residential and Special Rural zoned areas that have been identified prior to subdivision as having visual landscape values that require preservation.</p> <p>The Strategy identifies visual landscape value areas and prioritises these for controls over building materials and colours.</p> <p>The Strategy aims to balance this with community feedback seeking less 'red tape' around common types of development.</p> <p><i>Tiny Home Developments</i></p> <p>The Strategy supports a range of different approaches to infill development as a key part of promoting affordable housing. Acknowledging that the Shire must work within the constraints of</p> |

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| | | | existing State Government legislation, the Strategy supports further investigation into means of facilitating the use of Tiny Homes on Wheels as a legitimate form of accommodation. |
| S8 | [REDACTED] | <p>According to the strategy our property at 261 Ocean Beach Road will be rezoned to be a environmental conservation zone. We are not against the change as it aligns with out plans for the property, although it will be good to understand the finer details of the rezoning as the strategy is finalised and the Local Plan is progressed.</p> <p>With regard to the introduction of the Environmental Conservation zone it would be good to better understand the implications of the change. With regard to our property we have no plans on trying to develop it, however, it would be good if the following actions were not significantly restricted by the change in zone:</p> <ul style="list-style-type: none"> - development of the property for eco-tourism purposes - as long as significant vegetation clearing is not required, - clearing of invasive vegetation where necessary to maintain the existing flora, - clearing of vegetation necessary to maintain fire safety (obviously) - clearing of vegetation for the maintenance, renovation and improvement of existing buildings, - clearing of vegetation where required to create/maintain necessary access to the property (roads, tracks etc) | Noted. The detailed requirements for the Environmental Conservation zone will be prepared as part of the Shire's planning scheme review, which will allow landowners to provide further input on the finer details as part of the consultation process for the new scheme. |
| S9 | [REDACTED] | <p>Our submission relates to our property at [REDACTED] and our comments are as follows:</p> <ul style="list-style-type: none"> • We ask for the Strategy to identify the need for more appropriate residential density codings in Ocean Beach. <p>The older part of Ocean Beach on the eastern side of Ocean Beach Road has a</p> | Noted. This mis match in existing lot sizes and density codes appears to impact a number of existing residential areas in and around the Denmark townsite, including the suburb of Ocean Beach. |

variety of lot sizes. Many of these properties, including ours, were subdivided a long time before the Shire's current Strategy and Scheme. The Shire's current Scheme identifies density codings of R5 and R2.5 across neighbourhood areas that include both large and small lots. This has resulted in excessive and unnecessary development constraints on some pre-existing small lots in these areas. For example, some 1,000m² lots are required to have a setbacks of 15m from their front boundary and 7.5m from their side and rear boundaries – this leaves very little (if any) space to develop and results in planning approvals being required before developing just about anything, no matter how small.

We would like the Strategy to identify a need for the Scheme to identify density codings that reflects the actual size and nature of existing lots, and acknowledges that a 'salt and pepper' approach to density supports housing diversity more than blanket zonings. We suggest that this can be achieved without allowing more subdivision in the area but will help the Shire remove unnecessary 'red tape' for development that is plainly acceptable.

Our submission (also) relates to our property at 42 Mt Shadforth Rd and our comments are as follows:

- We support the proposed increase in residential density coding as outlined in the Strategy

This will provide us with the opportunity to consider smaller format, affordable housing options that Denmark is severely lacking – not just the same, common lot sizes as already exist.

- Inclusion of our property within the 'Additional Use' area that adjoins the Denmark Town Centre

There are few vacant lots within or in close proximity to the Denmark Town Centre, reducing opportunities for new businesses and commercial services to be established as Denmark continues to grow. The 'Additional Use' area

A new action is proposed under the Infill and Consolidation heading, to review residential density codings within the Denmark Townsite and surrounding residential areas during the local planning scheme review, to ensure that codings reflect existing lot sizes and fit for purpose development standards.

Noted.

The property sits outside of Planning Area A (Denmark Town Centre). The extension of Planning Area A boundary to include this lot is not a neat fit given the surrounding lot layout. The lot sits well away from Commercial zoned lots and is therefore not seen as part of the transition between Commercial and Residential zones. A range of home

identified is an excellent concept but will rely on existing residences being converted to commercial use – this provides limited options for purpose-built premises, may not be commercially viable given the value attached to some residential buildings, and may take a long period of time to eventuate. Including more properties within this Additional Use area will provide a wider range of opportunities, particularly where vacant land is concerned. We confirm this via having received several enquiries from prospective purchasers interested in establishing businesses, and we are aware of other landowners along this part of our road with similar interests. Our property fronts a major through road and has all services available, and opportunities for the development of small-scale business may allow us to better utilise our unique lot shape and address the development constraints of the site.

- Identification in the Strategy of the Denmark townsite as an area that will be strategically defended from bushfire risk

The central parts of Denmark that contain our commercial areas, key community services and medium-plus density residential areas should be defended from bushfire as a priority. Within these areas the Shire should ensure that strategic access and fuel management on both private and public property is implemented, and that the townsite is therefore defensible in severe bushfire events. Small reserves within the townsite already have compromised ecological values and are not a high priority for conservation compared to larger scale, more intact reserves outside of the townsite where ecological functions can be maintained. We should be encouraging and enabling development within the existing parts of the townsite to reduce the pressure for further sprawl into areas that are less defensible at a broad scale. This may also go some way to addressing the curious and inequitable situation where some landowners are forced to build to a high BAL rating when none of the neighbouring houses are.

- Addition of 'Caravan Park' as a permitted land use in the Residential Zone

businesses can still be supported in the Residential Zone without the additional use designation.

Noted. This issue is already addressed in detail by Denmark's Bushfire Risk Management Plan which provides a strategic asset based approach to fire management, including strategic recommendations for the Town Centre and surrounding areas.

Noted. The upcoming review of the Shire's planning scheme and policies will include consideration of

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| | | <p>We ask the Shire to add permissibility for this use class to offer the potential for the development of long stay (permanent) residential caravan parks as a part of the townsite. This could potentially provide options to legitimise the use of Tiny Homes on Wheels as an affordable housing option, given that they would be supported by appropriate infrastructure. Caravan parks are currently allowed in the Tourist or Rural zones but these areas are generally not as suited for long stay/ residential use as they are in locations further from community services and infrastructure. A Caravan Park in a Residential Zone may remain at the Council's discretion to approve, but we believe it may be useful to allow for this option to be considered.</p> | <p>changes to land use permissibility in the Residential Zone, including exploration of how tiny homes on wheels may be supported for use as permanent accommodation under either the National Construction Code, or as a caravan park under the Caravan Parks and Camping Grounds Regulations. This is already detailed within the strategy under section 3.1.4.5 Housing Forms.</p> |
| S10 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>We acknowledge receipt of your advice that our property is being considered for rezoning to "Environment Conservation:" in the latest Draft Strategy Review.</p> <p>This letter is to advise that all of the owners of the Property located at 1700 South Coast Highway, Shadforth wish our property to remain zoned as "Rural" in line with all other properties in our locality, and hence subject to the same considerations as other Rural properties, for any potential future considerations.</p> <p>We consider that the 22 December 2023 is not enough time for us to consider the various options or plans that may available to us in the future. Rezoning at this stage without full knowledge of all the implications is not acceptable to us.</p> <p>Points:</p> <ol style="list-style-type: none"> 1. Future Property rezoning to Environmental conservation from Rural. Similar to the property (comprising 200 acres) bounding our northern boundary. This property went through a process of rezoning and ended up with 12 x one acre lots with the remaining property being common and zoned Conservation. 1700 South Coast Highway could achieve this without any degradation to the natural environment. 2. Lack of detail for rezoning to Environment conservation. ie restrictions, | <p>Noted. Strategy Maps to be amended to designate the property at 1700 South Coast Highway as Rural.</p> <p>The future preparation of a Biodiversity Strategy for the Shire will seek to take a holistic approach and include detailed analysis of which private land holdings across the Shire are suitable for future inclusion within an Environmental Conservation Zone.</p> |

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| | | <p>loss of future potential, interference of use.</p> <ol style="list-style-type: none"> 3. Fire rules and considerations. Future bushfire implications. 4. Potential as Rural to obtain "Carbon Credits" in the future. 5. Rezoning now, leaves no incentive for the Shire or State Govt to consider any of these options. 6. Future consideration will be given to rezoning, once we have fully considered all of our options. 7. In the meantime, the natural heritage of our property is not at risk, except for Bushfire. | |
| S11 | <p>[REDACTED] [REDACTED] [REDACTED] [REDACTED]</p> | <p>Rise Urban represents [REDACTED] as landowner of lot 5 (1261) South Coast Highway, Shadforth. Lot 5 is located near the western edge of the Denmark township and is the single largest landholding in Denmark that is capable of being developed for residential purposes.</p> <p>We wish to congratulate the Shire for embarking on this important review of its future direction and provide our support for the Local Planning Strategy.</p> <p>In April 2023 we met with Craig Pursey of the Shire to discuss the factors that have prevented subdivision and development of lot 5 so far, as well as the planning mechanisms that could be used to facilitate development of the site.</p> <p><u>Sewerage</u> The major issue causing development of the site to be unviable is the cost to provide reticulated sewerage to service lots created at the site, including an approximate 1km extension of the sewerage network and construction of a new pumping station. It is not viable to commence any subdivision of this site until there is certainty that this development will not need to bear the full cost of the sewerage extension and pump station works required to fully service the site.</p> <p>In this regard we strongly support the Strategy's acknowledgement of this issue, and the intent for the Shire to seek State funding to extend sewer infrastructure throughout the town. In particular, we strongly support the</p> | <p>Support for Strategy approach to advocate for deep sewerage infrastructure noted.</p> <p>Through the Local Planning Strategy (and elsewhere) the Shire aims to identify infrastructure constraints that are limiting or delaying the development of</p> |

intent for the State to fund sewerage along Ocean Beach Road to the south of lot 5. Extension of sewerage along Ocean Beach Road and construction of a new pump station would enable lot 5 to connect via the unmade road reserve west of Weedon Hill Road. This would remove the main barrier preventing development of the largest landholding zoned for urban growth in Denmark, and will go a long way towards alleviating the housing shortage acknowledged by the Strategy.

As part of the Local Planning Strategy process, we recommend that the Shire actively lobbies the relevant State agencies to obtain commitments to fund this infrastructure in order to provide certainty and a timeframe for its delivery. We are happy to assist the Shire with these discussions as required.

South Coast Highway Access

There are two separate but-related concerns regarding access to South Coast Highway. These are:

1. Intersection Cost

The cost of delivering the current planned intersection to South Coast Highway to Main Roads' specification is cost-prohibitive, and along with the sewer extension, is currently preventing the development from proceeding. We request that, in a similar manner to the sewer extension, the Strategy references opportunities for alternative sources of funding to deliver this essential infrastructure.

2. Access to South Coast Highway

The Local Planning Strategy identifies an objective to "restrict access to South Coast Highway". It is unclear as to whether this objective refers to all access, including the current planned access as depicted on the approved structure plan and latest subdivision approval (WAPC ref 158298).

We are concerned about the potential for access to South Coast Highway be unreasonably restricted or for an intersection that is not commensurate to the traffic demand generated by the subdivision to be required to be constructed. These issues may also affect the ability to subdivide the land, such as by

housing within Denmark, and bringing this to the attention of the State Government and utility agencies.

Noted.

Intersection standards to South Coast Highway are to be Main Roads WA standards and satisfaction.


The Shire of Denmark is highly unlikely to contribute to intersection construction costs, however, the Shire continues to advocate for measures that enable the efficient development of sensitively designed, new subdivision areas.

Noted, no change recommended.

Access to South Coast Highway remains a key consideration for development of Lot 5, this issue is correctly listed at Figure 1 for *consideration* for future structure planning.

Access to Lot 5 will be guided by the recently updated WAPC Draft Operational Policy 1.12 –

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| | | <p>requiring access to be obtained through adjoining landholdings or restriction of bushfire emergency egress options.</p> <p>We request that this provision is reworded to recognise the current approved access and/or allow for access to be reviewed and agreed through a future Structure Planning process (if a new one is prepared in the future), rather than imply that access to South Coast Highway will be restricted, without clarifying to what extent.</p> <p>For example, we would support the following wording: “The location and treatment of any access to South Coast Highway is to be agreed with Main Roads, the Western Australian Planning Commission and the Shire of Denmark”.</p> <p><u>Development Contribution Plan</u></p> <p>We reserve our commentary on the proposed Development Contribution Plan as the Shire has not yet confirmed if it will seek to prepare one, however should that occur we expect it will be consistent with the principles in State Planning Policy 3.6 – Infrastructure Contributions and will not seek to levy contributions from developers of a value that would cause subdivision of land to become unviable.</p> <p>Should the Shire seek to prepare a Development Contribution Plan in the future, we would be happy to provide informal feedback prior to advertising to give the Shire confidence that it will not inadvertently impact the delivery of housing supply in Denmark.</p> <p><u>Conclusion</u></p> <p>This submission provides support for the Shire’s Local Planning Strategy, subject to requests for the Shire to proactively lobby the State Government to fund a pump station and sewerage infrastructure along Ocean Beach Road, and to enable the location and form of access to the site from South Coast Highway to be resolved through the current or a future Structure Plan rather than implying that access may not be supported.</p> | <p>Planning Proposals Adjoining Regional Roads in Western Australia which allows for limited access to South Coast Highway and consideration of emergency access ways.</p> <p>Noted.</p> |
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| S12 |  | <p>I found the draft LPS to be extremely well researched, documented and produced. I would, at a guess, support 95% of the Strategies & Recommendations provided in the document, noting that the words : Advocate for; Support; Facilitate; Subject to; Enhance; Wherever practical; Appropriate use of; Seek alignment to; and Minimise allow the actual implementation to vary quite considerably from the stated text or intent. In that respect I well understand that we are not always masters of our own destiny.</p> <p>S & A Tourism Good and somewhere we should emphasis the need to Buy Local and how it can be reinforced, particularly with locals!.</p> <p>S & A Education & Engagement Excellent, and especially engaging an ESD Practitioner.</p> <p>There were no Strategies and Actions that I oppose or feel as not being compatible with the Strategic Community Plan, but offer some improvements below.</p> <p>I was unable to see any reference to the Denmark Visitor Centre, either under Tourism or Infrastructure, page 110. It costs ratepayers over \$100,000/annum, paid monthly and is, in my view, failing to meet the terms of its contract (Denmark Chamber of Commerce) with the Shire of Denmark. I refer to it's contractual requirement to be self sufficient, or at least well on the way to being self sufficient financially. It is nearing the end of the term of the lease, and thus provision should be made in the LPS for its future use. There is money here to put to tourism, particularly as there a number of improvements to be made to various tourist nodes. For example, employ an additional Ranger to provide better control of the facilities used by tourists. We are currently short staffed, and an additional Ranger, even at only peak times would be most beneficial.</p> <p>S & A Potable Water Supply 1c Delete "Investigate potential means of increasing" Substitute "In collaboration with the Water Corporation plan to enforce" refer also to S & A Drainage.</p> | <p>Noted.</p> <p>The retention of the visitors centre service is beyond the scope of a Local Planning Strategy and more appropriately addressed as an operational matter and through the Shire's Strategic Community Plan and related Corporate Business Plan.</p> <p>Recommend retaining the existing wording. The need for mandating rainwater tanks action should be established through studies currently being undertaken into future regional water supply requirements by the State Government. This would need to consider the cost and benefits of this</p> |
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| | | <p>Plan 139 indicates that there is a dedicated left hand lane for turning from Ocean Beach Rd into the S C Highway. This, of course, is not the case, but seems very sensible and should be implemented.</p> <p>Figure 35 Excludes all the additional AirBnB and similar residences that provide accomodation, these should be included. Karri Mia should be altered to reflect three seperate entities there at Lot 2 427/429, namely Karri Mia (Chalets/Studios), Karri Aura (Caravan Park/Motel) and Ajar on Shadforth (Restaurant).</p> <p>S & A Water Resources 1a iii I consider this feeble and offer Delete "Investigate" substitute "Enforce", adding the correct wording to reflect whatever legislative control is required.</p> <p>S & A Development Applications & Buildings i Consider a voluntary trial period... I believe that this needs to more proactive, more forceful, rainwater collection to be mandatory (Water Corp involvement), No gas, Solar panels, Native vegetation in gardens minimising water usage, Cat proof, Grow your own fruit and vegetables etc.</p> <p>A small typo: Page 26 It should be "McLean" , not "McCLean".</p> | <p>approach, alternative options, and the cumulative impacts on housing affordability of policy changes made.</p> <p>The plan on page 139 is the Denmark town centre Strategy Plan is broad brush only, a turning pocket is not recommended by this plan. Improvements to this intersection are recommended elsewhere in this report with the planning indicating the eventual upgrading of this intersection to a roundabout coordinated with other improvements to South Coast Highway.</p> <p>Figure 35 relates to lots zoned Tourism, where tourism land uses are the primary use of the land. Holiday Homes exist in many other zones and are an ancillary or incidental land use within the zone overall. Acknowledge separate entities within Karri Mia and details to be updated in the Strategy.</p> <p>Recommend keeping existing wording as this matter should be part of the preparation a new Scheme and associated local planning policy and needs to be considered as part of wider water and sustainability strategies.</p> <p>Introducing the proposed 'Life Cycle Assessment (LCA)' methodology for new buildings is proposed via a trial period so that the process and effectiveness can be assessed and proven, noting that this is a departure from the assessment processes that are defined in State regulations.</p> <p>Noted - spelling of McLean to be corrected.</p> |
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| S13 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>This letter is written in response to the Shire of Denmark 'Draft Local Planning Strategy 2023' by the land and business owners ([REDACTED]) located at 107 Wentworth Road Ocean Beach.</p> <p>The current proposed 'Tourism Precinct' at William Bay, mostly includes land that is not used for tourism purposes and has excluded two existing tourism businesses that have been operating in the Denmark Shire for a long period of time (Turicum Chalets/Monkey Rock Winery & The Denmark Chocolate Factory). [REDACTED] have been operating a farm stay/chalet accommodation for 30 years and a successful winery with cellar door for nearly 20 years from this property which is currently zoned Rural-special/commercial. The current proposal has only included two newly formed tourism businesses - one which has been operating for 2 years and the other which is still in planning/building stages.</p> <p>The property located at 107 Wentworth Road Ocean Beach, although encompassing 200 acres, is predominantly made up of Karri Forest and has limited agricultural potential without having a negative impact on the environment. Due to the limited agricultural potential the owners were granted subdivision approval in 1998. As per section 3.2.5.5 Rural Tourism 'Some landholdings within rural areas are predominantly vegetated and may have limited agricultural potential. In these instances, conservation is considered the primary use of the land and support for tourism development will be considered where compatible with the preservation of ecological values' (page 84).</p> <p>We would like to request that the 'Draft Planning Strategy' be amended and the proposed tourism precinct at William Bay be expanded to include 107 Wentworth Road Ocean Beach. It is important to support and ensure the survival of existing businesses in the Denmark Area, especially those that are located on rural land. Inclusion in the tourism precinct would be extremely beneficial to our business. We have discussed these benefits planners at the Shire of Denmark. In these uncertain times businesses need to adapt and change and this would help facilitate future growth and diversification of our</p> | <p>Noted.</p> <p>In response to community feedback received, the Strategy's Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which assess the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The modified Tourism section is also supportive of tourism businesses growing and diversifying their existing operations, including pathways to rezone to Tourism or utilise and Additional Use designation where necessary.</p> |
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| | | <p>"strategic plan" will blow up in a big puff of smoke. Tourism development MUST be closely controlled and constrained within the limits of our vision for Denmark.</p> <p><u>Do you have any other comments or suggestions about the draft Strategy?</u></p> <p>While in some areas the strategy is pretty much spot on, in others seems the eyes had a veil over them. Some things are irreconcilable with one another and priority must be given to one or the other. How much courage does the Shire and Council have to stand their ground against another Byron Bay or Margaret River????</p> | <p>examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land generally.</p> |
| S15 | <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>The rezoning of rural land to tourism for a caravan park as you come over the crest of 8 Mile Hill near The Wallery at the entrance to William Bay and Greens Pool is a bad idea. Such visual pollution of a caravan park in place of the gorgeous rural setting and the stunning "ocean reveal" of William Bay and Point Hillier in the background, right on the entrance to William Bay National Park has surely not been thought through? We have even built a lookout in this location for cars to pull over and enjoy this view! Why would we ruin it with insensitive development? Tourism is the lifeblood of the town and should be encouraged, but this must be done with vision, foresight and sensitivity. You dont want to kill the goose that laid the golden egg! If it is really deemed that a Caravan Park is needed in a location like this (which is so far from all other amenities other than access to a big highway!) then surely a different location can be chosen that allows it to be hidden from public view at the end of a tranquil meandering tree lined entrance, and positioned over a hill and unseen? Denmark visitors and locals have enjoyed for over 100 years "that moment!" when you come over the crest of 8 Mile Hill, and the big reveal, the beautiful majesty, of William Bay, William Bay National Park, Point Hillier framed by the rural foreground is laid out before you. This is very first sighting of ocean since you leave town 15 km prior. The first chance to judge the wind conditions. The first chance to understand the days ocean swells. This experience in this location is special. A daily ritual that is ingrained in so many of our memories, particularly if you are a surfer or an ocean lover. The proposed location of a caravan park in this spot would majorly taint this classic Denmark experience. I say yes to well thought out tourism projects/precincts that are the source of many incomes and livelihoods within our town, but I absolutely say NO to poorly thought out tourism projects like this one that threaten to diminish the beautiful experiences we all know and love - threaten the experiences that bring tourists here in the first place! I object to the caravan park proposal at the intersection</p> | <p>The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.</p> <p>Upheld (in part). In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals shall be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The</p> |

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| | | of William Bay Rd and South Coast Hwy. | Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land generally. |
| S16 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>I strongly object to the Denmark Shire Council's Draft Planning Strategy related to the proposed new tourism areas in the shire.</p> <p>Denmark is already over-burdened with tourists in the peak season. Like many other locals, I do not visit some of my favourite places in summer such as Greens Pool because they are so overcrowded and access is so difficult. Even doing errands and socialising is made difficult by the number of tourists in the local cafes and shops. I am not making a claim to keep Denmark just for locals, to the contrary the tourists also experience overcrowding and a disappointing experience (as can be seen on Google reviews and other similar sites). The number of tourists must be within the capacity of the shire to comfortably and sustainably support them.</p> <p>The Draft Strategy contradicts the Council's existing Strategies of Sustainable Tourism, Sustainability and the Community Strategic Plan, including</p> <ul style="list-style-type: none"> • the tourism focus needs to shift to attracting visitors during off peak times • the three main beaches (Williams Bay, Ocean and Lights) are already under pressure from too many visitors at peak periods which causes negative environmental impacts. <p>The proposed large caravan park development at the entrance to Williams Bay contradicts with the requirement for community-centred tourism – not Council or developer-centred tourism.</p> <p>The Draft Strategy is the opposite of community planning points especially as it is the opposite of sustainability objectives, goes against community support and detracts from the ways of life in Denmark. The Denmark Shire Council is responsible to all residents in the shire, not just a few developers and profit-motivated people.</p> | <p>The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.</p> <p>Upheld (in part). In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and</p> |

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| | | | cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land generally. |
| S17 | [REDACTED] | <p>1.0 INTRODUCTION</p> <p>This submission is presented in response to the Denmark Shire’s invitation to residents to contribute to the review of the Draft Local Planning Strategy (2022).</p> <p>The property located at 90 Walter Road (The Property) falls within the land use category “Rural” and in the rating category “Rural – Additional Use Commercial”. Given the current status of The Property’s development and our intentions to further enhance the property into the future with respect to both rural and commercial pursuits, we respectfully request that the zoning be formally acknowledged as Rural Plus Additional Uses in section 3.1.6.2 (Rural Land Uses) of the Draft Local Planning Strategy (2022).</p> <p>2.0 CURRENT LAND USES AND ACTIVITIES</p> <p>The Property is an 80-acre block located along the west side of Walter Road. In the 16 years since we acquired The Property in June 2007, land use with respect to land area, is approximately as follows:</p> <ul style="list-style-type: none"> • viticulture (12 acres) 15% • commercial endeavours (5 acres) 6% • cattle grazing (30 acres) 38% • house and gardens (5 acres) 6% • orchards (3 acres) 4% • fenced riverine bush (25 acres) 31% <p>Activities that are currently routinely carried out on The Property include the following:</p> <ul style="list-style-type: none"> • Agriculture <ul style="list-style-type: none"> ○ grazing ○ vineyard ○ orchards ○ native edible garden • Processing | <p>Noted.</p> <p>The proposed modified tourism section of the Strategy proposes to recognise the existing tourism sites located in rural areas with potential to grow.</p> <p>90 Walter Road, Denmark is included in a recommendation to apply an Additional Use zone recognising the existing tourism activity and desire to expand.</p> |

- coffee roasting
- Storage, labelling, packing and distribution
 - wine and gin
 - coffee
- Cellar Door
 - wine and gin tasting and sales
 - coffee sales
 - function venue
- Tourism
 - vineyard and wine tasting tours
 - overseas, interstate and WA visitor destination
- Fruit barn
 - seasonal fruit sales

These activities have evolved into a vertically integrated approach to the use of The Property.

The key elements in the evolution of The Property since it was acquired by the owners in 2007 are summarised below.

3.0 SOCIAL, COMMUNITY AND COMMERCIAL CONTRIBUTION

Since The Property was acquired in 2007, we have endeavoured to develop it in such a way that it is commercially viable but at the same time contributes to the general amenity of the neighbourhood and contributes positively to the social fabric of the community.

Family Business

The Property is owned by [REDACTED] (through their wholly owned company [REDACTED]) who live on The Property and ensure it is properly managed. Family members manage the two principal businesses operating on The Property - Singlefile Wines is managed by [REDACTED] and Stash Coffee is managed by [REDACTED].

Property Development

The Property has been developed with care to upgrade and expand the vineyard, improve fencing of paddocks, fence the riverine area to exclude livestock and regenerate bush vegetation, tasteful landscaping of the Cellar

Door and park-like home grounds and planting an artistically designed native edible garden for gin botanicals.

The buildings including the home, Cellar Door, roastery and sheds, the substantial viewing deck at the edge of the dam and the fruit barn are attractive, high quality and well-maintained amenities. The driveway is sealed and car parks are gravelled.

Vineyards

The Property vineyards supply premium Pinot Noir and Chardonnay grapes to the Singlefile Wines Family Reserve tier.

Employment

Singlefile Wines, Stash Coffee and Sanseristic Pty Ltd together employ approximately 25 local, permanent and casual staff who are resident in the Denmark area. Sensitive management style, regular staff training and advancement opportunities are rewarded with outstanding staff loyalty.

Community engagement

There is ongoing collaboration with local businesses and engagement in sponsorships and donations to local organisations, in particular the Volunteer Fire Brigades of the Shire of Denmark.

Tourism and Visitor Venue

The Cellar Door receives a consistent flow of local visitors as well as state, interstate and international visitors. Visitors to the Cellar Door are offered experiences that include wine tasting (free of charge), chocolate and wine pairing, complimentary cheese plate as an accompaniment to wine sold for consumption by the glass or bottle. Singlefile is also well known for its Sense of Place Vineyard and Property Tour.

Visitors are invited to utilise The Property's extensive lawn and treed garden (at no charge) for picnics.

Stash Coffee, which is roasted on The Property, is available for sale at the Cellar Door. The Stash roasting facility is available for tourist visitation by prior

arrangement.

Recent achievements

Recent awards include Top 100 Red Wines, Halliday Nov'23, Second best Red in WA, Ray Jordan June '23, Best wine at Canberra International Riesling Challenge Oct'22.

The wine writer and wine judge, Mr Ray Jordan, has just named [REDACTED] the Best Producer in Western Australia (in his 2023 wine book).

The Singlefile Wines Cellar Door is consistently recognised as the Great Southern's best Cellar Door (Gourmet Traveller Wine) and was awarded Gold in the Tourism Wineries, Distilleries and Breweries category at the 2023 Perth Airport Western Australian Tourism Awards (2023).

4.0 FUTURE DEVELOPMENT OPTIONS

It is our view that The Property has, over the last sixteen years, successfully evolved as a vertically integrated operation that pays due attention to both rural and commercial activities and it remains our firm desire to maintain this balance of activities in the future.



Further investment/development of The Property is likely to involve application to the Shire for projects that include:

- shed construction for wine business
- function centre/conference centre
- guest accommodation as chalets
- manager's house
- distillery
- covered car parking for staff
- machinery shed

In addition to the above we expect to expand our vineyard plantings by way of both in-fill adjacent to existing vines and the possible planting of discrete new vineyard blocs as space permits.

Given the way The Property has developed so far, and the possible developments into the future, we are of the view that it is appropriate for the

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| | | property to be zoned Rural plus Additional Uses. | |
| S18 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>1. Long stay versus short stay (less than 3 months) Currently, the Waterfront complex consists of an owners house (long stay), a caretaker/managers cottage (long stay) and 20 accommodation units. All of the units have their own bathrooms and in addition certain of the units have built in kitchens/kitchenettes. As discussed it is very challenging to find accommodation for workers (managers, caretakers, groundsman, cleaners and restaurant staff). This is a challenge for the Waterfront along with other larger tourism operations in Denmark and in order to function we would need to provide on-site accommodation for key personnel for periods in excess of 3 months. Accordingly we seek an allocation of 20 percent (4 of the 20 accommodation units with kitchens/kitchenettes) to be designated long stay in addition to the Owners house and managers cottage. We have identified the Units (less likely to clash with Tourism stays) and can provide these Unit designations to you or alternatively seek a blanket allocation of 20 percent (4 of these units) which is not inconsistent with the draft town planning scheme and other Denmark projects.</p> <p>2. Approved uses Currently the approved uses include, inter alia, restaurant and microbrewery. We wish to add “wine bar” to the approved uses. This use would provide more flexibility around Liquor licencing laws while having no greater impact on the amenity and neighbourhood. The only neighbouring block likely to be impacted is an adjacent block zoned tourism where an old motel was recently demolished. The owners of this lot are very supportive of this initiative and progress at the Waterfront generally.</p> <p>There are no other matters on which we wish to comment other than to say we concur with the commentary around strata titling which has been a great impediment to progress at the Waterfront where we had to acquire and collapse 15 separate legal titles in order to consolidate ownership under one entity. This process was both expensive and time consuming.</p> <p>Please take our comments on board in relation to planning and don't hesitate to make further contact as required. With the Shire on board we intend to</p> | <p>Noted.</p> <p>The current Scheme provisions allow for up to 10 of the existing holiday units to be used for permanent accommodation, the Strategy has no recommendations to change this.</p> <p>Upheld.</p> <p>The Model Scheme Text has the land use ‘Small Bar’ which would enable the development of a wine bar as requested.</p> <p>‘Small Bar’ was not a recognised land use when the Waterfront Hotel was originally zoned Tourist and if managed correctly, could contribute to the success of this tourist zoned development. This additional land use should be added to the land uses to be contemplated in the preparation of Local Planning Scheme No.4.</p> |

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| | | <p>restore the complex to its functional best.’</p> <p>Just a note regarding the table on page 161 which you may or may not wish to update. Lots 1-15 no longer exist as these lots were consolidated into Lot 140. The business is called Waterfront not Pelicans. Pelicans is a Tourism business located on adjoining Lot 73 at 65 Inlet Drive – also zoned Tourism.</p> | <p>Upheld. Adjust Figure 35 ‘location’ and ‘name’ details to reflect that there are three tourist zoned sites in this location including the Waterfront Hotel and Pelicans. Include Lots 6, 140 & 73 Inlet Drive, Denmark in the location details.</p> |
| S19 |   | <p>The following are just some of the many economic, environmental and social benefits that would accrue to the Denmark town, shire and community from this potential project (see image below):</p> <p>ECONOMIC & SOCIAL</p> <ol style="list-style-type: none"> 1.) With the support of the community, the Shire should have enough persuasive arguments to encourage Landcorp, a Government agency with whom discussions have been held, to become the proponent and developer of the proposition with any profits going to the benefit of the State. 2.) The environmental studies, research and all development costs will be borne entirely by the developer with no cost to the community. 3.) The project is totally consistent with, if not essential, to meet the Inlet based priorities in the Denmark Tourism study and complements the Recreational Strategy for Denmark. 4.) The rate base of the town will be increased at no cost at all to the community which should, with diligent management, mean that the continual rate increases we have been experiencing and that are forecast to increase further should be unnecessary. 5.) The Government funding currently being spent on continually monitoring the Inlet and doing nothing would be unnecessary, creating a major saving. 6.) The focus of the town could be eco-tourism and venturing along with marine/maritime with recreational fishing, broad based commercial fishing, whale watching, yachting and other marine based activities becoming realities. 7.) A healthy Inlet and foreshore plus year round access for small boating into the ocean would be a huge boon to the tourist industry which is the primary industry currently underpinning the economy and forecast to be the only serious economic lifeblood of the town. 8.) There is no retail space available in the development that would compete with the existing businesses in the town centre, but new opportunities would be created for businesses associated with a marina, for example ships | <p>This proposal for a canal development and permanent sand bar opening was proposed and investigated in the 1990’s and not supported at this time.</p> <p>The Strategy provides a number of criteria (Part 3.4.4.4) for the development of new marine infrastructure. This proposal would meet a number of these aims but is unlikely to meet others.</p> <p>It would take substantial and extended investigations into environmental, hydrological and coastal processes matters for the potential impacts and benefits of a proposal of this nature to be understood, and the ongoing management requirements quantified.</p> <p>As this proposal is not consistent with the Shire’s adopted concept plans for Ocean Beach and Prawn Rock and is not recommended for inclusion in the current Local Planning Strategy.</p> |

chandlery, diesel motors, marine motors and businesses that do not exist in Denmark now because of the lack of docking facilities.

9.) The project would enhance the practicality and viability of a wind farm which itself would provide a major tourist attraction.

ENVIRONMENTAL AND SOCIAL

10.) A development of this size would justify a sewage main running from the existing sewage plant in town which would pick up all of the properties currently using septic systems along the entire Wilson Inlet western foreshore, including the Ocean Beach Caravan Park and other approved residential areas currently on hold through lack of sewage. This would drastically reduce the nutrients estimated to flow into the Inlet contributing to the serious eutrophication problem.

11.) The environmental outcome of allowing the tide to constantly flush the manmade nutrients out of the Inlet over the next few years will be an enormous benefit to boating, and marine life, clearing the shoreline to make it once again useable for recreational activities.

12.) The Prawn Rock Channel would become a sheltered, beautiful recreation area for the whole year. Constant year round sea water flushing would create an excellent location for swimming lessons, family picnics and the like.

13.) The stability of Ocean Beach that has long been a problem would be solved with this proposal by creating a full arch of beach back to the groyne on the western side of the opening, creating what surfers term "a double break" at Ocean Beach.

14.) A bird sanctuary island created with the surplus fill would create a cat and fox-free and nesting ground for the various species of birds that frequent the coastline and the Inlet.

15.) Coastal safety will be enhanced by Sea Rescue being able to access the ocean at any time of the year to save the lives of those swept into the sea from our attractive, yet dangerous coastline.

16.) A site would be provided for the Denmark Environment Centre to establish an office (base) as a focal point for eco-tourism and the monitoring of the new pristine environment created by the permanent channel.

17.) The social fabric of Denmark, that has been split with the eastern versus the western opening debate, would be restored, with the whole community and visitors able to enjoy a whole range of activities on and around a clean and healthy Inlet.

18.) It should be noted that I have no direct project involvement or benefit

arising from introducing this concept to Landcorp and the Shire. I paid for the initial conceptual design as my contribution to the community. Landcorp (Western Australia) will earn all the profits from the project.



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| S20 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>It looks like Rural Residential is the most appropriate zoning for our block and we'd like to confirm that as our preference.</p> <p>Our block isn't suitable for agricultural production or rural enterprise, but it's a big block that's close to town, which is why we wanted to explore possibly adding one or two dwellings down the track to rent out and/or supply tourist accommodation/diverse housing options that make use of the land in some way.</p> | <p>Noted. Shire planning officers should be contacted to discuss any future land use or development proposals, as raised by this submission.</p> |
| S21 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>Thank you for the opportunity to provide feedback on the Shire of Denmark Local Planning Strategy. It was pleasing to see that consideration was taken to ensure that all industries were catered for including tourism.</p> <p>Denmark Chocolate Company has been in operation since 2009 and provides a unique tourism attraction with its handmade chocolates, assortment of food and beverages for consumption on site or take away, beautiful garden historical chocolate timeline walk and rural setting. We currently employ seven local residents and anticipate expansion as we grow the business.</p> <p>As new owners of the property and business, we also have plans to include short term accommodation with 2 chalets currently approved for development and 2 further chalets planned.</p> <p>In the planning strategy documents we noticed that a Tourism Precinct along South Coast Highway has been identified but it does not include a number of existing attractions including Monkey Rock Cidery and Denmark Chocolate Company.</p> <p>We would like the opportunity to be included in the tourism precinct as we believe that we offer a unique attraction which meets to five tourism A's (accommodation, access, attractions, activities and amenities) and this is the primary use of our land.</p> | <p>Noted.</p> <p>In response to community feedback received, the Strategies Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which assess the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The modified Tourism section is also supportive of Tourism businesses growing and diversifying their existing operations, including pathways to rezone to Tourism or utilise and Additional Use designation where necessary.</p> |
| S22 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>After 2 telephone conversations and reading all the documents, I would like to clarify my own needs within the context of the Peace St Permaculture Community (survey strata).</p> | <p>Noted. The Strategy identifies a proposed change from Landscape Protection to Rural Residential zoning to be consistent with the standard zones now</p> |

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| | | <p>As we are aiming to grow food, run home businesses and live sustainably, please see below the elements of LPZ3 that need to be kept and other concerns...</p> <ol style="list-style-type: none"> 1. The ability to keep grass-eating animals, such as sheep, goats, alpacas; stocking rates as stated by WA Ag. Dept. 2. The ability to conduct a home-based business, with no increase in shire rates. 3. Intensive Agriculture (such as aquaculture), Hobby Farming, Cottage Industry and Primary production to be available to our community as required. 4. Ability to keep birds, esp. chickens & roosters to maintain the flock. 5. To be advised as to how the density of our 1000m2 will change 6. What, if any, changes will be made to our shared care Common Property? | <p>recognised under the current state planning framework, noting that the Shire's current planning scheme is from 1993 and significantly outdated. The exact details of provisions for the Peace Street community and the future Rural Residential Zone will be resolved as part of the future planning scheme review. An Additional Use designation can be considered if necessary to retain the existing range of permitted land uses for this property. The scheme review process will enable the community to provide feedback regarding the exact draft scheme provisions before they become active as part of the consultation process. The comments from this submission will also be considered as part of the scheme review process.</p> |
| S23 | <p>██████████ ████████████████████</p> | <p>We would like to register our distress that council is supporting a major tourism venture at the only entrance to the National park.</p> <p>Not only will it cause traffic chaos on the highway with poor vision, but also add to the pressure on the park.</p> <p>Already it is not safe in peak times to ride your bike on this road. Currently it forms part of the Mundi Bidi trail. Myself and family are regularly run off the road into the bush by tourists with no road / sharing skills.</p> <p>This part of the world is loved because of its beauty we don't need another brewery, restaurant, caravan park in a place that will likely affect the environment with rubbish and effluent waste hard to contain.</p> <p>Please do not do this, our children deserve better in a world already overheating with environmental impacts</p> | <p>The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.</p> |
| S24 | <p>██████████ ████████████████████</p> | <p>Members of the Shire work for their people, not self-interested groups. If you are committed to providing quality services and community engagement, please listen to people's objections to the Caravan Park on South Coast Hwy.</p> | <p><i>Lot 3 South Coast Hwy/ Amendment 147</i></p> <p>The Draft Local Planning Strategy reflects the</p> |

On many occasions, we have passionately submitted objections that, despite the majority of votes, get overruled by the Shire. The few make decisions in the club for reasons I will never understand. How do these decisions benefit the majority?

Again, this has happened with the South Coast Hwy Caravan Park. My concerns are:

Number 1,

I object to its ugliness. That should be enough to halt it in its tracks.

People love Denmark for its rolling hills, pastures and the forest that meets the sea. Now we have plonked in the middle of a beautiful scenic road leading to our star attraction, Greens Pool, a very ugly caravan park. The attempt to disguise its ugliness with rows of trees is feeble. It remains ugly.

The other thing is, the owner of this caravan park has presumed all along that Shire will approve it! He has begun the build. People are beginning to say that the shire is corrupt and underhand deals are going on because this seems like a 'done deal.' He should dismantle everything and begin the process of requesting Shire's approval.

Number 2, Fire

We don't have two bridges, but now we have several caravan parks. Everyone in town is doing the maths but not the shire. How do we evacuate additional caravans, boats, trailers and people?

Number 3, Greens Pool National Park

Our star attraction is now compromised. And it is a dangerous compromise. One road in and the same road out. Any car accident or fire at the junction of the caravan park and the entrance to Greens will be catastrophic. Young families will be trapped until the road is cleared. And this is a black spot junction with the new (yet to be) zoned caravan park. If anyone is injured or killed, then I hold you, the shire, to blame. Don't pass the buck to the Dept of Main Roads. You are behaving like seasoned politicians who can't give a straight answer and blame everyone but themselves.

existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.

Issues including visual landscape, bushfire risk and surrounding infrastructure capacities are all considerations that have and will continue to be assessed as part of any Tourism proposal on this site.

Tourism Precincts

Upheld (in part). In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to

Number 4

I've been told the shire now allows nine tourist precincts. The shire did not advertise this well because there would have been an uproar if they had, and you know this. Another example of skullduggery. And there needs to be a definition of what can be done in these newly zoned tourist precincts. The Ocean Beach headland is a worry, too.

Demarkians have gone to great lengths to avoid becoming another Margaret River. It has always been talked about. I've never encountered one person who wished that Denmark was like Margaret River, including visitors and tourists, but we will be if you don't pull your Sox up, man up, listen, be accountable and work for the people's will. Be visionary in your decisions. In 50 years under your stewardship, we will have chain stores, Disneyworld, slushies and fairy floss.

Please look at developing a different style of tourism. Environmental experts surround you, but you have yet to consult with them. Denmark could shine in a different, more remarkable, new, and innovative way, but you still use the same old 'developers' plan. No good will come of it.

Don't just talk the talk. Walk the walk, Kingsley. You seem to care about the environment, but I've seen no example. If you mean what you say, please take another long look at your actions. Take a drive out to Greens with fresh eyes and have a serious look at this eye-sore of a caravan park but also drive into Greens and out again and see for yourself the traffic hazard. A deep gully on the left is where oncoming cars are not seen until they are upon you.

Someone one day will be injured or killed. It could be an entire family.

It saddens me that you haven't had a good look.

Please can the Shire delay the zoning of the tourist precincts because right now it feels like a bad decision.

I can understand why you are toying with the idea but I think Denmark can move in a different direction and plan something quite unique that will put us on the map as visionaries 50 years from now. I think we are using a very tired template that does not work.

restrict opportunities for tourism development on Rural zoned land.

Emergency Evacuation

The Strategy identifies two emergency access routes across the Denmark River via South Coast Hwy and Churchill Rd. The Strategy takes a position consistent with previous Council decisions, that:

- Based on anticipated traffic and freight volumes an additional bridge is not expected to be required during the life of this Strategy, and it is therefore not appropriate to identify the location of a potential future bridge at this time.
- Further improvements to the existing road network may provide more cost-effective outcomes in the short to medium term.
- As a means of supplementing the regional road network, any potential future investigations into a new bridge should be led by the State.

Access to and management of evacuation from the William Bay National Park is subject to detailed planning by the Department of Biodiversity, Conservation & Attractions.

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| | | <p>Look at Byron Bay and Margaret River. I reckon they would love to start over again.</p> <p>We have that chance. Please don't squander it.</p> | |
| S25 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>In general, I support the overall approach to town site expansion, infill, and growth.</p> <p>The removal of previous Shire support for the development of Rural Living Estates is problematic. In particular, implementing a strict, global abandonment of Rural Residential living, as per 3.1.4.3, will exacerbate existing problems for East River Road and Tulley Road concerning bushfire risks. These could be readily resolved with a minor adjustment to the Draft Strategy that minimally extends SR 12 to include Lot 2 on East River Road, which would also head off further future problems with bushfire risk and conflicted land use in the general area. In addition, the change would set no precedent for further rezoning, would not lead to significant loss of rural-use property, and would complete a long-standing general vision for responsible development of the area.</p> <p>I have owned Lot 2 (514) East River Road for over 20 years. I gained support for a Scheme Amendment Request, prepared by Ayton Taylor Burrell, from Council in its January 2008 meeting, as conveyed in a letter from then Manager of Planning and Development, [REDACTED], dated 7 February, 2008, that is in the Shire's file on the property. That SAR requested rezoning within a then RR-designated zone, from Rural to Rural Residential; alternative plans for 4-7 lots have been discussed with the Shire over the many years since that time.</p> <p>The long-standing, general plan has been to complete the formal SAR process in concert with the development of adjacent land, esp. Lot 23, which had been rezoned in 1994 and there has been regular, intermittent coordination with developing Shire planning over an extended period of time. Development of the 2011 LPS and then the abandoned 2016 LPS, together with the period in which a second road west from the township was considered (potentially through East River Road, which formerly had a bridge across the Denmark</p> | <p>Although previous policies of the WA Planning Commission and the Shire of Denmark would have supported the rezoning of Lot 2 East River Road, Hay to the Special Rural Zone and allowed for subdivision, the more recent position adopted by the WAPC is that no further rural residential subdivision will be supported. The Strategy is consistent with this position and expounds on it within Denmark's context.</p> <p>The request to make an exception for Lot 2 is based largely upon the resultant improved road network, removing a cul-de-sac (Tully Road) and the consequential improvements to bushfire safety for residents in the immediate area. In considering this request it is noted that there is an easement for strategic fire access through the adjacent lots immediately to the east of Lot 2. Whilst not as effective as a full road, this easement effectively provides the secondary means of access from the end of Tully Road that is required to comply with the bushfire planning framework. The impetus to consider Lot 2 as rural residential is subsequently substantially reduced.</p> <p>Modification of the Draft Strategy is not recommended.</p> |

River), delayed execution of this plan, as did the advice of then Director of Planning and Sustainability [REDACTED] that successful execution would require the rezoning of the two remaining lots west of the subject property, Lots 5 and 6 (against the wishes of the owners of those lots, if necessary). Meanwhile, four lots have been created and developed on the immediately east adjacent property (Lot 23). Three of those lots occupying the cul-de-sac end of Tulley Road that borders Lot 2, one borders East River Road, and SR 12 more generally has become more densely populated over the past 15 years. This has increased bushfire risk significantly in the current SR 12, which ends at the boundary between Lots 2 and 23.

Including Lot 2 within the current rural residential zone that already contains Lot 23 would mitigate this risk by allowing for a road connecting Tulley Road to East River Road along the border of the two properties. As both East River Road and Tulley Road have seen significant lot and population expansions in 15 years since the Lot 2 SAR received Council support in January 2008—as reflected in the addition of residential rubbish collection for the whole west end of the street in the past two years—adding Lot 2 to the existing rural residential zoning in the present Draft Plan would be in keeping with the important goal of bushfire mitigation.

If the finalised Strategy were to reflect this change, an SAR for Lot 2 along the lines of the one previously approved in principle in January 2008 could be submitted that provided for the development of the connecting road as well as other safety features, such as underground power. This would enhance fire safety significantly for the whole SR 12 area, which currently includes two cul-de-sacs, since all properties on East River Road and Tulley Road would then have a second fire safety escape pathway with the removal of the cul-de-sacs and joining of the two roads.

This is independent of what happens with Lots 5 and 6 to the west, though I would be happy to coordinate with the owners and the Shire on a suitable plan that considers these lots. While the 2010s plan to “round off” this western part of East River Road with common zoning throughout is an understandable ideal, continuing to exclude Lot 2 from SR 12, as per the Draft Strategy, both

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| | | <p>exacerbates an existing fire safety problem and misses the opportunity to work towards a cost-effective solution to it and future problems with the current owner.</p> <p>This minor adjustment to the Draft Strategy would come with no effective loss in full rural use, since Lot 2 has had long-standing (25+ years) of non-rural use already. Moreover, sale of the land with its current Rural zoning could represent downstream challenges for the Shire, given the developments in SR 12 the past 15 years, were the property to revert to full rural use, rather than continue with the lifestyle rural residential use that Lots 2, 5, and 6 have effectively enjoyed for over the past 25+ years.</p> <p>In summary, with the development of lots within the existing SR 12 to the east and the earlier subdivision that created Lots 5 and 6 to the west, Lot 2 (at 12.1 hectares / 30 acres) has become anomalous. Including Lot 2 in SR 12 as a minor modification to the Draft Strategy removes the anomaly and the rezoning of the property creates the potential to mitigate serious bushfire risks in a cost-effective manner without the loss of land likely to be used for full-blown rural purposes. The proposed modification to the Draft Strategy constitutes one of the stated rare exceptions to the overall vision in the Strategy, one that will enhance overall Shire objectives.</p> | |
| S26 | <p>██████████ ██████████</p> | <p>I support the vision to provide direction for continual improvement in land use and development planning because it implies that the Council wishes to adhere to the dictum that businesses should not develop land in ways that contravene Shire planning strategies and then approve them once developed. I also support the vision of having a framework for growth that protects and enhances Denmark's unique character and environment, as this should guard against developing tourism precincts, as they would destroy Denmark's character and environment and mean that it loses its uniqueness in ways that development in other parts of the South-west (Albany, Margaret River region, etc.) have already done. I particularly support the aim to promote opportunities to increase the sustainability of tourism land use because this would ensure that any development that resulted in large numbers of extra tourists would have to</p> | <p>Upheld. In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include</p> |

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| | | <p>be opposed.</p> <p>I am opposed to the creation of nine tourism precincts. Adopting a plan that included these would ignore key elements of the Council's Sustainable Tourism Strategy, Strategic Community Plan and Sustainability Strategy, including commitments to: environmental stewardship climate change mitigation protection of cultural heritage preservation of rural land and visual amenity ecologically sustainable tourism a community-centred tourism strategy. In particular, the William Bay area has been identified in Council documents as being at risk from environmental degradation, over-promotion, over-visitation, and becoming a dissatisfying tourist experience. The proposed tourism precinct adjacent to the William Bay National Park will only heighten these risks. Council's tourism strategy should help conserve natural heritage and biodiversity, not increase the threat to habitat and ecosystems. Further tourism pressure on William Bay NP would go against the Draft Strategy's aims to help protect environmental features and ecological communities, and seek to preserve the outstanding landscape values of the district.</p> <p>Please recognise that the over-development of the tourism sector harms the well-being of the community that Council represents.</p> | <p>subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |
| S27 | <p>██████████ ████████████████████ ████████████████████ ██████████</p> | <p>I have lived for the past 43 years in the William Bay area of the Denmark Shire. I wish to comment on the tourism chapter of the Draft Local Planning Strategy 2022, in particular the proposed rezoning of rural land to create a William Bay Tourism Precinct and caravan park.</p> <p>Myself and other William Bay area residents have informally met several times during 2023 to discuss these proposed zoning changes. While we would individually prioritise our concerns differently, I think there is a consensus that we have all experienced the following problems during peak tourist times and share a growing concern they will be compounded if the green light is given to the caravan park and other proposed tourism zones without all relevant planning bodies first assessing and addressing these issues.</p> <p>It seems there are many planning bodies involved; The Shire, Great Southern Development Corporation, State Planning, DBCA, EPA, Main Roads and possibly other bodies I have overlooked. It seems to me that by writing to the Shire</p> | <p>The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.</p> <p>Upheld (in part). In response to the large number of submissions received in objection to the tourism</p> |

alone, I am not sure these other bodies which have significant advisory and planning powers are aware of our concerns, particularly the DBCA in relation to William Bay National Park.. Do we have to make submissions to several or all of them to be heard? How well do they communicate with each other and with concerned rate payers and residents?

Perhaps an 'on the ground' assessment of congestion and road safety issues could be done by relevant authorities during this current peak tourist season? With appropriate consultation and decision making residents and tourists could more comfortably share attractions and facilities in line with the low impact sustainable tourism objectives so well articulated in several local planning documents.

MY MAJOR CONCERNS ARE TWOFOLD:

1. Overcrowding of parking facilities at the Green's Pool area of William Bay National Park (WBNP)

I am aware WBNP is administered by the Department of Biodiversity, Conservation, and Attractions (DBCA). In recent years they spent a lot of money upgrading parking and other tourist facilities at the Park. Unfortunately this hasn't sufficiently resolved overcrowded parking and road safety issues as follows:

- The parking congestion during summer holidays has become a real point of frustration among many local residents who wish to regularly access the Park. It is our local swimming hole and the town's local annual swimming lessons venue. This is very important for the general health and well being of local residents, many of whom are regular swimmers and walkers, and indeed regard the Park as a major reason for choosing to live in the area.
- I have heard from participating swim teachers and families about how difficult it has been to find parking to get to lessons on time. Parents or other guardians of children, particularly younger children, naturally want to accompany them rather than drop them off to be looked after by swim staff alone.
- There is no town public swimming pool. The only other generally available safe venue for local children and the infirm or elderly is in Albany, a 2 hour 140km round trip from William Bay, which currently costs about \$20 per car in petrol. While Ocean Beach and Lights Beach are also popular swimming spots, these are more dangerous for beginners and the infirm and can also have crowded parking in summer. They are not suitable for ongoing summer swim classes, Green's Pool is the safest nearest place.

precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.

In short, local residents have little option other than to grin and bear it and expect these issues will only get worse if more tourists are encouraged to come here in summer.

We don't want to see more of the Park bulldozed to provide more parking.

How about a low cost or even free shuttle bus service from town to Green's Pool during peak season? Maybe utilise a school bus model of pick up and drop down along the Highway from town. This could have various spin offs such as less pollution, reduce fuel costs and encourages families to socialise more along the way.

Clearly Greens Pool and the wider WBNP are a major drawcard featured in tourism promotion that caravan parks and other tourist based operators depend on. Rather than leaving it up to displaced residents to fund their own shuttle bus could Denmark and its tourist operators be an innovator in this regard? If the proposed William Bay Caravan Park goes ahead, should it provide a shuttle bus for its residents to get to WBNP in summer?

Also several of us locals have known various Park Rangers over the years and know they are really stretched during Summer trying to fulfill their duties. We have no reason to criticise any of them, but there should be a couple more Rangers, just during the summer.

2. Road safety issues within WBNP and the adjoining South Coast Highway.

- Some local residents like to cycle to the Park, thus avoiding parking issues. However they report already feeling vulnerable with 80 km road speed on both the South Coast Highway and within the WBNP, and lack of a designated bike path within the Park thus competing with road traffic..
- Specifically in relation to the proposed caravan park we are concerned about the creation of an accident black spot as caravans try to enter and exit the caravan park near the entrance to the WBNP on the South Coast Highway. Some caravan rigs are very big and lines of sight are poor due to the bends and dips in the road.
- The safety of cyclists and pedestrians from the tourist park trying to cross four lanes of 80kph traffic to get to and from WBNP is also questionable in the same potential black spot area.
- It is noted that the speed limit for this stretch of road has very recently been

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| | | <p>dropped from 90kph to 80, which is a step in the right direction. There needs to be some well thought out road signage at both ends of the Highway approaching the Caravan Park site to alert first time visitors to what lies ahead.</p> <p>In short my concerns mostly revolve around who is assessing and managing increasing volumes of traffic. We are being loved to death, which is a similar world-wide issue at other famous tourist sites. As summers heat up due to climate change, we will only be more popular for people to our north wanting to escape south to a beautiful cool destination. But why should local residents and rate payers be squeezed out of their own front yard?</p> <p>We have built great bike paths within and around the WBNP. Electric bikes are becoming very popular, but the old railway bike trail from town can be treacherous in summer due to soft sandy patches causing bikes to suddenly founder and riders to fall. Would this be too expensive to fix?</p> <p>Like many residents I am also finding parking in town quite challenging during times of visitor influx, particularly as I am into my late 70's. However other than opening up more parking spots, I don't have any suggestions on that one.</p> <p>Rather than letting these issues compound let's get our heads together to genuinely safeguard the essential ecological and community values we want to maintain while welcoming tourists to join us here.</p> | |
| <p>S28</p> | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>Thank you for the opportunity to review the Shire of Denmark Draft Local planning strategy and the invitation to comment.</p> <p>Contrary to what is stated in the Statutory Planning Committee Minutes of meeting No 7703 we were not consulted at all prior to now and had no discussions around the removal of our Special Use zone. This strategy in no way reflects any discussion with us.</p> <p>As the Landowner of Lot 2 South Coast Highway, which comprises of a significant portion of the described East Denmark Industrial Estate we wish to make the following comments:</p> <ul style="list-style-type: none"> We were first approached by the Shire regarding rezoning some of our property to Light Industrial in 2009. After years of negotiation, it was agreed the part of our land, approximately 17 hectares abutting the Agricultural college land to the north would be rezoned. We would be | <p>Noted. Shire officers were not present at this Statutory Planning Committee (SPC) meeting and have made no claim that landowners were consulted on this issue. It appears to be a mistake in the SCP minutes.</p> <p>Upheld. It is acknowledged that the draft Strategy incorrectly identified the land to the south of the existing East Denmark Industrial Estate broadly for 'industrial' uses, without acknowledging the transition of land uses that has formed part of</p> |

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| | | <p>able to divide this land off into a separate title.</p> <ul style="list-style-type: none"> • This was on the clear understanding and agreement that the remaining portion of our property would be known as Special Use and dividable into 5 blocks. • The Town planning Scheme No 3 Amendment No 141 in March 2017 outlines this clearly as does the attached map 06. • We expect this commitment to be honored in the current Strategy. • We note the comments regarding the current zoning of General Industrial, which is certainly not what was envisaged for our property and not suitable for the sensitive use area of special uses and Boston’s Brewery next door. • We would expect the bulk of our 17 hectares would be amended to Light Industrial with only a small area at the north to be general Industrial. <p>Noted also is the proposal to relax restrictions on the development of multiple tenancies within a single lot.</p> <ul style="list-style-type: none"> • Considering our property has not been developed yet, it would seem sensible to simply allow our development to have more flexibility with smaller lot sizes. This is far preferable to multitenancy agreements and something other Industrial areas in the state have done. <p>It is becoming clear that the need for our land to be utilized is drawing close.</p> <p>If this current Strategy is adopted as it stands with our entire lot zoned industrial, it may be a very long time before any development happens.</p> | <p>previous planning for the southern portion of this area, including the existing Special Use zone (SU1) and Light Industrial portion. It is proposed to modify the Strategy mapping to reflect this transition of land use intensity and to provide necessary buffers to existing sensitive land uses in the surrounding area.</p> |
| <p>S29</p> | <p>[REDACTED]</p> | <p>The Shire of Denmark’s Local Planning Strategy 2011 clearly identified the need for an additional crossing point of the Denmark River, primarily to support east-west connectivity and future growth to the north of town along Scotsdale Rd. However, a second river crossing point would also improve resilience of the Denmark road network in the case of a catastrophic event (such as bushfire) and potentially improve evacuation procedures.</p> <p>The Draft Strategy seeks to remove this secondary bridge on the basis of a “detailed investigations and report”</p> | <p>It is agreed that the assessment of the total population of Denmark on any one day in summer was considerably understated in the Denmark Traffic and Evacuation Management Study from June 2018 and currently estimates suggest a figure closer to 16,500. It is noted that any evacuation of Denmark would occur in a progressive and staged manner in accordance with the direction of emergency services.</p> |

This report titled Shire of Denmark Denmark Traffic and Evacuation Management Study June 2018 states on page 11 “it can be concluded that there is an approximate 10-20% increase in the Denmark population (and hence traffic volume) during the peak summer holiday period (i.e. especially in the last and first weeks of the year); and minimal change in population during the Easter/autumn holiday period”

The traffic report is based on these assumptions and numbers.

This 20% population increase (approx 1200 people) assumption is a very significant underestimation of the actual tourist numbers. The Ocean Beach and Rivermouth caravan parks alone have capacity of 3000 and 600 respectively and are both full in the tourist season. A study by the Shire in 2014 indicated 10,000 to 12,000 tourists in total at peak periods. In other words the “detailed investigations and report” that was used to justify the removal of the second bridge is based on such totally incorrect population numbers that it should be disregarded.

The Draft Strategy acknowledges the increasing dangers and risks of fire. Recent fire events have highlighted Denmarks vulnerability to fire and the importance of proper planning for community safety.

Therefore I submit that the WAPC should retain the second river crossing point as per the 2011 LPS and remove all references in the Draft Strategy of the so called “detailed investigations and report”. [REDACTED]
Denmark

Since the preparation of the 2011 Local Planning Strategy and the Traffic Study mentioned above the Churchill Road bridge has been upgraded and is acknowledged by this Strategy as a second road crossing of the Denmark River, which also provides for evacuation in an alternative location and direction.

The Draft Strategy takes a position consistent with previous Council decisions, that:

- Based on anticipated traffic and freight volumes an additional bridge is not expected to be required during the life of this Strategy, and it is therefore not appropriate to identify the location of a potential future bridge at this time.
- Further improvements to the existing road network (i.e. improving the standard and legibility of Howe/Hamilton and Churchill Roads as a secondary means of crossing the Denmark River) may provide more cost-effective outcomes in the short to medium term.
- It should be noted that once the Denmark River is crossed near to town, there remains only one crossing point for the Hay River at its southern extent. It may be more sensible to encourage the second crossing to be further north (Churchill Road) to offer a true second option if leaving the district.
- As a means of supplementing the regional road network, any potential future investigations into a new bridge should be led by the State.

S30

3.1.4.3 Rural Residential - Strategies & Actions

From Page 31:

1. Improve the consistency of zoning for rural living land uses in the local planning scheme and pursue alignment with the State planning framework.

a) **Introduce a Rural Residential** zone into the local planning scheme consistent with the model provisions of the Planning and Development (Local Planning Schemes) Regulations 2015. Include landholdings currently zoned Special Rural within the Rural Residential Zone.

3. Increase the function and utilisation of land zoned for rural living purposes by providing greater opportunities for small scale businesses and self-sufficiency and **supporting increases in density** and limited infill development to increase housing yield.

a) **Consider proposals for infill development within the Rural Residential Zone** subject to the resolution of land use capability, bushfire risk, environmental impacts and other relevant land use planning considerations.

As home owners in one of the Special Rural Zones (being Special Rural Zone No. 5 - Mt Shadforth) we note with concern that the proposed change of zoning from Special Rural to Rural Residential will result in the properties in our immediate area being open up to the possibility of being subdivided (currently 2 ha minimum lot sizes will be replaced by a 1 ha minimum lot size). While we understand the desirability of having consistent zoning of the numerous Special Rural Zones in the Shire, we ask if this could be done in a way that enables the maintenance of the existing lot sizes?

Our three major concerns with the proposal are:

a. Loss of amenity

The subdivision of neighbouring properties will result in a loss of the amenity we have planned and worked so hard for. We bought our land in 2021 and built a house in 2023 on the basis that the properties in our area were at least 2 ha. We were seeking a quiet lifestyle, close to nature and away from the noise and visibility of neighbours. We acknowledge that we are extremely privileged to live as we do, but have worked hard and invested our life savings to buy our land and build our home. This proposed retrospective change of zoning is

The change in zoning name from Special Rural to Rural Residential is administrative only to accord with the WAPC 'Model Scheme Text' requirements.

The intention to allow for some infill development and subdivision within Rural Residential areas is based on making sustainable use of existing zoned land. This would only be entertained where it could be clearly shown that proposed subdivision would meet land capability, bushfire policy requirements, have no environmental impacts, the new lots could be shown to be able to be developed to meet setback requirements, and not require the removal of remnant vegetation.

Most existing Special Rural estates were subdivided to the maximum yield based on the above considerations when originally created. It is anticipated that the number of lots able to be further subdivided under this aspect of the Strategy would be small.

Given the scale of development in these zones the net change in traffic generated or impact upon amenity of existing development would likely be small as well.

An existing lot would still only have one neighbour if the neighbouring lot was subdivided from 2ha to 1ha. Therefore there would be little impact upon each individual landowner.

Lastly, it should be noted that this is a Strategy only at this stage and details would need to be provided

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| | | <p>naturally very concerning to us. It represents an unwanted and unanticipated shifting of the goal posts. It also has the potential to fundamentally change the amenity of our precinct, with increased traffic, noise and man-made structures that detract from the natural environment.</p> <p>b. Creation of uncertainty</p> <p>The threat of the subdivision of neighbouring properties will negatively impact our peaceful enjoyment of our property, our ability to plan, and should we ever have to lobby against a plan by a neighbour to subdivide, a potential loss of neighbourly relations. While we understand that there are many factors considered in allowing a subdivision (and have been told this proposed change of zoning isn't expected to have wide reaching applications in the Shire of Denmark), the threat still remains. It creates unwelcome, and perhaps ultimately unnecessary, uncertainty and anxiety.</p> <p>c. Loss of Remanent Bushland</p> <p>Many of the blocks in our precinct have areas of remanent bushland. If further subdivision of these blocks were to occur, new building envelopes would have to be created in remanent bushland, representing a considerable environmental loss. How will the rights of landowners to capitalise on their land be balanced by the importance of retaining the valuable remanent bushland?</p> | <p>when Local Planning Scheme No.4 was drafted.</p> |
| S31 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>Citation Text: <i>3.1.4.1 Reticulated Sewerage Infrastructure</i> <i>Some parts of the Denmark townsite are not currently provided with a reticulated sewerage service, and the achievement of infill development is therefore constrained by the Government Sewerage Policy (2019). Investment by the State in this infrastructure would enable new housing development as well as improving environmental outcomes. In particular, the development of a reticulated sewerage service in residential areas within an 800 metre catchment of the Town Centre should be prioritised.</i></p> <p>Comment: The southern lots located on McIlroy bend are currently zoned as R10 and are within an 800 metre catchment of the Town Centre as depicted in Map 1 Draft</p> | <p>Noted. The need for connection of sewerage to new residential subdivision is guided by State Government policy and is a decision made by the WA Planning Commission when subdivision is proposed.</p> <p>Sewer extensions for all residential growth areas are expected to be initiated, designed and funded by land developers as part of the subdivision of surrounding urban expansion areas. Landowners may work together to coordinate infrastructure development.</p> |

Local Planning Strategy 2022 (the Draft Strategy). Reference is made to Attachment 1 to demonstrate that these lots are within 800 metre (10 minute) walkable catchment from the Denmark Town Centre.



The current restriction to further development of the lots on McIlroy Bend to the full (existing) R10 zoning potential and in support of the infill consolidation objective of the Draft Strategy is primarily the absence of reticulated sewerage service accessible to these properties.

Given that the lots on McIlroy Bend and the eastern side of Kearsley Road are either between the Denmark Town Centre and/or adjacent to a number of the proposed Urban Expansion Sites identified in Figure 1 and Map 2 of the Draft Strategy, it is proposed that these lots are included in future plans for installation of reticulated sewage accessible to these properties. This will achieve the following objectives in line with the Draft Strategy:

- Reduces the reliance on urban sprawl to accommodate future population growth via infill development
- Increases the expected yield from existing zoned land without having to rezone
- Encourages diverse housing types and enables suitable land supply of larger lot sizes (>1000 m²)
- Promotes the consolidation of residential growth, and
- Improves environmental outcomes given the area falls within a sewerage sensitive area.

To enable optimisation of infill development in close proximity to the Denmark Townsite, it is requested that plans to extend the reticulated sewerage service include access to this service for the properties on McIlroy Bend and along the

Planning for the extension of reticulated sewerage infrastructure is undertaken by land developers in consultation with the Water Corporation. Extensions will typically follow the most efficient, effective and least constrained route in response to a structure plan and proposed subdivision layout for urban expansion areas.

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| | | <p>eastern side of Kearsley Road to assist the strategy to meet its objectives stated above. This could also be augmented with the extension of Smith Street through to Mt Shadforth road to improve road and footpath accessibility to a number of proposed Urban Expansion Sites identified in Figure 1 and Map 2 of the Draft Strategy.</p> | |
| S32 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>I am opposed to the adoption of the Draft Local Planning Strategy with its creation of nine tourism precincts.</p> <p>It ignores key elements of Council documents, including the Sustainable Tourism Strategy 2021-2025, Our Future 2033 Shire of Denmark Strategic Community Plan and the Sustainability Strategy 2021-2031. It is also inconsistent with aspects of the proposed Draft Local Planning Strategy.</p> <p>These documents contain commitments to environmental stewardship, climate change mitigation, protection of cultural heritage, preservation of rural land and visual amenity, ecologically sustainable tourism, a community-centred tourism strategy. Creating nine tourism precincts does not deliver on those commitments.</p> <p>I particularly oppose the creation of a William Bay Tourism Precinct. Council documents identify the area as being:</p> <ul style="list-style-type: none"> • sensitive • under pressure • under threat of environmental degradation • over-promoted and over-visited and • a dissatisfying tourist experience. <p>The proposed tourism precinct adjacent to William Bay National Park will exacerbate this situation. The Park is not just the Department of Conservation, Bio-diversity and Attractions' problem. Council is also responsible. Council says its tourism strategy should help conserve natural heritage and biodiversity (Sustainable Tourism Strategy 2021-2025) not increase the threat to habitat and ecosystems.</p> <p>Councillors have a clear choice between a business as usual approach to</p> | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the</p> |

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| | <p>tourism or protecting natural and rural environments along with the well being of our community. It's the community they are elected to represent, not sectional interests.</p> <p>There are better ways forward. The community is waiting to help. Council should reject the proposal for tourism precincts and take another long hard look at the management of tourism in Shire of Denmark.</p> <p>I have read the Tourism Section of the Draft Local Planning Strategy 2022 and studied the Tourist Precinct Maps. I object to expansion of tourism in Denmark and surrounds for two reasons:-</p> <p>Problem 1:</p> <p>Denmark is oversaturated with tourists in the school holiday periods which leads to parking and shopping anger, trampling and littering of sensitive areas etc. all creating a negative experience. For example Margaret River has been "loved to death" and sitting in a traffic jam there is no fun. We DO NOT want to go in that direction. (I am a long term resident who talks to many people through volunteering).</p> <p>Proposals: Denmark needs to create more tourism attractions during the non - holiday winter months to get maximum value for the owners of pre-existing tourist facilities all the year. For example the town of Orange NSW (freezing in winter) has created winter festivals. Have a shuttle bus service from town to William Bay NP, to relieve the parking and traffic angst there. Carefully revegetated areas currently get used as parking lots! Encourage nature based tours to gain appreciation of our special environment not trampling in ignorance.</p> <p>Problem 2: Bushfire Safety.</p> <p>When the residents of Ocean Beach, Little River and Weedon Hill tried to activate their bushfire plans, during the Bayview Rise fire in 2022 and move out early to the east , they were faced with a continuous wall of caravans escaping from Ocean Beach Caravan Park. If these suburbs ever need to move west to escape fire along Lights Beach Road and South West Highway we will be faced with the same problem but with the addition of another possible caravan park</p> | <p>Strategy is adopted.</p> |
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| | | at William Bay. More caravan parks could be a bushfire hazard. | |
| S33 | [REDACTED] | <p>I wish to comment on the Draft Local Planning Strategy</p> <p>3.4.4.1 Road Transport Page 131 Paragraph 1.</p> <p>The need for a Second Road crossing was clearly determined in the 2011 Local Planning Strategy and endorsed by the WAPC.</p> <p>I believe in 2018 the Shire of Denmark contracted GHD to do a desktop traffic study to determine the need for a second Road crossing of the Denmark River. The study was done in Sydney with no on site investigation and limited data provided by the Shire.</p> <p>The GHD report is full of incorrect information. I am amazed that Councillors or Shire Planning Officers have used this known to be flawed document for the Draft 2022 LPS. The GHD report based its findings on treated sewerage outflow from the Water Corporation Denmark Sewerage Treatment Plant.</p> <p>The increase in out flow from the Plant at peak tourist time was determined to be 20% and from this information alone GHD determined maximum tourist numbers in Denmark to be 1200.</p> <p>This report does not take into account that 3000 people at Ocean beach Caravan Park and the majority of Denmark which is not connected to the sewerage system. The correct number of tourists can be determined from Tourism WA data. I believe that numbers are around 12000 at peak tourist time between Christmas and Easter.</p> <p>Recent closures of the Denmark Bridge to one lane, due to road works, created delays of up to one hour at peak periods. Evacuation in the event of a significant bushfire would be chaotic compounded by the evacuation of caravans from all caravan parks.</p> <p>I notice the mention of the bridge on Churchill Road. This bridge would be totally inadequate with a fast-moving bushfire from the North. This has happened several times. I know this to be true as I have been a volunteer</p> | <p>It is agreed that the assessment of the total population of Denmark on any one day in summer was considerably understated in the Denmark Traffic and Evacuation Management Study from June 2018 and currently estimates suggest a figure closer to 16,500. It is noted that any evacuation of Denmark would occur in a progressive and staged manner in accordance with the direction of emergency services.</p> <p>Since the preparation of the 2011 Local Planning Strategy and the Traffic Study mentioned above the Churchill Road bridge has been upgraded and is acknowledged by this Strategy as a second road crossing of the Denmark River, which also provides for evacuation in an alternative location and direction.</p> <p>The Draft Strategy takes a position consistent with previous Council decisions, that:</p> <ul style="list-style-type: none"> • Based on anticipated traffic and freight volumes an additional bridge is not expected to be required during the life of this Strategy, and it is therefore not appropriate to identify the location of a potential future bridge at this time. • Further improvements to the existing road network (i.e. improving the standard and legibility of Howe/Hamilton and Churchill Roads as a secondary means of crossing the Denmark River) may provide more cost-effective outcomes in the short to medium term. |

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| | | <p>Bushfire fighter for 48 years.</p> <p>The decision of Council contradicts the 2022 Draft LPS which states the following under the heading, Strategies and Action Plan.</p> <p style="padding-left: 40px;">Item 5b states Support and Advocate for improvements for local and regional road networks that improve accessibility during a bushfire emergency.</p> <p>Councillors and Officers, please revisit the GHD Study and acknowledge the misinformation regarding the need for a second crossing of the Denmark River, also including the need for a second crossing of the Denmark River in the 2022 Draft LPS.</p> | <ul style="list-style-type: none"> • It should be noted that once the Denmark River is crossed near to town, there remains only one crossing point for the Hay River at its southern extent. It may be more sensible to encourage the second crossing to be further north (Churchill Road) to offer a true second option if leaving the district. • As a means of supplementing the regional road network, any potential future investigations into a new bridge should be led by the State. |
| S34 | <p>██████████</p> <p>██████████</p> | <p>Submission – Developer Contributions</p> <p>Clause 3.4.1.5 – Strategy states – This strategy proposes the preparation of a developer contribution plan to determine the need for contributions</p> <p><u>State Planning Policy 3.6</u> The application and mechanisms outlined in SPP 3.6 unlikely to be suitable for the Shire of Denmark where the rate of development would be unlikely to happen to fund infrastructure within the life of a DCP. The principles of certainty and need and nexus would be difficult to establish.</p> <p><u>Recommendation to WAPC</u> Advise the LA that alternatives with developers need to be considered. Development infrastructure may be imposed through the subdivision and development process without the need for a DCP – Schedule 1 of Policy 3.6.</p> <p>Remove reference to a DCP.</p> | <p>Noted.</p> <p>It is acknowledged that a full developer contributions plan (DCP) is unlikely to be pursued by the Shire in the short term based on the scale and rate of residential development; however, these circumstances may change in future. Conditions of subdivision approval may be used to gain contributions toward road, path and drainage infrastructure where there is a direct nexus between the subdivision and infrastructure required. Community infrastructure is often expensive and difficult for a small Shire to fund, all avenues toward supporting the provision of these facilities should be explored and options left open. It is reasonable for developers that are facilitating and profiting from growth to contribute to the community infrastructure that is required as a result.</p> <p>The recommended Strategies and Actions regarding developer contributions is to “Consider the preparation of a Development Contributions Plan to</p> |

Submission - proposed density

Reference: Strategy & Actions – Page 36

- 1(a) require new & revised structure plans for residential growth areas to demonstrate achievement of the following housing diversity targets;
- i). A minimum of 10% of total housing lots are high density (R60 or above):
 - ii) A minimum of 25% of total housing lots are medium density (R30 – R60):
 - iii) A minimum of 25 dwellings per Ha net residential density.

Assumption is this statement relates to fig 1 & 2 and map 2.

Comment

WAPC under Schedule 2 – Deemed Provisions Part 4 is the approval authority for structure plans and ‘density’, future subdivision, school sites, POS etc will be considered by the Commission.

Local governments’ role is to report to the Commission after submissions on a structure plan including a recommendation.

Figure 1 is a breakdown of existing sites zoned residential or special residential with a recommendation ‘seek increased yield & diversity’ which is appropriate.

To set density targets for all revised structure plans without reviewing current zoning is premature without detailed analysis of each structure plan including –

- Is sewer available
- Public transport
- Distance to amenities and shops
- Is density for aged development
- Demand for high density developments in Denmark.

Recommendation to WAPC

Delete broad reference (page 36) requiring all structure plans to meet minimum density requirement.

support the collection of a financial contribution from land development for new and expanded community facilities.” No change is recommended.

Upheld (in part).

While the setting of housing diversity targets is an important and necessary part of the Strategy’s response to housing availability and affordability issues, it is acknowledged that this may be served by maintaining a greater degree of flexibility in the way that these aims are met.

It is recommended that the wording associated with these housing density targets is modified to maintain these aspirations but provide greater flexibility in approach for how these might be met.

Note: Proposed densities in the strategy are higher than Perth-Peel goals.

Submission – East Denmark Industrial Estate

Reference: page 73, clause 3.2.4.2

Strategy

Draft document now includes the special use zone being included as a general industry zone which creates a further conflict with Boston Brewery which would be classified as a sensitive use under SPP 4.1.

The strategy proposed to mix general and light industry uses. ie: having a concrete ready mix plant adjoining a cabinet maker, panel beater etc – very poor practice.

History

The industrial estate was created by the Shire purchasing land from the Denmark Agricultural School and an agreement with [REDACTED] to include their land holding within the industrial zone subject to the land adjoining South Coast Highway being zoned special use and a transition from light industrial to general industrial south to north (letters between the owners, Landcorp and Shire of Denmark).

The Shire by amendment to TPS3 zoned the land general industry by inclusion of a general industry zone in TPS3 with minimum lot size of 4000m2.

The [REDACTED] objected to this by a submission to the amendment.

The general industry zone is now in conflict with the Boston Brewery (sensitive use).

The [REDACTED] will not develop with the current general industrial zoning, thus the predicament is no future industrial land being available.

Recommendation to WAPC

Strategy to retain the special use to the southern portion of the lot, transition light industry to general industry over the northern portion. This should take note of buffer distances required to Boston Brewery (sensitive use).

Submission - Light Industrial Area (LIA)

Upheld.

The initial stages of land release in the East Denmark Industrial Estate have been sold and the estate is expected to extend to the south. The Draft Strategy broadly identified the land to the south of the existing estate for 'industrial' uses, without acknowledging the transition of land uses that has formed part of previous planning for the southern portion of this area.

It is recommended that the Strategy is modified to reflect the graduation of Light Industrial land uses at the southern end, transitioning to Industrial in the northern portion, to ensure that necessary buffers can be achieved to existing sensitive land uses in the surrounding area.

Page 72 3.2.4.1

The strategy supports the relocation of the Shires works depot and the redevelopment of the site and the potential development of lot 139 Zimmermann Street, northern portion of lot 672.

History

Industrial area was developed by Dept of Lands in early 1980 with further two lots on Zimmermann Street released in later years (Shire depot and Thornton Building Co).

Although other land was zoned industrial the logistics of developing have been discontinued due to the creek line and subsequent discharge to the south of Zimmermann Street.

In 2012 the Shire commenced negotiations with Landcorp, Denmark Ag School and ██████████ to develop a new transitional light/general industry site. The LA was to purchase its existing depot site from Government and subdivide into smaller lots to fund relocation to new industrial site.

Strategy proposal

The strategy flags the possibility of developing waterway & stormwater discharge land in the existing industrial area. Further issues associated with fill, flora and fauna requirements.

10 years since the 2012 strategy the 2022 strategy once again flags the intention to relocate the Shire depot, one of the prime objectives of developing the East River Industrial land.

The Shire has not retained a substantial land holding at the new industrial estate for relocation or have included such a project in its future 10 year financial plan.

Submission to WAPC

Seek further detail on the possibility of developing existing land within the LIA due to water and fill issues.

Seek clarification on the likelihood of the Shire relocating its depot and thus this land becoming available for light industrial purposes.

Submission – Supermarket demand

Noted.

The Shire's current Corporate Business Plan proposes to renew the current infrastructure at the existing depot.

The Strategy currently recommends a land swap with Lot 300 South Coast Highway to relocate the depot and free up the depot site for service commercial land.

A minor modification is recommended to the Strategy acknowledging that this land swap is a *potential future* action.

Prior to the development of additional land for service commercial land uses further detailed investigations will occur as part of the planning approval process, including the resolution of drainage flows/ infrastructure.

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| | <p>Reference: Statement Page 65</p> <p>Commercial floorspace projections suggest that demand for an additional supermarket is unlikely to be generated during the next 15 years. The viability of an additional supermarket may also be affected by the remote servicing from supermarket retailers based in the City of Albany.</p> <p>Without a retail sustainability assessment (impact test) available for perusal this statement cannot be validated. Note: Planning officer advises that assessment prepared but document confidential, two IGS stores (existing) consulted in preparation of report.</p> <p>Note: The assumptions and findings of an impact test should be validated through an independent peer review, which has not occurred.</p> <p><u>History</u> Early 2000 the Shire of Denmark (as owner) zoned lot 50 Corner Hardy Street and South Coast Highway as commercial and sold site as a future site for supermarket. Sale funded construction of new Shire offices. Lots from Short Street to Ocean Beach Road zoned commercial, by amendments to TPS3.</p> <p>Metcash (IGA) parent company purchased the site in a bidding frenzy against Woolworths and Coles. The purchase shut the gate on supermarket opposition as no other large commercial site zoned in TPS3.</p> <p>Woolworths negotiated with the owners of Mitre 10 and service station site to investigate the possibility of relocating the hardware store. As no land available for service commercial the hardware could not relocate – negotiations ceased.</p> <p>Coles and Woolworths met with LG on possible alternative site for supermarket.</p> <p>Woolworths and Coles commenced on-line delivery service to Denmark as commercial site could not be procured, at that stage.</p> <p><u>Comment</u> Super IGA (1600m²) andIGA (300m²) service a population of 6500 residents, expanding to 18,000 during peak tourist season. Due to high</p> | <p>Upheld (in part).</p> <p>It is accepted that there is both significant latent demand (ie. past population growth that has not been met by the expansion of services) and a tourist and seasonal population that may support investment in new and/or expanded supermarkets in the near term. Officers therefore recommend that the Strategy maintains an opportunity for the potential development of a supermarket as this is a key commercial service to our community.</p> <p>Acknowledging that this may not be feasible within close proximity to the centre of town, a position on the periphery may need to be supported. Lot 50 (#82-90) South Coast Hwy is the only undeveloped, unconstrained, and sufficiently sized landholding within a reasonable distance to the Denmark Town Centre that is capable of accommodating a major supermarket development.</p> <p>Other than allowing for the development of a supermarket, it is recommended that the Strategy maintain support for the existing main street ‘village’ precinct and avoid the potential undesirable social and economic impacts that would result from the fragmentation of commercial land uses. It is proposed that the Strategy does not support the establishment of any shop or supermarket land uses on other commercial lots to the west of Short Street and Millar Street, identifies the need for improved connectivity between Lot 50 and the existing main street ‘village’ precinct, and recommends initiatives to maintain and enhance the vitality of the precinct.</p> |
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| | <p>absentee residential ownership plus year round tourist numbers the in-house population of Denmark is approx. 7500 people in low tourist season. Population continues to grow along with tourist numbers.</p> <p>Woolworths/Coles have previously completed supermarket \$ spend by Denmark residents shopping in Albany and would continue to survey in the likelihood a suitable site is available for a supermarket.</p> <p>If a supermarket (commercial zone) available to accommodate a mid-size supermarket (2500m²) the 3 main major supermarket chains would be interested based on population and grocery spend.</p> <p>Substantial retail leakage to Albany not only in grocery shopping would be dramatically reduced.</p> <p><u>Recommendation to WAPC</u> The impact test (peer reviewed) should be released by the LA to determine if –</p> <ul style="list-style-type: none"> • Is there a demand for additional supermarket floorspace. • How will a proposed supermarket impact on the role of existing supermarkets if located on the commercial site in Hardy Street (Note: previously approved by DAP) or other commercial site. • What are the anticipated benefits to the community. • Will the proposal (supermarket) contribute to employment. • Will the proposal contribute to new community benefit – ie: reduce leakage to Albany. • Traffic study to support location of another supermarket. <p>If the impact study supports the additional supermarket the strategy should indicate such and plan accordingly.</p> <p>Submission - Service Commercial Zone</p> <p>Page 70 of the strategy 3.2.3.2 Page 71 Strategy and actions Page 139 Planning area A – Map – zoning changes</p> <p><u>Strategy proposal</u></p> | <p>Modifications to the Strategy are recommended that include:</p> <ol style="list-style-type: none"> 1. Acknowledgement that Lot 50 (#82-90) South Coast Hwy is the only undeveloped, unconstrained and sufficiently sized landholding within a reasonable distance to the Denmark Town Centre that is capable of accommodating a major supermarket development. 2. Require any supermarket development at Lot 50 to provide pedestrian links to the Town Centre to maximise connectivity, and appropriately assess traffic impacts and provision for improvements to the surrounding road network. 3. Acknowledge the need for activation, placemaking and urban design enhancements to the Denmark town centre, to support the viability and vitality of the town's main street commercial environment. <p>Upheld (in part).</p> <p>Accepting Lot 50 South Coast Highway is likely to be a supermarket site into the future leads to a rethink on the future of the area identified for Service Commercial along the remainder of South Coast</p> |
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| | <p>Rezone from Short Street to Hardy Street from commercial to service commercial as the strategy seeks to preserve visual amenity, by avoiding inappropriate commercial sprawl on entrance to Denmark town centre.</p> <p><u>History</u> Lots from Short Street to Hardy Street zoned commercial by scheme amendments, supported by Policy No 31 since 2000 to allow for new supermarket lot 50, Mitre 10 Hardware expansion, and commercial uses on the smaller lots along South Coast Highway. The strategy statement above is not relevant.</p> <p><u>Definition of Service Commercial</u> Schedule 1 – Model provisions Part 3 Cl 16</p> <p>Service commercial – to accommodate commercial activities which because of the nature of the business, require good vehicular access and or large sites ie: bulky goods.</p> <p><u>Definition of Commercial</u> Model provisions</p> <p>To provide for range of shops, offices, restaurants and other commercial outlets.</p> <p><u>Present uses of lots</u> Excluding the Hardware and service station which have been on site since 1950 The uses are – Bike shop Catholic Church – unlikely to relocate Podiatrist Small tool sales 2 houses Recently approved Physio office – construction commencing Feb 2024 Tyre sales & repairs Previous travel agency office – for lease</p> <p>Apart from the tyre sales all other uses fall within the commercial definition.</p> <p>Most lots are generally small in area, 500 – 800m². To generate a large lot for service commercial would not be viable as a number of lot purchases would be</p> | <p>Highway.</p> <p>In response to submissions received, support for this area to be retained in the Commercial zone is recommended and an alternate strategy for providing service commercial land is proposed. This will support the maintenance of all current land uses.</p> <p>Reverting to a Commercial designation along South Coast Hwy will correspondingly reduce Service Commercial land availability. This includes the availability of development sites for larger businesses, which the Draft Strategy had proposed Lot 50 could accommodate. In response, it is proposed to modify the Draft Strategy to designate the Denmark Light Industrial Area (LIA) for Service Commercial uses. Compared to the Light Industrial designation in the Draft Strategy this will allow for a wider range of business opportunities and provide stronger commercial impetus for the transition of the LIA to land uses more compatible with its surroundings.</p> <p>The consolidation and uplift of the LIA is recommended over the establishment of an entirely new service commercial area. The existing LIA has opportunities for expansion, major development sites, and for the potential extension of a reticulated sewerage service to the area. Changes to the LIA will be enabled by the availability of land within the East Denmark Industrial Estate, which will provide for industrial businesses to relocate.</p> |
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required.

Metcash (lot 50) unlikely to support downgrading of zoning of lot 50 previously approved for a supermarket.

Strategy maps showing lot 50 (Metcash owned) as service commercial, however the text flags the site as future medium-high density or mixed use development ie: no service commercial.

What is the strategy proposing?

Conclusion

Lot 50 in the draft strategy could be service commercial of medium-high density housing ?? Unlikely Metcash have been consulted on the draft strategy.

Majority of current uses are commercial, not service commercial. (Commercial supported by TPS 3 and policy 31).

Lots are too small for service commercial.

Catholic Church unlikely to relocate (2 lots).

Possible vehicle access issues with main roads.

The commercial zoning exists, by zoning service commercial will not preserve visual amenity as the strategy states and may well be a negative outcome.

Thorntons Hardware have been negotiating and it was flagged by the Shire's previous planning staff and CEO's over the last 15 years that strategic planning will create a service commercial zone with a 13,000 – 15,000m² lot for a hardware store. As this has not eventuated adjoining properties have been acquired for expansion of the existing hardware store.

The 2012 strategy showed the corner of Mt Barker Road and South Coast Highway as future bulky goods zoning, this has been deleted in the 2022 draft strategy.

This strategy fails to plan for service commercial catering for bulky goods businesses.

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| | <p><u>Recommendation to WAPC</u> The strategy fails to allocate a greenfield site where large lots, vehicle access, reasonable land costs could be the formulae for a service commercial zoning. Request the WAPC to advise the Shire of Denmark to review the strategy in relation to a service commercial zone, prior to final approval of the strategy.</p> <p>Submission – Denmark River Crossing</p> <p>Page 131. 3.4.4.1</p> <p>The Shire of Denmark’s Town Planning Strategy released in 2011 clearly identified a need for a second crossing point over the Denmark River.</p> <p>The Great Southern Development Commission developed a business case for RfR funding which was subsequently granted by the Government for the construction of an alternative route over the Denmark river. 2017 - The Labour party won the WA state election and withdrew the funding because of a budget deficit. 2018 - The Shire commissioned GHD to carry out an evacuation management study.</p> <p><u>GHD Study</u> (referred to as subsequent modelling).</p> <p>Study area based on 2 intersections Sampled traffic flow During school week During Easter school holiday period Sampled waste water and water consumption to determine population increase in peak holiday periods.</p> <p><u>Findings from the study</u> Based on water analysis there is a 10-20% increase in the Denmark population (and hence traffic volume) during the peak summer and Easter holiday periods. (ie: an additional 600 – 1200 people in Denmark.</p> <p>Assumed that 20% of the total Shires population (1200 people) would be evacuated – free of any unforeseen chaotic incidents.</p> | <p>Noted.</p> <p>It is agreed that the assessment of the total population of Denmark on any one day in summer was considerably understated in the Denmark Traffic and Evacuation Management Study from June 2018 and currently estimates suggest a figure closer to 16,500. It is noted that any evacuation of Denmark would occur in a progressive and staged manner in accordance with the direction of emergency services.</p> <p>Since the preparation of the 2011 Local Planning Strategy and the Traffic Study mentioned above the Churchill Road bridge has been upgraded and is acknowledged by this Strategy as a second road crossing of the Denmark River, which also provides for evacuation in an alternative location and direction.</p> <p>The Draft Strategy takes a position consistent with previous Council decisions, that:</p> <ul style="list-style-type: none"> • Based on anticipated traffic and freight volumes an additional bridge is not expected to be required during the life of this Strategy, and it is therefore not appropriate to identify the location of a potential future bridge at this time. • Further improvements to the existing road |
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| | <p>Using the existing South Coast Highway bridge, all inhabitants could be orderly evacuated west to east within 1.5 hours – assuming 6000 permanent residents plus 600-1200 visitors during peak tourism periods.</p> <p>Traffic volumes were slightly lower during the holiday period (see figure 6 of report).</p> <p>Modelling suggests no significant increase in traffic before 2027.</p> <p>Turn counts at all key intersections not conducted. Recommended to conduct extensive surveys for turn counts at key intersections, as well as travel time survey for validation purposes.</p> <p>GHD excluded implied warranties and conditions, conclusions and recommendations are based on assumptions made by GHD and disclaim liability from any assumptions being incorrect.</p> <p><u>Disputed findings of the report</u> Using water waste and usage to determine visitor numbers is flawed. Waste (sewerage) is only available to the central area of the Denmark townsite – not where the tourists are in any numbers.</p> <p>Assumed 20% of the population (1200 people) would evacuate in the first hour, subject to no complications with traffic, within 1.5 hours 4500 people would have evacuated.</p> <p>Underestimates population increase from 2018 until 2027. Assuming 1% growth projected growth is at 1.3% - population of 6800 by 2027 and numbers increasing to 7800 by 2036.</p> <p>Tourist numbers Report states 600 – 1200 additional population in ‘peak holiday period’</p> <p>Tourism WA ‘Fact Sheet’ 177,000 visitors annually (15 years and over) 702,000 visitor nights – average stay 4 nights 29% visitors in caravan parks</p> <p>Modelled outputs of future year model v’s 2018 base model has used 60km/hr</p> | <p>network (i.e. improving the standard and legibility of Howe/Hamilton and Churchill Roads as a secondary means of crossing the Denmark River) may provide more cost-effective outcomes in the short to medium term.</p> <ul style="list-style-type: none"> • It should be noted that once the Denmark River is crossed near to town, there remains only one crossing point for the Hay River at its southern extent. It may be more sensible to encourage the second crossing to be further north (Churchill Road) to offer a true second option if leaving the district. • As a means of supplementing the regional road network, any potential future investigations into a new bridge should be led by the State. <p>The Strategy takes a holistic approach to reducing bushfire risk consistent with the expectations of State Planning Policy 3.7, including limiting the extent of development directly exposed to bushfire risk.</p> |
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to indicate total vehicle movement in 2018 and 2027. The current speed limit of 50km/hr in the town centre and vehicles are unlikely to travel at 50km/hr speed in the central commercial zone.

Total vehicle movements (table 2) in GHD report could not be achieved within the 1 hour timeframe in an evacuation event.

A previous survey conducted by the LA in 2014 showed an increase of 10,000 – 12,000 tourists per day in peak holiday times (excludes people staying with family which could not be determined). (Day trippers not included).

The Ocean Beach Caravan Park alone accommodates 3,000 tourists in peak holiday periods.

‘Denmark is a tourist destination’ contrary to the GHD report statistic’s.

Evacuation modelling

In relation to any modelling exercise, a simulated scenario is only as good as the data and assumptions used to underpin it. In this regard the evacuation model seeks to

‘enable the modeller to trace the location of the fire front and back of queue during the evacuation and for a safe evacuation the back of queue should always be ahead of the fire front’.

For such real life conclusions to be made a more sophisticated complex model would be required. The GHD report adopts a simplistic traffic model which excludes the blending of traffic at key intersections in a bushfire event.

An evacuation model should accurately reflect and justify complex assumptions relating to

- Fire assumptions (including environmental stimuli such as smoke, embers and evolving warning and incident updates).
- Traffic conditions, including a detailed analysis of trip generation/distribution, personal driver behaviour and vehicle ownership assumptions. ie: 29% of tourists in caravan parks exiting with caravans or trailers in tow.
- Demographics and household behaviours, including a detailed analysis of those who stay/return to stay and defend and those who make multiple returns to pick up animals.

The Denmark evacuation model should report on four separate bushfire scenarios, characterised by fire fronts approaching from the west, south west, north and north east. The simulation is to inform the progressive closure of key transport and local roads.

Conclusion

The GHD model does not demonstrate in absolute and quantifiable terms a 'timely and safe' evacuation.

Their assumptions on tourist numbers is at least 10 times lower than peak holiday periods, speed per hour on South Coast Highway incorrect and no blending of traffic at key intersections has been factored into the report.

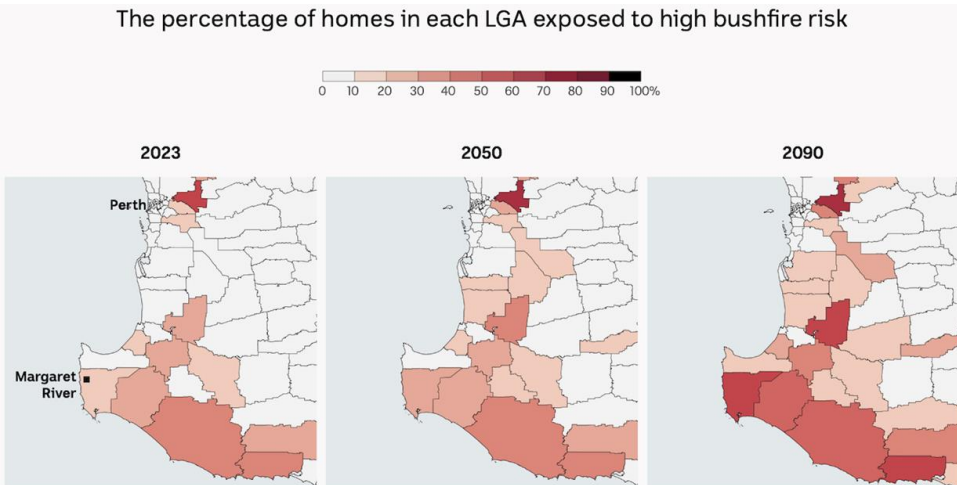


The GHD model does not recognise that Denmark has a very highly aged population, aged care and hospital evacuation requirements and driver behaviour with the elderly.

Draft Strategy

The strategy aims for intensification of urban development within 800m of the town centre – recommends structure plans allocate 10 per cent of area to a density of 25 houses per Ha. It is critical that the structure plan proposals, through the Bushfire Management Plan and other supporting information can demonstrate compliance with element 3, vehicular access of State Planning Policy 3.7. The strategy removes the future proposed river crossing previously shown in the 2011 strategy based upon the flawed evacuation study prepared by GHD. The data and assumption in that report are incorrect, the report is simplistic in modelling and does not show that evacuation of the population (6500 residents and 12,000 tourists) in peak tourist season would be achievable in the event of a bushfire occurring.

The majority of the Shire has been designated bushfire prone, however on page 108 of the strategy report it notes that – in 2017/2018 detailed investigations were undertaken which concluded that the current access was sufficient for the foreseeable future. The planning staff/Council should not have accepted/endorsed the report as an evacuation model due to assumptions and data provided.

Submission to WAPC

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| | | <p>The WAPC delete all references in the Strategy which removes the need for a second road crossing across the Denmark river as;</p> <p>The technical information which forms the basis of the GHD evacuation study (referred to in the planning strategy) does not include adequate or accurate details to demonstrate that the risk of impacts from a bushfire, including safe evacuation in a bushfire emergency is acceptable.</p> <p>The true impact on the future local and regional road network has not been demonstrated by the removal of the second access bridge previously approved by the WAPC in the Shire of Denmark Planning Strategy 2011.</p> <p>The percentage of homes in each LGA exposed to high bushfire risk</p>  | |
| <p>S35</p> |  | <p>Denmark own property 57 South Coast Hwy, on behalf of the Catholic Church and the parishioners I wish to oppose section 3.2.2 Denmark Town Centre, strategies & actions - Primacy consolidations 1.(d) to reclassify all land zoned Commercial west of Millar and Short St to the Service Commercial Zone.</p> <p>The vacant lot 57 South Coast Hwy, we propose to eventually build a church on this land.</p> | <p>Noted.</p> <p>The Service Commercial designation for lots along South Coast Highway indicated in the advertised version of the Strategy are proposed to be changed to a Commercial designation, including lot 57 South Coast Hwy. The Commercial designation will not inhibit the planned development of a church ('Place of Public Worship') on this site.</p> |
| <p>S36</p> |  | <p>I am opposed to the 9 tourism zones, in particular the William bay area. In the planning strategy it states that it will:</p> | <p>Upheld.</p> <p>In response to the large number of submissions</p> |

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| | <p>[REDACTED]</p> | <ul style="list-style-type: none"> • Contribute to protecting and managing the Shire’s environmental features and ecological communities. The impact of the tourism is currently being witnessed with an increase in litter, environmental damage and road/ parking rage. People are attracted to these areas. How can we protect William bay with tourism zoning that will magnify traffic in the area? • Protect and conserve the quality and quantity of the Shire’s natural resources . William Bay is more than a natural resource; it holds meaning as a place of tranquility, to ground people in the awe and wonder of nature. People of all ages walk, run, cycle and swim here in a mindful way. Denmark Shire website has photos of this natural resource - will it still exist as it is if there is tourism zoning? • Identifying conservation values and avoiding conflicts with development. Promoting tourism zoning is in conflict with the environment's need for conservation. How can ecotourism be achieved when there will be an increase in the number of footprints, car tread and bike damage? The recent decision that ignored 26 rate payers submissions against the development opposite William Bay road demonstrates how business is given president over the environments needs. The environment will be degraded and pay for this tourism zoning decision. • Protect key environmental resources for sustainable long term use. How is the Denmark Shire going to answer to future generations? There is no consideration beyond the current councils greed for income. What will shire councilor's tell there great, great, great grandchildren about Greens Pool, Madfish bay and Waterfall Beach? <p>Thankyou for the work you have done on the Draft local planning strategy, it needs refinement and to exclude William Bay from tourism zoning. I look forward to hearing how you consider this submission.</p> | <p>received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts.</p> |
| <p>S37</p> | <p>[REDACTED]</p> | <p>I would like the shire to consider the following items relating to our property on Lights Road (Hn 665), which is currently zoned landscape protection and subject to change.</p> <p>1. Can condition 6 & 7 be removed as we believe that this will be a burden to the planning team and council to seek approval.</p> | <p>Noted. The Local Planning Strategy does not go into this level of detail regarding specific zone provisions. A review of existing requirements for each Landscape Protection Zone and the creation of proposed development requirements for the new Rural</p> |

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| | | <p>2. Can conditions 9 & 10 allow the use of Zinalume for buildings and rainwater tanks. the property has planted screening along the boundaries and adjacent properties all have zinc building materials with little to no screening from lights road.</p> <p>3. Can the additional proposed land uses be included, Bed and Breakfast, Holiday accommodation and/or chalets, or a second dwelling (which this may help with the housing shortage).</p> | <p>Residential zone will be undertaken and advertised as part of the planning scheme review, which will take place at a later time and will provide landowners and the community with an opportunity to have input and provide feedback in relation to these finer details. The comments provided in this submission will be considered as part of the scheme review process.</p> |
| S38 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p><u>What are the strategies or actions in the draft Strategy that you support and why?</u></p> <ul style="list-style-type: none"> • I support the intent to increase density for the Denmark town center, as detailed in the draft Planning Strategy document (Section 3.1.4.1 Urban infill and Consolidation), at the same time as encouraging housing diversity and mixed use. • The problems with Rural Residential zoning is well articulated in the Strategy (Section 3.1.4.3 Rural Residential). For example, the Strategy identifies that current BAL requirements will now lead to loss of remnant vegetation rather than preservation; and also identifies water quality problems for waterways. I support the actions identified in Strategies and Actions – Rural Residential to ameliorate these issues, particularly Point 2 : Not allowing any further Rural Residential zoning and only supporting the retention of existing Special Rural zoned property (rezoned to Rural Residential)), and Point 3. Increasing function and utilization. • I appreciate that the Strategy acknowledges the importance of infrastructure to support sustainable development and urban expansion. The retention of sewerage sensitive areas around waterways including Wilson Inlet and lower Denmark River in accordance with the Government Sewerage Policy (2019) is arguably the most important infrastructure requirement. Whilst not currently designated a sewerage sensitive area, the Frankland River around Nornalup should be protected with the same requirements as a sewerage sensitive area, or other special conditions on future development that will be required to | <p>Noted.</p> <p>Lots located within 2km of the Frankland River are considered a sewerage sensitive area under the State Sewerage Policy (2019).</p> |

preserve water quality.

What are the strategies or actions in the draft Strategy that you do not support and why?

Regarding Section 3.1.6.1 Rural Settlements I disagree with the assessment that “Nornalup has the strongest attributes of the proposed rural settlements to accommodate and benefit from additional development”, for the following reasons:

- Nornalup is at the very edge of the Shire boundary, and as such is difficult to service, regulate and police. Walpole is only 10km away, and is a much larger town, with existing infrastructure capable of servicing the tourism requirement in the area. The Denmark Shire should acknowledge that Walpole (and Manjimup Shire) are better placed to service these requirements, even for those tourism assets located in the Denmark Shire. If tourist dollars are the concern, then accommodation and food are one of the biggest sources of income, and a low impact means of the Shire receiving this income is via ancillary dwelling laws for existing residential properties, and encouraging commercial investment in the existing zoned properties on the South Coast Hwy.
- Nornalup is situated too far from a large population center to be a viable location for permanent habitation by working families. Existing residential properties are largely used as holiday homes, with a small number as permanent residences for retirees. Increasing the size of the settlement will not change that, and will only result in an increased servicing and infrastructure spend for the Shire for no reason.
- The Frankland River will be very sensitive to pressures from increased urban development, as well as the associated increased direct usage (e.g recreational boating), resulting in erosional undercutting of the riverbank, trampling of vegetation and adverse impacts on water quality. As such your earlier statement should over-ride the consideration of Nornalup as a site for additional urban development: “All of the existing and proposed rural settlements are without a reticulated sewerage service and are within a

When compared to Peaceful Bay and Bow Bridge, which are the two other rural settlements identified by the draft Strategy, Nornalup has been recognised as having the best prospects for additional development, given the presence of cleared land contiguous with the existing townsite which is not impacted by flooding. Also, Nornalup is approximately a 10 minute drive from Walpole which does provide commercial and community services, which potential growth may enable the sustainability of, noting that development opportunities in Walpole are likely to be limited (subject to planning by the Shire of Manjimup). Any proposal for the growth of Nornalup townsite will be required to address issues in detail regarding bushfire constraints, appropriate wastewater disposal in a sewerage sensitive area, environmental impact, and visual landscape values, and many other considerations as part of any rezoning, subdivision and/or development application process.

designated 'sewerage sensitive area' under the Government Sewerage Policy. On the basis that this Strategy does not support the designation of additional land for rural residential subdivision, the establishment of a reticulated sewerage service is therefore a pre-requisite for further development."

Do you have any other comments or suggestions about the draft Strategy?

- Greater/ ongoing partnership/ dialogue with DBCA may be required to ensure good environmental outcomes for the entire Shire.
- Allocation of Shire resources may be required to ensure that usage is focused in locations where infrastructure is best able to support the volumes of people, but deter usage in sensitive locations where infrastructure is lacking. A push-pull approach is needed. For example, improve signage to direct people to locations with good infrastructure support (e.g. Prawn Rock Channel and iconic locations such as Williams Bay), but remove signage/ block access to sensitive locations where infrastructure is lacking and environmental damage can occur (e.g. parts of the Wilson Inlet foreshore degraded by 4WD vehicles, rubbish, toilet paper and human waste).
- Where infrastructure has been constructed to improve public access then increased regulation is needed to prevent environmental damage arising from increased usage. I specifically refer to the increased number of powerboats that will use the Frankland River at Nornalup as a result of the new boat ramp. The river bank is already suffering from undercutting erosion, and this will only get worse with increased traffic. The 5-knot limit upstream of the bridge is not being adhered to, and will need to be policed.
- Recognition and protection of its tourism assets has not always been done well by the Shire e.g. the Lookout at the end of Mohr Drive unquestionably provides the best vistas anywhere in the Shire, however the public will lose access to those views as adjacent landowners progressively develop their blocks, which is now occurring. The original subdivision was made by the ██████████ in the 90s, but with the blocks only sold separately in the past 4 years. Those blocks adjacent to the lookout should have been bought by the

Comments relating to the management of reserves are noted, but outside of the scope of the Local Planning Strategy.

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| | | Shire to preserve public access to those views for perpetuity. | |
| S39 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>I read the draft looking for issues that I wanted to comment on. Overall the Shire seems to have a pragmatic approach to the inevitability of growth, and stress the desire to maintain the village feel and attempt to support all stages of life in the community. I am happy you are not supporting a ring road. It made for an ugly approach to Margaret River, and Albany is depressing to drive in to. I like that you support helping individuals develop rather than developers who have created suburbs like Rapids Landing in Margaret River, where, if you were drunk you would not know which was your house because they all look the same, and are jammed up close.</p> <p>I am confused about the Shire's comments on private holiday homes - "the inefficiency, inequitability and unsustainable use of the Shire's resources and the Shire's housing stock". It reads as though we are a Communist regime. Many people bought holiday homes decades ago and support locals to maintain them in their absence - less than a decade ago houses in Denmark could be listed for a year without a bite. Do you begrudge our world class epidemiologist [REDACTED] from having a holiday home here which she does not get to use often? We live in a democracy and those with money or who have gone without to save, farmers who have holiday homes to take a well earned annual break etc etc. Are you going to appropriate these holiday homes ? And what about the hierarchy of "deserving". The Mohanje - an Indian religious organisation was permitted to buy the beautiful Nornalup caravan park and now it is private. We allow foreign investors, we allow Eastern States investors, we allow WA investors. We have Fifo workers who only live here half the time. Are you going to knock on doors and interview us to determine our rights? What about the growing number of FB users on The Bulletin Board who say they are coming to live here because they want to, but have no place to live and no job. Intrigued also by your comments on the unsustainability of large lifestyle plots - so judgy. Are people undeserving of them? If they wanted to be living cheek to jowl they would be in Perth. Your Draft Scheme is decorated with lovely scenes from nature but there are plenty of red (communist) flags. Talk of maintaining remnant vegetation - where is the policing? Lots of huge trees being chopped down in Weedon Hill to accomodate caravans and other</p> | <p>Noted.</p> <p>The Strategy is required to examine local housing issues, including the availability and affordability of local housing and the reasons for local trends. Housing data available shows a number of trends in Denmark that have been discussed in detail within the strategy. Given the acute nature of housing issues in Denmark, it is reasonable to examine the causes and contributing factors which have a significantly impacted Denmark's housing market, and current issues regarding the lack of housing availability and affordability.</p> <p>The WA Planning Commission has adopted a position that does not support the further development of land for rural residential purposes, and the Strategy discusses this within Denmark's context.</p> <p>In 2015 the State Government introduced policies for bushfire protection that require substantially more clearing than would have been anticipated when many of the residential, special residential and special rural lots in Denmark were first created. This has resulted in direct conflicts between the desire to retain and live amongst trees and the need (and</p> |

stuff. Jack Ricketts Drive - beautiful bush block razed and your answer to upset residents was it was too late. Nothing to be done. Bracknell Crescent - every tree gone on a block where a house to be built. It's easier for developers to knock down everything. Your best practice guidelines proposal for constructions. Unfortunately, with cost of materials and builders , people cant afford to buy "best practice". It is the era of cheap modular shed like constructions with the landscape decimated because of over the top BAL ratings requirements. Even bare land can be burnt multiple times by fire. Multiple occupancy - the Peace Street community centre looks like the tip. And allowing businesses to be conducted from home - all the dump bins and junk on the front lawn of a property on a tourist road. Unfortunately people flock to beautiful places , they get spoiled and somewhere else gets targeted but we are running out of places. I think there has to be serious thought given to the whys of development for Denmark. Cant we just leave a few beautiful mostly unspoilt places that are special to visit and marvel at the trees and the ocean, and feel in a safe environment. Margs has been uglified. Denmark became the new old Margaret River. Wish we could keep it that way. I did vote in the Shire election. Appreciate having people who will step up to work for the community

Tourist season

We are at capacity during Christmas and Easter. The town, the attractions are not set up to accomodate big increases over the present numbers. Our fragile landscape , our visual landscape and natural constraints of our beaches would be seriously impacted.

Nannup is a great example of how a village has maintained its village feel, limited growth and yet thrived by creating a destination that attracts tourism year around. They have so many festivals, they have made mountain biking a major attraction. I have lived in Nannup, know several tourist operators and Shire employees, and residents. Overall, everyone is happy and doing well and do not feel threatened by over development. Supporting Denmark Arts to create off season weekend arts festivals and promote wine and food attractions who can also add events and musicians for those weekend getaways.

statutory requirements) for minimising bushfire risk. The Shire has provided feedback to the State on the implementation of these policies and the Strategy proposes to investigate local variations from these requirements, where possible, to account for the unique local conditions and our community's expectations.

In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts.

The Strategy supports tourism business operators expanding or starting enterprises that encourage

Kayaking adventures can be done in winter. Mountain biking. Promoting Bib walks with and other bush adventures the easier way with pick ups, good meals and accommodation. Yes, the Bib Foundation does do some, but Tas is a success in this area. You need an ideas team and a great marketer with lots of tourism experience, and connections.

Make our winter wet cold weather attractive, log fires, good food and wine after a day of adventure. A great opportunity for a business selling adventure clothing to withstand the weather. They could also be an outlet for booking that kayaking adventure etc.

Both Nannup and Margaret River have mountain bike shops/cafes. The one in Margs also rents bikes. Cafes with bike secure areas are attractive. Cowaramup, Nannup, Witchcliffe.

In Victoria, Mansfield has Mount Buller in the winter, and has made a summer tourist season , promoting mountain biking, horse riding and river fishing.

Weedon Hill Development Proposal for a Resort where The Cove is situated

As well as destroying a beautiful tract of land and creating wealth for the present owners, the location is wrong on many fronts. Weedon Hill is a small area with a large number of residences close to street frontage. It is where people go to see and listen to the big Karris and enjoy the peace. If there was a fire currently, there would be a queue to get to Campbell or Ocean Beach Road . Traffic would increase dramatically in this residential area which has a growing number of permanent residents as opposed to holiday homes. And in the case of a fire, it would be chaos.

There is a story about a development in Queensland where all the trees were removed and the development was called Koala Grove, and the developers wondered what happened to the koalas.

With the current BAL ratings and developers mode of clear all to cut down costs, the landscape would be changed forever, with one saving grace - they can't touch The Inlet. People would prefer Bali for the Resort experience -

visitation during off-peak times of the year. This would be supported, in line with the Shire's Sustainable Tourism Strategy.

The Shire is not aware of any proposal for a resort in this location.

Rezoning of land and approval for tourism development is not a given for any land identified as being within a tourism precinct in the Draft Strategy. The existing statutory processes for planning assessment and approval would continue to apply. As above, proposed modifications to the Strategy recommend removing the identification of tourism precincts on account of community feedback.

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| | | <p>cheaper.</p> <p>Leave resorts to other towns which have been developed to the max and uglified in the process.</p> <p>So sad the dollar drives us.</p> <p>Infill development</p> <p>People in country towns always need cars. Will there be parking areas for these close developments?</p> <p>Byron Bay is now on the list of Shitty Towns not to visit, over developed, lots of restrictions on parking and beach usage. Even the Hemsworths have left. Look at Dunsborough and Margaret River.</p> <p>I just cant envision attractive small developments right in town. And it has to change that village feel.</p> <p>Why not have the reputation as the Shire who would not allow Denmark to go the way of beautiful places which fell to locusts who came in and sucked them dry of all the things which made them alluring in a world with more ruin than beauty and tranquility.</p> | <p>Infill development as proposed by the draft Strategy will continue to enforce car parking requirements and other minimum standards that protect the streetscape and amenity of surrounding areas.</p> |
| S40 | <p>[REDACTED]</p> <p>[REDACTED]</p> | <p><u>What are the strategies or actions in the draft Strategy that you support and why?</u></p> <p>to not further fragment rural land and habitats - we live in an ecologically valuable part of the country and need to preserve what we can - pressures on habitats and species are huge supporting anxillary dwellings development and THOW trials & cooperative housing - create efficient and effective housing options for locals that are less resource intense than large dwellings & McMansions prioritising pedestrian movement & universal access - this needs to be hugely improved before any further growth of our town is even considered develop public art - adds to the liveability; creates jobs for arts community; enhances well being of locals and visitors establishment of environmental conservation lots - preserve valuable habitat ESD principles for all developments - and do this well with checks and balances support of hosted vs unhosted tourism accommodation - to minimise negative impacts to local</p> | <p>Noted.</p> |

residents

What are the strategies or actions in the draft Strategy that you do not support and why?

minimum density requirements within 800m from town residential areas - people should decide this for themselves targets for high density developments - possibility is fine, but this shouldn't be mandated as individual owner occupiers who live in the town area value their gardens, natural outlook and privacy as much as the owners of lifestyle blocks or rural areas; to increase the density the infrastructure needs to be brought up to scratch first as it is inadequate now. Many residential streets have no footpaths at all even though they're walking distance from the town centre. incentivising any housing type - assuming this involves financial incentives; financial incentives just make housing less affordable - this has been very evident with recent federal government incentives tree farms - tree farms make no sense while we're having mandatory burns of valuable habitats in their vicinity - we should preserve our natural habitats and manage them appropriately before we look at tree plantations establishment of tourism precincts - I don't support further tourism growth and larger scale rural tourism development in precincts. Individual applications should be assessed on their merits, but the creation of precincts goes too far. Our town's infrastructure and services already cannot cope with the influx of tourists during peak times. Our medical services are under-resourced and all of our infrastructure is designed for the usual residential population (just look at the current impact on broadband speeds and the increase in power outages in summer when tourist numbers are up). The two main intersections in town are unsafe during Dec/Jan; William Bay NP is being loved to death (and still has no bins!!!!), the bird sanctuary is ignored etc.. We have enough tourists that visit our town now - I am against turning Denmark into another Margaret River Region just because we have wealthy investors who see opportunities to rake in money down here. I live here because of Denmark's natural beauty and because it is a small community. I would rather see a strategy that turns Denmark into a community that does 'enough' well rather than actively pursuing further growth. Existing tourism businesses are unable to cope well with existing tourism numbers at peak times and many struggle due to lack of customers during off peak times, so creating precincts will not do them any favours either. Some of the proposed precincts are in areas that aren't even connected to sewerage. Many have (or are adjacent to) naturally attractive landscapes and where existing residents will suffer significant negative impacts by their development. I think we should do

The proposed minimum density requirement under action 2(a)(iii) in the Infill and Consolidation section (3.1.4.1) seeks to preserve the opportunity for some infill development to be achieved in future, and does not mandate that any landowner must develop at this density. Sufficient area could simply be used for gardens, front/back yards and driveway, and buildings placed accordingly so that the density target may potentially be met in the future. Denmark has limited serviced and developable residential land due to several common constraints (slope, bushfire, infrastructure networks), therefore the draft Strategy seeks to use capable land as efficiently as possible, in a form that preserves Denmark's existing built form and character, instead of encouraging urban sprawl.

Upheld (in part).

In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that

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| | | <p>existing tourism better (for tourists and locals) rather than promote an increase in tourist numbers.</p> <p><u>Do you have any other comments or suggestions about the draft Strategy?</u></p> <p>While I think that the strategy largely has good intentions it doesn't consider the needs of our permanent population enough.</p> | <p>explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts.</p> <p>The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |
| S41 | <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>Might I express my opposition to the changing of the purpose of the Denmark No 3 Railway Station Reserve (no.30277) at Lot 952 on PO39348 (2) Inlet Drive to 'public purposes'.</p> <p>As an interested member of the public my concern is that such a change appears to broaden the scope of potential uses for the site. As Denmark's only historic precinct and one that played such a significant role in the town and district's history the protection afford to it should be strengthened.</p> <p>The Council and Councillors should already be aware of the considerable concern held by a large section of the community over the use of the precinct. Changes made to the classification should reflect that. It has already been watered down by the use of the word 'community' to allow a multi million dollar private business to take over a significant area of the site.</p> <p>Will the classification 'public purposes' put the area in further jeopardy?</p> <p>The only changes acceptable would be ones to strengthen protection and to enhance the historic purpose of the reserve. Any less than that should be rejected. Focus on strengthening, not weakening its purpose.</p> | <p>Public Purpose is a broad category and is able to adequately cover all existing uses of the site, including the ongoing restoration and promotion of heritage features.</p> |
| S42 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>The [REDACTED] is totally opposed to the changing of the purpose of the Denmark No 3 Railway Station Reserve (no.30277) at Lot 952 on PO39348 (2) Inlet Drive to 'public purposes'.</p> <p>This move yet again shows that the Shire do not value heritage in any shape or form. And yes while nothing has been done there for many years it is not for the want of trying. A number of times a request for finance to help restore the turntable has been declined. It is the only type of that particular turntable left</p> | <p>Public Purpose is a broad category and is able to adequately cover all existing uses of the site, including the ongoing restoration and promotion of heritage features.</p> |

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| | | <p>in Australia.</p> <p>The railway reserve is the ONLY heritage precinct within the Shire and should be protected.</p> <p>At present the Society is in the process of applying to Lotterywest to place some heritage signage along the rail trail to give its history. Walking/riding trails are becoming more and more popular in Australia and as such we should be promoting them. There are sections that are not maintained and have trees that have fallen across them that have not been removed, a Shire responsibility! What does 'public purpose' imply??</p> <p>The second part the Society is not happy about is the section on Parks to be 'proposed alternative uses of sites'.</p> <p>The Shire used to be a proponent for protected areas like these. They don't need in many cases 'recreational infrastructure'. As they are is just what the community needs to soften the environment. Many of you would not be aware of why parks have certain names and eliminating or changing them is an insult to those soldiers who fought for us as well as pioneers. The size should not matter and should be left as they are. Selling pieces off to developers is definitely inappropriate!</p> | <p>The Strategy supports the development of interpretive signage and infrastructure which recognises local cultural heritage.</p> <p>The Strategy includes a big picture review of all public open spaces under Shire management, recognising the manner in which public open spaces are used, identifying opportunities to prioritise, upgrade and manage public open spaces holistically, to better serve the needs of the community. Reserved land may also be kept for other purposes, such as conservation reserves and utility infrastructure, that is not formally identified as functional public open space for planning purposes.</p> <p>Any proposed rationalisation of public open space will be required to go through a separate Council approval process which includes public advertising, allowing the community to express their view on individual proposals.</p> |
| S43 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>This submission relates to land and existing development, known as the Boston Brewery, located adjacent to the 'East Denmark Industrial Estate' on the South Western Highway less than 4 kilometres east of Denmark townsite.</p> <p>The following description provides a snapshot of the existing development and the status of land surrounding the Boston Brewery. In addition, a brief history of the commitments and opinions of both the Shire of Denmark and Landcorp in the development of the land adjacent to the Boston Brewery.</p> <p>Location</p> | <p>Upheld.</p> <p>It is accepted that the Draft Strategy broadly identified the land to the south of the existing East Denmark Industrial Estate for 'industrial' uses without acknowledging the transition of land uses that has formed part of previous planning for the southern portion of this area, including the existing Special Use zone (SU1) and Light Industrial portion. It is proposed to modify the Strategy mapping to</p> |

Figure 1 shows a recent aerial photograph of the land the subject of the submission in relation to the adjacent land holdings.

FIGURE 1 – BOSTON BREWERY SITE



Source: Landgate, Planwest

The Boston Brewery property measures over 6.1 hectares with direct access to the South Western Highway.

The Boston Brewery

The existing development, including the Boston Brewery, was established in December 2011. The complex operates under a Tavern license with the main activities on site including the brewery, cellar door, bar, restaurant and space for a variety of functions.

reflect this transition of land use intensity and to provide necessary buffers to existing sensitive land uses, including Boston Brewery. The proposed changes to strategy mapping reflect the designations indicated on Figure 5 from this submission.

Since its inception, the venue has been upgraded and expanded several times with each stage providing a substantial investment to reflect the changing relevance of the facility to echo changing interests, composition and numbers of its attendees.

The facility provides a substantial contribution to local employment with 75 staff working at the local venue.

Visitor numbers are continuing to increase with these improvements reflecting diversified interest groups and the growth in tourism generally. It is estimated that there may be upwards of 100,000 visitors annually.

Improvements to the facility in the near future include solar power (with battery storage) and restaurant upgrades to better optimise the choice of eating environments.

Benefits to the local economy are unmeasurable but will certainly have a significant knock-on effect for local accommodation, shopping and other local services.

Current Zoning

Figure 2 shows an extract from the existing Shire of Denmark Local Planning Scheme No 3 (Scheme 3). Clearly showing adjacent property as a Special Use Zone (SU1).

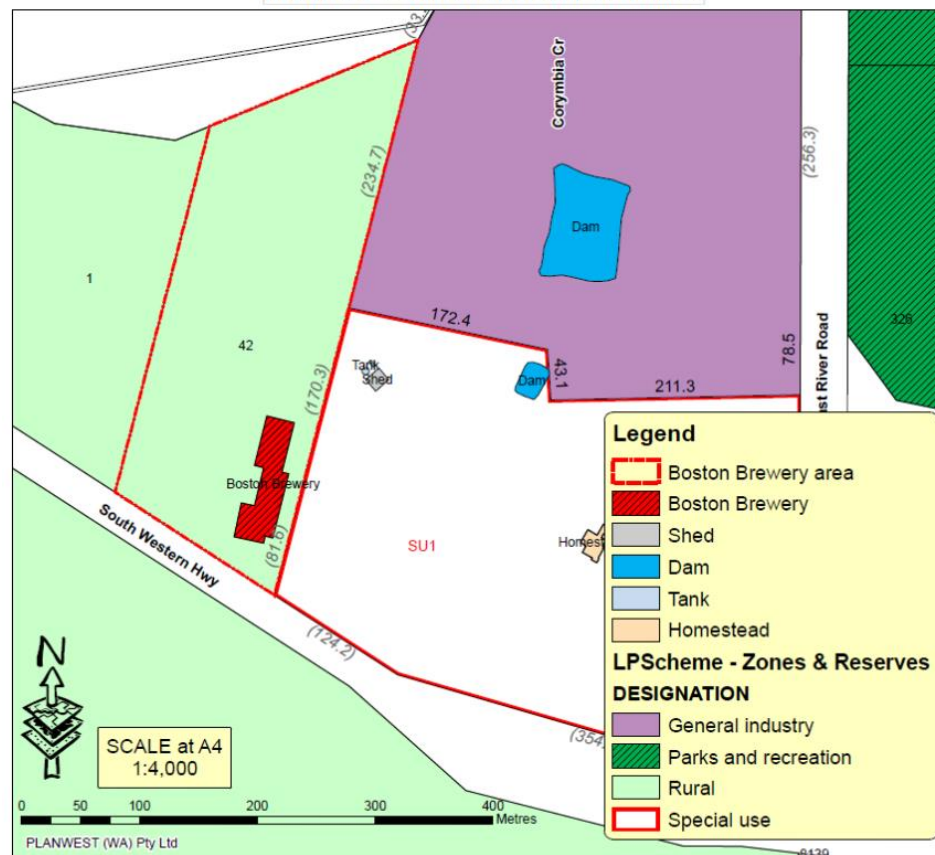
The Boston Brewery land is zoned 'Rural' in which a variety of uses are permitted including Restaurant – AA, Winery – SA and Rural industry – SA.

The adjacent property, with the SU1 notation, refers to Appendix XVIII – Special Use Zones that specifies the Special Use as being 'Rural Enterprise Precinct' with an objective as follows.

- *To provide for light industrial and ancillary residential development on one lot.*
- *To provide for lot sizes in the range of 1 to 4 hectares.*
- *To carefully design rural enterprise estates to provide a reasonable standard*

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| | | <p><i>of amenity (within the precinct and the surrounding locality) without limiting light industrial land uses.</i></p> <ul style="list-style-type: none"> • <i>To provide a transition use between the 'General Industry zone to the north of the precinct and South Coast Highway, acknowledging the precinct's location on South Coast Highway being the 'gateway' into Denmark.</i> • <i>To notify prospective purchasers of potential amenity impacts from industrial land uses onsite and from the adjoining industrial area.</i> <p>The conditions attached to this zone state that only certain land uses are permitted and that a Local Development Plan (LDP) should be prepared and approved by the local government. The only permissible land uses in this zone are:</p> <p><u>'AA' Uses:</u> Light Industry, <u>'IP' Uses:</u> Single House, <u>'SA' Uses:</u> Aquaculture, Garden Centre, Service Industry, Transport Depot</p> <p>These uses are clearly activities that will not emit, or cause any impacts, to neighbouring 'sensitive' properties. The EPA has prepared guidelines for separation distances between industrial uses and sensitive uses.</p> | |
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FIGURE 2 – EXTRACT FROM SCHEME 3



Source: Landgate, DPLH, Planwest

Brief Background

In early 2009 the Shire was seeking to establish a supply of industrial land around the Denmark townsite. The [REDACTED] land (adjacent to the Boston Brewery site shown as SU1 and the industrial land northwards in Figure 2) was identified by Landcorp and the Shire as being potentially suitable for a future industrial area.

In April 2009 the Shire wrote to the [REDACTED] asking whether they would sell their land to the Shire or Landcorp for *light industry*, and providing a definition of light industry emphasising the absence of any land uses that would create

impacts.

In October 2009 the Shire wrote again to the [REDACTED] confirming the points discussed at a previous meeting of the parties, but also offering to rezone the northern portion of the land for industrial purposes, and to assist with development and services.

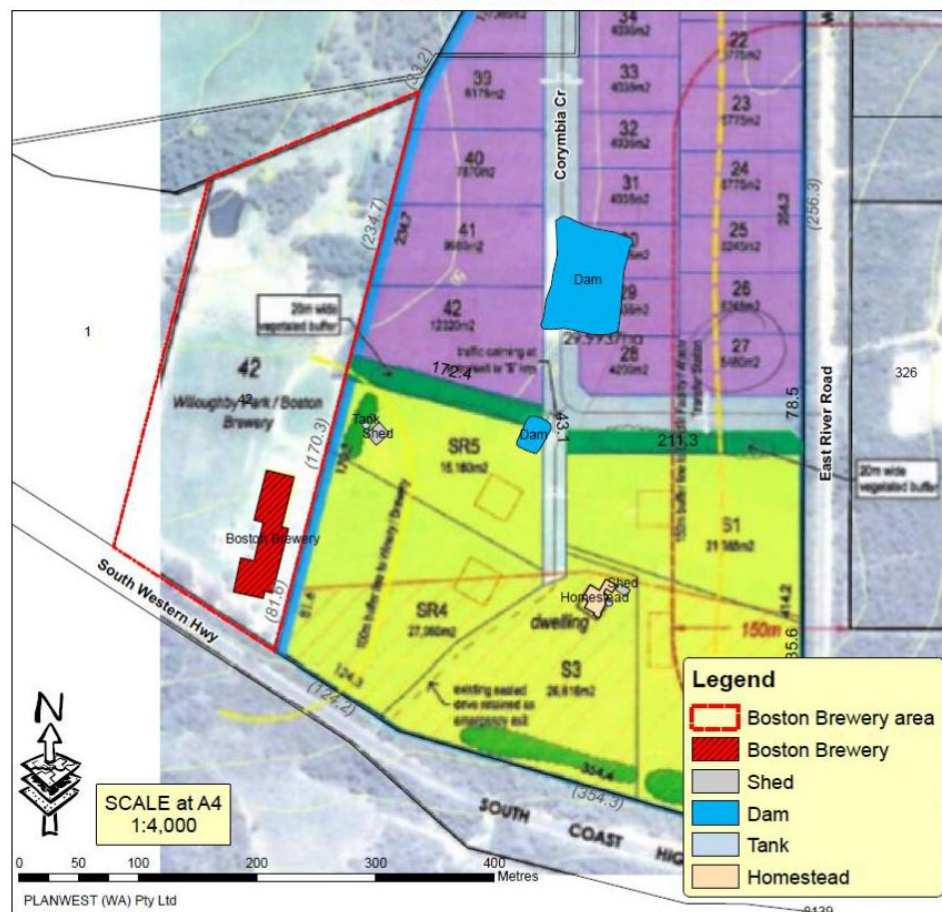
In September 2015 Landcorp wrote to the owners of the land [REDACTED]
[REDACTED] An extract from that correspondence is shown below.

The first imperative noted by all parties was the requirement that the [REDACTED] quality of living should not be reduced, and that the highest and best use of the southern portion of your land is for “lifestyle” lots (taking advantage of the views to the south and to also act as a visual buffer between the South Coast Highway and any development to the north). I am treating this planning objective as a “non-negotiable” requirement and it is my understanding that the Shire of Denmark is of a similar view.

In summary, it is clear that there has been no recorded history, or discussion, about rezoning the southern portion of land for industry.

A Concept Plan was subsequently prepared by Edge Planning and Property for Landcorp. An extract from the plan is shown in Figure 3 below.

FIGURE 3 – EXTRACT FROM CONCEPT PLAN



Source: Edge Planning and Property, Planwest

The Concept Plan clearly shows the absence of any industry in the southern part of the property abutting the Boston Brewery.

Draft Local Planning Strategy (2022)

Part 3.2.4.2 of the Draft Local Planning Strategy provides a discussion about the industrial area and how the area ‘was developed’ (see extract below). It is clear from Landgate and aerial photographs that only the land around Mycena Street has been developed with titles issued.

3.2.4.2 East Denmark Industrial Estate

The East Denmark Industrial Estate was developed as a partnership between the Shire and Development WA (previously LandCorp) as a response to the shortage of industrial land in the Shire and the desire to relocate heavier industrial land uses out of the existing LIA.

A first release of lots between 6,879m² and 1.4 hectares took place in mid-2018 and a further 17.3 hectares of land provides for the future expansion of the East Denmark Industrial Estate in a southerly direction. The Estate is expected to sufficiently provide for demand for additional industrial floorspace during the life of this Strategy, noting that the Estate will also potentially accommodate the relocation of a number of existing businesses.

A number of barriers, including shortcomings with water infrastructure, have prevented the sale of lots in the East Denmark Industrial Estate, the relocation of existing industrial businesses and the establishment of new industrial uses within the precinct. In addition, the Estate is currently zoned General Industry and this allows a relatively narrow range of land uses.

While ultimately desirable to retain the East Denmark Industrial Estate for general/heavy industry, it is acknowledged that there is currently no supply of lots for light industry. Although the Strategy proposes more proactive measures to encourage the relocation of general industry from the LIA and provide for expansion, this may take time to eventuate. As such, the Strategy recommends that the local planning scheme is amended to permit light industry and other similar land uses within the East Denmark Industrial Estate to respond to immediate demand and promote the establishment of operating businesses within the Estate.

To facilitate the development of lots within East Denmark Industrial Estate, it is also proposed to relax restrictions on the development of multiple tenancies within a single industrial lot, allowing for the development of factory units. This will potentially encourage investment while assisting start-up and small businesses that do not require an entire lot. Policy guidance will assist in

ensuring that factory units are constructed in a manner that appropriately reflects industrial use.

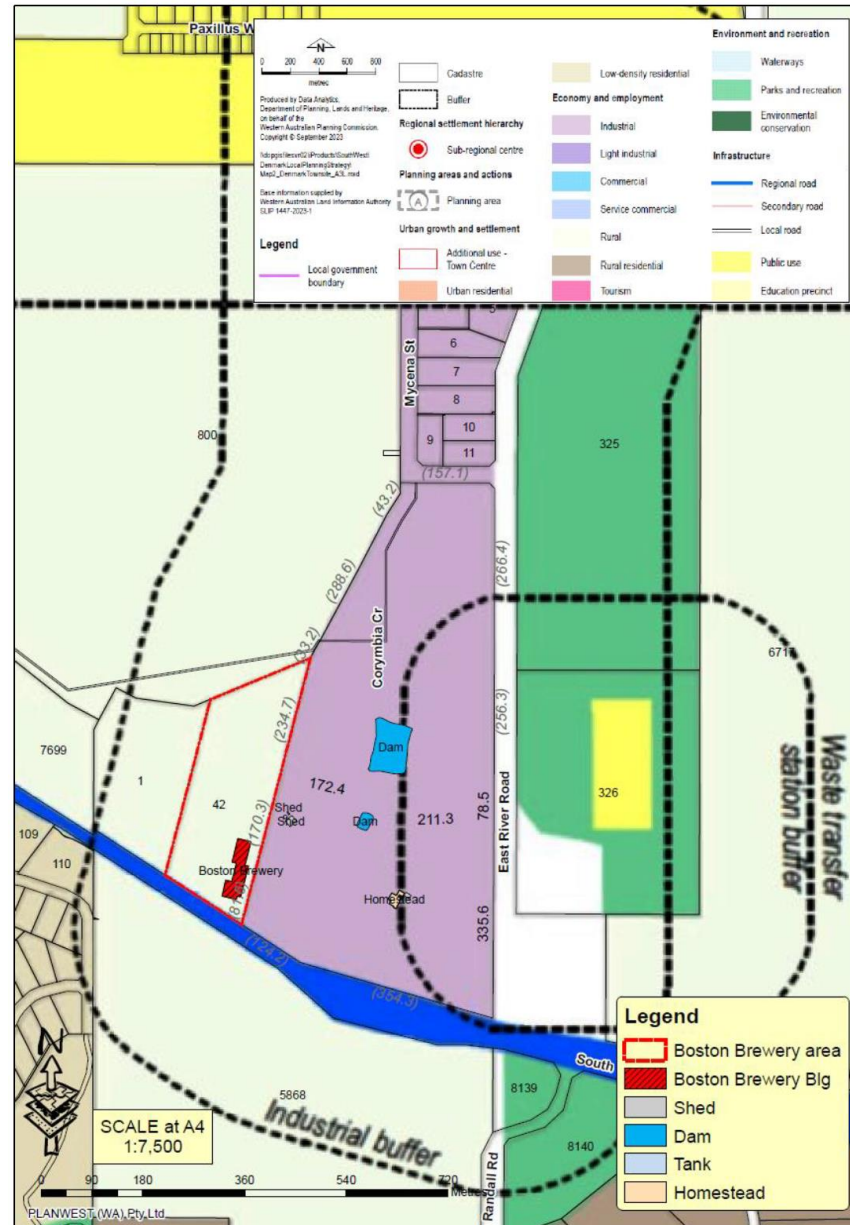
NOTE: It is interesting to note that the Strategy mapping, produced by the DPLH, confuses the industrial designations by colouring 'light industrial' areas as darker purple, and the 'Industrial' designations as a lighter purple. This is certainly contradictory to the guide for Scheme designations outlined in the *Planning and Development (Local Planning Schemes) Regulations 2015*.

The whole point of the Regulations is to create a degree of standardisation and consistency in the preparation of schemes and strategies.

The Draft Strategy proposes that the established industrial area around Mycena Street be extended all the way south to the South Western Highway.

An extract of the Draft Strategy is shown in Figure 4, with some additional features superimposed for clarity. The extract shows a 300m buffer around the industrial area potentially impacting a significant area – including the 'sensitive' Boston Brewery site.

FIGURE 4 – EXTRACT FROM PROPOSED STRATEGY



Source: Shire of Denmark, Planwest

The Draft Strategy states that the industrial area around Mycena Street was

developed in 2018, yet there only appears to be a single lot developed – 6 years later. This perhaps demonstrates that there may not be the demand that the Council anticipated for general industrial uses.

Another issue to consider is the mixing of general and light industrial uses. Often light industrial uses can be significantly affected by nearby general industrial uses. For example, automotive activities generally need clean air without dust. This can never be guaranteed in an area where impacting industries are permitted.

A possible solution includes separating the light and general industrial areas.

This is an opportune time - that may not occur again in the future - to retain the Mycena Street 'Industrial' designation in the Strategy but changing the land south of this area to 'Light industrial' whilst retaining the existing Special Use area southwards to the South Western Highway.

The Draft Strategy acknowledges the shortage of light industrial areas, as such, the proposal suggested above provides an exclusive area for light industries and goes some way to providing land to satisfy the shortage.

The following parts are in the Format suggested for submissions to the Draft Strategy

What are the strategies or actions in the draft strategy that you support and why?

Support for Establishing Businesses

It is admirable that the Strategy outlines the Council's endeavour to attract and support local businesses by providing zoned areas that will attract a variety of employment types.

This approach is echoed in the Strategic Community Plan that also has one of the three main objectives as;

- Support local jobs, industry, and small business and facilitate

sustainable development.

What are the strategies or actions in the draft strategy that you do not support and why?

Support for Existing Businesses

Following on from the objective of supporting local jobs, industry and businesses, it is concerning that the Council has little regard to these jobs and businesses once they are established in Denmark.

The Boston Brewery is a real example whereby it currently has a significant impact on local employment, it also creates a major tourist destination providing a variety of hospitality attractions in the district.

This is a facility that the Council needs to actively support.

However, the current proposal will allow general industrial uses on the Boston Brewery boundary thus threatening the successful continuation of the current operation.

If such conflict which undermines the hospitality operations of Boston Brewery and Willoughby Park wines occurs, this will cause the owners to re-evaluate planned investment in the site (approx. \$1.6m planned for CY2024) and the longer-term commitment to locate the brewery operations in Denmark.

The Council should be aware of the considerable cost to businesses to maintain operations in Denmark. The lack of housing for staff, limitations on power and water infrastructure and transport costs to metropolitan markets carry a premium, more should be done to support existing businesses with a track record of significant investment in the region.

Draft Strategy Designations

The Daft Strategy mapping for industry types needs to be modified to reflect the intent of the Scheme designations outlined in the Regulations.

Proposed extension of the East Denmark Industrial Estate

The extension of the East Denmark Industrial Estate has not been supported in

the past by either the Shire or Landcorp. The proposal has very little merit and potentially has a devastating impact on existing nearby uses.

The Council may be left with the issue of resolving on-going complaints from nearby sensitive uses being impacted by adjacent general industrial uses that are permitted to be in the industrial area.

Resolution of these conflicts can be unnecessarily complicated, exhaustive, time-consuming and expensive.

Do you have any other comments or suggestions about the draft strategy?

Commit to on-going Business Support

The Draft Strategy should better acknowledge existing businesses that it has supported and encouraged. This support should be extended to provide its on-going protection and commitment by ensuring surrounding changes are not going to prejudice the continued successful operation of the enterprise.

This specially applies to the Boston Brewery that provides so many benefits to the Shire and district, not just in local employment, but also the flow-on effect of tourist spending and the domino impact on other services, hospitality and tourist operations.

East Denmark Industrial Estate

This submission raises the injurious impact potential of allowing general industrial uses up to the boundary of the Boston Brewery.

The potential impact of a general industry next door to the Boston Brewery can easily be rectified and avoided.

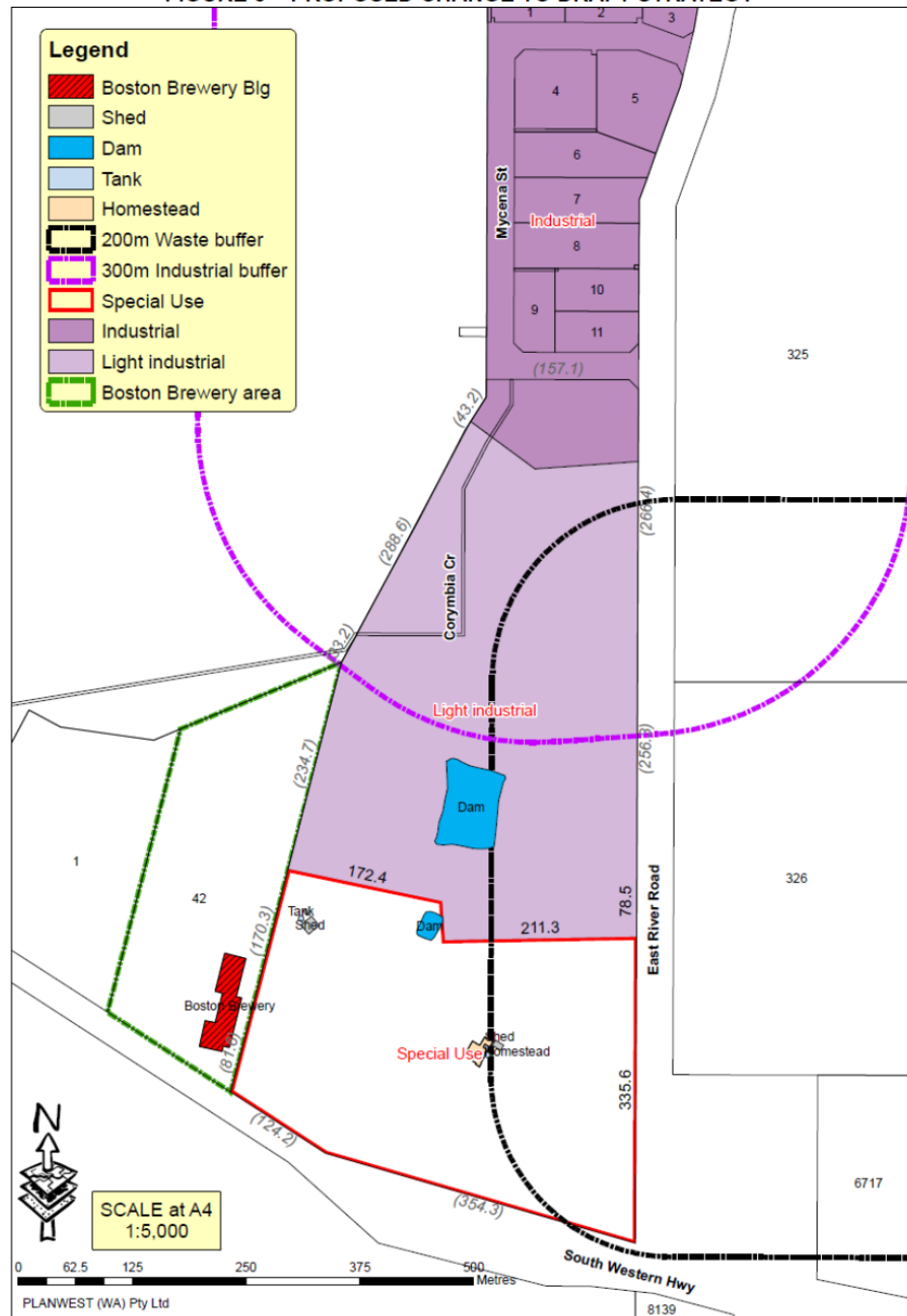
Figure 5 shows the proposed change to the Draft Strategy.

The advantages of this change are as follows;

- The change involves very few agencies or owners and is unlikely to attract any submissions - other than those owners involved.

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| | | <ul style="list-style-type: none">• The provision of an exclusive light industrial area avoids the potential conflict between light and general industry activities.• The proposal provides an exclusive area for light industries and goes some way to providing land to satisfy the shortage mentioned in the Draft Strategy.• The net result produces the same amount of land for industrial uses and does not affect any services or roads.• The revised 300m potential impact buffer avoids impacting Boston Brewery site.• There is no change to the 200m waste transfer station buffer.• There is no change to the land designated as 'Special Use'.• There are no potential impacts from general industrial uses on the area designated as 'Special Use'.• The proposal is consistent with the Landcorp and Shire assertions previously voiced.• The proposal avoids the Shire being involved in lengthy and expensive litigation regarding amenity complaints between permissible industries and nearby sensitive uses. | |
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FIGURE 5 – PROPOSED CHANGE TO DRAFT STRATEGY



Source: Landgate, Planwest

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| S44 | <p>[REDACTED] [REDACTED] [REDACTED] [REDACTED]</p> | <p>I wish to make comments in objection to the proposal of a tourist precinct on the corner of McLeod, Scotsdale and Suttons Roads. These comments are made in consultation with, and on behalf of [REDACTED] residents of [REDACTED]. As a resident of [REDACTED] I have a direct personal interest but also a more general interest in the way tourism develops and influences the Denmark area. I support the aims of the proposed strategic plan as the pressures of population growth, increased tourism and climate change will provide Denmark with unprecedented challenges. Careful planning will help to protect this unique part of Western Australia from the poor outcomes experienced by some rural towns.</p> <p>The majority of the land within this proposed precinct is prime agricultural land being used for primary production. Such land is in short supply and fragmented within our shire. With the warming and drying effects of climate change on food producing areas of Western Australia, the South Coast will be increasingly important for future food production. "To protect rural land for agricultural production" is a stated aim of the proposed plan. The inclusion of a large area of prime agricultural land in a tourist precinct is in direct opposition to this aim. These proposed precincts would facilitate and encourage the development of larger tourist enterprises whilst the current position is that any development would need to be secondary to the rural use of the land. The current zoning ensures the protection of rural land for agricultural purposes whilst the proposed "precinct model" does not. The majority of the rural land included in this precinct is part of a network of adjoining land used for agriculture. While these properties may be individually owned they are able to be leased to farmers to provide the economy of scale required to be viable in an area with such high land costs. Larger tourist development would further fragment our existing land with high agricultural value. Larger enterprises would result in irreversible loss of this valuable resource.</p> <p>As acknowledged in the proposal, tourism and agriculture are often in conflict. Noise, use of agricultural chemicals and machinery movements are examples of such issues. Small compatible, secondary enterprises such as the current petting zoo do not create these problems. Furthermore smaller enterprises</p> | <p>Upheld.</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |
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with less capital investment are more readily returned to agricultural uses.

One theme of the new planning proposal I strongly support is the strategic focusing and concentration of development to protect and preserve resources and the environment. The promotion of larger scale tourism in the McLeod Scotsdale precinct is not compatible with this principle. There is no infrastructure currently in place to support this development. The current road alignment creates an intersection that is currently tricky to navigate and would be dangerous with more traffic. Any development north of Scotsdale Rd would require entry off Suttons Rd which is a narrow Karri lined road only servicing existing properties and one accommodation facility. Maintenance of this road and safety would become an issue if it were to take more traffic. The road is not suitable to widen as this would necessitate the removal of the valuable remanent vegetation which includes large Karri trees. The proposed precinct is not near to any facilities that tourists seek nor to the draw card of the coastal beaches. Development of these more outlying areas would mean more reliance on car travel rather than more sustainable methods such as cycling and walking. Larger tourist facilities are more appropriately concentrated close to town or along the major traffic way of South Coast Highway. Focusing these types of developments in precincts on the highway takes advantage of the fully maintained roadway and avoids expanding the areas negatively impacted by of high levels of traffic.

The inclusion of the special rural area on Suttons Rd would seem to be very impractical. These blocks all have existing residences and domestic infrastructure. There is a ridge of remanent Karri forest across the back half of the blocks. Any kind of larger tourist development on these properties would cause extreme loss of amenity in the area, traffic problems and conflict with the existing farming. It is also worth noting that when this subdivision was approved it was with a range of strict conditions that purchasers assumed would protect their amenity. Given these blocks are surrounded by agricultural land it may be appropriate to allow a broadening of use for small scale, low impact niche agricultural pursuits such as garlic growing or alpaca breeding.

The rationale for selecting the McLeod Scotsdale precinct is noted as being that

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| | | <p>it is on a tourist drive and there are existing tourist facilities. These existing tourist facilities are extremely limited. The animal farm/petting zoo is a popular but small scale attraction occupying only a very small portion of the farm on which it is sited. There is a registered bed and breakfast (in residents home) and a winery with a small 4 berth caravan site. Essentially this is not an existing tourist node that the precinct would be building on but encouraging a new remote area of inappropriate development. None of the existing tourist activities have substantially reduced the availability of agricultural land in the way larger scale tourism will.</p> <p>The comments I make in regard to the inclusion of prime agricultural land in tourist precincts also apply to parts of other proposed precincts such as the farming land south of the Dam block in the Williams Bay precinct. Our agricultural land is an extremely limited and vital resource, not just for our shire, but for food production for Australia in the future. The land within the proposed McLeod Scotsdale precinct has very fertile loam/clay based soils and good opportunities for water collection making it of high agricultural value, particularly for the emerging sustainable methods of farming. We must protect Denmark's productive land as once it is put to other commercial uses it will be hard, if not impossible, to recover. Tourism is an important part of Denmark's future but must not be allowed to dominate at all cost. I believe that larger scale development should be clustered closer to town to allow more sustainable development and use. Areas with substantial existing development should be earmarked for further development to limit sprawl and to maximise the use of resources. Protecting our arable land will not impede tourism but is an urgent priority.</p> | |
| S45 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>I have reviewed the Shire of Denmark Draft Local Planning Strategy.</p> <p>As we are currently Light Industrial with our Retail, Plumbing & Manufacturing Operations at 3 Hockley Close Denmark WA 6333 the proposed Draft Local Planning Strategy will not affect our current operations.</p> <p>Our Business neighbour [REDACTED] has stated that he has never experienced any problems with our adjoining business with regard</p> | Noted. |

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| | <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>to noise or any dust factor.</p> <p>We have operated our business at 3 Hockley Close Denmark WA 6333 for more than 40 Years without a single complaint.</p> <p>We thank you for this opportunity to comment regarding the Denmark Draft Local Planning Strategy.</p> | |
| S46 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>I wish to express my strong objection to the Tourism Precincts proposal outlined in the draft local planning strategy.</p> <p>The Denmark Community has expressed many times that the way that tourism is working for its residents, businesses and the health of our environment at the moment does not suit this town.</p> <p>Some of the proposed Tourism precincts are the LAST place we should be encouraging, enabling and allowing further tourist development.</p> <p>Weedon Hill is one of the most dangerous places for potential bushfire tragedynarrow, quiet, hilly, residential streets, heavily forested, very little safe egress should there be a need for folk to rush to evacuate. The idea of this being an ‘ unique location for a large scale tourism development’ is an appalling abrogation of any safe or appropriate planning responsibilities.</p> <p>The Rivermouth is at the moment a small - almost tiny, tranquil location, replete with flocks of waterbirds, and pelicans. It already has a jetty, a launching ramp, and the caravan park hires pedal- powered watercraft and a few other non invasive water devices.</p> <p>To suggest this area lends itself to ‘more private and public marine infrastructure and needs better access for marine activities’ is abhorrent.</p> <p>Shadforth Road should remain untouched - its tourism ‘potential’ is in its very unspoiled nature. People love to enjoy its beautiful vistas and rolling hills during leisurely scenic drives. It doesn’t need further tourism opportunities, with the resultant traffic, noise and disturbance that could bring. To further describe it as ‘ a rural location only accessible by road at the moment’ is particularly</p> | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |

concerning. What does the Shire have in mind to permit in the future so it is no longer simply accessible by road!?

The Suttons, McLeod and Scotsdale Road precinct is another area that is already well serviced by mostly unobtrusive tourist ventures - it has outstanding stands of Karris, forest views, valley vistas and sea views. For God's sake any responsible Council would be looking to preserve the area and its natural attractions and quiet rural lifestyle. This would be in line with the community's stated wishes and needs!.

The William Bay tourism precinct is a recipe for disaster - for that precious National Park, (already in the Council's own words- over promoted, over visited and suffering environmental degradation because of these things) and the rural lifestyles of those people who have chosen to live in that area. The totally, inappropriate large scale caravan park is a nonsensical and dangerous proposition and to then designate that area as earmarked for future tourism possibilities is even more shocking.

To have a planning officer decide that the DFES advice that it could not support that proposal because of serious fire concerns, was wrong is hubristic, poor-decision making at its worst. To have a council support that decision making is an absolute disgrace.

The council seems to be captured by old style, gung- ho tourism approaches and attitudes that in no way reflect what this town has said it wants and needs.

Appropriate tourism ventures, in appropriate locations that benefit all, not just short term tourism, are one thing but we do not want certain areas of the shire sacrificed with tourism developments clustered in those locations.

Innovative, responsible and intelligent planning to ensure that happens are what we need and are asking for.

To date 912 locals have signed a public petition against the double proposal of the caravan park on south coast highway, and the Tourism Precincts - what will

The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.

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| | | it take for this council to listen to its community!? | |
| S47 | [REDACTED] | <p>I am most interested in the portion of the document as it relates to “Infill and Consolidation”. Section 3.1.4.1 and other portions.</p> <p>The document fails to consider the beautification and development of the actual existing laneways in the denmark town centre. There are numerous laneways which abut properties which are duplex potential. The higher density is best placed in the town centre as the document states.</p> <p>Laneways in the local government authorities of the Town of Cambridge, Vincent and City of Stirling should be considered for research purposes. This can help address the “poor perception of Infill development” which your report notes. Laneways in these local government authorities allow the traditional long and skinny pedestrian walkway to avoided. By developing laneways, occupiers of land are able to access post and rubbish collection at adjacent and convenient points. Laneways are “street fronts” for houses. Landscaping and fencing is guided by the same principals as traditional street front properties. It lends to a more attractive and safer community. There is no down side.</p> <p>We think this oversight (of not considering laneways) should be addressed. It would be a significant loss of opportunity to not do so. Individuals who wish to subdivide (Including ourselves) will bear the responsibility of costs. The council already charges for this. We would very much appreciate being part of this process.</p> | <p>Noted.</p> <p>Actions for section 3.1.5.1 Denmark Town Centre, and section 3.1.5.2 Residential Areas, have been modified to include additional recognition and emphasis of the importance of upgrading and better utilising Denmark’s existing network of laneways.</p> |
| S48 | [REDACTED] | <p>I am objecting to the tourism precincts proposal in the draft local planning strategy. I believe many of these locations are seriously inappropriate for tourism development.</p> <p>I urge Council to be visionary; to go beyond already over-worked sites and come up with a plan in keeping with stated community desires around tourist development ie environmentally conscious, low key and beneficial to our town and our tourists.</p> | <p>Upheld.</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed</p> |

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| | | | <p>set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts.</p> |
| S49 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>It is always a difficult task to envisage the sort of world we may live in 10 or 15 years into the future, given the alarming changes we are experiencing from global warming and the effect they will increasingly have on our rural and built environment.</p> <p>1. We are lucky to live in an area of considerable beauty and biodiversity and as a result, we are a sought-after tourism destination. While this has an economic benefit to the town, it also places a strain on existing power, water and technical infrastructure, to the point where in the height of Summer, telecommunications infrastructure is barely able to cope with the number of people in town using mobile phones. Services become slow and overloaded at a time when they should be at their most available, given the risk of fire to our community. While this is something which the Shire has no real control over, it suggests a problem for towns like Denmark. How do you ensure that local amenity is preserved while balancing that with an influx of tourists? Are the infrastructure strains worth the risk of expansion?</p> <p>2. The Shire talks in this document about the importance of maintaining our rural and agricultural environment and of protecting and maintaining a rural aspect, with a pleasing visual outlook. A recent decision by the Shire to approve the rezoning of a piece of land located within the Greens Pool vicinity from rural to tourist appears to contradict this strategic goal. The land has been rezoned to allow for a highly visible caravan park in the middle of an attractive rural area.</p> <p>This flies in the face of the stated aims in 3.2.5.5. The Shire's desire to expand into new tourist precincts, rather than offering existing natural and eco-tourism experiences is bewildering. While the Shire does not advocate further</p> | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals shall be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local</p> |

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| | | <p>development of housing into rural areas, due to the infrastructure strains, it envisages developing unspecified tourist developments in areas where water and power are already an issue and in areas of high bushfire risk.</p> <p>I believe there is a strong need to be realistic when considering tourism expansion. There is a strong wish in the community to find ways to spread the influx of tourism more evenly across the year - to allow for businesses to have a more even cash flow through the year and to place less strain on the existing frayed infrastructure. Rezoning our rural areas into a series of unspecified tourist zones seems to fly in the face of the risks of bushfire in a drying environment, an ageing emergency services volunteer group and relatively poor telecommunications infrastructure.</p> | <p>Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.</p> |
| LATE SUBMISSIONS (Received after 22 December 2023) | | | |
| S50 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>1. I like that the council is doing long term planning of this nature, documenting this in the public domain and inviting local community comment. Thank you, this is a big job and I acknowledge its challenges.</p> <p>My Suggestions / Questions</p> <p>The process for public comment at this stage seems to be via responding to a lengthy document in writing. At 204 pages long it is unlikely most people will read the whole document (me included) and may not gain a sense of continuity, if this is written into the strategy. We may also miss points that cross the itemised sections in the contents page. It importantly means that the Shire will only receive community input from those who have the skills and time to review such a document. This limits the useful feedback the Shire could receive in other ways.</p> <p>I note that early in the process there was a stage where conversation cafes, surveys, and stakeholder meetings were included. Is it possible to outline in this document how many community members engaged and what the findings were of these consultation processes. I did not engage with this and wish I had. I wonder how many other community members may feel the same.</p> | <p>Noted</p> <p>Two page information sheets covering the key themes of the draft Strategy were prepared and available to the public during the consultation period online and in hard copy at multiple Shire buildings. These summary sheets were intended to assist people engage with the consultation period who were not willing or able to open and navigate the contents of the draft Strategy document. Topics covered included:</p> <ul style="list-style-type: none"> - Draft Local Planning Strategy Overview - Community, Urban Growth and Settlement - Rural Land Uses and Settlements - Housing - Economy and Employment |

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| | <p>Would it now be possible for the Shire to hold a public presentation of the strategy in its draft form, where the community is able to ask questions of key personnel? I think this would offer a way of responding to the tension in the community I highlight in the following point and the Strategy acknowledges itself.</p> <p>2. I like that the Strategy acknowledges there is tension between tourism development and the local community needs on page 75</p> <p>‘Although tourism is a significant characteristic of the district, there are inherent tensions between the tourism industry, visitors and the local community. The Strategy acknowledges these tensions and seeks to provide the basis for a planning approach to managing and mitigating apparent points of conflict.’</p> <p>My suggestion / questions</p> <p>These tensions exist largely in my experience because there is a natural concern from local community members about how tourism development will impact upon healthy community life and the preservation of the natural environment. There have been some recent destructive impacts of tourism on the east coast beaches in Australia recently in the media, which suggest these concerns are indeed valid.</p> <p>There can be a belief that the tourism dollar has priority with the Shire over the wellbeing of the local community and the environment. There is likely to be differing views on these priorities and the Shires role in ensuring cohesion and transparency in addressing different views is pivotal for community wellbeing. This strategy does not appear to outline how it will address these tensions it just sates it will. I think the community fear is that “hidden” decision will get made that adversely affect local life.</p> <p>There could be a lot more done on how community consultation occurs and how community wellbeing can be included as an essential part of the development process. Not just something to “manage and mitigate” but a fundamental and central part of the planning process a local shire uses. The</p> | <ul style="list-style-type: none"> - Environment - Infrastructure <p>Shire Planning staff were available to discuss the strategy and answer questions over the phone or in person. Many such conversations and meetings took place.</p> <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>All reports, background information and decisions of Council are on the public record.</p> <p>The Shire has limited resources to balance between a broad range of community needs and consultation activities that are necessary. Officers strive to do their best to maximise meaningful engagement and</p> |
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| | <p>Denmark Shire could place itself as an exemplary Shire in Australia, addressing this critical point of tension, which reflects many of the larger societal issues of our times.</p> <p>My sense is we stand in a delicate and powerful place as a community and as a Governing Shire to face this tension in a creative and sensitive way. This possibility inspires me and I would welcome any opportunities to offer my skills and input further...</p> <p>3. I like that the Strategy acknowledges Aboriginal and Torres Strait Islanders people (page 3) and welcomes their guidance and counsel. The strategy states it aims to ensure that it respects Indigenous cultural, social and environmental connection to this Country</p> <p>My Suggestion / Questions</p> <p>Can the process for how this will be obtained be explained in the strategy? Has there been a consultation process with local Aboriginal and Torres Strait Islanders, in particular key elders and if so could this and its findings please be included in this document?</p> <p>If this has not occurred could we please put such a process in place and make it available to the local community? We are privileged to live in a region with Aboriginal people willing to offer guidance. This is such a wonderful resource available to us all.</p> <p>4. I like that the Strategies stated aims (page 3) reflect an intention to accommodate change and ensure sustainability, preserve and protect the natural environment and communities.</p> <p>My suggestions / Questions</p> <p>Demonstrating how this will be achieved in tangible ways would be an excellent means of alleviating community concern. Also highlighting what the anticipated changes are likely to be. This could be a key component in a public presentation</p> | <p>consultation processes.</p> <p>The Shire contacted the Department of Planning, Lands & Heritage to seek advice as to how to proceed with direct consultation. Consultation on the Strategy coincided with the pending finalisation of a regional body representing the traditional custodians of this country, and as such was difficult to undertake at this time. The Strategy aims to represent an invitation and an open door to developing relationships with traditional custodians within our community and their representative bodies to develop a shared vision for land use management in years to come, and to adopt changes to the local planning framework that may be necessary to assist in the achievement of objectives for lands that are under the management of traditional owners. This will remain an important relationship and ongoing conversation that the Shire wishes to continue to develop in future.</p> <p>Sections 3.1.7 Ecologically Sustainable Development and section 3.3 Environment provide many tangible actions in this space. The document is long and technical in nature due to the statutory requirements of the WA Planning and Development Act and Regulations, which specify in detail how a local planning strategy is to be set out and written.</p> |
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of the Strategy I suggest in point 1. Otherwise stated aims remain an intellectual list in a report and do not carry the power of facilitating true community engagement and cohesion.

5. I like that the Strategy is linked to other documents including the Sustainable Tourism Strategy

My Suggestions / Questions

Emmet Blackwell, the Strategic Planning Officer at the Shire of Denmark made me aware of this link in a telephone conversation we had around the topic of tourism development. It is good to hear this linkage exists. It demonstrates the shire has common threads running through its documentation and planning and this can engender confidence. Could this Draft Local Planning Strategy show how and where it cross references to this other important strategy?

6. I like that the Strategy highlights Tourism specific sites and locations

My Suggestions/Questions

It makes sense that in a planning document, specific locations are identified, especially as they will be under tourism pressures and demands and require careful management. When I look at the maps of the tourism precincts on page 164 I feel alarmed and I think I am not the only community member to feel this way. I think this is a point the shire and everyone should reflect upon.

I see all the areas as a local I visit, love and are a part of my day to day life in Denmark. The term "tourism precinct" makes me feel like my relationship with this land and these spaces is secondary to tourism, almost like the tourist's needs are a higher priority than mine as a local who lives and works here; emotive yes and very real.

When I talked to Emmet Blackwell the Senior Planning Officer at the Shire of Denmark I heard that the concept of the tourism precincts is to limit and monitor tourism development. I feel calmer knowing this and then I wonder why when I look at this report I feel so concerned about tourism development.

Complex issues necessarily require in depth analysis. Implementation of the Strategy will occur through the preparation of a new local planning scheme and review of associated local planning policies.

The tourism section has been modified as described above, including additional links to the Sustainable Tourism Strategy.

The tourism section has been modified as described above.

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| | | <p>Reading that the re-zoning of land for commercial purposes is broadly supported also alarms me. Who can re- zone what and what are we in for here?</p> <p>Hearing anecdotally the other day that William Bay National Park was temporarily transferred to the Shire of Denmark for management instead of National Parks (if true) also alarms me. Why would this be needed? My point here is that there is a level of distrust within the community about the processes for decision making in relation to tourism precincts. This could be alleviated by some sensitive and transparent community consultations and information sessions.</p> <p>I think the language is powerful here and worth considering. When I google the meaning of precinct this is what comes up; ‘An area in a town designated for specific or restricted use, especially one which is closed to traffic’. If I would read something more like;</p> <ul style="list-style-type: none"> - Areas of high tourism demand - Locations frequented by tourists - Natural environments impacted by tourism <p>If it is true that identifying specific locations is for managing and looking after them in terms of tourism, preservation and community wellbeing I think this could be conveyed in a stronger and clearer way than the strategy currently conveys.</p> <p>7. Helicopter Recreational/Tourist Flights</p> <p>The Dam restaurant is currently providing helicopter tourist and recreational flights. I would like to ask a few questions about these flights:</p> <p>(a) How will flights be monitored and assessed for impact upon;</p> <ul style="list-style-type: none"> - The noise and interference level for local dwellings and people - The impact upon local flora and fauna in particular native species <p>(b) What zoning is required for commercial premises to allow helicopter landing</p> | <p>William Bay National Park is managed by the Department of Biodiversity, Conservation & Attractions.</p> <p>Noted. Helicopter joy flights require separate planning approval as they are ‘private recreation’; a discretionary land use in the Tourist zone that applies to Lot 305 Wentworth Road, Ocean Beach.</p> <p>The landowner may not be aware that separate approval is required. The Shire has not received an application for this land use and will approach the</p> |
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| | <p>and take-off facilities?</p> <p>- Are any more venues likely to be allowed to operate these flights from their premises?</p> <p>I include a link to a report on the impact of helicopter flights done in the Blue Mountains Australia. I am currently reviewing literature to see if I can find anything else that might be helpful and would be happy to forward these if found. Link below:</p> <p>https://www.bluemountains.org.au/airfield/documents/katoomba-airfield-impact-of-helicopters-on-bm-world-heritage-values-summary.pdf</p> | <p>landowner to work through the application process.</p> <p>Public consultation is required as part of the planning assessment and issues of noise and appropriate flight paths are appropriate planning considerations.</p> |
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| S51 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>This submission addresses two components of your LPS ie (i) Community, Urban Growth and Settlement and (ii) Housing. The Shire is keen to consolidate growth within the townsite and therefore it is important to consider the context of our land and adjacent land. The following background information provides that context.</p> <p>1. Background.</p> <p>We are the owners of lots 372 Horsley Road and 51 Scotsdale Road. We purchased [REDACTED] in 1994 and [REDACTED] in 2004 with the intent of rezoning and subdividing the land which was identified as Planning Unit A in the Shire's then Local Planning Strategy and residential expansion strategy. In 2005 the then five owners of Planning Unit A united to prepare a local structure plan and then seek rezoning to Residential. The Horsley Rockford Road Local Structure Plan (LSP) was adopted by the Shire in ... and endorsed by the WAPC on 18 May 2012. Lots 372, 51 and 366 were rezoned to Residential on 6 August 2013. The then owners of [REDACTED] chose not to pursue rezoning to Residential as they were intent on retaining their lifestyle lots.</p> <p>The development syndicate that owned lot 366 on the corner of Horsley and Rockford Roads, which was the most likely residential expansion location, advertised the sale of Stage 1 and Stage 2 lots off the plan, for some 6 years from 2016 to 2021 without any success. There was insufficient interest and any prospect of subdivision was not feasible. The cost of creating residential lots, relative to anticipated sale price, was unviable. That syndicate sold [REDACTED] to [REDACTED] which promoted an aged care facility (ACF) for part of the site and initiated an associated amendment to the endorsed structure plan. However, Amaroo has decided (i) not to proceed with the ACF as proposed and (ii) not to proceed with the amendment to the endorsed LSP.</p> <p>So we have a situation where we are the only owners within the Horsley Rockford LSP interested in subdividing land. Additionally, the LSP adopted by the Shire for lot 371 Horsley Road to our west, will not advance to residential subdivision as the two owners intend to maintain their lifestyle lots. The LSP, which appeared to facilitate 51 residential lots, was prepared only to gain</p> | Noted. |
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subdivision approval to split lot 371 into two lots only. The two endorsed structure plans show Horsley Road meandering away from the existing road reserve (which contains trees) into lot 371. Since both [REDACTED] families have no intention of subdividing their land it would appear there is no prospect this section of Horsley Road being constructed in the short to mid term.

2. Comments on Community, Urban Growth and Settlement Initiatives.

- a. Council to identify ways to bring about the construction of Horsley Road within the [REDACTED] ownership [REDACTED] or at least arrange for the ceding of the road reserve so that we can plan ahead with confidence.
- b. Enabling The Development of Medium Density Housing. We support this initiative.
- c. Minimisation Of Infrastructure Requirements and Support Of Sustainable Modes Of Transport. We support this initiative and ask that Council accepts the road reserve widths and carriageway widths in our (draft) subdivision plan, as supported by the Transport Impact Statement prepared by Transcore. (In final draft form presently with final report available on 17 January 2024)

3. Comments on Housing Initiatives.

- a. Housing Diversity and Density Targets. We support this initiative in general terms however the application of this initiative should vary according to proximity to the town centre. In the case of our proposed subdivision, which follows the intent of the endorsed Local Structure Plan, the two group housing sites should be R 50 and not R 30 which is inefficient and wasteful. Group housing sites with strata titles are far more affordable than equal density Green title lots and property maintenance is of a better and more consistent standard because of the strata fees. Additionally, there is more space and scope for solar passive design.

The Shire is willing to collaborate and assist in finding a suitable solution, including exploring realigning Horsley Road through the structure planning process.

Noted.

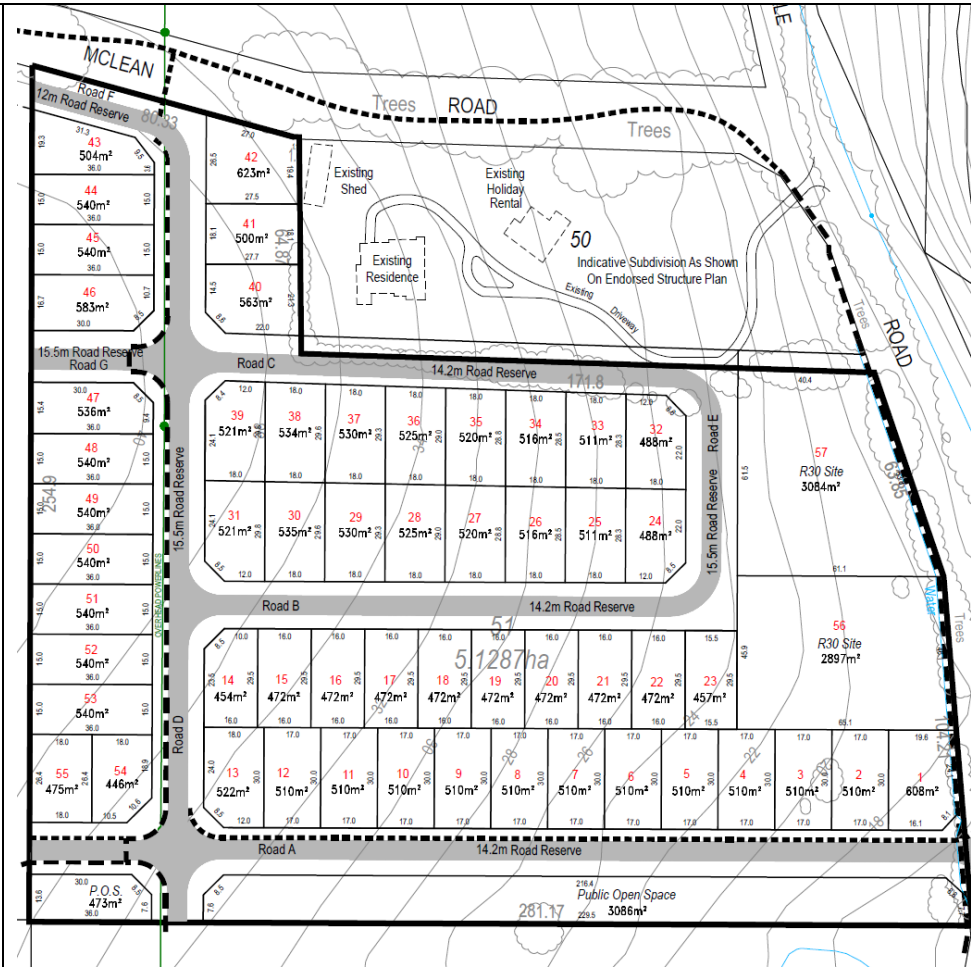
Noted.

The subdivision application mentioned has been lodged with the WAPC and is subject of a current assessment under the existing planning framework.

Upheld.

The Strategies action regarding diversity and density targets are recommended to be modified to enable increased flexibility and consideration of each sites specific context.

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| | | <p>b. Facilitation Of Tiny Houses On Wheels. We support this initiative and similar small house initiatives.</p> <p>c. Working With Land Development And Building Industries To Understand Cost and Regulatory Constraints, And Consider Opportunities To Promote Housing Affordability. We support this initiative and ask that Council undertakes the following:-</p> <ul style="list-style-type: none"> • Carries out some clearing or regular maintenance of the vegetation in the Horsley and Mclean road reserves to reduce the fire risk and BAL rating of adjacent lots. The Fire Management Report prepared by Bush Fire Works identifies various lots adjacent to the McLean road reserve have BAL ratings in excess of 29 which means construction costs are significantly higher because of fire proofing measures. The same situation will apply to future subdivision lots adjacent to the treed section of Horsley Road. • Determines a way to re-activate the amendment to the Horsley Rockford LSP which provides land owners and developers with greater certainty on issues such as entry roads; staging of roads ie suitability of interim single road entry until a second road is constructed (to alleviate FESA concerns); efficient sharing of Horsley and Mc Lean road reserves as part of new subdivision roads; formalizing construction of DUP's meandering through treed sections of Horsley and McLean road reserves and determining whether carriageways are to be 5.5m or less as traffic calming mechanisms or 6m acknowledging higher traffic speeds. | <p>Noted.</p> <p>Noted.</p> <p>The Shire of Denmark has an adopted policy position to not clear vegetation in reserves adjacent to private development for the express purpose of reducing a BAL Rating. However, if the clearing is strategic in nature and of benefit to the wider townsite then it may be included in the Shire's Bushfire Risk Mitigation Plan and appropriately planned and funded.</p> <p>In this case the Shire will work with the landowner to consider road alignments, health of vegetation, etc to see where we can work together to achieve outcomes.</p> <p>Noted.</p> <p>Discussions are ongoing with DPLH as to the status of a structure plan amendment that addressed the issues raised in the submission.</p> <p>Not a matter that requires addressing specifically in the Local Planning Strategy.</p> |
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S52

[REDACTED]

What are the strategies or actions in the draft Strategy that you do not support and why? I do Not support the extra tourist ‘precincts’. The town struggles with the amount of tourists we have already.

We are becoming over-developed. STOP!!!

Do you have any other comments or suggestions about the draft Strategy?

Upheld (in part).

In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of

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| | | <p>Simply, more authority figures. More rangers patrolling.</p> | <p>the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>The resourcing of Rangers is outside of the scope of this Strategy.</p> |
| S53 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>I strongly oppose the creation of nine tourism precincts, as recommended in council's draft Local Planning Strategy (dLPS).</p> <p>The dLPS ignores or contradicts several key elements of other strategic documents, including the Sustainable Tourism Strategy 2021-2025, Our Future 2033: Shire of Denmark Strategic Community Plan, and the Sustainability Strategy 2021-2031. It is also inconsistent within itself.</p> <p>The above documents include commitments to environmental stewardship, climate-change mitigation, protection of cultural heritage, preservation of rural land and visual amenity, ecologically sustainable tourism, and a community-centred tourism strategy. Creating nine distinct and disconnected tourism precincts is contrary to the spirit of all those commitments.</p> <p>There are in WA and elsewhere many examples of towns that have lost their souls through tourism dependency or over-promotion. It is not just possible but imperative to manage visitor numbers in Denmark, based on two principles for delivering quality over quantity. The first of these is not copying or duplicating what other "successful" tourist towns have done, or trying to outdo them for customers/visitors.</p> | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |

Denmark's near-unique position in the marketplace is its relatively unspoiled natural environment, rural/coastal setting and small-town ambience. These increasingly rare resources can only diminish further and faster if tourism is encouraged to expand beyond a point where its impacts exceed its net benefit to the broader community. I believe that Denmark has reached that point.

Frankly, it beggars belief that nobody—including council—can see this; or that people are so naïve as to believe that Denmark will somehow become a better place by filling it with 'temporary citizens' three times a year; or that some people are so exploitative, uncaring and uncreative that their sensitivity extends only to their hip pockets.

Unintended consequences

It's a fact that if you widen a road more vehicles will use it and travel faster, thereby accelerating impact wear and tear, driver stress, and the likelihood of more serious accidents; perhaps even lose any benefits through increased management and maintenance costs, reduced safety, and driver disaffection.

The recent major redevelopment of William Bay–Greens Pool perfectly illustrates how NOT to 'do' tourism: increasing access and facilities, at considerable financial and environmental cost (not to mention inconveniencing regular users for many months) have not solved the perennial problem of overcrowding but *have* brought with them an increase in the associated ills of disappointment, frustration, bad press, and antisocial and even aggressive behaviour.

The antithesis is Parry's, where site allocation is on a first-come-first-served basis. However unsophisticated the system maybe it's simple, it works, and it's understood by all concerned. For decades at Yosemite National Park in the US entrance has been strictly regulated, with one vehicle allowed in for each vehicle leaving – again, crude but effective. What both systems do well, however, is minimise negative impacts on the environment as well as human and financial resources, because both follow the second principle, that of carrying capacity.

The Department of Biodiversity, Conservation and Attractions is the manager of the William Bay National Park.

Carrying capacity may be defined as the maximum population of [a] species that an environment can sustainably support. It has long been a primary metric when assessing livestock or crop farming, fisheries, tree plantations and other natural resource-based activities, and is wholly applicable to tourism from environmental, social and economic standpoints.

Alas, this principle has been forgotten or ignored by present-day commercial practice, whose mantra, crudely put, is: “How can we jam the maximum number of paying customers into the smallest possible space, for the least outlay and most profit?” The most stupefying breach of carrying capacity principles is the calculation that the world’s human population is now consuming an estimated 1.6 planet’s-worth of resources¹ – *ie*, exceeding by 60% the planet’s assumed carrying capacity. Nonetheless population, consumption and waste creation (and *ipso facto* tourism) continue to grow.

If the rest of world lived like we do in Australia, we would need the equivalent of 3.6 Earths to meet the demand.²

There are ways and there are ways ...

Under its new LPS council can choose to allow the expansion of businesses which exploit the district’s diminishing natural and rural environments – which directly and indirectly influence the composition, cohesion and wellbeing of our community – or protect them into the future, by strengthening and holding to its suite of strategic documents.

I particularly object to the creation of a William Bay tourism precinct, given that the area has already been identified in the dLPS as being —

- ‘sensitive to development’
- under pressure and threatened by environmental degradation
- over-promoted and over-visited, and
- a dissatisfying tourist experience.

The proposed caravan park on the doorstep of William Bay National Park will markedly exacerbate these shortcomings. Worse, the final responsibility and

The Draft Local Planning Strategy reflects the existing ‘Rural’ zoning of Lot 3 South Coast Hwy

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| | | <p>cost for whatever negative impacts the development delivers will fall on local residents and ratepayers, via council, while any benefits will accrue only to the proponent and small cadre of other providers. The <i>Sustainable Tourism Strategy</i> makes clear that we should help conserve natural heritage and biodiversity – not increase the threats to habitats and ecosystems, which <i>include</i> those for people.</p> <p>The endangered Baudin’s & Carnaby’s white-tailed black cockatoos are known to nest in the corridor of relatively undisturbed forest between William Bay and Mt Hallowell-Ocean Beach. Additional tourist facilities will necessarily increase human activity in this corridor, which can only have a negative impact on these vulnerable species, as well as other endemic native fauna and flora.</p> <p>It behoves council to reject additional tourism precincts at this time, and take a long hard look at the broader management of tourism in the shire; to buck the trend, resist pressure from short- term commercial interests, and underwrite Denmark’s unique market position as a special place where the local resident community and the natural environment take precedence over the tourism dollar.</p> <p>¹ UN Secretary General António Guterres, 2021, quoted at https://populationconnection.org/blog/carrying-capacity-earth/</p> <p>² https://www.science.org.au/curious/earth-environment/population-environment</p> | <p>under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.</p> <p>The Strategy identifies regional level ecological linkages and supports the preparation of a Biodiversity Strategy to identify key biodiversity values and responses.</p> |
| S54 | <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>As a landholder and long-term resident of Denmark, I request that the Denmark Shire Council does not adopt the Denmark draft Local Planning Strategy (draft LPS) in its current form.</p> <p>General</p> <p>Request that further specific consultation with affected landholders (and community) in relation to the proposed tourism precincts, prior to inclusion in the draft LPS - as per the Denmark Shire's Strategic Community Plan - Our</p> | <p>Upheld.</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and</p> |

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| | <p>future 2033, Sustainable Tourism Strategy, Sustainable Strategy 2021-2031.</p> <p>Request further investigation in relation to the proposed tourism precincts, prior to inclusion in the draft LPS - as per the State Planning Policies (SPPs):</p> <ul style="list-style-type: none"> - SPP 2.5 Rural Planning - Environmental and Natural Resources (SPP 2); - Planning for Tourism Guidelines - SPP 2.9 Water Resources and (draft) Planning for Water - SPP 3.7 Bushfire Prone areas 2023 - Government Sewerage Policy 2019 - Denmark Rural Settlement Strategy no.29 (1999) and Settlement Strategy for Denmark no.28 (1998) <p>In addition, consult local knowledge holders in the community pertaining to fragile ecosystems, foredunes, high biodiversity areas, wet and flooded areas etc.</p> <p>The plan does not 'reflect the community's vision for the future, as expressed in the Shire's Strategic Community Plan Our future 2033' due to ineffective community consultation and so I do not support the draft LPS in its current form for this reason.</p> <p>I support only the addition of the identified Denmark Town tourism precinct and suggest the addition of the previously identified Bow Bridge rural settlement node, as a potential future tourism precinct (with landholder and community agreement/discussion). Detailed reasons attached below.</p> <p>I do not support any of the other proposed tourism precincts due to lack of environmental analysis, lack of essential infrastructure, land constraints, visual landscape damage, lack of affective landholder consultation, and lack of effective community consultation.</p> <p>Tourism development should not automatically be granted as a land-use planning right, nor should it take precedence over the natural environment - which is currently the driving factor for the proposed Tourism Precincts.</p> | <p>rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |
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Planning for development should only occur on an as needs basis rather than for individual developer-driven gains and benefits.

I therefore request that the Denmark draft Local Planning Strategy is not adopted in its current form.

Details

I SUPPORT the creation of the proposed Denmark Town tourism precinct in principle.

Suggestions for Denmark Town Precinct:

Development should focus on the inadequate infrastructure and support it through applying 'development contributions'. Provide consistent power & electricity to cope during peak periods, consistent and stable internet, connection to sewerage, support of businesses to access staff for services. Increase and maintain creative attractions - such as music, art exhibitions, and performances throughout the year (not just summer time). Denmark Town can be nurtured and appropriately developed to provide an attractive place for in-between season, locals and visitors. Effective community consultation and input should occur.

I DO NOT SUPPORT the other proposed tourism precincts because:

Ineffective community consultation

The significant alteration to the draft LPS proposing to include nine (9) Tourism Precincts, has failed to effectively communicate this to the Denmark community, and consult in a timely manner.


Ineffective community consultation –




a. poor timing over Christmas with many people unaware of the proposed huge impact on the area with the changes proposed, evidenced by social media activity after the closing date for submissions; and f2f conversations with many locals and potentially affected landholders.

The preparation of the Draft Local Planning Strategy was supported by a substantial public consultation process, as summarised in the Council report. Advertising of the Draft Strategy occurred for 60 days between 23 October and 22 December 2023 and late submissions were accepted for a further 31 days up until 22 January 2024. This provided approximately 3 months for interested persons to become informed and make comment on the Draft Strategy.

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| | | <p>magnificent varied coastline and hillsapes. Not just isolated pockets.</p> <p>Although a Landscape analysis study has been done which identifies isolated pockets of higher value. The production of such a document minimises the presence, of the overall accumulative natural tapestry and environmental beauty and diversity. The landscape in its entirety, is ALL very valuable, it is the reason why people visit this area, for its natural beauty.</p> <p>Please do not adopt the draft Local Planning Strategy in its current form.</p> | <p>aims to identify key values and locations where controls are necessary; however, landscape values remain relevant to planning assessment in all locations in the event that planning approval is necessary.</p> |
| S55 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>The guiding principle for a local planning strategy is to provide the rationale for planning directions and targeted planning actions.</p> <p>Accordingly it provides the rationale for any zoning or 'classification' of the land under the strategy by –</p> <p>Avoiding the identification of land use intensification that is heavily constrained, for example - land that is low lying and requires extensive fill, has environmentally sensitive areas or native vegetation, has infrastructure and or servicing limitations such as access to water, is subject to bushfire risk that cannot be adequately addressed. Avoiding, mitigating or managing conflict between incompatible land use.</p> <p>The guidelines state local governments may identify planning areas which are spatially defined and include an area of land that has similar land use and development issues/opportunities. The guidelines give examples of planning areas and require the strategy to establish the proposed planning directions and actions, including why it was identified, the planning matters or issues of relevance, the rationale for the spatial extent and the suitability of the preferred land use.</p> <p>The Denmark strategy has identified thousands of acres which are classified future tourist precincts (no such classifications under the model provisions 2015).</p> <p>The extent of the 10 tourist precincts is unprecedented in area or selection. No</p> | <p>Upheld.</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |

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| | | <p>detail or support is given why such a vast area in each precinct is identified. Much of the land is either priority agricultural land, residential zoned, commercial zoned, reserved, very low lying, bushfire prone and could not meet the required recommendations or considerations outlined in Table 36. Example – Ocean Beach precinct – a very large section of the precinct area can be up to 1metre under water prior to the breaching of Wilson Inlet.</p> <p>Page 78 under tourism precincts states – under TPS 3 to include land within a tourist zone requires a zoning amendment. This has resulted in a complex and uncertain process and accommodated ad hoc proposal and uncertainty from neighbouring owners. Denmark is a tourist town and tourism should not be defined in precincts. Apart from a few zoning amendments which cater for varied aspects of the tourist market there has not been ad hoc proposals or uncertainty in providing for the tourist market.</p> <p>The strategy states that any amendment to accommodate tourism is a complex amendment but if within a tourism precinct it will be considered as a standard amendment. If this is the sole justification for a tourism precinct, as no other reason has been outlined, it is impossible to support the proposal. It should also be emphasised that the commission will determine under the 2015 regulations if the amendment is basic, standard or complex.</p> <p>Developers have aspirations, ideas and plans to cater for varied forms of tourism, continually changing with the age of the tourist. The strategy does not prohibit these developments within the Shire but for an unsubstantiated reason outlines substantial areas for tourism precincts.</p> <p>Therefore I submit that the WAPC should remove all tourism precincts as no planning basis has been shown for these substantial areas, nor have the Shire or Commission been inundated with tourism proposals which cannot be determined by zoning amendments.</p> | |
| S56 | <p>██████████ ████████████████████ ██████████</p> | <p>In regards to Draft Local Planning Strategy I would like to know whether environmental impacts have been considered for some of the sensitive tourist precincts that are up for development.</p> | <p>Upheld (in part). In response to the large number of submissions received in objection to the tourism precincts</p> |

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| | | <p>William Bay is an iconic location which locals have enjoyed for years but more and more it is too busy to even get parking let alone a space on the beach. To develop this area further is ridiculously and now with a “ proposed “ caravan park at its entrance it will be impossible. There is also the issue of safety on the highway at its entrance.</p> <p>Ocean Beach is another of the proposed tourist precincts, have environmental impacts been considered for this area with its coastal reserves and A class Mt Hallowell. What guarantees are there for their protection.</p> <p>Denmark already has the WOW trails, the Bibbulmun track, the heritage rail trail and many more. All these trails need maintaining which is already proving difficult for the Shire. As far as I am aware there is only one ranger to oversee our reserves, it’s an impossible situation already, with more tourism the very thing people come here to enjoy will be lost completely and destroyed.</p> <p>What consideration has been taken for the well being of the locals, the social impacts, the housing crisis, the environmental impact, water, power, parking and the list goes on.</p> <p>I understand a need for tourism which clearly we already have in abundance of, I can’t see that the small coastal town of Denmark can cope with more without compromising its natural beauty and the natural environment that most people come here for. Denmark has reached its tourism limit.</p> | <p>proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>The Draft Local Planning Strategy reflects the existing ‘Rural’ zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.</p> |
| S57 |  | <p>I am writing with great concern for the planned 9 Tourist precincts that are proposed in Denmark.</p> <p>There are so many areas of concern, for one I live in the Ocean Beach area and would like to know how Mt Hallowell/ Kooryunderup would be impacted. This</p> | <p>Upheld (in part). In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the</p> |

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| | | <p>is a very fragile A class reserve with 9 roosting endangered cockatoo pairs which is significant. There are rare orchids, fungi's not to forget the rare assassin spider and much more. We don't know what the impact of more tourism will have on this reserve.</p> <p>Then there is the Prawn Rock Channel that cannot cope already in summer, cars, people and children packed into such a tight spot. To encourage more tourists over the busy summer months is ludicrous.</p> <p>Town can't cope with the traffic, cafes can't find staff, there is no housing for extra staff or just for the locals that have lived here all their lives who are now either moving into campers and cars or having to leave town.</p> <p>I feel it is far more urgent that we look at housing rather than encouraging more people into town. Tourism encourages landlords to do holiday rentals which exacerbates the problem.</p> <p>William Bay is another area that has over reached its limits, even after being closed for nearly a year while new parking bays and roads were sealed and it no more copes than it ever could. Now we have a new caravan park opening up adjacent to its entrance putting more pressure on the area as well as making that stretch of road more dangerous .</p> <p>It seems to me that there is no consideration for the local population but rather grasping for the all mighty tourist dollar. Who is considering the environmental impact, climate impact, social impact.</p> <p>I have lived in and around Denmark for 44 years, over that time I have seen many changes but what has happened over more recent years is of great concern to me. I have only just touched on some of the issues, I hope our concerns are taken seriously.</p> | <p>Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |
| S58 |  | <p>In regards to running a small business in special residential zones such as , Shadforth, greater flexibility around the regulations here would mean that small businesses like mine could survive.</p> <p>In regards to operating a holiday home or holiday accommodation in the 'special residential zone' that we reside in at ,</p> | <p>The Strategy identifies an intent to increase the range of home-based business that are supported in residential and special residential areas, while acknowledging the need to minimise potential impacts on neighbourhood amenity.</p> |

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| | [REDACTED] | <p>Shadforth, greater flexibility around which parts of the property we make available for holiday accommodation would be appreciated and greatly help with the current rising costs of living. IE. Ideally, we would love the flexibility to be able to rent out the ancillary dwelling or the main home according to guest requirements. Or putting it another way, we would love the flexibility to be able to live in the main property and rent out the ancillary dwelling to holiday makers, or stay in the ancillary dwelling when we are down and rent out the main property to holiday makers.</p> | <p>The Strategy recognises a preference for hosted forms of short stay accommodation and the Shire will consider this feedback as part of the preparation of a new local planning scheme, where existing controls can be revised to reflect the intent of the Strategy.</p> |
| S59 | [REDACTED] | <p>I am writing on behalf of [REDACTED] and [REDACTED], Directors of [REDACTED], the registered proprietor of Lot 11 on Diagram 97148, who are seeking to:</p> <ol style="list-style-type: none"> 1. Subdivide Lot 11 into two green titles under Development Control Policy 3.4, exemption 6.5 – the creation of a ‘conservation lot’ (“Subject Site”), whose subdivision application has been submitted to WAPC dated 24th November 2023; 2. Include the Subject Site into the Peaceful Bay Tourism Precinct, as an extension of that tourism precinct; 3. Subsequent to the inclusion into the tourism precinct, rezoning of the Subject Site to Tourism under the new Local Planning Scheme; 4. Resolve the matter of the existing four (4)-site caravan park that was established by the previous owner who did not obtain approval from the Shire of Denmark for such a development; and 5. Apply for an additional 16 caravan bays within the Subject Site, for a total of 20 caravan/camping sites. <p>The registered proprietors engaged [REDACTED] to prepare a subdivision application for a two-lot subdivision under DC 3.4, which was submitted to the WA Planning Commission in November 2023 (still awaiting decision).</p> <p>Should subdivision be approved by WAPC, [REDACTED] would like to bring to the Shire’s attention, an opportunity to rezone the Subject Site to Tourism, under the new Town Planning Scheme and in accordance with the new proposed Local Planning Strategy. The following key components support this proposal:</p> | <p>Noted.</p> <p>Applications for subdivision approval are to be made directly to the WA Planning Commission and the Shire will assess and provide advice upon referral. In the event a conservation subdivision is progressed under State Planning Policy 2.5 and Development Control Policy 3.4, the lot will be included in the Environmental Conservation Zone as per the direction of these policies.</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts.</p> |

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| | | <ol style="list-style-type: none"> 1. Lot 11 Ficifolia Road already has an existing holiday accommodation business, trading as Nutkin Lodge, which has three self-contained chalets; 2. Lot 11 already has three powered and one unpowered caravan bays, albeit not currently approved by the Shire; 3. Lot 11 is surrounded by a number of significant local and international tourist attractions, such as: <ol style="list-style-type: none"> a. The Bibbulmun Track, which is only 13 metres to the west of Lot 11. Hikers could use Lot 11 as a starting point to begin if camping was made available through additional caravan/camping bays; b. The Walpole-Nornalup National Park which would attract visitors looking to enjoy the unique flora and fauna, such as the Albany pitcher plant; c. The Conspicuous Cliffs, which is only 5.8km drive from Lot 11; and d. The Valley of the Giants Tree Top Walk which is a significant international tourist attraction. 4. Lot 11 is only 8km from Peaceful Bay and only 12km from Nornalup. Provision of additional bays could boost commercial activity in these two towns. <p>It should also be noted that following subdivision, the conservation lot will have limited capacity for rural pursuits and given the factors above, the Subject Site would be better suited as zoned Tourism, particularly if the proposed caravan park is approved. It should be noted that under the Local Planning Scheme No.3, the Council may permit Aquaculture within the Conservation Lot following the rezoning, and this will also attract tourists, with the potential to create a “stay-catch-pay” type attraction with any ponds, similar to Karri Valley Resort in Pemberton but at a much smaller scale.</p> <p>In light of section 3.2.5.2 Tourism Sites and Precints, of the Draft Local Planning Strategy 2023, I ask that the Shire considers this proposal and identifies the Subject Site as a location where tourism land use and development is appropriate, beneficial as well as strategic and sustainable.</p> | <p>The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>The Draft Strategy indicates that the following matters will be considered as part of the preparation of a new local planning scheme:</p> <ul style="list-style-type: none"> • Introducing a ‘Camping Ground’ use class to support the retention of small scale, incidental nature based camping in the Rural Zone; • Removing permissibility for the ‘Caravan Park’ use class in the Rural Zone, thereby requiring rezoning to the Tourism Zone; • The introduction of Additional Use designations to enable the sustainability of existing, established tourism/ multi-faceted businesses in rural areas, where appropriate. <p>The Shire will not include new proposals for Tourism zoning within the preparation of a new local planning scheme.</p> <p>The Strategy provides details on how the Shire will assess landowner-initiated proposals for rezoning to the Tourism Zone.</p> |
| S60 | <div style="background-color: black; width: 100px; height: 15px;"></div> <div style="background-color: black; width: 100px; height: 15px;"></div> | <p>I have concerns regarding the implications of the Draft Local Planning Strategy (the draft). I strongly oppose its adoption, specifically the proposal of nine</p> | <p>Upheld. In response to the large number of submissions</p> |

tourism precincts (the proposal).

I am writing this submission amidst the most obvious reasons for my opposition to the adoption of the draft: the experience of an overcrowded, under-resourced, environmentally strained rural town with its residential and business community under pressure and awaiting post-summer reprieve.

The proposal does not include specific-enough strategies to address environmental, community, and infrastructure challenges. Words such as 'sustainable', and 'community' appear regularly in the draft, however, no specific details are included to illustrate what is envisaged in practical terms, which results in the proposal contradicting what seems the aim of the draft. Specifics (the 'how') should be considered, scrutinised, and workshopped with intensive and inclusive community input BEFORE adopting the proposal and the draft. When the impact of current levels of tourism seems the antithesis of sustainability and community interest, how can 'large-scale' tourism developments in the proposed precincts even be on the radar, and, to add insult to injury, be facilitated?

Denmark faces resource, and infrastructure challenges in its busy season, from water-supply to waste-management, parking issues to general congestion. The focus on tourism in the light of the challenges it brings, is a thorn in the eye of the current housing crisis. For example, what is sustainable about creating 'employment' opportunities when some of the servicing staff are unable to find housing?

In addition to environmental strain, community pressure, and infrastructure issues, I also strongly oppose the proposal because of its implication on future governance. Assuming the current council holds our local natural environment in reasonable regard, I am concerned that the proposal will fail to safeguard against future councils that may be even more business oriented.

It appears that in Australian politics it is generally believed that economic developments benefit communities, which the draft seems to illustrate. I would like to argue that there might be more evidence for the reverse. Encouraging

received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.

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| | | <p>strong community values, and the safeguarding of residents' primary needs are the cornerstones of a stable community, upon which robust economic developments can be build. Therefore, a draft Local Planning Strategy focussing on community values, proposing, for example, a more lenient multiple occupancy policy on rural land could be one step in the right direction to solve the real-life challenges of Denmark.</p> <p>In summary, I strongly urge the council to review the draft and to reject the proposal until a more sustainable proposal, which includes a deeper level of regard for all residents of Denmark, is established.</p> | |
| S61 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>I am firmly opposed to the adoption of the draft local planning strategy. It is incomprehensible to me that the Denmark community is faced with the prospect of the development of nine different so-called tourism precincts.</p> <p>Denmark Shire is barely coping with the current level of tourism. It is clear on many levels that infrastructure and resources are lacking on many levels. Denmark shire is already under severe strain.</p> <p>The proposed tourism precinct in the William Bay area is of particular concern. After recent major infrastructure projects at William Bay National Park, no sooner were new parking facilities and amenities completed, than the entire William Bay National Park area was overwhelmed with visitor numbers. The recent improvements undertaken by DBCA were overwhelmed before they were even completed.</p> <p>I have lived in the William Bay area since 1980 and I am distressed to see the increasing pressure placed on this precious and unique area. Every year the impact of too many visitors puts more pressure on a relatively small National Park.</p> <p>The proposed caravan park on South Coast Highway adjacent to the William Bay turnoff is a bad idea on so many levels one doesn't know where to start. How this ever got any traction at all is beyond belief. Access alone from South Coast Highway on the long curving hill is so dangerous that this never should have received consideration and should have been dismissed outright. There</p> | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the</p> |

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| | | <p>are many other problems associated with this proposal, and I am aware that concerns have been outlined by the Department of Main Roads, the WA Water Authority, and the DBCA, who all have reservations about a caravan park on Lot 3, South Coast Highway.</p> <p>I have a 120 acre property on the western side of the proposed site of this caravan park. I am dismayed that it seems to be a foregone conclusion that this caravan park is going ahead with little or no consultation with residents of Denmark Shire, and in particular for landowners who will be directly impacted by this proposal.</p> <p>The amount of work and capital that has already gone into this proposed caravan park site makes me wonder what is at work behind the scenes on the local and state level to seemingly green-light this project. There is something amiss with the processes and procedures of this proposal in particular.</p> <p>This is only just one instance of development in one of the proposed tourism precincts and one can only wonder what the Denmark community will be faced with when there are nine tourism precincts.</p> | <p>Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.</p> |
| S62 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>The Denmark Bird Group (DBG) wishes to express its strong concerns at the LPS proposed expansion of tourism development within the Shire as outlined in Section 8.2 Tourism Precincts of the Strategy.</p> <p>Community Feedback</p> <p>DBG notes the community and business feedback to the LPS indicates there may be support for maintaining the current level of tourism during peak times of the year (ie NOT increasing tourism) but is open to increasing levels during off-peak times. However, DBG remains alarmed even at the current level of tourism with its visible impacts upon the environment and local community amenity.</p> <p>More tourism development, such as proposed in the LPS, is certain to cause increasing negative affects to the local residential community who are already suffering significant difficulties with access to parking, cafés, restaurants, commercial business and to coastal recreation facilities. As well, they already</p> | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship,</p> |

see environmental impacts (rubbish, damaged vegetation and soil erosion (including from 4WD's) to the fragile coastal ecosystems.

Specific Tourism Precincts

Particular concerns are expressed for the following proposed precincts specified in the LPS due to their likely negative impacts on Wilson Inlet.

- Ocean Beach Rd

As a collective, the impacts from the extensive development of this precinct on the Inlet could be expected from waste water (+possible septic seepage), refuse and disturbance to waterbirds, shorebirds and other wildlife.

In particular, the Djerrt Mia Bird Sanctuary is vulnerable to tourist's noncompliance with signage to not encroach within the Sanctuary. The noncompliance behaviour is already evident under current tourism levels and even more will degrade the integrity and purpose of the Sanctuary.

- Weedon Hill

The impacts likely to threaten the Inlet from this precinct are similar to those for the Ocean Beach Rd precinct, acknowledging that Weedon Hill would be a smaller scale development.

Additionally, there is both on-site and adjacent forest containing foraging and potential breeding sites for Carnaby's and Baudin's cockatoo's, parrots and a variety of bush birds which would be directly threatened by construction for development and to tourism disturbance subsequently.

- River Mouth

As for Weedon Hill, both with direct frontage to the Inlet, the concept of siting more tourism access so close to the Inlet is totally inappropriate and does not need further explanation.

Tourism Precinct Development - Management and Mitigation of Impacts

Disappointingly, the LPS does not elaborate on the details of the management and mitigation of proposed developments upon the social and environmental

carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.

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| | | <p>impacts. Neither does it mention who will undertake the monitoring commitment which too often is left to the developer to take up that responsibility.</p> <p>Unfortunately, as has occurred in instances around WA and beyond, it is not uncommon for the developer to default on those responsibilities. In many cases it is then left to the local or State Government to have to take on the burden of rectifying the default issue.</p> <p>In the case of the Shire of Denmark, it would not have the resources to undertake those activities or bear the associated costs.</p> <p>DBG would advocate for specific responsibilities for independent monitoring to ensure better outcomes than relying solely upon the developers' actions.</p> <p>Community Engagement and Consultation</p> <p>As the LPS is a 200-page document it is unlikely that a representative section of the community has had the time to read and understand the proposals. We believe it is therefore imperative that the Shire commits to explaining to the community how they can justify the proposed tourism precincts against the growing concerns of residents to the likely impacts that will inevitably eventuate.</p> <p>We call on the Shire to respond urgently to the community's substantial concerns with a public engagement and information forum.</p> | <p>The preparation of the Draft Local Planning Strategy was supported by a substantial public consultation process, as summarised in the Council report. Advertising of the Draft Strategy occurred for 60 days between 23 October and 22 December 2023 and late submissions were accepted for a further 31 days up until 22 January 2024. This provided approximately 3 months for interested persons to become informed and make comment on the Draft Strategy. The Strategy was supported by two page summaries of key themes, FAQs and open invitation for enquiries to be discussed with Shire staff.</p> |
| S63 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>Thank you for opportunity to make a late submission to provide feedback on the council's draft Local Planning Strategy (dLPS).</p> <p>I would like to state my opposition to the proposed nine Tourism precincts as outline:</p> <p>1. The plan contradicts guiding Shire Strategic documents, including the Sustainable Tourism Strategy 2021-2025 (STS), Our Future 2033: the Shire of Denmark Strategic Community Plan, and the Sustainability Strategy 2021-2031, all of which emphasise environmental preservation and community-centred tourism. It also contradicts itself in the stated aims of the Plan under Our</p> | <p>Upheld (in part).</p> <p>The proposed introduction of tourism precincts in the Draft Strategy aimed at providing clear delineation on the locations where the Council would <i>and would not</i> consider planning proposals for tourism to be the predominant use of the land.</p> |

Natural Environment (p 11.). These documents and statements reflect community input . The misalignment between the intent of these statements and the dLPS requires immediate adjustment.

Examples of this misalignment occurs in the following places.

A. Under Strategies and Actions point 2 a.11. (P. 79) rezoning of land to support major tourism proposals is broadly supported, subject to the resolution of relevant planning issues AND to accommodate large scale to enable large tourism development proposals that come from within any of the proposed precincts. The dLPS in its stated support for large scale and major tourism development strongly implies that development proposals, if situated in a Tourism Precinct, will have in principle support. Having established a Precinct, Council will be placed in a compromised position to support major tourism development which clearly conflict with the other guiding documents, that state community intent to keep Denmark tourism low impact with limited increase tourism numbers.

B. It appears that the establishment of the precincts have been proposed within intent to streamline developer applications (p. 76) and rationalise tourism development to gain efficiencies in the provision of supporting infrastructure. However, what major tourism development is remains undefined throughout but does seem to align with the intent of the STS. Rather it implies large development, increased tourist numbers and threat to the environment through over tourism. A review of the published feedback did not find evidence of expression for this direction to be emphasised into this dLPS that will influence the look, feel and sustainability of the Shire for the next 15 years. It appears that while consultation was done to meet basic requirements Council has not aligned the planning strategy with the feedback received. It appears that external lobbying from State government and private development interests may have been given priority in this document given the deviance from the other guiding documents.

C. Tourism Precincts- how were they designated is not defined. Other than alignment with the five A's of tourism development - Accommodation, Access,

This did not propose to rezone land – the initiation of a rezoning would remain the responsibility of an individual landowner. Further, the delineation of precincts did not infer that a rezoning, land use or development proposal will be supported. All development or land use proposals that require planning approval are required to address relevant land use planning matters as prescribed in the *Planning and Development (Local Planning Schemes) Regulations 2015*. This may include site specific investigations into land use capability, environmental values, hydrology and water management, and any other matters that are deemed relevant.

In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of precincts, all major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.

Attractions, Activities and Amenities and an aim to co-locate resources, there is not a single reference made to environmental or social impact on communities, wildlife and green corridors, traffic flow and road safety, visual amenity or consideration of the long term impact on the carrying capacity of the natural environment to support intensive tourism development in these areas.

A recent example of how poorly planned tourism development can occur is the William Bay Caravan Park approval. This was approved despite numerous concerns raised in relation to identified nesting sites of Carnaby and Baudin Black Cockatoos, traffic hazards, over tourism of Green's Pool and sewage management issues. This shows how Council may be swayed to support major development that does not align with the abovementioned Shire documents. This development has the capacity to have detrimental impact on the visual amenity of surrounding areas with the ugly coloured playground already a blot on the landscape value of the area as well as disturbance to cockatoo nesting sites and increased demand on the William Bay National Park.

The Ocean Beach proposed Tourism precinct also raises a red flag, in particular, the designation of the wet paddock alongside Ocean Beach Road and the farming land which has remnant stands of old karris that are nesting and roosting sites of many bird species. This area surely would not meet that surely would not meet planning requirements. Why propose it in the first instance?

A precautionary principle should be routinely applied to avoid opening the door to a broad range of tourism development proposals that may result in a highly invasive and environmentally threatening solutions, such as wetland infill or removal of remnant vegetation on farmland. This is especially true in an area in proximity to key tourism attractions and aligning with the five A's further increasing a push for development.

More clarity on how these zones were determined is required with a strong request to abandon the idea of these Tourism precincts. This will allow for each application for tourism development, large or small, wherever it occurs in the shire, to be thoroughly evaluated for environmental and community impact using the precautionary principle as a guiding theme. This would align more

The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.

accurately with the abovementioned documents and would position Denmark to be an environmental jewel in the crown in the face of rampant overtourism and overpopulation as seen across Australia and globally. Essentially such long sighted measures would conserve the environment and the community for future generations.

D. Support for Tourism Attractions on state based land indicates an open door policy when it comes to planning for future Denmark tourism and use of lands, in many cases, with a high conservation value. The statement (p 78) that the dLPS supports the idea that Tourism Attractions may be considered on State lands where a range of unique natural assets exist subject to the resolution of relevant planning issues, consistency with the STS, and consideration of how public tourism assets will contribute to the development of tourism precincts, is of concern. Although qualified with reference to the STS and planning, this statement appears to provide in principle support for A Class and others Reserves, such as Mt Hallowell, to be further developed for unspecified tourism activities. The planners need to review whether a statement about development on State lands is necessary or legal and also quantify what kind of attractions would be considered in order to provide surety that the community priorities as stated in Shire documents are abided by without erosion from their original intent. While the statement may align with external State or Federal government directions, I would suggest that this question is posed to the Denmark community with more information as to why it has been included in the first place.

E. Lastly the statement that Denmark would like the option to progress the idea of being a Centre of Excellence for a specific regional attraction requires further detail. Where in the feedback is this reflected or is was this a decision taken by various interest groups within Council itself? Is this statement, along with item 3 that allows for Tourism Attraction on State lands, part of a push to promote Denmark as a centre for mountain biking. If this is the case, how was the community consulted on this and what other opportunities might there be for a other less invasive activities, for instance, indigenous heritage tourism or nature based tourism which has less environmental impact and an elevated capacity

The development of any attraction or infrastructure relating to the recreational use of land within a reserve is subject to the decision making processes of the government or council of the day and the public consultation that it deems fit. The Strategy seeks to promote alignment of any such development with its intent, as well as the Sustainable Tourism Strategy, in order to promote consideration of the community's vision and values that have been expressed through these documents.

The Strategy acknowledges that the centralising of funding and other resources into a regional centre can create disparity in the community and sporting facilities available in other towns such as Denmark. The Strategy suggests that alternative approaches, such as the development of 'centres of excellence', may assist in responding to this tendency. The Strategy does not identify or suggest what or how

for custodianship as stated strongly in much of the community feedback that informed the other Shire documents. Further it should be noted that Denmark is already a Centre of Excellence for its relaxed, lower impact and less developed tourism attractions. Is this concept really warranted in town already endowed with many natural attractions. This concept is not warranted or needed in this dLPS and should be reviewed.

More generally this plan does not address :

- Negative impact on community and land of unmanaged visitor numbers to the region resulting in the loss of the unique selling point of Denmark that has been identified in numerous consultative processes – that of the green, wild, natural and unspoilt environment. The Denmark community clearly does not want to become another SW tourist town sprawl of over tourism and destruction of natural amenity.


- Council to ensure that this plan clearly outlines how it will support the local community and prioritise long term sustainable tourism over short term commercial gains through including measures taken to provide a framework for developers on what kinds of tourism are acceptable to the local community that will safeguard the natural environment rather than identifying where they can develop.

- Further the Council should consider that a wise decision now to protect the integrity of Denmark for the future generations of locals and visitors will ultimately provide a critical point of difference that will value add to the longer term Denmark tourism experience while preserving local community values.

While the statement that we cannot stop Tourism is often stated, this does not mean that we cannot shape the kind of tourism that will build and enhance Denmark, including business interests. Councils and their communities have ample opportunity to guide the development of their shires and should do so.

In closing, I request that the current Council:

this concept might be achieved.

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| | | <p>1. integrates the intent of the other planning documents into the dLPS</p> <p>2. holds a Town Hall forum on this matter as part of the consultation process as part of a much stronger community engagement approach that extends beyond the Denmark Bulletin and the Denmark Shire Facebook page to increase community awareness and feedback.</p> | <p>The preparation of the Draft Local Planning Strategy was supported by a substantial public consultation process, as summarised in the Council report, including an open public meeting at which the concept of tourism precincts was discussed. During the extended advertising of the Draft Strategy an open invitation for enquiries and meetings with Shire staff was provided.</p> |
| S64 |  | <p>I am a long-term resident (over 20 years) of the William Bay area. I wish to comment on the tourism aspect of Draft Local Planning Strategy 2022 and in particular the proposed William Bay Tourism Precinct and caravan park.</p> <p>This proposal seems to contradict the principals of the Sustainable Tourism Strategy (2021-2025) which defines sustainable tourism as “ Tourism that takes full account of it’s current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities.” It also contradicts the guiding aims stated on page 5 of the Draft Local Planning Strategy.</p> <p>Community surveys for the Denmark Shire Sustainable Tourism Strategy identified these priorities</p> <ul style="list-style-type: none"> - 60% of respondents wishing to see no increase in the number of tourists in peak season (Summer /Easter) - Preserving resident quality of life - Conservation of natural areas, clean air and water, and the maintenance of Denmark’s village character - Better traffic management at peak periods - Denmark to remain an attractive, vibrant, creative community; and they want tourism to be eco-friendly and environmentally sustainable. <p>I do not understand how the creation of tourism precincts will seek to address these priorities or fix concerns regarding tourism in our shire. I believe that future tourism development needs to focus more on preservation of our community well being and be sensitive and responsive to its needs.</p> | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |

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| | | <p>As local residents we already experience the following problems –</p> <ul style="list-style-type: none"> - Overcrowding of William Bay National Park (WBNP) in peak season - Negative environmental impact on WBNP (eg rubbish, dogs, overuse) - Understaffing of National Park Rangers at WBNP - Negative impact on summer swimming lessons at Green’s Pool due to parking and beach crowding - Road safety issues within WBNP and the adjoining South Coast Highway- There is extreme road traffic problems within the park during busy periods as well as developing safety issues when exiting the park onto the South Coast Highway. - Road safety concerns for cyclists-Local cyclists already feel vulnerable with 80 km road speed, lack of designated bike path and existing volume of traffic. <p>I am concerned the development of the proposed caravan park will further exacerbate these existing issues. I am also greatly concerned that the development will contribute to the creation of a black spot area near the entrance to the park on the South Coast Highway, and jeopardise the safety of cyclists and pedestrians from the tourist park.</p> <p>I also believe the proposed caravan park will pollute and negatively impact the water quality of Lake Byleveld which is the drainage area for this development.</p> <p>As a resident I am deeply concerned about the current stress placed on WBNP and local traffic safety. I believe that development with the William Bay area needs to be sensitive to the existing stress on our local environment and community and that the proposed development will only amplify these issues.</p> <p>Thank you for taking the time to seek and process feedback from local residents.</p> | <p>The Draft Local Planning Strategy reflects the existing ‘Rural’ zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.</p> |
| S65 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>[REDACTED] acts on behalf of [REDACTED], being the owner of Lot 50 (No’s 82-90) South Coast Highway corner Hardy Street, Denmark (the ‘site’). We are pleased to provide, on behalf of our Client, the following comments in relation to the Shire’s draft Local Planning Strategy (‘draft Strategy’) which was advertised for public comment in late 2023.</p> <p>Whist formal consultation concluded on 22 December 2023, we confirm that the Shire has agreed to an extension of time being granted to enable Metcash to review the draft Strategy and provide a formal submission. We appreciate</p> | <p>Upheld.</p> <p>Although the Strategy does not forecast the need for a new/ second supermarket on the basis of the population growth during the next 15 years, it is understood that there is both significant latent demand (ie. past population growth that has not been met by the expansion of services) and a</p> |

the Shire's agreement in granting this extension and are pleased to provide the following comments for your consideration.

Site Location and History

The site is located on the corner of Hardy Street and South Coast Highway, opposite the Denmark Visitor's Centre. It measures approximately 9,986sqm in area and maintains a frontage of approximately 94m to Hardy Street and 143m to South Coast Highway.

The site is held in green title (freehold) ownership and is legally described as *Lot 50 on Diagram 9877 and held within Certificate of Title Volume 2186 Folio 204*. There are no encumbrances registered on the Certificate of Title. The site is currently vacant of any built form but contains some existing vegetation which is primarily located along the South Coast Highway boundary.

██████████ purchased the site in May 2013 with the intention of relocating their existing supermarket from Lot 150 (No. 2) Mount Shadforth Road corner Strickland Street. The Strickland Street premises has become too small (comprising a retail floorspace of only 1000sqm) and is struggling to accommodate sufficient stock and a variety of products to service local needs and compete with centres in Albany. The existing site is also not particularly well suited to a supermarket operation due to its sloping topography and limited parking.

Following its purchase of the site in 2013, ██████████ submitted an Application for Planning Approval to construct a 2,650sqm supermarket and 500sqm of speciality retail floorspace on the site. The Application was conditionally approved by the Southern Joint Development Assessment Panel ('JDAP') at its meeting on 10 April 2014. A subsequent amendment to this Approval was granted by the Shire of Denmark in 2017 (DA 153A) however this Approval was not implemented and has subsequently expired.

A change in store ownership halted progress of implementing the 2017 approval and ██████████ have been engaging with the new owner and potential developer with a view to fast tracking plans to support a fresh Application. It is

seasonal population that may support investment in new and/or expanded supermarkets in the near term. Officers therefore recommend that the Strategy maintains an opportunity for the potential development of a supermarket as this is a key commercial service to our community, and a significant component of trade leakage.

This also acknowledges concerns raised in other submissions about the availability of community and commercial services to support seasonal population peaks.

Feedback regarding the viability of developing a supermarket on land within the area designated as 'commercial' within the Draft Strategy is noted, and it is acknowledged that the Draft Strategy's approach may therefore not sufficiently enable the development of a supermarket within the next 15 years.

As a result, it is proposed to modify the Strategy to allow for the development of a supermarket on Lot 50, which is the only undeveloped, unconstrained and sufficiently sized landholding within a reasonable distance to the Denmark Town Centre that is capable of accommodating such a development, and that alternative options are available for service commercial land uses. The history associated with this property is also acknowledged.

However, it is noted that the establishment of a major retail development outside of the Town

expected that a formal Application for Planning Approval over the site will be submitted within the next 3 - 4 months.

Existing Zoning

The site is zoned 'Commercial' under the provisions of the Shire's current Local Planning Scheme No. 3 ('LPS3'), being rezoned from a 'Public Use' reserve in July 1999 via Scheme Amendment No. 24. The primary purpose of the Commercial Zone is to allocate land *"...for the major service, retail, office and entertainment uses in the townsite"*.

Refer to Figure 1 – LPS3 Zoning

The use class 'Shop' (which would include a supermarket) is classified as a permitted ('P') land use in the Commercial Zone under the Zoning Table in LPS3 meaning it is a use that is permitted provided the relevant standards and requirements contained in LPS3 are complied with.

Current Local Planning Strategy

The Shire of Denmark's existing Local Planning Strategy ('existing Strategy') was adopted by Council in October 2011 and endorsed by the Western Australian Planning Commission ('WAPC') in May 2012. The existing Strategy designates the site as 'Commercial'.

In relation to retail floorspace, the existing Strategy indicates a need for an additional 9,012sqm of commercial floorspace by 2031 to accommodate predicted population growth. It is unclear whether this additional floorspace has been delivered.

Proposed Local Planning Strategy

The site is proposed to be designated 'Service Commercial' under the Shire's draft Local Planning Strategy ('draft Strategy'). Land identified as Service Commercial is intended to accommodate *"...larger scale, car-dependent, lower-order commercial land uses (e.g. service station, drive-through development, bulky goods retail, vehicle sales and repair, warehousing) that are less suited to the primary commercial area"*. Retail land uses such as a supermarket are envisaged to be located within the Commercial area.

Centre main street environment could potentially have major social and economic impacts, and the proposed modifications to the Draft Strategy also seek to contain and minimise these impacts as much as possible.

In light of the issues raised by this and other submissions from affected land owners, the draft Strategy maps are proposed to be modified to change all Service Commercial designated lots located on South Coast Highway to a Commercial designation, including Lot 50.

Refer to Figure 2 - Draft Strategy Map

██████ does not support the site's identification as Service Commercial under the draft Strategy and is of the view that its existing Commercial designation should be retained.

Refer to Figure 3 – Proposed Amendment to draft Strategy Map

The draft Strategy sets out a number of specific Objectives in relation to the 'Economy and Employment'. These Objectives include the following:

- *“Provide opportunities for businesses to service the needs of the Denmark community locality as our district grows; and*
- *Provide flexibility to support businesses and commercial developments that maximise the benefit to the local community”.*

Removing the site's Commercial designation under the draft Strategy could compromise the achievement of these Objectives. The existing supermarket on Strickland Street has become too small (comprising a retail floorspace of only 1,000sqm) and is struggling to accommodate sufficient stock and a variety of products to service local needs and compete with centres in Albany. The existing site is also not particularly well suited to a supermarket operation due to its sloping topography and limited parking. A new (larger) supermarket is required to service local needs and reduce the extent of trade being lost to Albany.

This existing 'trade leakage' is acknowledged by the Shire at Section 3.2.1.3 of the draft Strategy which reads:

“The Shire experiences a relatively high level of trade leakage outside of the district, particularly to Albany as the regional service centre. Local spending within the Shire is lower than other local government areas within the Great Southern Region, as well as Australian averages.”

“To help promote opportunities for businesses and the provision of services locally it is important that the Shire has sufficient amounts of suitably zoned

land (commercial, service commercial and light industry) in order to accommodate future population and subsequent commercial growth.”

Section 3.2.1 of the draft Strategy (Economy and Employment) contains a similar statement:

“This Strategy seeks to support a sustainable and resilient local economy that provides services and employment for our community, encourages innovation, and adapts to change. This will be achieved by providing sufficient zoned land in appropriate locations and a balanced local planning framework that supports community outcomes but does not unnecessarily encumber business investment.”

If the draft Strategy is adopted as proposed and the site is ultimately rezoned from ‘Commercial’ to ‘Service Commercial’ (or similar) via an amendment to LPS3 or through the adoption of a new Local Planning Scheme, there will be no adequately sized and appropriately zoned land within the Town Centre suitable for the location of a supermarket. This is evidenced by the plan at Figure 4.

An area of land ideally in the order of around 7,500sqm is required to provide a supermarket, speciality shops and accompanying carparking. As Figure 4 demonstrates, there are no existing lots within the Town Centre of this size that are sufficiently zoned and unencumbered from a heritage and/or environmental perspective to accommodate such development.

Refer to Figure 4 – Town Centre Land Availability Analysis

The ‘Strategies and Actions’ identified in relation to ‘Primacy and Consolidation of the Town Centre’ under the draft Strategy includes a proposal to rezone land located north of the existing Town Centre comprising Lot 97 (No. 1) Short Street, Lot 257 (No. 2) Hollings Road and Lot 228 (No. 2) Strickland Street, to ‘Commercial’. These land parcels are constrained from both a heritage and an environmental perspective and are not suitably zoned under LPS3 to facilitate the development of a supermarket. Further commentary on these sites is provided later in this submission.

We understand the Shire's preference is for any new supermarket to be located within the Town Centre. However, the draft Strategy seeks to reduce the amount of Commercial land in and around the Town Centre which significantly reduces the prospects of a new (larger) supermarket being able to be accommodated.

Section 3.2.2.1 of the draft Strategy states:

“Commercial floorspace projections suggest that demand for an additional supermarket is unlikely to be generated during the next 15 years; however, this does not account for latent consumer demand or other commercial drivers having influence (such as available land and development costs). The viability of an additional supermarket may also be affected by the remote servicing from supermarket retailers based in the City of Albany.

This Strategy proposes that the Shire assist with the consolidation of landholdings within the Town Centre to support the development of a new or second supermarket if commercial interest is demonstrated. The Strategy does not support the development of a new or second supermarket outside of the Commercial Zone, as shown on the Shire of Denmark Local Planning Strategy – Denmark Town Centre (Planning Area A) map, on the basis that this would significantly affect the viability of the primary commercial area.”

The assessment undertaken by the Shire to inform the draft Strategy assumes a new (second) supermarket is sought however the proposal is to relocate the existing supermarket from the Strickland Street premises to the Hardy Street site. It would not be a second supermarket but a new larger supermarket.

The draft Strategy appears to acknowledge the constraints of existing lot sizes within the Town Centre and indicates that the Shire intends to assist with the consolidation of landholdings to support the development of a supermarket. It does not explain however, how this will be achieved. The large majority of landholdings within the Town Centre are held in freehold ownership and contain existing buildings, some of which are assigned heritage protection under LPS3. The consolidation of multiple land parcels held in private (freehold)

ownership is a complex process and we query how the Shire, notwithstanding its best efforts, could assist this process in a way that secures a developable site within a reasonable period of time.

Section 3.2.2.1 of the draft Strategy (Denmark Town Centre Primacy and Consolidation) states that:

“... the district is projected to require an additional 5,900m² of commercial floorspace between 2021 and 2036. The Town Centre has capacity to accommodate additional commercial development and with appropriate planning can adequately provide for commercial floorspace needs during this period. This will be facilitated by the consolidation and redevelopment of land within the Town Centre, limited expansion of the Town Centre footprint and the gradual movement of low yield land uses (e.g., showrooms) out of the Town Centre.”

The source of these floorspace projections is not quantified in the draft Strategy but appear to be based on the 2019 Land Use and Employment Surveys conducted by the Department of Planning, Lands and heritage (‘DPLH’). It may be correct, in theory, that the Town Centre has capacity to accommodate additional commercial development (although no evidence has been provided to support this statement) however a supermarket requires a large (and ideally flat) single land parcel given its floorspace requirements. As discussed above and demonstrated in Figure 4, there are no suitably zoned, appropriately sized and vacant land parcels within the Town Centre that would accommodate a supermarket.

The proposed change in approach to commercial development in proximity to the Town Centre under the draft Strategy does not appear to be supported by any technical economic input, the provision of which is critical to the development of a Local Planning Strategy. Once adopted, the draft Strategy will guide decision-making within the Shire for the next 20 years. It is therefore critical that rigorous assessment and analysis is undertaken. The absence of independent economic input in the development of the draft Strategy is of concern.

Section 3.2.1.4 of the draft Strategy (Commercial and Industrial Floorspace Analysis) notes that:

“Forecasted commercial floorspace growth is based on a continuation of the current level of trade leakage to other centres. If a greater proportion of resident spending occurred within the Shire this would increase the commercial floorspace that was viable within the Shire. If the range of services available in the Shire continues to increase as population grows, this becomes more likely.

Forecasted commercial floorspace growth is also based on the current ratios of employment by each industry sector. If the Shire was to see a greater level of growth in emerging industry sectors, such as tourism and food and beverage manufacturing, the future requirement for commercial and industrial floorspace could potentially double.”

This suggests that additional commercial floorspace beyond the predicted 5,900sqm could reasonably be required during the life of the Strategy, particularly if the range of services within the Shire were to be increased and the extent of trade leakage to Albany reduced. Rezoning existing land that is ready and suitable for commercial development could create a significant shortfall of commercial floorspace in the future which would, in turn, reduce the services and facilities available to residents and increase trade leakage to Albany. It would appear counter-intuitive to remove suitable zoned commercial land, particularly when there is no alternate land available for development.

Commercial Strategy

The Shire of Demark Commercial Strategy was adopted as a local planning policy in February 1999 and identifies the site as ‘Commercial’. It specifically refers to the site as *“the only option available”* for a new supermarket and recommended that the site be rezoned to ‘Commercial’ under the local planning scheme. This rezoning occurred in July 1999.

The Shire’s proposal under the draft Strategy to remove the site’s Commercial designation is inconsistent with the recommendations contained within the Commercial Strategy and it does not appear as though any formal review of the

Commercial Strategy was undertaken to inform the draft Strategy. In our view, this is an important and necessary process, particularly given the significant changes proposed to Commercial land under the draft Strategy.

Previous Decisions and Commitments

The Shire has consistently advocated for commercial development on this site since the land was rezoned in 1999 and the landowners (both previous and current) have consistently demonstrated a commitment to develop a supermarket on the site, as evidenced below.

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| 27 June 2006: | Council resolved (Res No: 181/06) to support the concept of the proposed commercial development on the site subject to a number of design considerations |
| September 2008: | Development Application for a Shopping Centre development on the site lodged with the Shire of Denmark |
| 24 March 2009: | Application refused by Council on the basis of build form design concerns |
| April 2009: | Proponent appealed the decision to the State Administrative Tribunal ('SAT') and through the process of mediation, amended plans were re-submitted to the Shire |
| 22 Dec 2009: | Amended Application approved by Council |
| May 2013: | Site purchased by [REDACTED] |
| August 2013: | New Development Application for a Shopping Centre development comprising a 2,650sqm supermarket and 500sqm of speciality retail floorspace on the site was lodged with the Shire of Denmark / Great Southern Joint Development Assessment Panel ('JDAP'). |
| 13 Nov 2013: | Application refused by the JDAP on the basis of build |

form design concerns

December 2013: Proponent appealed the decision to the SAT and through the process of mediation, an amended plan was re-submitted to the JDAP

10 April 2014: Planning Approval conditionally granted

12 May 2017: Proponent lodges an Application with the Shire to amend the approved plans

20 October 2017: Amended Application conditionally approved

Consideration of Alternative Site (Fire Station and Surrounds)

In recent discussions with the Shire, it has been suggested that [REDACTED] could acquire land north of the existing Town Centre for the construction of a new supermarket. The site suggested is [REDACTED] on Plan 157240, located on the corner of North Street and Horsley Road. The Shire also indicated that part of the adjoining property at [REDACTED] Strickland Street, which is owned by the Shire, could also be purchased or leased to provide additional land area.

[REDACTED] North Street measures 5,464sqm in area and maintains a street frontage of approximately 77m to North Street and 75m to Horsley Road. It is currently occupied by the Department of Fire and Emergency Services ('DFES') and is owned by the 'FES Ministerial Body'.

The northern 'half' of the site is heavily vegetated and is mapped by the DFES as being bushfire prone. The site also contains a creekline (Millars Creek) which runs in an east-west direction connecting with the Denmark River to the east. The site's proximity to the Denmark River means it is located close to, if not within, the flood plain and/or flood fringe associated with the river which could be problematic in terms of achieving necessary groundwater/surface water clearances for building construction. Given these constraints, the potential 'developable' portion of the site is considerably small and would not facilitate the construction of a suitably sized shopping centre.

This site is currently reserved for 'Public Use – Fire Station' under the provisions of LPS3 and forms part of the Shire's 'District Heritage Area' as shown on the

scheme maps. A local scheme amendment (rezoning) would need to be undertaken before an Application for Planning Approval could be considered. The timeframe for a local scheme amendment generally varies anywhere from between 12 - 24 months depending on the complexity of issues involved. Given this site contains both environmental and heritage constraints, we would expect the amendment process to take between upwards of 18 – 24 months from preparation to gazettal. There is also no guarantee that an amendment would be successful as the ultimate decision as to whether the amendment is adopted rests with the Minister for Planning. There are no rights of review (appeal) in respect to local amendment amendments, meaning that the decision of the Minister is final.

Given the above, the alternate sites suggested by the Shire at [REDACTED] corner North Street and Horsley Road and [REDACTED] Strickland Street present considerable risk and uncertainty in terms of their suitability to accommodate commercial development. The site's availability is also dependant on the relocation of the existing fire station. Whilst we are advised that the Shire maintains funding to relocate the fire station to new premises behind the Shire's existing administrative offices, we are not aware of any approved plans or construction detail that would indicate the fire station could be relocated within the next 2-3 years.

Summary / Key Issues

The following provides a summary of the key issues and concerns outlined above:

1. The site is zoned 'Commercial' under the provisions of LPS3 being rezoned from a 'Public Use' reserve in July 1999 for the specific purpose of accommodating a supermarket.
2. [REDACTED] purchased the site in May 2013 with the intention of relocating their existing supermarket from Lot 150 (No. 2) Mount Shadforth Road corner Strickland Street. The site was selected because it was (and remains) the only suitably sized and appropriately zoned parcel of land in the town.

3. The Shire has consistently advocated for commercial development on this site since it rezoned the land in 1999, with various Planning Approvals being granted since 2006.
4. The existing supermarket located on Strickland Street has become too small (comprising a retail floorspace of only 1000sqm) and is struggling to accommodate sufficient stock and a variety of products to service local needs and compete with centres in Albany. The existing site is not particularly well suited to a supermarket operation due to its sloping topography and limited parking and is constrained from redevelopment by its existing lot size and location. A new (larger) supermarket is required.
5. The current landowners remain committed to developing a supermarket on the site and are in discussions with the operator and developer to submit a fresh Application for Planning Approval in the coming months.
6. There are no alternate sites within the Town Centre that are unencumbered, sufficiently sized and appropriately zoned to accommodate a supermarket.
7. The large majority of landholdings within the Town Centre are held in freehold ownership and contain existing buildings, some of which are assigned heritage protection under LPS3. The consolidation of multiple land parcels held in private (freehold) ownership is a complex process and we query how the within a reasonable period of time.
8. The assessment undertaken by the Shire to inform the draft Strategy appears to assume that a new (second) supermarket is sought however the proposal is to relocate the existing supermarket from the Strickland Street premises to the Hardy Street site. It would not be a second supermarket but a new larger supermarket.
9. The commercial floorspace projections used to inform the draft Strategy are not quantified in the draft Strategy but appear to be based on the 2019 Land Use and Employment Surveys conducted by the DPLH. There does not appear to be any evidence of technical economic input being sought or

provided to support these projections.

10. Rezoning existing land that is ready and available for commercial development (such as the site) could create a significant shortfall of commercial floorspace in the future which would, in turn, reduce the services and facilities available to residents and increase trade leakage to Albany. It would appear counter-intuitive to 'lose' suitably zoned commercial land, particularly when there is no alternate land ready for development.

11. The draft Strategy is inconsistent with the Shire's adopted Commercial Strategy which identifies the site as being suitable for a commercial (supermarket) development. There is no evidence that a formal review of the existing Commercial Strategy was undertaken to inform the draft Strategy. In our view, this is an important and necessary process, particularly given the significant changes proposed to Commercial land under the draft Strategy.

12. The alternate sites suggested by the Shire at [REDACTED] corner North Street and Horsley Road and [REDACTED] Strickland Street present considerable risk and uncertainty in terms of their suitability to accommodate commercial development. The sites are significantly constrained by heritage and environmental issues and require rezoning under LPS3 before commercial development can be considered.

Having regard to the above, we confirm that Metcash do not support the draft Strategy in its current form and specifically object to the proposal to 'rezone' the site from Commercial to Service Commercial. Similarly, any proposal to rezone the site from 'Commercial' to 'Service Commercial' (or similar) via an amendment to LPS3 or through the adoption of a new Local Planning Scheme is not supported.

It is therefore requested that the Shire update the draft Strategy to retain the Commercial designation over [REDACTED] South Coast Highway corner Hardy Street, Denmark prior to the draft Strategy being presented to Council

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| | for consideration. Figures: | |
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FIGURE 1

SHIRE OF DENMARK LOCAL PLANNING SCHEME NO. 3 ZONING

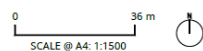
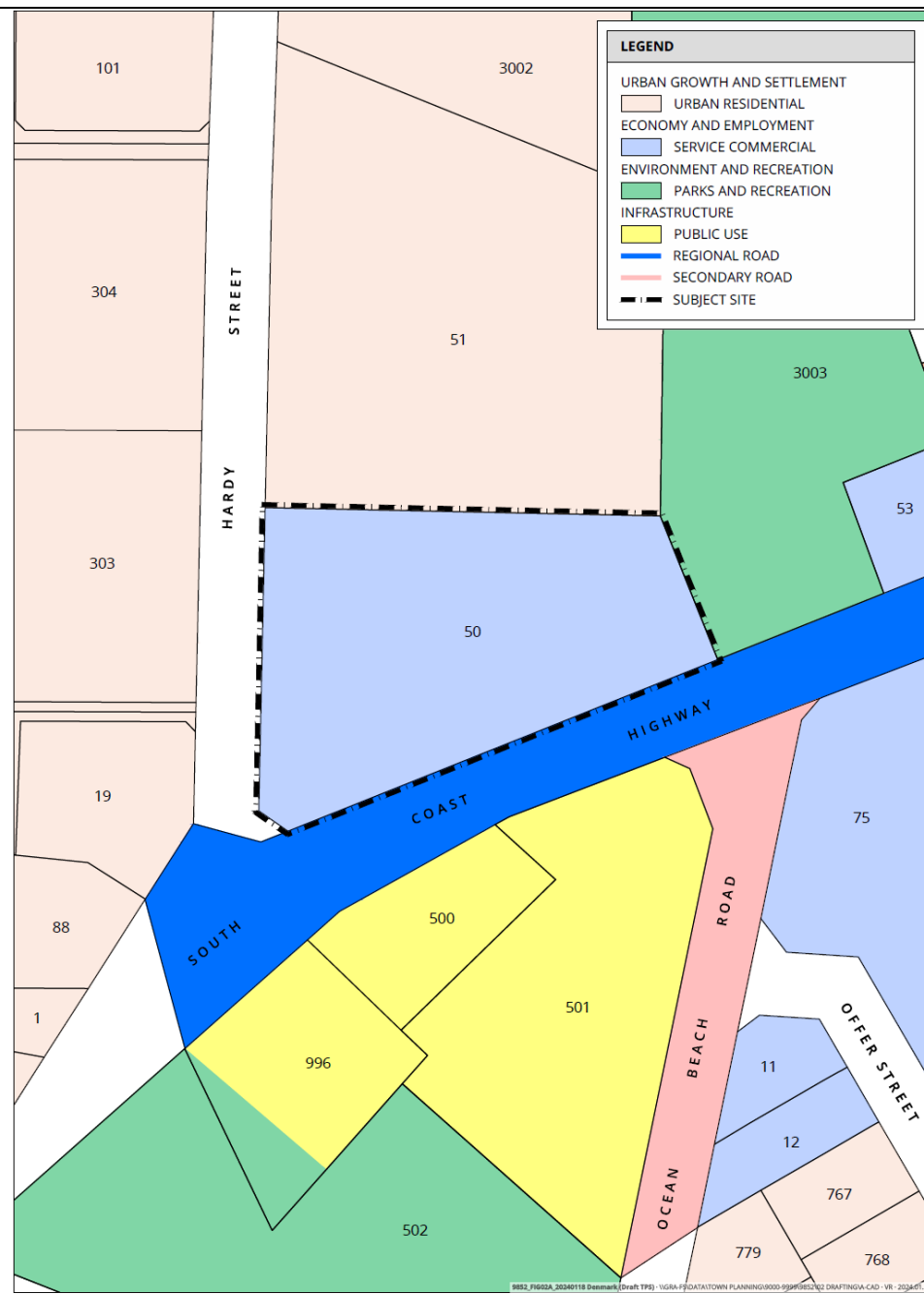


FIGURE 2
DRAFT SHIRE OF DENMARK LOCAL PLANNING STRATEGY MAP

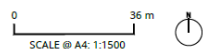
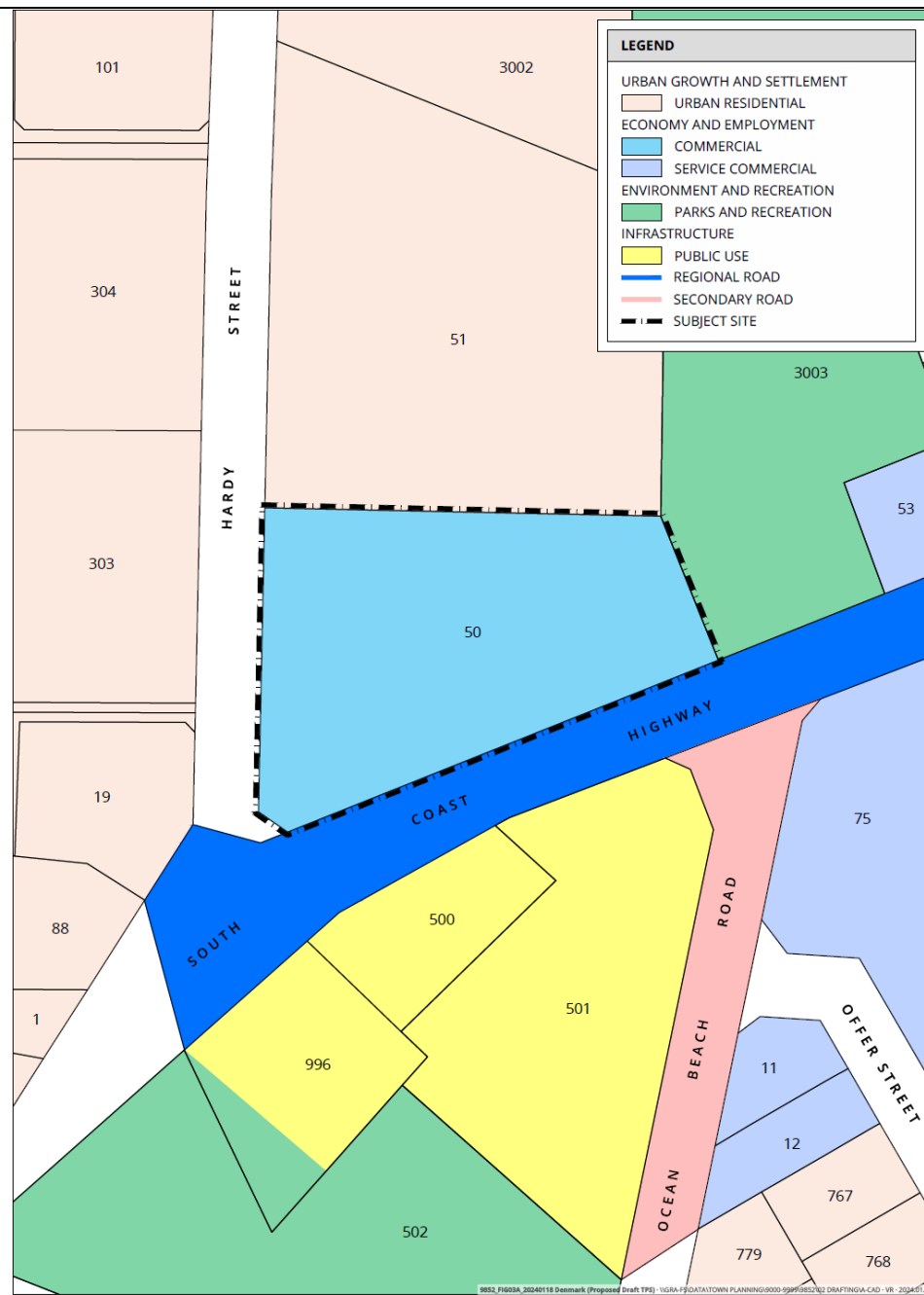


FIGURE 3
PROPOSED AMENDMENT TO SHIRE OF DENMARK LOCAL PLANNING STRATEGY MAP

9852_FIG03A_20240118 Denmark (Proposed Draft FPS) - VGBA-FG\DATA\TOWN PLANNING\0000-09852\FPS\02 DRAFTING\CA-D - VR - 20240122

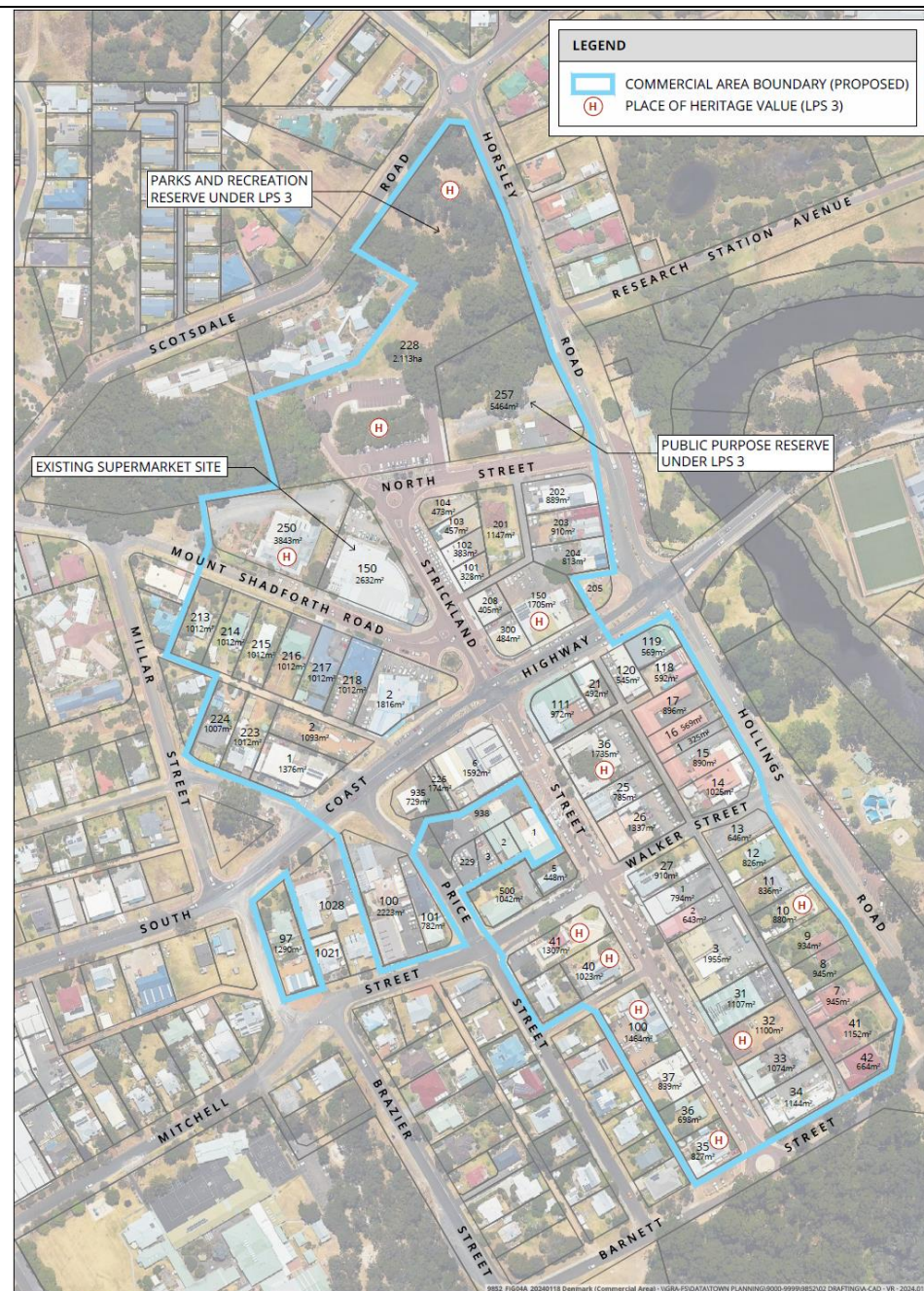


FIGURE 4
TOWN CENTRE LAND AVAILABILITY ANALYSIS

9932_FIG04A_20240118 D:\market (Commercial Area) \GIBA-FSD\TOWN PLANNING\0000-9999\9852\G2 DRAFT\FIG04A-CAD -VR - 2024.01.22

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| S66 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>In line with the Shire’s Climate Emergency declaration (2019) and Totally Renewable Denmark’s (Green Skills project) objective to reduce carbon emissions, Green Skills would like to emphasize the importance of prioritising an Integrated Transport Plan (see below for more detail). Transport (predominantly passengers and commercial vehicles) and Agricultural livestock have been identified as the two prominent sources of high emissions in the Denmark Region. See South Coast Climate Dashboard for 21/22 data.</p> <p>Transport</p> <p>Great to see the inclusion of a Denmark Town Centre precinct plan included – it needs to not favour cars in town centre – car parking is not a community building/effective use of town centre space and precludes giving priority to more sustainable transport options.</p> <p>Budgeting and preparing an integrated transport plan is a top priority – we have not had a plan to date and it is evident in the lack of integration of riding and walking, lack of facilities and connectivity; no public transport or strategy specifically to promote and support public transport p 131; the Shire needs to have a plan for EV charging now to meet rapidly increasing demand. This needs to be integrated with all forms of transport and integrated with the settlement and development patterns that will emerge from the Local Planning Strategy and updated Town Planning Scheme. Good to see this in the Infill and Consolidation section of the LPS draft. It is important to recognise that walking riding and public transport provision is central to address equity of access to transport for low income and to maximise accessibility to all abilities. Currently the car dominates Denmark and without a specific integrated plan this is unlikely to change. A vision such as ‘The Rottnest of the South Coast’ would set a different goal.</p> <p>Integrated transport plan mentioned on p 133 –needs a hierarchy that supports walking and cycling first, plans for public transport via mini buses and lastly cars. The bike plan, prepared by Green Skills, is very old and not sufficient to address needs in the draft LPS. An update is required. With the huge uptake of electric bikes, there needs to be more bike parking areas and potentially recharge stations available. This may include accessible power in public parks,</p> | <p>Action 3(b) within section 3.2.2.1 (Road Transport) of the draft Strategy commits to the preparation of an Integrated Transport Plan.</p> <p>Noted.</p> <p>Noted.</p> |
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replacement of carpark space in town with bike parking and e-bike recharge stations.

Consideration of supporting conversion of waste trucks, school buses to electric. School buses can be utilised as community buses outside of school hours and in school holidays to reduce tourism transport pressure to key iconic sites such as Greens Pool.

Tourism

██████████ supports the Sustainable Tourism Strategy and Action plan and the directions providing in them. It is important that tourism precincts are not created on the basis of proposals for development rather than being based on independent assessment of the types of activities that will support sustainable tourism and in suitable locations that do not detract from the environment and the village feel. The Sustainable Tourism Strategy includes feedback from the industry requesting that further expansion be in shoulder periods and not in the peak visitation times. This should be reflected in the LPS to be consistent.

The LPS draft makes reference to the opportunity and need for better interpretive activities and highlighting local materials. ██████████ was involved in preparing an Interpretive Guidelines for the Shire of Denmark as early as 2002 to indicate what would be included in such a Shire plan. It is timely to raise the need and positive outcomes from an Interpretive Plan for Shire and to name this in the LPS as part of the Tourism approach.

Some of the Tourism Precincts are not in ideal locations:

- Ocean Beach is in a potential high risk of flooding associated with weather events exacerbated by climate change.
- William Bay includes a proposal for a caravan park opposite the William Bay National Park turnoff that will add to peak tourism numbers close to a natural area site that is already under significant pressure. This is contrary to the Shire's Sustainable Tourism Strategy.

Tourism Strategy 2025 and any future changes to proposed Tourism precincts

Upheld.

In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.

Additional actions are proposed to be included in the draft Strategy recognising the importance of interpretive guidelines across the Shire, particularly for the Denmark town centre and surrounding areas.

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| | | <p>to be in alignment with Strategy and thorough community consultation.</p> <p>Promote ecological significance of this region through tourism and education. Includes supporting upgrade/ new infrastructure in areas which celebrate our unique ecosystems. Includes interpretive signage network accessible by bicycle transport/ walking, and an environmental education hub(s).</p> <p>Consider small ecologically sensitive camping facilities on rural/ special rural properties.</p> <p>Waste</p> <p>Implementation of FOGO as soon as possible will reduce waste management issues and turn a problem into a positive resource for the region.</p> <p>Denmark could be a town that models town-wide adoption of innovative and sensible waste management solutions such as – Ban on single use plastic (includes supermarkets), no single use cups/ containers, recycling/ reuse of wine bottles in local wineries. Great exposure to tourists. Strengthen current initiatives.</p> <p>Mixed land use</p> <p>The LPS draft suggests that mixed land use between residential and commercial can be incompatible.</p> <p>“Service commercial areas typically benefit from co-location, transport accessibility and high visibility, yet are generally incompatible with a mixed-use, main street, Town Centre environment due to high traffic generation and the large amount of low yield floorspace required.”</p> <p>While this is the case for some commercial businesses research on sustainability, community and land use has concluded that mixed land use is desirable whenever possible leading to vibrant town centres, great use of sustainable transport options and shorter trips for more people between home and work and home and retail. Careful selection of business is important but a goal of increasing mixed land use is important for sustainability with requirements for insulation and vegetation screening adding to overall</p> | <p>These waste related proposals are supported in principle but are outside of the scope of this land use planning strategy.</p> <p>Noted. The revised location of land in Denmark designated for Service Commercial uses has changed from along the Highway, to the existing Light Industrial Area. This area is proposed to be a mix of light industrial and service commercial land uses and is therefore not supported as a suitable location for the mixing of residential uses which may create reverse sensitivity issues, as well as taking up sought after commercial/light industrial land which is in short supply.</p> |
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| | | <p>attractiveness.</p> <p>Agriculture Support changes in agricultural practices that reduce fertiliser use.</p> <p>Diversity and housing [REDACTED] supports key strategic direction to provide Urban growth through infilling and not large lifestyle subdivisions – more sustainable, create community, protect biodiversity and agricultural land. Important to retain community open space, community gardens.</p> <p>Increase residential areas/ housing density along areas identified in Integrated Transport Plan as nodes or access pathways (public transport or connected to town via bicycle network).</p> <p>Feasibility Study of implementing ‘One Planet Development’ policy to support sustainable communities.</p> <p>Affordable Housing developments:</p> <ul style="list-style-type: none"> - Increase work with public bodies, utilities, charities and churches to explore the possibility of land sites being secured for affordable housing developments. This should be combined with local planning authorities continuing to make their own land available for development. - Link in with State programs for refugee and immigrant placements. - Co-op housing models like Mia Mia to be duplicated. - Tiny House and shared land use agreements to be reviewed to allow multiple occupancy. - Artists housing- To complement Denmark’s ‘village feel’ and Arts, Environment and Tourism culture, consider Artist cooperative alike City of Fremantle’s SHAC - a unique and exciting artist run housing cooperative whose core business is to secure permanent affordable housing and studio | <p>The Strategy supports initiatives identified in catchment management plans and similar that aim to reduce the impacts of agriculture on water quality.</p> <p>Noted.</p> <p>Noted. Sections 3.1.4.4 (Housing Availability and Affordability) and 3.1.4.5 (Housing Forms) of the Draft Strategy support a range of the housing options including tiny homes on wheels and co-operative housing models. The Strategy aims to provide a local planning framework that enables a wide variety of forms of housing in an appropriate and sustainable way.</p> |
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| | | <p>workspaces for professional artists and creatives in the City of Fremantle area.</p> <ul style="list-style-type: none"> - Explore the potential opportunities of using holiday accommodation, student accommodation and semi-permanent dwellings during periods when they are unoccupied. <p>Maximise the involvement of developers, including private developers and housing associations, in establishing the need for housing at an individual settlement level and engaging with local community at an early stage about the range of options for local developments</p> <p>Energy</p> <p>Implement Nationwide House Energy Rating Scheme (NatHERS) for all new homes, major renovations and (coming soon) existing homes – expected to be available mid 2025. This will put accountability on Landlords to improve rental home energy ratings.</p> <p>In alignment with encouraging Renewable Energy uptake, consider providing green loans to community members for installation (and maintenance/ servicing) of solar and battery systems. As a financial service licence is required for loaning of funds, there would need to be research into partnering with financing bodies i.e.. Bright or Bendigo Bank.</p> <p>Green Skills propose that the Shire provide free or heavily subsidised Household Energy Audits to the community to encourage faster uptake of RE. Householders need to first identify their current energy usage, in order to prioritise replacement/ purchasing of alternative lower energy solutions and RE production/ storage.</p> | <p>Noted. The National Construction Code including NaTHERS requirements are implemented and enforced by the Shire’s Building Services team.</p> <p>Outside of the scope of this land use planning strategy.</p> <p>Section 3.1.7.3 (Education and Engagement) of the Draft Strategy encourages community education and advocacy efforts regarding Ecologically Sustainable Design which may include energy audit subsidies or initiatives.</p> |
| S67 | <p>██████████ ██████████ ██████████ ██</p> | <p>As a long-standing environmental organisation within the Shire of Denmark, The Denmark Environment Centre would have hoped to have been consulted and had opportunity for input before the draft was released.</p> <p>It is our opinion that there needs to be further and more extensive public consultation before we and the community of Denmark can make an informed submission on the Draft Strategic Plan, specifically section 3.2.5.2 regarding the</p> | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove</p> |

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| | <p>Tourist zones. It is a complex document that takes time to read and understand, and lacks clarity and key information.</p> <p>The section about the Tourism zones is midway through this lengthy document and is just one of many topics. The maps supplied are hard to read and the dotted lines denoting the proposed tourist zones are difficult to see clearly. As they are the main focus of the maps they should be prominent features with clear explanations as to why such large areas should be reclassified as tourist zones, and what that means for residents.</p> <p>One aim of the document is stated on p. 5 as:</p> <ul style="list-style-type: none"> • Promote opportunities to increase the sustainability of tourism land use and development. <p>However, other aims on p.5 are stated as:</p> <ul style="list-style-type: none"> • Retain rural areas for agricultural production. • Recognise and seek to preserve the outstanding landscape values of the district. • Contribute to protecting and managing the Shire’s environmental features and ecological communities. • Protect and conserve the quality and quantity of the Shire’s natural resources. <p>We question the viability of meeting the second group of aims as proposed.</p> <p>This issue affects the lifestyle of residents and the integrity of large areas of the natural environment. There is detail lacking in what the process would be when tourism approval is sought within these zones.</p> <p>The document states that it is ‘likely’ that there would be further planning approval required, but it doesn’t say this would be a definite requirement nor what that entails. Furthermore, pages 78 and 79 clearly state that these new</p> | <p>all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>The proposed introduction of tourism precincts in the Draft Strategy aimed at providing clear delineation on the locations where the Council would <i>and would not</i> consider planning proposals</p> |
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| | | <p>tourism precincts be put in place to facilitate and streamline major tourism development.</p> <p>We are concerned that the plan allows for Tourism development without rigorous assessment of individual locations on a case-by-case basis.</p> <p><u>Careful consideration needs to be given to native vegetation, waterways, native species, and impacts on adjacent bushland habitats in each location.</u></p> <p>In addition to this we are concerned that the priority given to tourism via these swathes of pre-approved zones disregards residents who have come to the area to enjoy the natural environment and a rural lifestyle. Despite the stated objective of the plan to maintain existing lifestyle values, tourism is being expanded to the detriment of the values and lifestyles that residents come to Denmark to enjoy and work hard to maintain.</p> <p>We question the lack of value given to rural lifestyles and we hope to see more specific details as to how the integrity of the natural environment will be assessed and maintained within these zones. We would like to suggest that a single document be created regarding the Tourist Zones including more clearly defined and informative maps. In addition, more detailed and well publicised public consultation sessions specifically on this topic would allow the community to voice its concerns and achieve clarity on this issue.</p> | <p>for tourism to be the predominant use of the land. This did not propose to rezone land – the initiation of a rezoning would remain the responsibility of an individual landowner. Further, the delineation of precincts did not infer that a rezoning, land use or development proposal will be supported. All development or land use proposals that require planning approval are required to address relevant land use planning matters as prescribed in the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>. This may include site specific investigations into land use capability, environmental values, hydrology and water management, and any other matters that are deemed relevant.</p> |
| S68 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>The Wolery is affected by a number of the proposed policy changes and directions in the Strategy.</p> <p>In particular:</p> <ol style="list-style-type: none"> 1. The proposed change in the zoning of our property from Multiple Occupancy to Rural 2. The proposal for 9 tourism zones including a zone that impacts directly on the Wolery to the south and east of our community. <p>The Wolery submits that:</p> <ol style="list-style-type: none"> 1. The zoning of Multiple Occupancy should be retained by the Shire and strong representation be made by the Shire to the State Planning Department for this zoning to continue statewide as an avenue for | Noted. |

providing sustainable and affordable housing and social communities with high wellbeing and self sufficiency.

2. That the proposed tourism zones be removed from the current draft Local Planning Strategy and a broad review and updating of the Sustainable Tourism Strategy be undertaken with thorough community consultation for the best ecological, business and social outcomes to be achieved for the community as a whole.

Change of Zoning from Multiple Occupancy

Wolery members are very concerned that our community, which was established as a Multiple Occupancy, will be designated under a different and not an appropriate zoning. We understand that the Council is making this decision in line with a State Planning Department decision not to support MO as a separate zoning category in future Local Government Strategies and Town Planning Schemes.

At this critical time of need for affordable and accessible housing in Denmark – and across Australia - the WA government is closing down this option by not supporting Multiple Occupancy rather than seeing it as an important route, along with a range of other models such as Housing Cooperatives for equity and non-equity households, to help meet the affordable housing needs of WA.

Multiple Occupancy thrived in Australia post-wars and then again during the Bob Hawke government as it was seen as a way of providing self organised communities on the land with access to housing and sustainable lifestyles. The Hawke government supported the establishment of the NGO Australian Sustainable Communities Association bring interested people together. Out of these groups a range of self organising and self funded communities established and remain active today.

The Wolery is seen as a model of sustainable community in WA and Australia wide. It was established in 1976:

- To acquire and manage land, to conserve, restore and improve it on sound ecological lines.
- To encourage and carry out in conservation farming and in lower impact

In order to receive consent to advertising the draft Strategy, the Department of Planning Lands and Heritage (DPLH) required that the Shire modify the first version of the draft Strategy by removing the Rural Multiple Occupancy Zone and showing these areas as being within the Rural Zone, with an intention under a new Local Planning Scheme to provide an Additional Use designation to carry over the existing provision contained within Appendix VII (Rural Multiple Occupancy Zone Provisions Relating to Specified Areas). DPLH have made it clear that this is not an issue that the Western Australian Planning Commission is flexible on.

The proposed change to Rural zone with Additional Use provisions will enable this site to continue to operate as they always have and will not impact what is allowed to occur on this site under the local planning framework.

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| | | <p>technology and share experience.</p> <ul style="list-style-type: none"> - To provide educational, recreational and residential amenities on the Community land for members of the Community and for visitors. <p>This model has provided affordable housing to the 15 households on the Wolery and provided inspiration to hundreds of visitors and student groups and to other communities who have established similar self sustainable communities.</p> <p>The lived experience of members of the Wolery is that MO provides the basis for more resilient and self directed communities than other models such as purple title and strata title zoning.</p> <p>The Wolery is based on joint ownership through one title and membership through an Incorporated Association. This means that all decisions are jointly made and new members need to be agreed to by 90% of the members of the community. This model leads to high levels of cohesion in the community and a high commitment to living according to the common objectives and sharing resources and our lives. The community is self sufficient in water supply, fire fighting capacity, internal roads, has a community centre, joint workshop, tractor and implements, water supply, bulk food cooperative and grows much of its own fruit and vegetables which is shared internally and externally. Socially its members are well connected to each other providing support especially in times of need.</p> <p>The Wolery houses have been substantially built by the members as owner builders from mud bricks made from the property, recycled materials and sustainably sourced timber.</p> <p>Members of the community are very active in community organisations and volunteers in the wider Denmark Community. Members have been recognised by the Shire as Senior Citizens of the Year and other accolades for their services to the broader community.</p> <p>There are few other models of housing that provide an avenue of affordable and sustainable housing like the Wolery model of Multiple Occupancy.</p> <p>It is perplexing to see such a positive model being discarded at this juncture when it is needed most acutely.</p> | <p>Although the Shire is unable to support the continuation of Rural Multiple Occupancy Zone in the next Local Planning Scheme for the reasons detailed above, the Strategy is supportive of co-operative and shared ownership models of housing as detailed in the 'Co-operative Housing' sub section</p> |
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Proposed Tourism Precincts

It has been very disappointing to read the section on Tourism and the proposed Tourism Precincts in the Draft Strategy.

The proposal is contradictory to elements of other strategic documents including the *Sustainable Tourism Strategy 2021-2025*, the *Sustainability Strategy 2021-2031*, *Our Future 2033: Shire of Denmark Strategic Community Plan*.

There is no indication in the Sustainable Tourism Strategy or Sustainability Strategy that 9 proposed precincts are the logical response to the objectives of these strategies. The Sustainable Tourism Strategy states that *“tourism that is poorly planned and managed can generate negative impacts on the environment, on the health and wellbeing of communities and on economic outcomes.”*

These discontinuous precincts appear to be an ad hoc determination based on proposals from developers rather than the Shire outlining how it will meet the needs expressed in key strategies to manage tourism to avoid further pressure on the environment and local business infrastructure and resources during current peak periods and across the whole year. Council strategies identify that there are constraints to resources including energy, sewerage, water, climate change impacts, transport services and housing that need to be addressed.

All three strategies mentioned above highlight community support for environmental and cultural stewardship and protection of the environment, visual amenity and Denmark’s village, human centred community. Yet we have 9 proposed disconnected precincts of 2279.21 ha in total without detailed rationale of their locations or the need for them. The William Bay proposed precinct is 439.74 ha and neighbours have indicated that they were not consulted about their inclusion. Ad hoc encouragement of tourism like the proposal for a caravan park and associated activities in the William Bay proposed precinct, does not engender confidence in this approach. Several Wolery members are active volunteers of the William Bay National Parks Association and are personally aware of the impact of current visitor numbers

under 3.1.4.5 (Housing Forms).

Upheld (in part).

In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.

especially at peak times.

The proposed caravan park is sited opposite the entry to the William Bay National Park and will increase visitor numbers to Denmark and the William Bay National Park at peak periods. The proposal is contradictory to the community's interest in environmental stewardship and puts pressure on servicing tourism in the larger community. It will benefit the proponent but be detrimental to the environment, has the potential to create a road safety Black Spot. The location does not have access to bike, walking trails or natural areas other than by car and the proposal has major waste management and other shortcomings.

The proposed William Bay Tourism Precinct also include Bell Road which is the access point to two properties included in the Precinct. Bell Road is a school bus stop. It is clearly inappropriate to jeopardise children safety with potential future tourist traffic to the two properties with Bell Road as their sole access.

Several of the 9 proposed Tourism Precincts pose threats to the rural visual amenity and all will put additional pressure on tourism service industries if carefully thought through planning in a detailed, update Sustainable Tourism Strategy with community consultation is not undertaken. The current strategy indicated that many in the local tourism and service industry do not want further growth in visitation in the peak period.

It is ironic that in the William Bay tourism precinct is already identified in other strategies as being

- 'sensitive to development'
- under pressure and threatened by environmental degradation
- over-promoted and over-visited, and
- a dissatisfying tourist experience.

We agree with this assessment and wonder how the proposed William Bay precinct can be seen as anything but an amplifier of those issues.

The Wolery is supportive of many aspects of the Local Planning Strategy but feels strongly that the approach to Tourism represented by the proposed Tourism Precincts needs to be reviewed with community consultation and

The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.

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| | | <p>addressing how the approach can meet the community objectives of ecological and cultural stewardship and protection, protection of rural and natural vistas and the village feel and address resource sustainability and traffic safety issues.</p> <p>The Sustainable Tourism Strategy begins the discussion about how to attract tourists that care about Denmark's core values and visit across the seasons. An interpretive and restorative/regenerative tourism approach has been exemplified by initiatives such as the Gondwana Link Heartland Journeys – telling the stories of place and people who care deeply about the Great Southern and are working to protect and share knowledge about it https://heartlandjourneys.com.au/ This is consistent with the Wolery Ecological Community's approach to its stewardship role on this property and consistent with community vision expressed in the Shire's key strategic documents.</p> | |
| S69 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>Please register this as our objection to the 2022 Local Strategic Plan for the Shire of Denmark Proposed Mt Shadforth Tourist Precinct Eastern Boundary. This proposed area directly borders our property, 8 Edwards Street, Mt Shadforth. We propose a reasonable amendment to this Eastern Border and we have attached an improved eastern border location for your review and consideration.</p> <p>This suggested improvement allows for a 'buffer zone' to neighboring residential areas that the current proposal encroaches on. This amended boundary considers existing residential lots, accessibility routes and promotes existing and prospective tourist locations. We believe this route reduces environmental impact, allows residents privacy, reduces potential noise disturbance and maintains existing character of the neighborhood.</p> <p>We strongly believe that the amendment to the eastern boundary is required for the following reasons:</p> <p>Environmental Noise- Any tourist business will cause noise disruption to ourselves and residents directly neighboring and nearby, of which the current proposed eastern boundary has many! [REDACTED], you said yourself in our</p> | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |

discussion on the 19th January 2024 that this had not been considered. Traffic increases, noise from business activities, noise from human interaction at tourist attractions will all negatively impact on our residence and those of our neighbours, no matter what the tourist business.

Loss of Privacy- This current proposed boundary quite literally encroaches onto residential back doors. The proposed eastern boundary is situated on higher land than neighboring residential lots. Most of these are not acreage lots and any tourist activity will directly overlook ours, neighbours and those nearby. This will be an invasion of our privacy.

Traffic- Pushing the Eastern boundary back westward would negate the need to use Cussons Road as a tourist route. An increase in traffic on Cussons Road will, as previously mentioned cause an increase in noise to residential areas neighboring it. Additionally, Cussons Road is partially unsealed and consistently corrugated. An increased number of vehicles to new tourist sites will only cause costly further degradation to this road and increased dust in the area.

Making a small reduction to the proposed Mt Shadforth tourist precinct by shifting the eastern border westward would encourage tourists to use this existing 'Scenic Route' route. I am of the understanding that Sunrise Road has been advertised as budgeted to be sealed. Sunrise Road is already part of the designated 'Scenic Route' and would deliver tourists on the doorstep of existing tourist attractions such as Denmark Chocolate, The Dam and Lights Beach. Tourists travelling in the opposite direction would be channeled into the town centre promoting greater potential for economic expenditure. With currently no tourist attraction on Cussons Road this will not disadvantage any business in the boundary was altered.

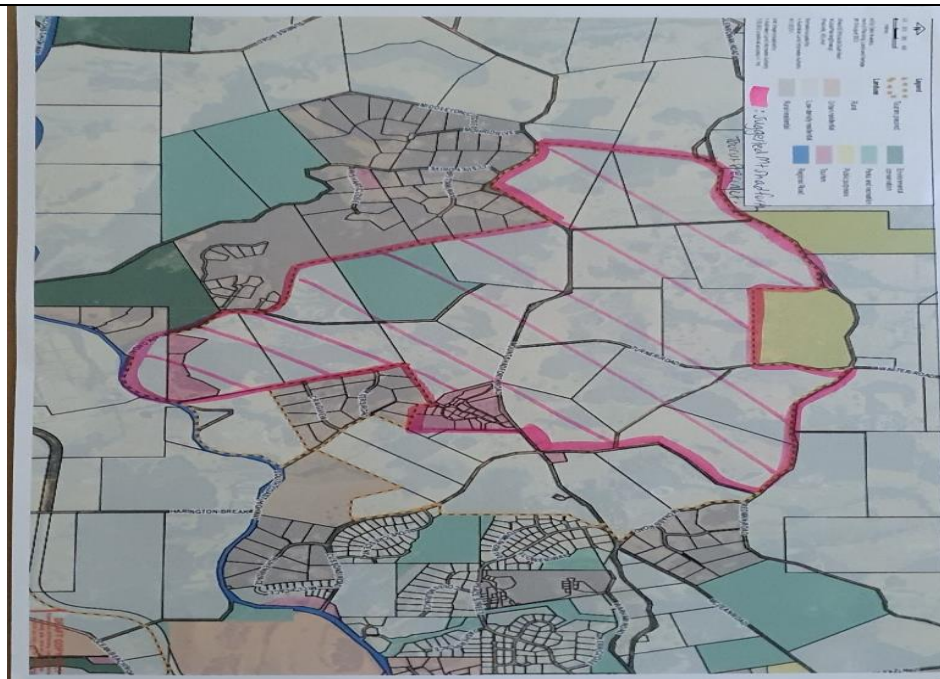
Environmental Impacts- Shire Planner advised me that one of the aims of the LPS defined tourist precincts was to protect existing farmland, currently our neighboring lot (and the majority of the Proposed Mt Shadforth Precinct) are farmland. Designating this area as a 'tourist precinct' discourages use of this land for this purpose. There are literally hundreds of Karri and Tingle trees on these properties preserved. Many native wildlife resides on these locations of

A wide range of land uses can potentially be developed on any Rural zoned lot under the current Town Planning Scheme 3. Before support is given for any land use, including tourism, a proposal is assessed for its compatibility with neighbouring land uses, and consideration of mitigating impacts may include the need for increased setbacks, screening, changes to development design or orientation, hours of operation, etc. The Strategy proposes a number of measures that will improve these protections.

the neighboring lots. It would be a significant loss to lose farmland, trees and wildlife of the area to tourism ventures. Mt Shadforth Road is a designated a 'Scenic Route', how scenic will Mt Shadforth Road outlook be if it is overdevelopment with buildings and tourist attractions. This in itself may be detrimental to tourism in this precinct.

Character of the neighborhood- The Neighborhood on the proposed Eastern Boundary is a quiet, well kept, respectful area. It is a sanctuary for residents away from the chaos of town, life and tourists. This is why many of us have chosen this location to live. For some it took years to find and secure a lot of this caliber. Overdevelopment of too many tourists' business' in the area will undoubtedly, and sadly change the character of this neighborhood.

We implore you to please consider and accept our reasonable proposal as attached on the map for the repositioning of the Eastern Boundary of the Proposed Mt Shadforth Tourist Precinct contained within the 2022 Local Strategic Plan. Please contact us as we are more than happy to discuss this further with you and appreciate the time you have provided to us to date.



S70
 [Redacted]
 [Redacted]
 [Redacted]

I note with interest that one of the proposed tourism areas on Mt Shadforth is situated on the corner of Illsley Drive and Wishart Close. The current use is as a residential area. We live directly opposite the area in question and have a particular interest.

The area has developed as residential over time with three new residences being built since we moved in 9 years ago. In that time two places have changed hands and to my knowledge, no mention of any tourist development has been mentioned. I would urge Council to recognise the reality that the area is now residential and rezone the area as such.

Noted.

The site referred to is a Tourist zoned lot which was created and zoned when this subdivision first took place, as identified in the Mt Shadforth subdivision guide plan. The site is currently only developed with a single dwelling. The Draft Strategy is proposed to be modified to change designation of this site from Tourism to Rural Residential, to match surrounding lots and current use of the site.

S71
 [Redacted]
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We believe that the proposed Mt Shadforth Tourism Precinct should be reduced in size as indicated in the attached map to prevent any possibility of commercial tourism negatively impacting the existing residential properties in our part of the Mt Shadforth area.

This amendment would see any new tourism developments located closer to and in the vicinity of existing tourism enterprises such as Castelli Wines, Ajar

Upheld (in part).

In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove

Restaurant, Karri Aura Caravan Park and Chalets, Lake House Denmark, away from residential properties.

When we moved to Denmark, quality of lifestyle was our greatest imperative. It took us 5 years of searching to find our idyllic property in Edwards Street, Shadforth. We went to great lengths to find our quiet, peaceful, unbusy residence. Our evenings are undisturbed, we have respectful neighbours and live in a well looked after, no fuss area. It is our sanctuary.

Our property is our one and only significant asset and we need to protect this investment into the future to ensure we have, as retirees, sufficient wealth for whatever ageing may deliver to us. We strongly believe this part of the Mt Shadforth area should remain a purely residential area.

The adjoining property to our property's western boundary is a large undeveloped acreage (farmland) that has been held by its current owner [REDACTED] for about sixty years. This owner is in his very senior years and has no desire to develop this property, that we are aware of.

However, he has two children currently residing in Denmark who we believe could make significant financial gain from this property, if it were to be sold as a whole parcel of land to a large-scale developer for a purpose that may include, for example, a brewery, winery/restaurant, caravan park, adventure playground, sporting complex, BMX park or any other larger scale retail like enterprise (ie. The Dam, Boston Brewing).

To think that such like commercial enterprises could be built within 10 metres of our side boundary causes us extreme anxiety. There is zero possibility of us mitigating or abating any impacting noise or other disturbance from any such development.

By way of example, the last Castelli Estate music concert (Birds of Tokyo), with the associated traffic and concert goers' noise was considerably impacting on our evening, and, we are about two kilometres away from Castelli Estate. Whilst we would never complain about such infrequent events, to have them on a regular basis is quite a different story. To think that such music impact could happen every Friday, Saturday and Sunday afternoons and evenings should such a similar venue be built on the adjacent property to us and our neighbours is just not acceptable. The Dam and Boston Brewing and other such venues have

all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.

A wide range of land uses can potentially be developed on any Rural zoned lot under the current Town Planning Scheme 3. Before support is given for any land use, including tourism, a proposal is assessed for its compatibility with neighbouring land uses, and consideration of mitigating impacts may include the need for increased setbacks, screening, changes to development design or orientation, hours of operation, etc. The Strategy proposes a number of measures that will improve these protections.

regular live (loud) music each weekend during the tourist seasons.

We would never have thought that such rezoning, in such close proximity to our property, would be at all possible, ever!

If this large acreage is to be rezoned, it should be only permitted to be developed into similar residential lifestyle properties, with the same zoning and caveats as the properties it currently adjoins.

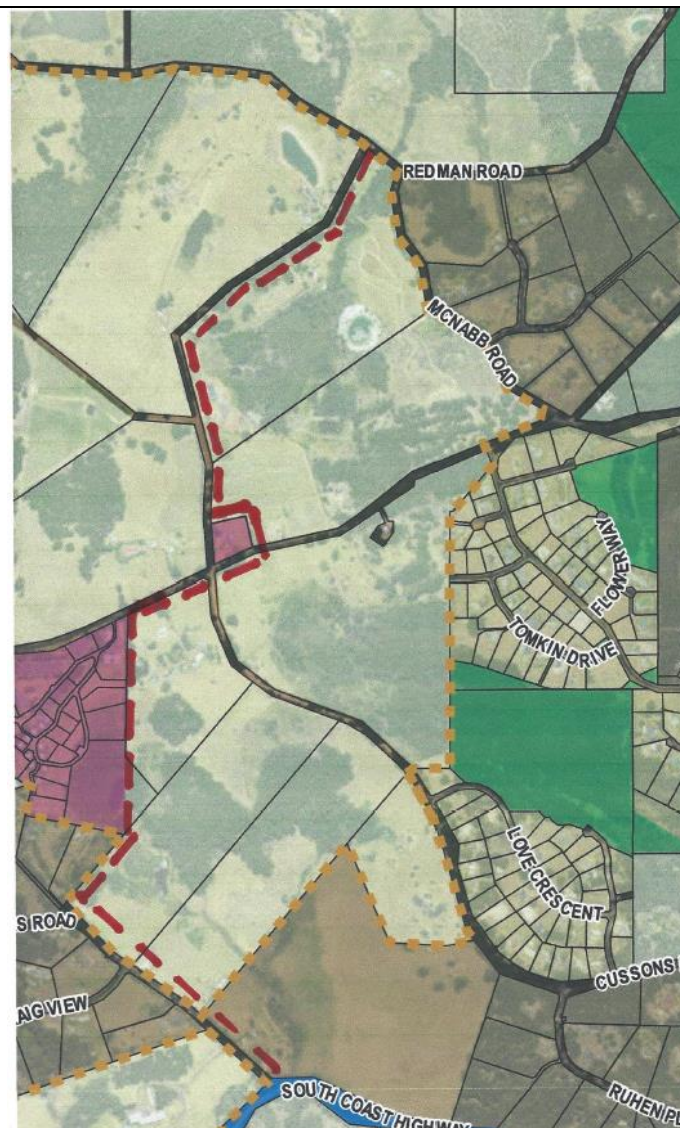
The current adjoining property owners of this part (Edwards Street) of the eastern boundary of the proposed Mt Shadforth Tourism Precinct must have their properties and lifestyles protected from any future development and enterprise that could significantly and negatively affect their amenity.

To us, it would be unconscionable for council to allow our lifestyles to be all but destroyed and property values significantly negatively impacted by developers who, by and large, seek to maximise their financial gain through commercial development. In this case, on our doorsteps.

With all the current concerns being expressed by residents of Denmark regarding peak season tourism expansion, accommodation shortages, staff availability, Airbnb's and lack of parking and infrastructure etc. we need to be smart about our towns future progression and should not desire to turn Denmark into another Margaret River, but rather take all necessary steps to avoid it.

Please, for the sake of our mental health, well-being and future in Denmark, give this submission your focused attention.

We believe the precinct boundary should be where the red dotted line is, with the tourism precinct being on the western side of the dotted line.



S72
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 [REDACTED]
 [REDACTED]
 [REDACTED]

I ask you to reject the aspects of the Draft Local Planning Strategy (DLPS) which concern Tourism and to ask the Shire Officers to review section 3.2.5. dealing with “Tourism Precincts.” I am particularly concerned about the designation of large swaths of land as “Tourism Precincts” without any proper assessment of the environmental impact, nor the social impact on the Denmark community.

The purpose of the designation of “Tourism Precincts” is stated in the DLPS as

Upheld.

In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove

providing greater clarity for proponents of tourism development and to reduce the approval and application requirements. It is stated (on p76) that the Shire will prepare “an updated local planning scheme and policies” without specifying what exactly that will involve.

These are substantial proposed changes which will facilitate tourism developments in very large areas, particularly the area near Ocean Beach, without there having been any study of the existing value of the biodiversity, fauna habitat and ecosystems of the area and to what extent these and the amenity of Ocean Beach and the prawn channel should be protected from over-use and development.

The DLPS states that as “tourism development is typically unique... a need for planning assessment in many circumstances is likely.” It does not say that it will be invariably required, nor to what extent planning assessment will be mandated.

An obvious issue is that designating a particular area as available for tourism development leads to the situation that an owner has an expectation of gaining future approval for a particular development and may start preparing that area for a substantial tourism development even before planning approval has been obtained (as was clearly the case with the land opposite the turn-off to William Bay which has already been partly developed as a caravan site). This leads to a self-fulfilling approval process which may mean that proper studies and investigation of the impact of that development on the environment and the community’s amenities never take place.

It does not seem that the environmental impact of the development of a large caravan park opposite the turnoff to William Bay Reserve in relation to Green’s Pool and Elephants Rock was taken into account (apparently not, on the basis that the William Bay Reserve is not under control of the Shire). The impact on the environment of yet another large group of people (from the caravan site) who will clearly seek the nearest beach, but will have to take their cars to park, will become apparent in years to come. The impact on the amenity of the local community to make use of that exceptional piece of pristine and unique

all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.

The proposed introduction of tourism precincts in the Draft Strategy aimed at providing clear delineation on the locations where the Council would *and would not* consider planning proposals for tourism to be the predominant use of the land. This did not propose to rezone land – the initiation of a rezoning would remain the responsibility of an individual landowner. Further, the delineation of precincts did not infer that a rezoning, land use or development proposal will be supported. All development or land use proposals that require planning approval are required to address relevant land use planning matters as prescribed in the *Planning and Development (Local Planning Schemes) Regulations 2015*. This may include site specific investigations into land use capability, environmental values, hydrology and water management, and any other matters that are deemed relevant.

The Draft Local Planning Strategy reflects the

coastline is already affected in that it is impossible to find any parking within reasonable walking distance or within the designated parking bays during the summer months.

It seems that the same is intended for the Ocean Beach area. What is the level and extent of tourism and accommodation development that is contemplated in designating such a large area as a "Tourism Precinct"? Has any assessment been made of the natural assets of that area and the environmental impact of, say, a large hotel complex? Has any consideration been given to the over-use and degradation of the small area which constitutes the prawn channel and the reduced beach (by reason of change of wave movement) at Ocean Beach?

The smaller areas designated as "Tourism Precincts" in and around town and Mount Shadford may not pose the same problems in that it is unlikely that all occupants of a large tourist facility will descend onto Strickland Street or a particular venue near Mount Shadford, but are more likely to disperse to the many natural and other attractions available in and around Denmark. However, placing an exceptionally large "Tourism Precinct" right next to a beach (which is already degrading) or the prawn channel (which by reason of its small size is vulnerable) without assessing the environmental and community impact of that, foreshadows overuse and degradation.

Denmark is unique when it comes to its wild and unspoiled environment and that attracts a particular class of nature lovers who are prepared to drive five hours to Denmark rather than three to Dunsborough or Margaret River. Over-developing tourist facilities close to Denmark's pristine and special nature sites may be counter-productive. In order to maintain the uniqueness of Denmark's wildness and beauty, all possible steps should be taken to keep its nature areas wild, unspoiled and in their current pristine condition.

Tourism development aimed at attracting more people during summer, will only grind away slowly but surely at the pristine and unique habitat that is Denmark. Developers focus on developments which can fit in as much as possible and are only concerned about financial gain (that is how their business functions). Developers do not consider the environmental consequences - that

existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.

duty lies with the Shire. By creating large “Tourist Precincts”, the Shire is essentially waving a carte blanche at developers.

I am not submitting that no tourism development should be allowed or no tourism development in the Ocean Beach area, I simply find it concerning that the DLPS seems to put the cart before the horse and designates large areas for tourism development without first considering the environmental or social impact of each particular development or a combination of several in a certain “Tourist Precinct.”.

The approach taken in the DLPS is contrary to the Council’s Our Future 2033 Shire of Denmark Strategic Community Plan, the Sustainable Tourism Strategy 2021 – 2025, the Sustainability Strategy 2021-2031 and section 3.3.1.1 of the DLPS dealing with the unique natural environment and biodiversity that Denmark is lucky and proud to have. That section places emphasis on environmental stewardship, preservation of rural land, biodiversity and unspoiled environments, visual amenity and protection of Aboriginal cultural heritage. Designating large areas of pristine land as “Tourism Precincts” without these factors being taken into account, contradicts the Shire’s stated principles (on p88) and should be reviewed and preferably scrapped. Each proposed tourism development should be individually subject to the usual requirements for planning approval and in granting planning approval the factors stated in section 3.3.1.1 should be taken into account.

A further concern regarding the DLPS is the expressed support for tourism attractions on State-based land without indicating which land or what kind of tourism activities are contemplated. Does that mean that tourism attractions for the State owned (but managed by the Shire) Mount Hallowell Reserve are contemplated? Which other State-owned areas are targeted? The community is entitled to be provided with more detail of what tourism activities are contemplated, in which State-owned parcels of land and should be given the opportunity to make submissions on that.

As stated in the DLPS there are inherent tensions between the tourism industry, visitors and the local community. However, tourism is not an overriding value

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| | | <p>and should not be the ultimate goal overshadowing other considerations. It is also important to consider forms of tourism which are more conducive to the preservation of nature, such as eco-tourism.</p> <p>I trust that the Council will not lose sight in its decisions of the overriding and most important question: “What will the Denmark look like that we want our great-great-grandchildren to inherit?”</p> | |
| S73 | <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>I am opposed to the creation of tourism precincts as proposed in the Draft LPS and additional associated development.</p> <p>Denmark Shire's Community Strategic Plan 2033, Sustainability Strategy 2021-2031 and Sustainable Tourism Strategy 2021-2025 (STS) recognise the importance of protecting and caring for the environment, along with protecting and maintaining the community and its well being.</p> <p>Protecting rural land and landscape is also important. The draft LPS reflects similar concerns, but is lacking in practical application.</p> <p>Most relevant in considering tourism and tourism precincts is the STS. That strategy is based on destination tourism but notably, also incorporates a sustainable tourism approach. Since the development of the STS, contemporary approaches have replaced destination tourism with a shift to destination <i>stewardship</i>. Similarly sustainable tourism has developed further, with stronger approaches to environmental stewardship at their core.</p> <p>Some critical findings in the STS appear overlooked in the Draft LPS. These are:</p> <ul style="list-style-type: none"> • the majority of businesses and residents want the current [2021] levels of tourists visiting maintained, not increased, during peak season: the market is saturated • tourists need to be spread throughout the year, with increases in shoulder and off peak seasons: while not alleviating summer pressures, this has occurred to some extent during covid and post-covid periods • coastal areas such as William Bay, Ocean Beach and Lights Beach are under pressure, with places like Greens Pool and Elephant Rocks over-touristed, congested, at risk of environmental degradation and the | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>The proposed introduction of tourism precincts in the Draft Strategy aimed at providing clear delineation on the locations where the Council would <i>and would not</i> consider planning proposals for tourism to be the predominant use of the land. This did not propose to rezone land – the initiation of a rezoning would remain the responsibility of an individual landowner. Further, the delineation of</p> |

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| | | <p>tourists are dissatisfied: this is a growing problem</p> <ul style="list-style-type: none"> • we lack all-weather tourism product and experiences, especially for inclement weather and there are few opportunities to gain insights into the regions history, culture, biodiversity or Noongar culture and heritage: a shift in focus is needed • tourists need to be dispersed throughout the Shire: a further shift in focus is needed • accommodation offerings are diverse, there is a lack of high end properties and a need for refurbishment of some aging properties; there is only one nature-based campground: the former is currently being addressed by a number of existing providers, the latter substituted for, to some extent only, by existing caravan parks and pop ups. <p>These issues are best addressed by the development of a new STS which would build on the existing strategy and further adapt or adopt contemporary and emerging approaches to eco tourism. It is our environment, after all, that attracts the tourists.</p> <p>However, a Local Planning Strategy is critical in supporting this. Planning enables both land availability and usage. Introducing tourism precincts with the stated aim of promoting development is, in the Denmark context, neither a necessary nor an effective way of addressing the issues found in the STS. Put simply, the current proposal involves too many, too big precincts in wrong locations. It also involves some other questionable recommendations re tourism.</p> <p>Providing more land and promoting its development fails to address:</p> <ul style="list-style-type: none"> • the majority view of the community, including business operators, that visitor levels need to be maintained, with increase only in shoulder and off peak - the tried and tested planning adage, 'build it and they will come' holds true, more development will create a self perpetuating demand for still more of the same in a supply driven demand cycle • the spread of tourists throughout the year - the untargeted tourism development facilitated by the proposed precincts leans toward attracting more people during high season • the dispersal of tourists throughout the Shire - the proposed precincts are concentrated to the west and south of the town • environmental conservation - location and size of the precincts exacerbates existing degradation and pressure on recognised | <p>precincts did not infer that a rezoning, land use or development proposal will be supported. All development or land use proposals that require planning approval are required to address relevant land use planning matters as prescribed in the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>. This may include site specific investigations into land use capability, environmental values, hydrology and water management, and any other matters that are deemed relevant.</p> <p>The Draft Local Planning Strategy reflects the existing 'Rural' zoning of Lot 3 South Coast Hwy under Town Planning Scheme No. 3 (TPS3). Rezoning of Lot 3 was proposed under TPS3 and the final Strategy will reflect the determination of the Minister for Planning on this matter. The Local Planning Strategy cannot direct or influence the finalisation of the statutory process for the rezoning of Lot 3, but does intend to provide guidance for any rezoning proposals that come forward after the Strategy is adopted.</p> |
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environmental hot spots, destroys currently undeveloped areas with their threatened species habitat, biodiversity and fragile ecosystems - large scale development eg at William Bay, Ocean Beach, Shadforth, Weedon Hill and healthy, flourishing ecosystems cannot co-exist, it's a choice

- the need for specific, identified forms of tourism accommodation and offerings tailored to STS-identified gaps in the market - these cannot be effectively targeted, managed or controlled through the creation of multiple tourism precincts, with the removal of so called 'red tape' and community consultation.

In fact, tourism precincts as proposed will compound existing problems. They are a significant enabler of more and harder to control tourism growth.

The draft LPS makes tourism development easier for developers, including large scale developments. A strong claim has been made that it's good because it corrals tourists into neat, manageable locations and preserves the rest of the Shire from tourism development. It doesn't. In fact it makes new provision for additional tourism development to occur in rural residential areas. And it does not prevent people applying for rezoning for tourism purposes in other areas outside of the precincts. Within a precinct, tourism land use and development will be the primary land use, other uses are secondary. Outside of tourism precincts, and currently, tourism land use and development is supposedly secondary, compatible with the primary purpose of the zone and sensitive to surrounding non-tourism land uses.

The Draft LPS also supports the introduction of a 'Camping Ground' use class into the local planning scheme to facilitate the development of private camping grounds. The intention is to encourage small scale, low service, hosted camp grounds. There may be merit in this but it too will serve primarily to attract more people during peak seasons. Without specific guidance it is unlikely to be actioned and managed in a way that will provide off season, all-weather attractions, as would be possible with a targeted approach to establishing one or more nature-based camp grounds.

The Draft LPS is intended to attract and make possible far more tourism development with less effort than at present. There is no evidence that the environmental or social impacts of this have been investigated and assessed or that neighbours have been consulted. The community deserves more than well intended ideas with obscure origins, that pose a threat to the environment and

our community way of life. We deserve more than a reference to 'that will get taken care of later in the planning process' - later will be too late.

It represents a major departure from the direction that has so far helped keep Denmark liveable for its people, preserved impossibly beautiful places and conserved habitat, biodiversity and ecosystems that most of the rest of the planet has lost and wishes they hadn't.

Those who are market driven can salivate over the profit opportunities created by scarcity. The majority of our community apparently does not. They don't want to rush to meet and grow demand, they want to conserve and act in a truly balanced and sustainable way. The Shire needs to build community confidence in its development processes and practices and in its willingness to listen, represent and act in accordance with the majority view rather than sectional interests.

On the face of it, the Shire, the community and the environment would be better served by a conservative approach to tourism, closer to that which the Draft LPS takes in relation to marine infrastructure development proposals.

There remain important issues in relation to the Draft LPS and its proposed tourism precincts, like infrastructure or lack of it, or the impact on housing availability and affordability, which no doubt other submissions will address.

Meantime, it seems important or helpful for the Shire to be aware of the growing strength of opposition to the Draft LPS, particularly its proposal to create tourism precincts. To that end, attached is a progress report from the petition For Greens' Children, from 18 January 2024. The petition remains open. Denmark-Sustainable Tourism Action Group, of which I am a member, will seek approval to formally present it to Council at a later date.

Also attached is a copy of the open letter to Council from community members which was published in the Denmark Bulletin 21 December 2023. The call to reject the Draft Local Planning Strategy and its tourism precincts remains. The offer to work with Councillors to develop a better way forward is sincere and it also stands. Contemporary approaches to tourism and our community's long held views on environmental protection and the value of community, can enable us together, to develop an innovative, sound and sustainable way forward. Surely this is something we all want.

We are now deep in a global climate crisis. Its effects are seen and felt on a daily basis. Denmark Shire Council has a recognised responsibility to play its part in climate change mitigation. This includes conserving recognised biodiversity hot spots and remaining habitat. We live in one of the few places of its kind left in the world. Its value in real terms to human and non-human life is incalculable. We here still have the opportunity to keep our natural environment intact and with it, our community. Please don't jeopardise or waste it.

Attachment 1: Petition <https://www.change.org/p/for-greens-children>

Attachment 2: Open letter published by Denmark Bulletin 21 December 2023

ADVERTISEMENT

Councillors
Shire of Denmark
Western Australia

Dear Councillors

At this time of year we think of gifts and giving, festivities and, in quiet moments, reflect on what the future holds.

We, members of the community, are asking: what will this Council give to the Denmark community?

Will you deliver on commitments to environmental stewardship, climate change mitigation, greater adoption of Aboriginal perspectives on land use planning and management, preservation of rural land and visual amenity, protection of cultural heritage, ecologically sustainable tourism, a community-centred tourism strategy?

These are promised in Council's Our Future 2033 Shire of Denmark Strategic Community Plan, the Sustainable Tourism Strategy 2021-2025, the Sustainability Strategy 2021-2031 and in aspects of the current Draft Local Planning Strategy.

Will you listen to the majority of Denmark businesses and the rest of the community when they say no to an increase in summer through to Easter tourism levels? Will you do what the Sustainable Tourism Strategy points to and refocus on all weather tourism offerings based in learning and experiencing Noongar culture and heritage, Denmark history and culture and our biodiversity?

We ask that you ensure your actions are aligned with these strategies, and focus on sustainability and preserving the beauty of our Shire, rather than supporting developments driven by financial goals in areas, such as William Bay, which are sensitive, under pressure, over-visited and threatened with environmental degradation. In this, we ask that you be guided by the philosophy of 'seven generations forwards' in considering your proposal to create nine tourism precincts as outlined in your Draft Local Planning Strategy.

Tourism is neither compulsory nor inevitable. New development needs to be thought through with great care and diligence.

At this time in the world, stewardship asks us to consider as paramount, the need to fully protect our biodiversity, habitat and eco-systems from further threat. We cannot keep plundering the little that is left.

Our social systems, community health and well being are also under threat from the negative impacts of tourism. A healthy tourism is one that looks after place and the community members who have chosen to call it home.

We call on you to reject the Draft Local Planning Strategy and review your relationship with tourism development. The climate crisis is rapidly reshaping approaches to tourism, shifting from destination, marketing-based tourism to geo-tourism, regenerative tourism, slow tourism and no tourism.

The Denmark community stands ready and more than able to help. Give us a future that generations to come will thank us for, and where Denmark can be an example which is celebrated for foresight and good custodianship.

Yours sincerely,
Denmark Community Members

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| S74 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>Today I was at Elephant Cove and saw two beautiful stingrays and a sea eagle. I also saw graffiti, rubbish, cigarette butts, stickers, noise and pollution from individually owned food businesses, drones over people and migratory shorebirds, and drunken behaviour. These are an indication of changing times, and we must ask ourselves what our predominant responsibilities are as custodians of this and other parks: encouraging graffiti, rubbish and illegal drone usage, or protecting the extraordinary beauty of this biosphere?</p> <p>I am against the proposed tourism zones until the Shire has carefully considered a set of guidelines governing tourism which is aligned with its stated goals of sustainability and environmental and cultural stewardship, and has established mechanisms for how it will ensure tourism takes into account that our primary responsibility is caring for Country.</p> <p>The proposed precincts do nothing that suggests this, and by default, seems to support the Shire in allowing a style of tourism based on development proposals rather than on environmental stewardship. William Bay, in particular, is clearly overstretched and as stated in Shire strategies, is ‘sensitive to development, over-promoted and threatened by environmental degradation’. There is no clear overriding philosophy outlining commitments and priorities to the environment, nor any measures in place which ensure the negative impacts of over-tourism are mitigated. Rather, there is an ‘anything goes’ approach, based, it seems, on financial profit for a few.</p> <p>The whole question of the sort of tourism the Shire is fostering needs reviewing. Without this, we will turn this precious part of the world into something that none of us want. A few people may get rich in the process, but we will have failed in our responsibilities to the planet. This is a critical time in our history – it is our primary responsibility to take this seriously and respond.</p> <p>To offer one example: what environmental measures were considered when approving helicopter flights landing and taking off from The Dam – supposedly an ecologically conscious tourism development? Helicopters are well proven to be damaging to the environment, community and carbon footprint. It seems the new Denmark, which the Shire is supporting, is all about a “rockstar</p> | <p>Upheld.</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>Helicopter joy flights require separate planning approval as they are ‘private recreation’; a discretionary land use in the Tourist zone that applies to Lot 305 Wentworth Road, Ocean Beach.</p> <p>The landowner may not be aware that separate</p> |
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| | | <p>entrance”, and “treating oneself”.</p> <p>I would urge the Shire to consider geo-tourism as a model, and becoming unique not through making itself a destination for rich would-be rockstars, but rather for standing strong in preserving the fragile environment and encouraging tourism ventures which foster cultural and environmental stewardship. The proposed zoning needs serious rethinking.</p> | <p>approval is required. The Shire has not received an application for this land use and will approach the landowner to work through the application process.</p> <p>Public consultation is required as part of the planning assessment and issues of noise and appropriate flight paths are appropriate planning considerations.</p> |
| S75 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>Referencing the draft Local Planning Strategy 2022 document that the Shire of Denmark put to it’s residents for review and provide comment, the owners of the Peace Street Community at 144 Peace Street, Shadforth have the following request:</p> <ul style="list-style-type: none"> - All Landscape Protection conditions that currently apply to the subdivision’s special provisions as per LPZ Appendix XVI of the Shire’s TPS3 document remains in place. <p>We reserve the right to meet with the shire to co-write the special use characteristics which will replace the LPZ characteristics upon change of zoning. The characteristics we will insist on will be those existing LPZ characteristics that underlie and enable both the strata’s by-laws, and allow the implementation of Permaculture principals. These may be existing characteristics as tabled in the LPZ but also additional characteristics that may be needed to allow for the future development of the community and its principals. These additional characteristics may include, but are not limited to, the the following:</p> <ul style="list-style-type: none"> - Does the proposed re-zoning have consequences for the current Shire rates, i.e. will rates increase due to re-zoning (not meaning annual increases)? - Will the re-zoning change the current building density in our area, i.e. sub-division or smaller lots will be encouraged? - With the proposed re-zoning will postal service be provided at Peace | <p>Noted. The Local Planning Strategy does not go into this level of detail regarding specific zone provisions. A review of existing requirements for each Landscape Protection Zone and the establishment of land use controls and development standards for the new Rural Residential zone will be undertaken and publicly advertised as part of the planning scheme review. This will take place following the finalisation of the Strategy and will provide the community with an opportunity to have input and provide feedback in relation to these finer details. The comments provided in this submission will be considered as part of the scheme review process.</p> <p>No change is envisaged.</p> <p>No change is envisaged.</p> <p>No change is envisaged.</p> |

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| | | <p>Street?</p> <ul style="list-style-type: none"> - With the proposed re-zoning will sewage become available at Peace Street? - Will the proposed re-zoning impact home business activities? - Will the proposed re-zoning have an effect on keeping farm animals? - Peace Street Community as a strata company has a large percentage of common land. Will the proposed re-zoning have an effect on common property responsibilities i.e. fire protection zones? - Does the proposed re-zoning have an effect on maintaining firearms on property for pest control? - Does the proposed re-zoning prevent result in residents being ineligible for discounted farm vehicle registration fees? <p>If the current conditions of our zoning classification can not be transferred to the new proposed zoning then the Peace Street Community herewith formally objects to the proposed re-zoning. We obviously have trust in the Shire of Denmark that a mutual agreement can be reached. Therefore, we look forward to your positive reply.</p> | <p>The Strategy supports infill sewerage in areas close to the Denmark Town Centre only. No change is intended, other than potentially adding more flexibility within the Rural Residential Zone.</p> <p>No change is envisaged.</p> <p>No change is envisaged.</p> <p>This matter is outside of the scope of the Strategy.</p> <p>This matter is outside of the scope of the Strategy.</p> |
| S76 | <div style="background-color: black; width: 100%; height: 15px;"></div> <div style="background-color: black; width: 100%; height: 15px;"></div> | <p>Thank you for opportunity to make a late submission to provide feedback on the Denmark Shire draft Local Planning Strategy (dLPS). This submission is from the Friends of Kooryunderup-Mt Hallowell group.</p> <p>The Friends of Kooryunderup-Mt Hallowell has objections to the proposed Tourism strategy as outlined in the points below:</p> <ol style="list-style-type: none"> 1. The plan contradicts guiding Shire Strategic documents, including the Sustainable Tourism Strategy 2021-2025 (STS), Our Future 2033: the Shire of Denmark Strategic Community Plan, and the Sustainability Strategy 2021-2031, | <p>Upheld (in part).</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove</p> |

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| | <p>all of which emphasise environmental preservation and community-centred tourism. It also contradicts itself in the stated aims of the Plan under Our Natural Environment (p. 11.). These documents and statements reflect community feedback and should be prominent in the intent of this dLPS.</p> <p>The overall effect on high value conservation areas such as Mt Hallowell A Class Reserve due to increased tourism and visitation numbers is of concern to the group. We would ask that the Shire adopts an approach of immediate review to correct the misalignment between the intent of the guiding documents and the dLPS to ensure that environmental concerns receive more emphasis in the document.</p> <p>As a local community group with approximately 50 active local members and around 160 members across social media platforms, our membership is concerned that the dLPS does not provide surety when it comes to stewardship of the environment.</p> <p>This is driven by the misalignment implicit in the wording of the document. For instance, references to large and major tourism proposals and development, are not defined, but appear to preference large scale tourism over the adoption of a sustainable tourism approach – that is a planning approach that is deliberately designed to avoid over tourism and development and emphasises strong environmental planning, including support for increased understanding of how the natural environment may be impacted by increased tourism. The plan should consider the carrying capacity of the environment to support further tourism development as well as Shire and Great Southern regional capacity to manage increased tourist and population load.</p> <p>Specific items of concern in the dLPS are:</p> <p>A. Tourism Precincts- how they were designated is not defined. There is not a single reference made to environmental or social impact on communities, wildlife and green corridors, traffic flow, road safety, parking, visual amenity, or consideration of the long-term impact on the carrying capacity of the natural</p> | <p>all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> <p>The proposed introduction of tourism precincts in the Draft Strategy aimed at providing clear delineation on the locations where the Council would <i>and would not</i> consider planning proposals for tourism to be the predominant use of the land. This did not propose to rezone land – the initiation of a rezoning would remain the responsibility of an individual landowner. Further, the delineation of precincts did not infer that a rezoning, land use or development proposal will be supported. All development or land use proposals that require planning approval are required to address relevant land use planning matters as prescribed in the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>. This may include site specific investigations into land use capability, environmental values, hydrology and water management, and any other matters that are deemed relevant.</p> |
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environment to support intensive tourism development in these proposed areas. Of concern to this Friends group, is the Ocean Beach proposed Tourism precinct. In particular the designation of the wetland paddock alongside Ocean Beach Road and the adjacent farmland contains remnant stands of older growth karri forest. These areas form part of the natural environment associated with the Mt Hallowell A Class Reserve. Wild creatures, birds, and vegetation will be impacted if this area is further developed. This includes the endangered populations of black cockatoos, recently registered inhabitants (Birdlife WA) as well as ducks, spoonbills, herons and others.

While it may be true that the area would not meet planning requirements. Why propose it in the first instance? A precautionary principle should be routinely applied to avoid opening the door to a broad range of tourism development proposals that may result in a highly invasive and environmentally threatening solutions, such as wetland infill (as seen in other parts of Australia in environmentally sensitive coastal areas) or removal of remnant vegetation on farmland disrupting wildlife corridors. This is especially true in an area in proximity to existing tourism attractions and aligning with the five A's further increasing a push for development.

More clarity on how these zones were determined is required with a strong request to abandon the idea of these Tourism precincts. This will allow for each application for tourism development, large or small, wherever it occurs in the shire, to be thoroughly evaluated for environmental and community impact using the precautionary principle as a guiding theme. This would align more accurately with the Shire guiding documents and further position Denmark as an environmental jewel in the crown in the face of rampant over tourism and overpopulation as seen across Australia and globally. Strategically, such long sighted measures would conserve the environment and the community for future generations.

B. Support for Tourism Attractions on state-based land. This indicates an open door policy when it comes to planning for future Denmark tourism and use of lands. The statement (p 78) that the dLPS supports the idea that Tourism

The development of any attraction or infrastructure relating to the recreational use of land within a reserve is subject to the decision making processes

Attractions may be considered on State lands where a range of unique natural assets exist subject to the resolution of relevant planning issues, consistency with the STS, and consideration of how public tourism assets will contribute to the development of tourism precincts, is worrying. Although qualified with reference to the STS and planning, this statement appears to provide in principle support for A Class and others Reserves, such as Mt Hallowell to be further developed for unspecified tourism activities. The planners need to review whether a statement about development on State lands is necessary or legal and quantify what kind of attractions would be considered to provide surety that the community priorities as stated in Shire documents are abided by without erosion from their original intent.

A suggestion is that this question is posed to the Denmark community with more information as to why it has been included in the first place. This needs to state clearly how the Shire would be able to manage such tourism attractions given its stated inability to provide resources to manage Mt Hallowell with any Ranger presence to address issues of illegal trail development, garden waste dumping, rubbish, and feral animal control.

How would development of tourism attraction on state owned land be managed now and into the future given the current scarcity of resources?

C. The statement that the dLPS supports the option to progress the idea of being a regional specialty attraction requires further detail. Where in the feedback is this reflected or is this a decision taken by various interest groups within Council itself? Is this statement, along with item 3 allowing for Tourism Attraction on State lands, part of a push to promote Denmark as a mountain biking hub. If this is the case, how was the community consulted on this and what other opportunities might there be for a for such a Centre, for instance, indigenous heritage tourism or nature-based tourism which has less environmental impact and an elevated capacity for custodianship as called for in the community feedback that informed the STS. Given the recent concerns about mountain bike trails on Mt Hallowell this question is of relevance to the Friends group.

of the government or council of the day and the public consultation that it deems fit. The Strategy seeks to promote alignment of any such development with its intent, as well as the Sustainable Tourism Strategy, in order to promote consideration of the community's vision and values that have been expressed through these documents.

The Strategy acknowledges that the centralising of funding and other resources into a regional centre can create disparity in the community and sporting facilities available in other towns such as Denmark. The Strategy suggests that alternative approaches, such as the development of 'centres of excellence', may assist in responding to this tendency. The Strategy does not identify or suggest what or how this concept might be achieved.

Further, Denmark is already a regional centre for its relaxed, lower impact and less developed ambience, it's natural environment and associated recreational activities. With minimal investment, Denmark already attracts considerable tourism numbers which, many argue, are not currently well managed. The suggestion is that this concept is removed from this plan pending further community consultation as it appears superfluous.

More generally this draft plan needs to address:

- Negative impacts on community and environment, particularly areas of high conservation value such as Mt Hallowell, because of unmanaged visitor numbers.
- The Denmark community clearly does not want to become another SW tourist town sprawl of over population and destruction of natural amenity. The potential loss of the unique selling point of Denmark that has been identified in numerous consultative processes – that of the green, wild, and unspoilt environment, is implied within the dLPS through the planned 9 Tourism precincts where it states large scale tourism would be supported pending required planning obligations are met. This is of grave concern to the membership.
- To mitigate, Council needs to ensure that this plan clearly outlines how it will support the local community and prioritise long term sustainable tourism that maintains the natural environment. This would include the provision of a framework for developers on what kinds of tourism are acceptable to the local community that safeguards the natural environment. Currently the dLPS only identifies where they can develop supported by weakly worded references to existing planning controls.

Finally, Friends of Kooryunderup- Mt Hallowell respectfully request that Council consider carefully a wise decision now to protect Denmark for the future generations of locals and visitors will ultimately provide a critical point of difference that will value add to the longer-term Denmark tourism experience and preserve local community values and critically biodiverse areas such as Mt Hallowell.

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| | | We would welcome the opportunity to participate further in any further consultative processes that may be available. | |
| S77 | [REDACTED] | <p>The designation of tourist precincts is discriminatory. My neighbour can develop for tourism in the future but I cannot. The line seems very arbitrary.</p> <p>If that is not the case then why have precincts? I would like tourism developments to be assessed on an individual basis with proper process.</p> | <p>Upheld.</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |
| S78 | [REDACTED] | <p>I own the property at Lot 56, 165 Ocean Beach Road, Denmark. I'd like to make a submission regarding the proposed rezoning of my property back to Rural in the LPS 2024.</p> <p>I would like to have it remain zoned urban residential as there is the prospect of subdivision still in my mind because of its location and its proximity to the sewage treatment plant, town CBD, the Inlet and Ocean Beach. I am positive there would also be developers who would be very interested in this property should I decide to sell.</p> | <p>Upheld.</p> <p>The landowner's intention to pursue residential subdivision/ development as per the 2011 Local Planning Strategy is acknowledged. A modification to Strategy is proposed to change the designation of number 165 Ocean Beach Rd to Urban Residential, with the Strategy recommending zoning as Urban Development in a new local planning scheme.</p> <p>It is noted that this lot is at the lowest point in the landscape within the surrounding area and is the logical site for a sewerage pump station (as</p> |

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| | | | identified in the Denmark Regional Land Supply Study 2017), which is infrastructure essential for the servicing of surrounding urban development areas. |
| S79 | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> | <p>REQUEST - William Bay Tourism Zone to include lots 3468 & lot 22 (Received 15 January 2024)</p> <p>RAINTREE seeks lot 3468 and Lot 22 (Formally Lot 2617) that share the Northern Boundary of the National Park to be included in the William Bay Tourism Precinct in accordance with the DTM Proposal funded by TWA and submitted to DBCA for the RAINTREE LINK – a Collaboration to create a new safe bike and walking link from the South Coast Highway to Greens Pool.</p> <ul style="list-style-type: none"> • This request for a low cluster adventure based national park tourism experience is a State priority for the <i>WA National Parks Tourism Experience Development Program</i>. • Rezoning Lot 3468 was first identified by Marius Wakka in the 1970's and tabled by the Birkbeck family to the Denmark Shire in 1998. <p>Rezoning will justify our stated objective to donate a 5 Km corridor of our land to act as a fire easement for the district, link the Denmark Heritage bike & walk and horse trail to the Bibbulmun & Munda Bididi Trails.</p> <p><u>Background</u></p> <p>Over the last 20 years RAINTREE has been consulting and seeking the Shires support to develop adventure based low density tourism on land adjoining the William Bay National Park.</p> <ul style="list-style-type: none"> • This request for a low cluster adventure based national park tourism experience is a State priority for the <i>WA National Parks Tourism Experience Development Program</i>. • Rezoning Lot 3468 was first identified by [REDACTED] in the 1970's and tabled by the [REDACTED] family to the Denmark Shire in 1998. • In 2012 RAINTREE worked with the Denmark Shire and DBCA to link the William bay national Park to the Munda Bididi Bike Trail resulting in the donation of land to create a 1km link. • In 2017 RAINTREE presented to the Denmark Shire a vision to extend this original donation through Lot 3468 and Lot 2617 (Now Lot 2). This was supported and resulted in a series of interagency meetings over the next 6 years. | <p>Noted.</p> <p>In response to the large number of submissions received in objection to the tourism precincts proposed as part of the advertised version of the Draft Local Planning Strategy, the Tourism section (3.2.5) has been rewritten and proposes to remove all previously identified tourism precincts. In place of the precincts, major tourism development and rezoning proposals will be assessed under a detailed set of criteria outlined in the strategy which examine the appropriateness of infrastructure, environmental and social impacts, proposed scale, location and design of tourism development. The Tourism section has also been expanded to include subsections that explore concepts of environmental stewardship, carrying capacity, and social and cultural impacts. The Strategy also proposes to restrict opportunities for tourism development on Rural zoned land.</p> |

- In January 2024 Tourism Western Australia (TWA) completed the first of a series of studies on RAINTREE based on extensive state wide stakeholder consultation and research to improve the William Bay National Park – where old growth forest meets the Ocean experiential product to truly live up to Western Australia’s new tourism brand, ‘Walking on a Dream’.

William Bay Road runs adjacent to Raintree Farm for a distance of 3kms to the park boundary. Raintree Farm is currently working on low density tourism/worker accommodation development on their 6 titles. The advantage of this large land holding is that there are significant buffer zones from neighbours and low bush fire risk cleared areas, the large land holding allows low density development.

State Policy - Tourism Western Australia

“Western Australia has some of the most stunning, pristine locations in the world, from the remote and rugged Kimberley region in the far north, to the World Heritage listed Ningaloo Reef - the world’s largest fringing reef - to the diversity of the southern coast where old growth forest meets the ocean” TWA.

To help facilitate sensitively designed, unique accommodation offerings in or around our national parks, the Western Australian Government, through Tourism WA, has established a *National Parks Tourism Experience Development program*. The program provides operators/investors with the following support:

- Guidance through the processes involved in developing land in Western Australia, working with various agencies to minimise regulatory burden and prioritise approvals.
- Advice on known development opportunities and/or assistance with identifying a suitable site, based on an operator’s individual requirements.
- Financial and technical assistance with feasibility and planning studies, business case development, community and Traditional Owner engagement, and the progression of approvals.
- Consideration of financial support to ensure sites are de-risked and shovel ready.

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| | <p><u>New trail from South Coast Highway to Greens Pool</u> Extensive consultation has resulted in TWA paying for the attached development proposal for trail extensions in relation to Lot 3468 and Lot 2617 (Now Lot 2) that have a 3 km shared border with the Northern Boundary of the William Bay National Park. The Raintree that is currently being submitted to the Department of Bio-Diversity and Conservation the State Government is trying to leverage private sector investments alongside national park assets.</p> <p>The section of the trail from South Coast Hwy along William Bay Road to the coast was identified as also requiring realignment due to safety concerns as part of the Great Southern Regional Trails Masterplan project. DBCA did a community presentation on 16/2/2021 and committed to a dedicated bike trail from Greens Pool to the South Coast Highway to rectify these concerns. DBCA was unable to fulfill this commitment due to budget constraints which precluded this section from being developed, although the value to the visitor experience was not in doubt.</p> <p>Raintree Farm, the land holding adjacent to the William Bay National Park, has the ability and desire to work with DBCA to facilitate access options by utilising land within the Raintree boundary for a multiuse trail, which will provide the ability to move current trail users off William Bay Road. Through a collaboration project, Raintree Farm is proposing to construct and maintain an Emergency Access Way (EAW) which will also serve as a multi-use trail.</p> <p>Raintree Farm is embarking on an exciting period of development which will place us at the forefront of visitor experience in the Great Southern. Our commitment to tourism is equalled by our desire to introduce diverse visitor experiences which are authentic to our region. We offer a solution to enable strategic tourism plans in the region reach their potential.</p> <p>Linking land to sea through trails, taking cars off the road and bringing a state-of-the-art accommodation and health retreat to life alongside one of the State's most visited National Parks.</p> <p><u>Conclusion</u> Support for this project has been quantified through meaningful data, insights, and overwhelming demand from visitors across WA, locals to the town, as well as industry bodies and individual influencers in the tourism, food, agribusiness,</p> | Noted. |
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arts, culture and tourism sectors. Examples of the + 600 highlight letters of support for the rezone and associated Raintree ventures at the property are summarised and a few examples attached.

In the words of the Shire, we have proven ourselves as sustainable business owners giving the town and the people what they want. We look forward to working with our community, WAPC, Tourism WA, The Denmark Shire, DPLH, GSDC, DBCA, DPIRD, DOH and Main Roads to make this vision a reality.

Attachments

- Raintree Link Proposal December 2023
- Raintree Community Consultation Report
- Master Data Base 635 Letters.

(A full copy of attachments can be provided by Shire officers upon request)

RAINTREE LPS SUBMISSION “A CALL TO ARMS FOR BOLD ACTION”

(Received 18 January 2024)

In August 2020 the Denmark Shire Planning team invited RAINTREE to submit a vision for the Local Planning Strategy. [REDACTED] paid \$ 10,000 to [REDACTED] to prepare a case for Rural Small Holdings and prepared his own detailed response that were both submitted to the Shire.

As per this submission and previous ones in 2000, 2005 and 2012 prepared by myself, there is a growing community awareness that Denmark will face future catastrophic fire events, but there still appears to be a gap between this awareness and the future fire proofing of the Shire through long term planning policies on how we should manage population growth.

Denmark has the chance to lead regional communities nationally as our species must now re-examine how we plan for a hotter and drier continent that is able to adapt to the existential threat of new climate thresholds. We must focus on becoming resilient, as the world has been unable to unite under the UNDP’s mandate for a low carbon, biodiverse, nature based economy.

We need to take bush fire into greater consideration for future building envelopes. The old policy of situating everything central works for the City but

Noted. Section 3.3.2.4 (Bushfire Risk) in the draft Strategy provides extensive detail in relation to planning for bushfire risk in relation to future land use planning and population growth. Consistent with SPP 3.7, a Bushfire Hazard Level Assessment (BHL Assessment) has been undertaken to inform the draft Strategy. As a result of a submission provided by DFES, additional detail will be included in the modified version of the draft Strategy in relation to bushfire risk management and mitigation measures for future urban growth areas to be included within section 3.1.4.2 (Urban Expansion).

by 2025-2050 a new approach to how we live in a climate with a + 2 degree Celsius temperature and reduced rainfall and water will be essential to survival and the long term health of this community.

The Shire has reviewed the request for rural small holdings at RAINTREE and determined the high value land at RAINTREE would be more suited to TOURISM REZONING. Extracts from this body of work are included below and the full submission is attached.

While RAINTREE broadly supports recommendations around tourism rezoning subject to taking into account the State Policies on national parks (and bringing in lots 3468 and Lot 22) the Community feedback is that as one of the largest employers in the district, as RAINTREE grows and brings more skilled workers people to the region it has a responsibility to offer a residential component to take pressure of the districts housing crisis.

While a mixed use to allow for affordable housing for staff may be achieved through strata lots on Tourism Zoned land RAINTREE would like to table the October 2020 LPS submission on rural small holdings and update some key bush fire concerns to better assist work with the Shire Executive and elected Council to consider a mixed Tourism/ Rural Small Holdings case study that could act as a template for the Shire, as submitted in 2000, recommended by the Denmark Shire in 2005 and resubmitted in 2012.

The town of Denmark is reliant on Albany groundwater being piped into the village and as the impact of a drying climate and a migration south from the hotter temperatures occurs over the coming decades, identification of where growth can occur that has water independence and is low bush fire risk with robust bush fire preparedness should be given a higher priority under Local Shire and State WAPC Planning Policies.

With a significant Tourism footprint accepted by the Denmark Community for this large landholding of + 330 Ha of land located in between the Great Southern's most frequented National Park and the regions karri hinterland, Raintree provides Denmark with unparalleled tourism synergies that when combined with the intensive horticultural and grazing regenerative farming and agri-business value added activities, makes this case study without peer and a

Noted. Rural Small Holdings are not supported by the draft Strategy, the further fragmentation of rural land also poses a threat to the long-term viability of agriculture and food production. Fragmentation makes the assembly of land for viable farming enterprises more difficult, while smaller rural lots are also more vulnerable to demand from buyers seeking 'lifestyle' opportunities without the intention or ability to realise commercially viable food production. Rural living estates can also consume potentially productive rural land and cause issues at the interface between residential and agricultural land uses.

genuine case study worthy of a bold approach to planning norm's.

Affordable housing is a major issue in the Denmark community. RAINTREE first requested consideration for rural small holdings and tourism rezoning in 2000. After 5 years of consultation this was adopted in the 2005 draft Local Planning Scheme but removed in 2008. We are still trying to build affordable housing and are at a loss to understand why this would not be welcomed by the State. Not only would it ease supply pressures, carefully planned envelopes would reduce demand on the Shire to supply essential services, reduce bush fire risk for the satellite residential enclave at Privet Road and increase the Shires revenues through rates.

In a November 2023 community leadership meeting with Steve Dawson, the Minister of Emergency Services, it was pointed out that a large proportion of the Denmark Township was vulnerable to bushfire and will become harder and harder to insure and rebuild after future bushfires. He advised the township to identify low bush fire areas for future development because rebuilding bush fire prone areas would become harder and harder.



DFES Bush Fire Prone Map / RAINTREE – One of the Shires lowest Bush Fire Risk Areas

RAINTREE, independent of any future clearing, has significant cleared land area

with a low bushfire risk. While portions of the site designated for Rural Smallholdings have a low bushfire risk, the majority is not identified as bushfire prone, as designated as by the Commissioner of Fire and Emergency Services. This has been emphasised by a BAL contour plan prepared over the landholding, and is included in **Figure 3**. It is intended that all future dwellings and tourist accommodation will be located in areas identified as BAL-LOW, or not identified as bushfire prone.

We need to take bush fire into greater consideration for future building envelopes. The old policy of situating everything central works for the City but by 2025-2050 a new approach to how we live in a climate with a + 2 degree Celsius temperature and reduced rainfall and water will be essential to survival and the long term health of this community.

Raintree can provide essential services, employment and a relatively safe environment and act as a case study in bushfire readiness - in terms of the development requirements around preparing for and defending against bushfire.

CONCLUSION

I support the hard work of the executive team on the LPS and I think it a good body of work. In my recent consultation with the Shire, I have been informed it is state planning policy to centralise all future population growth in towns and that what I have submitted does not comply with current WAPC policy. That is exactly my point in this submission, we need to rethink policies and seek out innovative case studies adapt that overcome existential threats from no water and increased bushfire risk.

I would to put on record that while a blanket centralisation policy may work in some parts of WA, due to high bush fire risk in the town of Denmark we cannot have a blanket rule, if we are going to meet population growth demand and keep our children living in this community, noting that when a major fire breaks through the town as per DEFS modelling, it will be cost prohibitive to rebuild for many that would find their land would not able to be insured and this will have a flow in impact on properties where fire insurance will become cost prohibitive.

We have championed for 20 years planning to take into account that we should build in areas of low risk for bushfires, and as we see more houses destroyed by fire in WA, this simple prerequisite is gaining growing support. RAINTREE 332 ha is an ocean front property that has vast water resources with a large proportion of the cleared land not identified as bushfire prone, as designated as by the Commissioner of Fire and Emergency Services.

We have sought the right to build here for 25 years and will continue to do so into the next generations, I would appreciate some structured feedback on the October 2020 submission we were invited to submit and this subsequent update.

Support for this rationale can be quantified through the 626 submissions associated data, insights, and inputs on RAINTREE'S vision as submitted to the Shire in September 2023.

We look forward to working with our community and The Denmark Shire to build a long term case study on building a sustainable agri-tourism district that provides safe long term accommodation to our staff and descendants.

Kindest regards,



Extracts: Community Consultation Responses September 2023.
From the October 2005 LPS submission.

Attachment: October 2005 LPS submission

(A full copy of images and attachments can be provided by Shire officers upon request)

Extracts from the October 2020 LPS Submission

State Planning Policy 3.7- Planning in Bushfire Prone Areas

The 2011 LPS was prepared prior to the December 2015 adoption of State Planning Policy 3.7- Planning in Bushfire Prone Areas (SPP 3.7). As illustrated in

Figure 2, 470ha of land has been designated for Rural Smallholdings, with 170ha of this area comprising heavily vegetated areas not suited to future development due to extreme bushfire risk.

This 170ha area represents a loss of 36 percent of land available for Rural Smallholdings within the Shire. This submission provides an opportunity to offset this loss with more suitable land that is capable of supporting this use.

RAINTREE SITE

A preliminary assessment of the subject land indicates ultimate development of the subject land will be able to achieve the four (4) key bushfire protection criteria location, siting and design of development, vehicle access and water.

NEED FOR RURAL SMALL HOLDINGS

The average occupancy rate for rural smallholding lots within the Shire is 75 percent, which demonstrates a critical supply shortage of vacant Rural Smallholding lots within the Shire. As acknowledged in State Planning Policies, a shortage of land available for Rural Smallholdings restricts population growth and negatively impacts on the long-term sustainability of regional communities.

Due to the small statistical base, further support for Rural Living (i.e. Rural Smallholding) areas should be sought from comparable regional communities that have successfully integrated Rural Smallholdings into their settlement pattern. The town sites of Dunsborough (*pop. 6039) and Margaret River (*pop. 6392) each have similar populations to Denmark (*pop. 5845); yet support significantly larger number of Rural Smallholdings (4-40ha) than Denmark. This is a significant contributor to the success of these towns and a clear problem needing to be addressed within the Shire of Denmark.

STATE PLANNING POLICIES

The following State Planning Policies form the relevant framework for the designation of the site as Rural Smallholdings and Tourism within the revised LPS:

- State Planning Policy 2.5- Rural Planning (SPP 2.5);

- State Planning Policy 2.0 – Environment and Natural Resource Policy (SPP 2.0);
- State Planning Policy 3.7 – Planning in Bushfire Prone Areas (SPP 3.7),
- Government Sewerage Policy
- Planning Bulletin 83/2013 - Planning for Tourism (PB83).

The development of the site for Rural Smallholdings will provide for smaller lot sizes (i.e. circa 20ha average) to support more intensive forms of primary production and lifestyle lots. Any future development will not result in a significant increase in the overall lot numbers. This will ensure a greater proportion of each holding(s) is used for its highest and best use and assist with diversifying primary production activities. Diversification of primary production provides an opportunity for economic growth, economic diversification and assists with improving the long-term sustainability of regional areas.

The development of the site provides an opportunity for improved management of environmental, landscape and water resources to occur through site specific protection measures to be provided through well considered future structure planning design and town planning scheme provisions. Furthermore, a more intensive rural land use on the site will provide the opportunity for agricultural activities that have a reduced carbon footprint from the current land use activity (i.e. the production of crops that act as a carbon sink as opposed to animal husbandry).

Water Supply

State Planning Policies and the LPS acknowledge the importance for providing opportunities for minor rural pursuits,

water supply shall be as follows

....where reticulated supply is demonstrated not to be available, or the individual lots are

greater than four hectares, the WAPC may consider a fit for purpose domestic potable water supply, which includes water for fire fighting. The supply must be demonstrated, sustainable and consistent with the standards for water and

health...

The site is located in a high rainfall area (>1,000 mm/pa). A suitable potable water supply can be provided to future dwellings via rainwater harvesting and storage to the Shire's specifications (i.e. min 92,000 litre tank). In recent times with climate change the reliability of this indicator must be taken into account in future planning. The cost of water provision from the State is becoming more and more of a drain on Government resource, this site offers unprecedented high quality water springs, aquifers and access to over 200 million litres of stored water.

An additional water supply for irrigated horticultural activities may be provided from existing dams or via irrigation lines connected to the existing dam located on Lot 305, which has a capacity of over 120 million litres. Access to this supply will be protected through an easement registered on individual future titles and will support continued primary production to occur on the subject land.

A suitable water supply can be provided to future Rural Smallholdings.

Improved Environmental and Landscape Outcomes

Future Rural Smallholding development on the site will result in slightly smaller lot sizes than existing (i.e. average of 20ha as opposed to the average of 50ha) and provide new opportunities for improved environmental outcomes through well considered structure plan design and town planning scheme provisions that protect environmentally sensitive areas.

The current level of land management is covered by general provisions applicable to all rural land and the conservation interests of the landowners. Smaller lot sizes and site specific town planning control measures will enable more efficient primary production activities to occur, and reduce land conflicts with surrounding lots, whilst also providing suitable measures to protect areas with high conservation, environmental and landscape values, as well as the ability to restore, enhance and protect biodiversity.

Further, small scale agricultural pursuits will result in individual lot owners seeking to use their lots in the most productive way permissible and enable a more 'hands on' land management regime. These measures will assist in

limiting soil erosion and nutrient export, improved soil structure, conservation of remnant vegetation and sustainably utilising the natural attributes of the land to meet the needs and demands of food production and rural living

Government Sewerage Policy

The Government Sewerage Policy is a whole of government policy setting out the minimum standards to be achieved for onsite effluent disposal throughout the State.

This submission is able to support the objectives and policy control measures of the Government Sewerage Policy.

General Points

- This submission will provide a new opportunity that is not currently available for the site to be used for its highest and best use, with more intensive forms of agriculture occurring on those areas of the site identified most suitable for this purpose.
- This submission will assist with improving the long term sustainability of the Shire of Denmark by providing lifestyle living and new employment opportunities to Denmark's residents, as well as providing visitors with a unique tourist offering not currently available within the Shire.
- This submission will provide a unique opportunity to establish a strategically located intermodal tourism hub in close proximity to popular tourist attractions, including; William Bay National Park, Greens Pool, Elephant Rocks and Mad Fish Bay - all of which are accessible by bicycle and foot.

CONCLUSION

Raintree has responded to the Denmark Shires Executive and Councils wishes on rezoning Lot 305 at significant cost under short term deadlines.

The [REDACTED] has worked hard and invested a lot of time and resources to support the LPS review and table detailed documents as a starting point. The proposed Rural Small Holdings and complimentary tourism zoning DOCUMENTS INDEXED AND TABLED are not prescriptive and provides the Denmark Council,

local Community and State stakeholders the chance to workshop with one of the worlds leading examples unlocking nature based solutions to climate change.

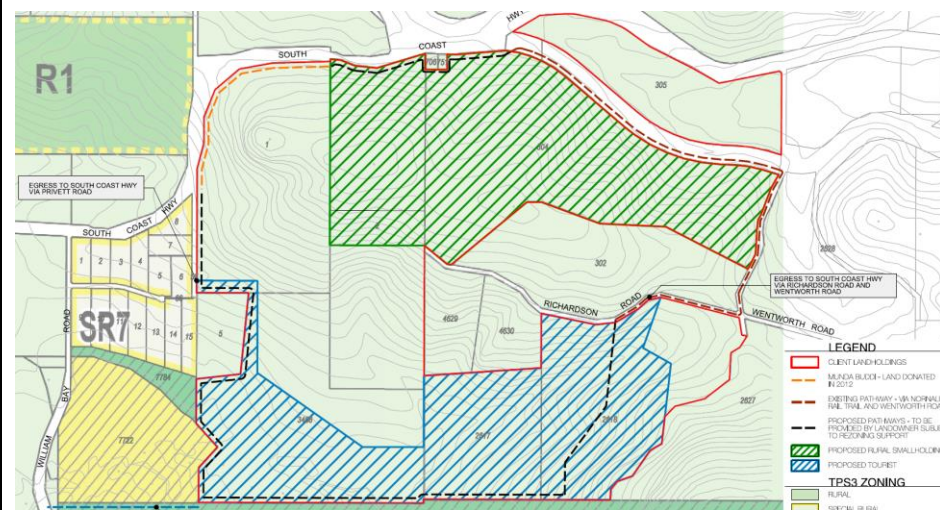
In the words of Indigenous elder and long standing family friend [REDACTED]
Tjina ny wanala ...

We invite our Denmark Community elders to listen to the millennial and alpha generations and walk with us on this shared journey to preserve a safe world for our grandchildren.

Attachments

- Preliminary Consultation phase written submission (September 2020) including proposed map below.

(A full copy of attachments can be provided by Shire officers upon request)



REQUEST – Mixed Zoning Conservation, Rural, Rural Small Holding and Tourism

(Received 22 January 2024)

Having undertaken the review I now think that a boundary amalgamation all under Tourism Zoning of lands you have defined as part of the tourism precinct for limited low cluster use in accommodation may be able to satisfy my various

concerns. It seems based on talking to Emmet Tourism rezoning in the future can be done more efficiently and quickly if it is a simple request in line with Tourism zoning precinct eg low cluster accommodation.

Also as well as the time and expense to put in place, to have multiple titles with small rural holding and tourism rezoning may in fact create problems on having a central sewerage and power plant.

To get to scale and able to finance renewable power station and water treatment plants with adequate water dispersal on 40 Ha is viable, but a bit dense, but to pull together a 150 ha Tourism zone with mixed use (ie caretaker residences) allows a balance of tourism and worker accommodation) and may in fact be the best solution as recommended by the Council Executive.

A mixed land has been put in place on the central 40 Ha of Lot 305, so extended areas of boundary amalgamation can be limited to accommodation (without other uses) to maximise low impact footprint with large buffers for neighbours. With 4 km of highway frontage it will be easy to find a single entry point and reduce from 2 to 1 the current children, horse and bike crossings.

The single title will also allow dispersing of treated water to increase agricultural productivity (eg Distillery/ brewery) and maximise accommodations low impact footprint, with large buffers for neighbours - with the unique ability to provide essential services on a large strategic land mass spread over 150 ha.

Having said that I still seek that the Tourism precinct extends to Lot 3468 and Lott 22 (formerly Lot 2617) as per submission of the 15th of January 24 but that would be longer term for separate applications.

i.e. A mix of Titles and different rezoning classifications may slow down any boundary realignment with a simple tourism rezoning for low cluster accommodation where as mixed zones on multiple titles not be the best way forward as essential services such as sewerage are not able to be transferred across titles.

1. Renewable solar
 - Wind
 - hydro

The tourism precincts are proposed to be removed from the draft Strategy as per the above response.

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| | | <ul style="list-style-type: none"> • Solar <ol style="list-style-type: none"> 2. Water <ul style="list-style-type: none"> • Drinking • Household • Gardens • Agricultural • Fire fighting 3. Sewerage 4. Road 5. Recycled refuse <p><u>Conclusion</u> The submission of the 18th I failed to underline an important point that your master zoning in Tourism may in fact be able to overcome concerns of the transfer of water treatment plants/treated water etc between titles.</p> <p>What is clear is that RAINTREE has been approved (subject to WAPC) to build a component of residential in it's tourism mix. If the percentage of residential (Caretaker etc) is right the concerns raised could all be covered in one zoned larger lot that would then be at scale to allow for the construction of essential services such as a renewable power station, sewerage treatment, water and fire fighting systems.</p> | Noted. |
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Submissions Received from Government Agencies

| Ref No. | Submitter Details | Verbatim Submission | Planning Services Comment |
|---------|--|--|--|
| G1 | Main Roads WA Steven Pickin Acting Network Operations Manager Main Roads Great Southern 98920555 gsreg@mainroads.w | Thank you for the invitation to comment on the draft Local Planning Strategy. I have read the sections of the current draft Local Planning Strategy relating to transport which identifies that there has been some conceptual planning for a heavy haulage route to avoid the main street, but it has never been actioned. There are statements about the probable high costs of an alternate route making it unattractive. There are a few sentences about future crossings of the Denmark River, and a statement that the planning of/selection of a river crossing location should be done when the need arises? This would seem be too late and if there is a future need for another river crossing there should be some planning incorporated into the strategy to protect the required approaches to avoid inappropriate land development. Lack of planning has already seen land | The Draft Strategy was prepared on the basis of preliminary consultation with Main Roads that included advice that there was no need for a heavy haulage bypass to be identified in the Strategy and that freight numbers were not increasing. |

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| <p>a.gov.au</p> | <p>development in the town which now restricts the potential for a heavy haulage route.</p> <p>There is a strong environmental awareness in the Shire of Denmark. Discussion of a heavy haulage route impacting remnant bushland and riverine habitat would be subject to strong community debate. The Shire of Denmark has not been proactive in considering the medium to long term road transport needs in conjunction with land use development. The Shire of Denmark has focused their efforts on lobbying for funds to upgrade the existing South Coast Highway alignment.</p> <p>Main Roads, in consultation with the Shire of Denmark, undertook a planning exercise in the 1980s to assess options for a proposed heavy haulage route for the town of Denmark. Two primary options were detailed, one to the north of town and one to the south of town. The southern option, however, did have several alternatives.</p> <p>In 1999 Main Roads undertook a traffic study on the section of South Coast Highway through the town of Denmark. This study also included a review of the heavy vehicle route options for the town and was based on the previous work undertaken. Despite this planning work being undertaken, a preferred option was not included into the subsequent Denmark Town Planning Scheme and was not protected from development.</p> <p>Land development has continued to grow in the town of Denmark and has resulted in the northern route option being further compromised and the southern route options virtually extinguished. There appears to be an ongoing resistance from the Shire of Denmark to the heavy haulage proposal, resulting in a lack of protection for a potential corridor/route.</p> <p>Main Roads continues to investigate possible improvements to the South Coast Highway in Denmark, the current concept plan proposes roundabouts at Scotsdale Road and Ocean Beach Road with some channelisation/rationalisation of the main thoroughfare from the Denmark River to Ocean Beach Road:-see attached.</p> <p>Main Roads policy regarding the upgrade of main streets that are also State roads is to limit funding to pavement works for the through carriageway (excluding parking lanes) and a proportion of the cost of drainage infrastructure and service relocations (this proportion is determined by the area on the through carriageway compared to the total pavement area). I understand the Shire has been unsuccessful in attracting significant funding to progress the project.</p> <p>The planning process fails whilst LGA's resist identifying heavy haulage corridors in Local Planning Strategies and Schemes. Subsequent inappropriate land development within these potential corridors then prevents the viable routes from being implemented. Unfortunately, this is a common practice that LGA's routinely adopt, they don't include future heavy haulage corridors due to the absence of funding to undertake the actual works.</p> <p>I propose that the draft Local Planning Strategy should be amended to include:- There is an ongoing requirement for the Demark Shire to further develop strategic plans for an alternate heavy haulage</p> | <p>The Draft Strategy does not identify any land use changes that would suggest a substantial increase in heavy haulage traffic, and the Shire is not aware of any regional-level strategy or other expected land use change that would increase heavy haulage traffic through the Denmark townsite.</p> <p>As there is no anticipated need for a heavy haulage bypass, no reasonably practical opportunity to identify land for a bypass (as a potential future scenario), and substantial negative social, environmental and economic impacts that could result from a bypass, the Shire does not propose to amend the Draft Strategy in this regard.</p> <p>The Draft Strategy proposes to continue to work with Main Roads to achieve improvements to the South Coast Highway that both enable the movement of freight as well as improving the function and amenity of the Denmark Town Centre.</p> |
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route/corridor and these plans shall be incorporated into the new subsequent Local Planning Scheme.



G2 Department of Education
 Joshua Gould
joshua.gould@education.wa.edu.au
 9264 4008

Thank you for your email on 25 October 2023 providing the Department of Education (the Department) with the opportunity to comment on the Shire of Denmark draft Local Planning Strategy (Strategy).

The Department notes that the draft Strategy estimates that there will be approximately 755-1,000 additional dwellings by 2050. As per the Western Australian Planning Commission’s (WAPC) Operational Policy – Planning for School Sites (OP 2.4) requirements, one public primary school site is required for a threshold of every 1,500 dwellings.

Based on the number of additional primary and secondary students projected in the Strategy, it is anticipated that these could potentially be accommodated by the existing schools in the short to medium term.

In view of the above, the Department has no in principle objections to the draft Strategy. The Department will continue to monitor residential growth and student enrolment demand of public schooling and welcomes the opportunity to continue to work with the Shire to forward plan a future

Noted.

The Shire considers educational opportunities to be a competitive advantage for our community and will continue to monitor population growth and change and liaise with the Department with regard to future educational requirements.

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| | | <p>primary school site to accommodate the educational needs of the Shire in the long term.</p> <p>Should you have any questions in relation to the above, please do not hesitate to contact Joshua Gould, Senior Consultant - Land Planning.</p> | |
| G3 | <p>DFES Michael Ball Senior Land Use Planning Officer advice@dfes.wa.gov.au 9395 9819</p> | <p>I refer to your email dated 25 October 2023 regarding the submission of a Local Planning Strategy (LPS), supported by a Bushfire Hazard Level (BHL) Assessment prepared by Bio Diverse Solutions and dated 13 April 2022.</p> <p>This advice relates only to State Planning Policy 3.7 Planning in Bushfire Prone Areas (SPP 3.7) and the Guidelines for Planning in Bushfire Prone Areas (Guidelines). It is the responsibility of the proponent to ensure the proposal complies with all other relevant planning policies and building regulations where necessary. This advice does not exempt the applicant/proponent from obtaining necessary approvals that may apply to the proposal including planning, building, health or any other approvals required by a relevant authority under other written laws.</p> <p>Assessment</p> <p>It is critical that the bushfire risk is understood for the Shire, in particular areas where the Strategy contemplates intensification of land use. These areas proposed for future investigation/intensification are the focus of the below comments.</p> <p>DFES supports the inclusion of the BHL Assessment in the development of the Strategy, and the hazards identified that must be addressed as part of the Strategy. Further, DFES supports the general approach for a consolidated settlement pattern and infill development avoiding low density rural living estates ensures, to enable future growth to facilitate a balance between desirable environmental and bushfire outcomes.</p> <p>While the BHL provides a broad location of the areas of highest risk, it does not appear to provide a sufficient level of detail to guide the LPS regarding the potential impact of bushfire and the submitted information does not clearly articulate how findings from the BHL assessment have informed recommendations for future growth.</p> <p>It is noted that the BHL provides a high-level overview of the overall Shire's Bushfire Hazard Level, and provides broad comments regarding the risks present within the Shire. However, limited commentary is provided in relation to the suitability of each potential development site for intensification, with comments for almost all areas stating 'may achieve compliance with BPC' based on BHL outcomes and recommendations.</p> <p>Strategic planning of this nature presents an opportunity to consider required infrastructure investments to enable future growth, as discussed below, and further assessment of bushfire</p> | <p>Noted.</p> <p>Based on the BHL the LPS has determined which areas are suitable for land use intensification (and with reference to areas identified in the 2011 LPS, which are not).</p> <p>Recommendations specific to each potential urban growth area will be added to provide clarity on how assessment of bushfire risk informed the recommendations of the Strategy. More detailed assessment of each site, including the</p> |

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| | | <p>hazards and associated risks will be necessary to fully understand opportunities and constraints for land use intensification, and the ability to achieve compliance with the bushfire protection criteria of the Guidelines.</p> <p>As an example; Map Ref 19 is noted to have an extreme BHL for most of the site, with moderate to extreme slopes, not connected to reticulated water supply, and only one built road connection, however the BMP does not recommend that development in the area is avoided. Site 20 notes that BPC is not compliant, however no mention is made that the area is not suitable for development.</p> <p>In addition, this level of planning offers an opportunity to consider mechanisms for securing funding for infrastructure which may assist in avoiding onerous obligations on local government for future management (e.g. developer contributions or management agreements).</p> <p>DFES has provided general comments below addressing each element of the Bushfire Protection Criteria as required by the Guidelines, as well as some issues that should be addressed in an updated BHL Assessment.</p> <p>Element 1 Strategic planning presents the best opportunity to influence outcomes at later stages of planning avoiding reliance on design, in lot setbacks and ultimately building responses to hazards that could and indeed should have been avoided. DFES advocates for strategic planning to be used to identify opportunities for coordinating infrastructure to support delivery of development in areas to provide hazard separation, avoid existing hazards that may not have suitable design responses (e.g. extreme slope, protected vegetation and waterways), and utilise elements such as road reserves and managed public open space to provide separation for future developments.</p> <p>In order to demonstrate compliance with the intent of Element 1, i.e. that strategic planning and</p> | <p>delineation of BAL contours and design of access, will be undertaken at subsequent stages of planning in accordance with the State policy framework.</p> <p>Additional references to the infrastructure requirements identified in the Bushfire Resilience in the Great Southern (BRIGS) report, the Shire's Bushfire Risk Management Plan (BRMP) and required for identified urban growth areas to conform with the State policy framework will be proposed as modifications to the Strategy.</p> <p>Where infrastructure is required as a direct result of development this may be required to be established or contributed to by the developer. Should the Shire introduce a Developer Contributions Plan in future the need for community infrastructure may be considered; however, infrastructure specifically required for fire fighting is supported by the Emergency Services Levy.</p> <p>Noted.</p> <p>Additional comments to be added</p> |
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| | <p>future applications are located in areas with the least possible risk of bushfire to facilitate the protection of people, property and infrastructure, DFES recommends that the BMP shows a BHL for each site being considered for intensification displayed with the context for the site, and that conclusions are included articulating whether the site is considered suitable for development (from a bushfire perspective) and if so, what infrastructure would be required in order to facilitate such development,. This may also assist identifying contributions to be sought from developers in the future and/or investment requirements from the Shire. The narrow scope of the area for each site assessment within the BHL gives little detail on the broader landscape surrounding the site, leaving it unclear what the overall context surrounding each site is. DFES notes that all BAL/BHL assessments should include at least a 150m assessment buffer, and this has not occurred with the submitted diagrams.</p> <p>It is noted that not all sites in the BHL are included in the Strategy and that some identified in the Strategy for intensification are not referenced in the BMP. It would be helpful for the BMP to identify, or perhaps reference within the Strategy or a supporting document, how the BMP / BHL has informed the decisions articulated within the Strategy to demonstrate compliance with SPP and Guidelines.</p> <p>As the vegetation assessment provided does not use inputs consistent with the Guidelines, DFES is unable to validate the vegetation inputs. Any future BHL assessments should ensure that site photos are provided to validate the proposed vegetation inputs.</p> <p>Element 2 DFES acknowledge that this Element is not usually relevant at strategic level of planning as concept plans for future development are required. However, the BMP should address any growth areas which are constrained by environmentally protected vegetation such as rivers / wetlands and other areas of vegetation which are unable to be modified or managed to a low threat status.</p> <p>Comments in the BHL assessment appear to suggest that large scale clearing can take place within the developments sites to provide compliance with the BPC, however this does not appear to align with the intent of the LPS to reduce the impact of development on the environment.</p> <p>DFES suggests that the sites identified in the LPS include comments regarding hazard reduction strategies, to reduce risk for future developments. As noted above, this can include the use of</p> | <p>discussing bushfire risks associated with urban growth sites.</p> <p>Each site has been assessed in context – individual images added as identifiers only – Maps 8 to 10 are provided for reference.</p> <p>Additional comments to be added discussing bushfire risks associated with urban growth sites. Some sites were prioritised for urban growth and others were excluded based on a consideration of all relevant planning matters, including bushfire risk.</p> <p>The assessment method for vegetation classification is detailed in part 4.3 of the BHL Report. Photos and field notes were not attached to this report due to size.</p> <p>The Strategy generally excludes potential growth areas that contain significant areas of remnant vegetation, indicates a presumption against the clearing of vegetation, and notes that site specific studies will occur at more detailed stages of planning approval prior to development occurring.</p> <p>Site specific risk mitigation will be the subject of more detailed</p> |
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| | | <p>perimeter roads, POS as a buffer to unmanaged vegetation etc.</p> <p>While there is no detail provided, DFES has concerns over proposed modifications to APZ requirements, with the increased canopy cover likely to reduce the effectiveness of the APZ requirements.</p> <p>Element 3</p> <p>The LPS has identified potential strategic improvements through the Bushfire Resilience in the Great Southern project (BRIGS), which are subject to further investigation. Where future development relies on achieving these improvements, the strategy presents the best opportunity to identify and articulate these before structure planning progresses.</p> <p>DFES notes that while some sites are noted as ‘potentially compliant’ in the future regarding vehicle access, the BHL assessment does not provide any detail as to the level of investment required to achieve this compliance. Further it is unclear if the costs associated with the delivery of additional vehicle access would be commensurate with the level of development/ intensification proposed within the site.</p> <p>DFES notes that both the LPS and BHL assessment could include comments regarding the road links identified in both the BRIGS and previous Bushfire Management Plan to guide future development and ensure that where possible new road linkage provide benefit to both future residents as well as the greater community.</p> <p>DFES does not object to the inclusion of potential DFES response times, however note that this should only be provided in addition to an assessment of the above issues and clear detail of the works required to achieve compliance with the BPC (as DFES response times are not required for consideration under SPP 3.7). It is noted that DFES has not validated the response times, and the assessment does not consider any external factors that may impact the response times/road access to each site.</p> <p>Element 4</p> <p>The BMP assumes that may areas proposed for development can be reticulated. An assessment of each area and the current reticulation service should be provided in the BHL assessment to ensure that reticulation can be provided to each site.</p> | <p>investigation in accordance with State policies at following stages of the planning approval process.</p> <p>The Strategy identifies the need for further investigation only at this stage.</p> <p>Potential urban growth areas identified will be required to demonstrate compliance with relevant State policies for bushfire protection at each stage of the planning approvals process, including road design that provides secondary access. These areas are not reliant on the achievement of improvements to bushfire risk mitigation identified in the BRIGS report or the Shire’s current BRMP (generally retrospective in nature).</p> <p>The Strategy identifies potential future road or emergency access linkages at part 3.3.2.4. Proposed amendments to clarify.</p> <p>Noted.</p> <p>There are no known impediments to the provision of reticulated water for the potential urban growth areas identified in the Strategy, subject to</p> |
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| | | <p>General Comments</p> <ul style="list-style-type: none"> • As stated above, the BHL provides some guidance towards the future location of development within the Shire, and how this may avoid high risk areas. It has not been demonstrated however how this information has informed LPS recommendations. DFES notes that some areas recommended for investigation do not appear appropriate for further intensification. • A BMP should be produced that draws conclusions from BHL assessment and how these should be taken forward and whether treatments etc need to be included in any strategic planning. The BMP should also include a comment as to how suitable each site is for future development, and if the hazards present could likely be overcome whilst maintaining the vegetation present in the area. • The BHL Assessment doesn't provide sufficient evidence to support the proposed BHL ratings, and does not provide post development BHLs (to show the area capable of development). DFES notes that the inputs used for the vegetation assessment are not consistent with the requirements of SPP 3.7, and it does not appear that any site inspections have taken place as part of the overall vegetation assessment. While this information is useful as a guide, more detailed evidence and site assessments are required to validate the proposed inputs and outputs. • DFES notes that there are several sites discussed either the LPS or BHL assessment that do not appear in the other document. (e.g. Site 20 – DMK55 is not listed in the LPS and DMK28 and DMK68 from the LPS do not appear to be detailed in the BMP). Please note that this is not an exhaustive list. DFES notes that all future investigation areas should be addressed by the BHL assessment. | <p>considerations of supply sources and efficiencies at a regional level. The Strategy includes an action at part 3.3.2.4 that supports the provision of (or contribution to) stand-alone water storage sources for bushfire fighting purposes as part of new urban development. The criteria for where and how these sources should be developed is more appropriately resolved through bushfire risk mitigation and response planning, not the Strategy.</p> <p>Additional commentary on suitability of urban growth areas to be provided. Some areas investigated as part of the BHL assessment (including areas identified in the 2011 LPS) were not included in the Strategy.</p> <p>Additional commentary on suitability of urban growth areas to be provided. Review of the Shire's Bushfire Risk Mitigation Plan is due in 2024/25.</p> <p>The assessment method for vegetation classification is detailed in part 4.3 of the BHL Report. Photos and field notes were not attached to this report due to size.</p> <p>9 sites included in the BHL report were not included in the Strategy as they were not considered appropriate for land use</p> |
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| | | <p>Recommendation – insufficient information</p> <p>The proposed Local Planning Strategy is supported by a Bushfire Hazard Level Assessment that has not provided sufficient information to guide or fully understand the potential hazards and response mechanisms required for each investigation area. DFES requests modifications to the assessment and LPS to address the issues raised above, to ensure that future planning investigations are based on an understanding of the bushfire risk and potential hazard reduction measures.</p> <p>Should you require further information, please contact me directly (Michael Ball).</p> | <p>intensification (DMK27, DMK33, DMK41, DMK42, DMK43, DMK52, DMK53, DMK55, DMK69).</p> <p>2 sites were not included as they were not required to meet projected growth needs during the life of the Strategy (DMK46, Lot 374 Scotsdale Rd).</p> <p>2 sites are already zoned for Rural Residential development which is addressed at part 3.4.1.3 of the Strategy (DMK25, Lot 1 Riverbend Lane).</p> <p>5 sites were omitted from site specific assessment in the BHL on account of being small, already zoned for Residential development and there being no opportunity to change land use outcomes through the Strategy (DMK5, DMK28, DMK50, DMK68, DMK73). Bushfire protection requirements will apply to future development/ subdivision as per the current State policy framework.</p> <p>1 site is addressed at part 3.1.6.1 as a rural settlement (DMK36 – Nornalup).</p> <p>A number of modifications to the wording of the Strategy are recommended based on DFES advice, including recommendations specific to each potential urban growth area to provide clarity on how assessment of bushfire risk informed the recommendations of the Strategy.</p> |
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| G4 | <p>Department of Water and Environmental Regulation (DWER) Nicolie Sykora Program Manager – Planning Advice (South Coast Region) nicolie.sykora@dwer.wa.gov.au or alison.vangel@dwer.wa.gov.au 9841 0148</p> | <p>Thank you for providing the draft Strategy for the Department of Water and Environmental Regulation (Department) to consider.</p> <p>Overall, the Department is pleased to see an extensive number of actions drafted for implementation through the Local Planning Scheme that are relevant to strategic water resource and environmental protection management outcomes. These actions appear to have largely incorporated the Department’s preliminary input on the draft Strategy in 2020.</p> <p>The Department has also recently provided advice to assist the Shire in the drafting of the new Local Planning Scheme, which is also relevant to the draft Strategy.</p> <p>Detailed comments on the draft Strategy are provided in Attachment 1. Also attached is Advice note - trade waste considerations for beverage manufacturing in unsewered areas, which has been developed by a whole of government brewery working group (DWER, DOH, DPLH and DPIRD) to assist Local Governments.</p> <p>For further queries please do not hesitate to contact Alison Vangel (9841 0100) or Nicolie Sykora (9841 0123).</p> <p>Attachment 1 – Department of Water and Environmental Regulation comments on the draft Shire of Denmark, Local Planning Strategy</p> <table border="1" data-bbox="472 786 1675 1453"> <thead> <tr> <th>Section/Page</th> <th>Topic</th> <th>Issue</th> <th>Suggested changes</th> </tr> </thead> <tbody> <tr> <td></td> <td>Table of Contents</td> <td>No list of Maps and Figures/tables</td> <td>Include list of Maps, Figures and Tables to aid document legibility</td> </tr> <tr> <td>15</td> <td>Reticulated Sewerage Infrastructure</td> <td>Draft State Planning Policy 2.9 – Planning for Water is also relevant here, particularly the designation of Sensitive Water Resource Areas.</td> <td>Include reference to dSPP 2.9</td> </tr> <tr> <td>17</td> <td>Reticulated Sewerage Infrastructure</td> <td>Reference to Map 1 to provide visual context for 800 m catchment of Town Centre priority for reticulated sewerage.</td> <td>Modify last sentence of paragraph 1 to read: <i>“In particular, the development of a reticulated sewerage service in residential areas within an 800 metre catchment of the Town Centre (shown in Map 1) should be prioritised.”</i></td> </tr> <tr> <td>20-1</td> <td>Urban Expansion</td> <td>Support the reconsideration of some of the areas previously identified as ‘Special Residential’ in the 2011 Strategy based on site constraints in the context of the current planning framework.</td> <td>Nil</td> </tr> <tr> <td>28</td> <td>Urban Expansion</td> <td>Action 2 needs to clarify that reticulated sewerage required for all new land zoned to Residential or Urban Development and all infill in residential areas, as per GSP & dSPP 2.9.</td> <td>Modify Action 2. b) to read: <i>“2. b) land capability assessment.”</i> And insert new: <i>“2. c) connection to reticulation sewerage”</i> and subsequent renumbering.</td> </tr> <tr> <td>28</td> <td>Urban Expansion</td> <td>Action 2 h) needs clarity to ensure new development is located predominantly in existing cleared areas, and structure planning considers cumulative impacts on water resources as per dPP 2.9 7.1 e)</td> <td>Amend 2. h) to read: <i>“h) Impact on the environment including:</i> <ul style="list-style-type: none"> <i>Development shall be predominately in existing cleared areas. 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There is a presumption against vegetation clearing for urban development</i> | <p>ToC. Agreed 15. Agreed 17. Agreed 20-1. Noted 28. Intent supported, changes proposed to reflect, but noting that some residential growth areas already have subd approvals unsewered 28. Modifications not supported. Some vegetation clearing will inevitably be required for residential growth to proceed – this should be avoided where possible and assessed where proposed, but not sure the Strategy should be determinate of this outcome. Water Management planning referenced at</p> |
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| 20-1 | Urban Expansion | Support the reconsideration of some of the areas previously identified as ‘Special Residential’ in the 2011 Strategy based on site constraints in the context of the current planning framework. | Nil | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 31 | Strategies & Actions – Rural Residential | Action 3 requires more specific wording to clarify the manner in which infill proposals can be considered. In particular, unsewered infill proposals for lot sizes below 1 hectare (the minimum lot size for sensitive water resource areas under dSPP 2.9 / SSAs under the GSP) should not be supported regardless of the existing minimum lot sizes specified for the site in the Local Planning Scheme (many of which predate the GSP an dSPP 2.9), and proposals should consider the whole of a Rural Residential area. The Albany Local Planning Strategy provides an example of how this has been sufficiently addressed. | <ul style="list-style-type: none"> • <i>Assessment of cumulative impacts on water resources</i> Modify Action 3 a) to read: <i>“3. a) Consider proposals for infill development within the Rural Residential Zone subject to:</i> <ul style="list-style-type: none"> • <i>a Scheme amendment is not required to support the proposal;</i> • <i>the land is not located in a Conservation zone;</i> • <i>the existing minimum lot size for the land specified in the Local Planning Scheme can be achieved;</i> • <i>if located in a Sensitive Water Resource Area under draft State Planning Policy 2.9, infill proposals for lot sizes below 1 hectare will not be supported regardless of the existing minimum lot sizes specified for the site in the Local Planning Scheme;</i> • <i>there is no increase in potential land use conflict with neighbouring agricultural and rural land uses;</i> • <i>proposed lot sizes respond to identified constraints and meet the objectives of the zone;</i> • <i>the appropriate level of servicing can be achieved;</i> • <i>local roads, drainage and other infrastructure has sufficient capacity to support the development;</i> • <i>scenic landscape and conservation attributes will not be eroded;</i> and • <i>clearing of native vegetation is not required.</i> <i>In reviewing the structure plan, the full possible extent of the estate must be shown and considered.”</i> | 2i and State policies will form these requirements – modifaciton to wording not required. |
| 42 | Rural Settlements | Support the Strategy’s recommendations regarding Nornalup, Bow Bridge and Peaceful Bay. Also support the explicit statement that reticulated sewerage is a pre-requisite for any | Consistent with paragraph 4 of section 3.1.6.1 on page 42, the strategies and actions should state that: “the establishment of a reticulated sewerage service is a pre-requisite for further development” in rural settlements. | 31. The Strategy provides a statement of intent, but this will be a matter to be considered as part of the preparation of a new Local Planning Scheme, as this is what currently limits any further subdivision in Special Rural (to become Rural Residential) areas. The relevant planning considerations and process will vary according to the site – eg. some areas are sewer sensitive and some are not, so it is not proposed to make a blanket statement on lot size or wastewater requirements. Any potential subdivision will need to be demonstrated to be consistent with draft SPP2.9 and the Government Sewer Policy and it is not necessary for the Scheme to duplicate these requirements. |
| | | | | 42. Supported via insertion of additional action 1e for Nornalup (the only settlement where expansion is supported). |

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| | | further development of any rural settlements and rural residential areas. | |
| 47 | Agricultural Impacts | Environmental impacts should also include native fauna habitat loss and secondary salinisation. | <p>Modify the last sentence of paragraph one to read:</p> <p><i>“Management of the potential environmental impacts of these land uses needs to be considered, particularly the potential for nutrients, pesticides and herbicides to contaminate land, waterways or wetlands offsite, and of native fauna habitat loss and secondary salinisation.”</i></p> |
| 48 | Rural Enterprise | <p>Breweries and distillery sites are increasingly being proposed on unsewered sites as part of a tourist attraction, often identified because of the site’s environmental aesthetics and sensitivity. These sites may include a number of different waste generating land uses on the one site, such as tourist accommodation, taverns and restaurants, as well as breweries, wineries and distilleries, which may not individually require works approval or licensing under Part V of the <i>Environmental Protection Act 1986</i> as ‘Prescribed premises’, but cumulatively may pose an environmental risk if not carefully assessed and managed at the earliest possible planning stage.</p> <p>The general identification of breweries as being a suitable land use on rural land without further clarification is not supported as Breweries and Distilleries should only be generally considered appropriate where trade waste management involves connection to reticulated sewer.</p> | <p>Include the subsection under ‘Other Rural Land Uses’:</p> <p><i>“Breweries and distilleries Breweries and distillery sites proposed on rural land especially require careful, holistic case-by case consideration at the earliest possible planning stage, in order to manage potential environmental risk from onsite waste disposal, which is heightened in the Shire due to relatively low pan evaporation rates and sensitive water resource areas.</i></p> <p><i>The Strategy supports the location of breweries and distilleries predominantly where they are connected to reticulated sewer. Any site-specific proposals for a ‘Brewery’ or ‘Distillery’ in unsewered areas must holistically assess all proposed land uses on that particular site, through the Scheme Amendment process to ensure that permissible land uses can be developed on that site.”</i></p> <p>And under ‘Strategies & Actions – Other Rural Land Uses’ insert:</p> |

47. Agreed.

48. The Department’s preference for these land uses to be located in areas that are sewerred is noted, but there are currently no suitable sewerred areas where this may occur. It is also noted that the Water Corporation have advised that further investigation would be required to determine whether the Denmark treatment plant is capable of receiving trade wastes of this nature, which is not common for systems servicing smaller towns. In the absence of the State providing infill sewer to the Shire’s industrial areas there are no alternatives and these type of production businesses will continue to be proposed in rural areas where there is sufficient land area for wastewater to be treated and disposed of, subject to the capability of the receiving environment. Precluding these land uses from rural locations would effectively mean ruling them out of the Shire altogether, which is not considered an appropriate or desirable action given the importance of these rural industries

| | | Section/Page | Topic | Issue | Suggested changes | that are otherwise supported by the Shire and State. It will remain the responsibility of the developer to address wastewater collection, management and disposal and any such proposals will be referred to the Department for technical advice. Advice on potential future LPP development noted. |
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| | | | | <p>It is acknowledged that the Shire's industrial areas are currently not connected to reticulated sewerage, however a strategic approach needs to be taken to support food and beverage manufacturing without compromising environmental values on rural land.</p> <p>The Department also recommends the Shire develop a Local Planning Policy on Breweries and beverage manufacturing and would be happy to assist the Shire in this regard. Attached is an "Advice note - trade waste considerations for beverage manufacturing in unsewered areas", which has been developed by a whole of government brewery working group (DWER, DOH, DPLH and DPIRD) to assist Local Governments. This approach is supported by draft State Planning Policy 2.9 objectives to:</p> <ul style="list-style-type: none"> • protect and improve the environmental, social, cultural and economic values of the State's water resources (cl.5.1) and • minimise future costs and protect public health by ensuring that appropriate wastewater infrastructure is provided (cl. 5.6) . | <p>"3. Prepare a Local Planning Policy on Breweries and Distilleries to provide further guidance on the strategic location of these high-risk land uses."</p> | |
| | | 49 | Rural Enterprise – Tree Plantations | The environmental risks stated here are consistent with those of clearing for agriculture in general. Plantation establishment, harvesting and reversion mapping in the Wilson Inlet | <p>Modify this section to include:</p> <p><i>"Tree plantations can provide benefits to water quality. Catchment modelling in the Wilson Inlet catchment</i></p> | 49. Noted, but on balance with agricultural production, landscape values and social outcomes the Strategy does not support the widespread expansion of plantations. Other targeted water quality improvement programs within agriculture, revegetation of ecological corridors, etc. are considered to have a greater priority due to the potential for mutually beneficial outcomes. |

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| | | <p>catchment by DWER (1984-2020) found that <1% of the plantations were established on land that was cleared for native vegetation (i.e., 99% of plantations were established on land used for beef grazing).</p> <p>Consider supporting the retention of the remaining areas of plantations in all areas of the shire and their expansion as a cost-effective management action for water quality improvement.</p> | <p><i>found that on average, the water quality from plantations is 5 to 13 times better than beef grazing. Retaining existing areas can be a cost-effective management action for water quality improvement.</i></p> |
| 51 | 3.1.6.2 Rural land uses, conservation lots | Refer to wetlands in strategy and action 1.d.ii. | <p>Modify 1.d.ii to read: <i>"ii. Proposals that include contiguous remnant vegetation directly adjoining national parks, local reserves, conservation reserves, riverine or wetland systems or other environmental features, where they demonstrate significant capacity to contribute to a local-level ecological linkage."</i></p> |
| 70 | 3.2.3.3 Other Commercial Nodes | Reference to Weedon Hill Outline Development Plan as a Local Development Plan is incorrect | Replace reference to LDP with Local Structure Plan as per LPS Regulations. |
| | | DWER support the explicit requirement for reticulated sewerage to support residential or tourism development on Lot 55 on P006685 Ocean Beach | Nil |
| 72-74 | 3.2.4 | In relation to the Strategy's commentary on potential growth in agribusiness and food processing on page 72, the Department reiterates the comments made in relation to | <p>Under 'Strategies and Actions – Industrial Areas' insert a new point: <i>"2. c. Explore options for supporting high-risk agribusiness and food manufacturing such as breweries</i></p> |

51. Agreed.

70. Agreed.

Noted – this is a critical requirement for any potential development of the site.

72-74. Agreed – Shire is advocating for infill sewer funding from the State for this. Proposed to include additional action within 3.4.2.3 Wastewater.

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| | | Breweries and Distilleries under 'Rural Enterprise' section on page 40. | <i>and distilleries through the provision of reticulated sewerage in industrial areas for these land uses."</i> | |
| 89 | 3.3.1.1 | 2.e. DWER would be happy to arrange a meeting with the Shire and the NVR branch to clarify requirements of the EP (Clearing) Regulations. | | |
| 91-93 | 3.3.1.2 Water Resources | Overall, the strategies & actions are supported. Owingup wetlands The Wilson Inlet Management Strategy should be referred to as it is an existing cross-government endorsed strategy which identifies detailed strategies and actions for protecting and enhancing community values of the Inlet and its catchment, and highly relevant to the implementation of Action 2. d. | Modify para 4. All waterways and wetlands with management plans/reports should be given due regard in considering planning applications. Change the heading "Inlets and wetlands" to "Waterways and wetlands". [Alternatively, "Waterways, inlets and wetlands"] Under this section include reference to the Wilson Inlet Management Strategy. | 89. Noted – appropriate action to support drafting of Scheme provisions regarding clearing controls. 91-93. Reference to WIMS to be added. |
| | | Nutrients are lost from all land uses not just intensive agriculture. Urban land-uses have a similar intensity of nitrogen loss compared to some forms of intensive agriculture. Beef grazing is not intensive (on average) but is the largest cleared land use in the catchment and thus contributes two-thirds of the nutrient load to the Wilson Inlet. | Modify the last sentence of the first paragraph to read: <i>"The Wilson Inlet faces many threats, the most serious being nutrient flows from intensive agriculture, beef grazing and urban land use within the surrounding catchments."</i> | Agreed. |
| 92 | | Reference to Department of Water incorrect | Modify last sentence to read: "there are no groundwater areas proclaimed under the <i>Rights in Water and Irrigation Act 1914</i> within the Shire. | 92. Agreed. |

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| | | SCA for Sensitive water resource areas (SWRAs) also recommended, and referral to the Department for proposals within PDWSA and SWRAs. The Shire of Esperance Local Planning Scheme provides a good example. | <p>Include a new subsection: <i>"Sensitive Water Resource Areas</i></p> <p><i>A number of Sensitive Water Resource Areas have been identified within the Shire, including land that drains to and is within two kilometres of Wilson Inlet, Irwin Inlet, Peaceful Bay, and the estuarine areas of Walpole-Nornalup Inlet, as shown in Map 4 – Water Resources by draft State Planning Policy 2.9.</i></p> <p><i>DWER recommends these Special Control Areas are applied to these areas within the Local Planning Scheme to protect water dependent ecosystems, natural waterways and estuaries, wetlands and selected coastal inlets and embayment that have been recognised at either the State or National level as having high ecological, social, cultural and/or economic values and are sensitive to contamination associated with land use and development."</i></p> |
| 93 | | <p>The strategy has several actions that require the shire to "consider catchment management plans", and should include some context for the existing and future framework of these plans, including the development of the Water Quality Improvement Plan for the Nullaki (Wilson) Inlet, which will be supported by a catchment scale hydrological and nutrient model.</p> <p>The Department can on request provide a targeted presentation of the catchment modelling results to the Shire in the new year.</p> | <p>Insert a new section to read: <i>"Catchment Management</i></p> <p><i>DWER is developing a Water Quality Improvement Plan (WQIP) for the Nullaki (Wilson) Inlet and the rivers and drains of its catchment. This plan will detail the sources of nutrients by catchment and land use. Relevant nutrient targets will be discussed, including nutrient application targets which represent the maximum amount of nutrient that can be applied to land with a low risk of impacting catchment and inlet water quality (these are heavily used in the Peel-Harvey to reality check intensive land use proposals). Management actions will be prioritised at a high level for catchments and landuses. Threats from agriculture, urban expansion</i></p> |

Not supported. It is not clear what this would aim to achieve above and beyond the existing application of draft SPP 2.9 and GSP where a planning approval is necessary. Using a SCA is a tool that usually imposes a requirement for approval or a development standard over and above what applies outside of the SCA in that zone. What is it proposed that this would apply to?

The Shire is not in favour of introducing additional approval requirements where these do not already exist or are exempt according to other State legislation – assessment should be targeted to specific land uses that pose a risk to water quality or land uses that can be assessed at a strategic level (ie. residential at zoning or structure plan stage).

The Shire will consider relevant State policies and referral responses provided by agencies when decision making requires the exercise of discretion.

93. Strategy not proposing to reference all relevant documents including those that are under development. General references to relevant management documents is incorporated, noting these will likely change during the lifetime of the

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| | | | | <p>The Department has also developed the UNDO tool to guide the design and assessment of urban development to mitigate nutrient losses to sensitive aquatic environments, such as the Wilson Inlet and the waterways of its catchment.</p> <p>The Department is happy to support the Shire in the adoption of the UNDO tool. For further information contact Karl Henning (karl.henning@dwer.wa.gov.au) or contacts via the UNDO web page.</p> <p>Please contact Karl Hennig (karl.hennig@dwer.wa.gov.au) for further information on the Nullaki (Wilson) Inlet WQIP.</p> | <p><i>and climate change will be detailed and recommendations made.</i></p> <p><i>The WQIP is supported by a catchment scale hydrological and nutrient model, which will be published next year. The catchment model provides most of the detail in terms of sources of nutrient, target setting and the effect of management, land use change and climate change. In addition to the Wilson Inlet Management Strategy, this modelling report can be used by the Shire in the interim until the WQIP is published. DWER's UNDO tool can also be used to guide the design and assessment of urban development to mitigate nutrient losses to sensitive aquatic environments "</i></p> | <p>Strategy. More detailed integration can occur at the next review of the Strategy.</p> |
| | | 3.3.1.2 | Strategies & Actions – Water Resources | <p>DWER supports the intent of the strategies and actions for dams and waterway foreshore areas and recommended some amendments to improve the wording and clarify requirements.</p> <p>Consider whether the Strategy should provide guidance on waterway crossings. Refer to section 8.3 of the dSPP 2.9 guidelines, Supplementary information for permit applications to interfere with bed or banks of watercourses (Department of Water 2012), Building creek crossings (Department of Water 2010) and Crossing creeks – Stream crossings on farms (Department of Water 2008); and the requirements of the <i>Rights in Water and Irrigation Act 1914</i>. Guidance in the Strategy will minimise the risk of fragmenting aquatic fauna populations, restricting migration to breeding</p> | <p>Insert a new point below 1. b. to read: <i>"c. Introduce a Sensitive Water Resource' Special Control Area into the Local Planning Scheme. Apply with SCA to land identified as Sensitive Water Resource Areas in draft State Planning Policy 2.9. Introduce provisions into the local planning scheme to restrict inappropriate land use and development."</i> and renumber subsequent points.</p> <p>And</p> <p>Modify action 1. d) (as modified) to read: <i>"1. d) Consider water management as appropriate at each stage of the planning approval process, demonstrating maintenance of pre-development water flows and water sensitive urban design".</i></p> <p>Modify action 1. e (as modified) to read:</p> | <p>Not supported, as above.</p> <p>Reflects existing wording of 1c.</p> |

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| | | | | <p>grounds, limiting available habitat or causing local extinctions of aquatic fauna.</p> <p>Note that native fish are highly mobile and may need to travel long distances to complete their life cycle. Even relatively small barriers such as waterway crossings, piped culverts and gauging stations may prevent small native fish and other aquatic fauna, including threatened and priority fauna, from migrating upstream. They may not be able to swim through water that flows fast through a barrier, or they may not be able to jump more than a few centimetres to clear the barrier.</p> <p>DWER can assist with strategies and actions for crossings if required.</p> | <p>“ 1. f) <i>Utilise land use controls and enforceable management protocols to prevent contamination of water resources, including drinking and agricultural water supplies <u>and aquatic ecosystems</u>, from pollutants and nutrient loss including through the use of DWER’s UNDO tool.</i>”</p> <p>Modify point 2. to read: <i>“Protect, manage and rehabilitate <u>waterways and their foreshore areas and wetlands and their buffers</u> to maintain and enhance water quality, ecosystem function, biodiversity, recreational and scenic values.”</i> [This edit is preferred because it is more specific. Alternatively, change “riparian areas” to “riparian and wetland areas”.]</p> <p>Modify point 2.a. to read: <i>“Support the replanting of endemic species of vegetation in strategic locations such as waterways, <u>wetlands</u> and drinking water catchments.”</i></p> <p>Modify point 2. b. to read: <i>“When assessing subdivision applications, rezonings, and structure plans which include land adjacent to a <u>waterway, coastal area or wetland</u>, consider the widening of <u>waterway or coastal</u> foreshore reserves <u>or wetland buffers</u>, and <u>require the establishment of waterway foreshore reserves or wetland buffers if they are not already established.</u>”</i></p> <p>Modify point 2. c. to read:</p> | <p>Agreed to add ‘aquatic ecosystems’.</p> <p>Agreed.</p> <p>Agreed.</p> <p>Agreed, but need reference guidance for this as this is not always supported by DPLH, even for conservation subdivisions.</p> |

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| | | | <p><i>"2. c. Preserve or re-establish vegetated buffer areas adjoining water resources, including waterways and wetlands.</i></p> <p>Modify point 2. e. to read: <i>" 2. e. Refer proposals to DWER where located within a PDWSA or SWRA Special Control area, and where the Local Government considers that a proposal would impact catchment area management."</i></p> <p>Change the term 'swamp' to 'wetland', which is the term in water resource management policies and guidelines, including dSPP 2.9.</p> <p>Define the term 'waterway', consistent with dSPP 2.9: "any river, creek, stream or brook, including its foreshore area or reserve, floodplain, estuary and inlet. This includes systems that flow permanently, for part of the year or occasionally; and parts of the waterway that have been artificially modified."</p> <p>Define the term 'wetland', consistent with dSPP 2.9: "an area of seasonally, intermittently or permanently waterlogged or inundated land, whether natural or otherwise, and includes a lake, swamp, marsh, spring, dampland and sumplands."</p> | <p>Agreed.</p> <p>Referral should be based on need, not mandated.</p> <p>Agreed.</p> <p>If these terms are defined in draft SPP 2.9 then we should use it as per, and then do not need to define it.</p> |
| 93 | | <p>A Map of Water Resources is recommended to provide visual context for this section.</p> <p>DWER can assist with identifying significant waterways in the residential, rural residential</p> | <p>Insert a new "Map 4 – Water Resources" which maps PDWSAs, SWRAs, waterways and wetlands, and renumber subsequent Maps.</p> | |
| | | | | <p>Would this add value? We could add lots more maps. Would this be at a scale where info is easily definable?</p> <p>It would be the role of a Biodiversity Strategy, in conjunction with other plans, to identify land suitable for acquisition or other mechanism to improve environmental outcomes.</p> |

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| | | and environment conservation areas which are a priority for ceding and protection at the time of subdivision and development. | | |
| 95 | Identifying values | Edits are required to the term 'waterbodies' or 'water bodies' to make it consistent with water resource management policies and guidelines. | Modify the term "waterbodies" or "water bodies" to read: <ul style="list-style-type: none"> • <i>"The South Coast Noongar people consider all natural water resources within the Shire to be equally important and the health of these systems are intrinsic to their culture (Guilfoyle, 2011).</i> • <i>Presence of water bodies (waterways (i.e. waterfalls, rivers, creeks, streams or brooks and their estuaries and inlets), oceans, wetlands, inundated areas) (Plate 54)"</i> | Agreed References taken from VLE directly, and are examples only, not an exhaustive list of values, and reflects perspective of water within the visual landscape, not all water resources. |
| 103 | 3.3.2.3 Flooding Risk | It is recommended the draft Strategy includes an action to incorporate flood prone land as a Special Control Area (SCAs). | Insert or modify point 2 to read: Proposed development has adequate flood protection from a 1 in 100 (1%) Annual Exceedance Probability (AEP) flood. Proposed development does not detrimentally impact on the existing flooding regime of the general area. Consideration of the cumulative impact of individual developments on the floodplain is given | Based on subsequent advice and discussion with DWER staff it is not recommended to include a Special Control Area for flood prone land - refer supplementary advice below. |
| 115 | Potable Water Supply - Denmark Townsite | Denmark's potable water supply has increased security through connection to the Lower Great Southern Towns Water Supply Scheme. Water Corporation is undertaking source development planning that may be needed to maintain a reliable drinking water supply, and this is a | Modify first sentence of second paragraph to read: <i>"The sustainability of local and regional water supplies is increasingly challenged by the effects of climate change and demand, and needs careful consideration when planning further development in the Denmark townsite."</i> | Removal of reference to water supply not being a constraint to development of the Denmark Townsite is not supported. It is appropriate for the Strategy to clearly articulate where there are infrastructure constraints to development proceeding, or not. |

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| | | <p>consideration in future development. Further information can be found at Future water source planning in Great Southern Region (watercorporation.com.au).</p> <p>An evaluation of the Great Southern Regional Water Supply Strategy (2014) is being undertaken by the Department.</p> <p>Whilst outside the scope of the Strategy, the Department encourages the Shire to pursue all options for reducing potable water demand.</p> <p>A local planning policy on water which is underpinned by the local planning strategy may assist with identifying water efficiency targets.</p> | |
| 117 | 3.4.2.3 – Composting | This section discusses composting toilets rather than composting in general | Modify heading to read: “Composting toilets” |
| 118 | 3.4.2.3 – Wastewater | Draft State Planning Policy 2.9 will supersede the Government Sewerage Policy and should be referred to. | Under Constraints, following ‘Government Sewerage Policy’ insert “to be superseded by draft State Planning Policy 2.9,)” |
| 127 | 3.4.3.2 – POS Rationalisation Figure 10 – Site P5 – Kwoorabup Community Park | The Kwoorabup Community Park contains large areas of cleared land which are inundated for most of the year due to the area being located in the hyporheic zone of the Denmark River and the floodplain. Revegetation and restoration of riparian vegetation in these areas should be a key part of any Master Plan, which will improve water quality and ecosystem value of this area, as well as reduce maintenance costs in the long term. | Modify ‘Reinvestment to:’ to read: “Master plan required to define function, identify useable portions of reserves and identify areas suitable portions to rationalise and address in staged approach, including the restoration of riparian vegetation in areas subject to inundation. Funds to support enhancement of Kwoorabup Community Park.” |

Agreed.

Agreed.

Whether areas adjacent to the Denmark River are identified for public use and/or revegetation will be a matter for site specific master planning to resolve, not the Strategy.

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| 137 | 3.4.4 | Support 1.c. vi. where applicable to the <i>Waterways Conservation Act 1976</i> . | |
| 161 | 8.2 – Tourism Precincts – Figure 36 | Where onsite effluent disposal is proposed, assessment should include holistic assessment, including of potential cumulative impacts, of the site's suitability for all proposed land uses as part of a Scheme Amendment, including any high risk trade waste-generating land uses such as breweries and distilleries, in accordance with the GSP and dSPP 2.9. | For any precinct not connected to reticulated sewer, include (or modify) a point under 'Development to include detailed assessment of:' "Suitability for onsite effluent disposal for all proposed land uses" |
| | | Support the Recommendations and Considerations for the Peaceful Bay and Normalup precincts | Nil |
| 188 | Draft State Planning Policy 2.9 | This policy also designates Sensitive Water resource areas and will supercede a number of other policies e.g. SPP 2.7 and GSP | Update this section to include reference to SWRA designations. |
| 196 | 11.4 - Local Planning Policies | A list of proposed local planning policies that need to be developed as recommended by the Strategy should also be provided here, including a Local Planning Policy on Breweries and Distilleries as identified in a recommended modification on page 48. The Department is happy to assist in the preparation or review of any local planning policy. | Insert a table summarising proposed new Local Planning Policies recommended by the Strategy. |

Noted.

Revised approach to tourism development proposed in final Strategy – capacity to accommodate wastewater disposal will be adopted as a criteria for assessment.

Noted.

Additional references regarding the content of the Draft SPP not considered necessary within this section of the Strategy.

Not supported. This section of the Strategy provides background only and references pre-existing policies, and is not appropriate to contain recommendations. The number, type and content of policies is also dependant on how a new planning scheme is drafted.

Advice note - trade waste considerations for beverage manufacturing in unsewered areas

| Items | Discussion | Mitigations opportunities in the planning system |
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| <p>Regulation requirements</p> | <p><u>Environmental works approval and license</u></p> <p>Under s.52 and s.53 of the <i>Environmental Protection Act 1986</i> a works approval is required for construction of prescribed premises or carrying out certain work on existing prescribed premises and a licence is required to authorise emissions and discharges from the operation of the premises, onto land or into waters.</p> <p>Thresholds for determining if regulation is required:</p> <ul style="list-style-type: none"> • For alcoholic beverage manufacturing the threshold design capacity is the capability to produce 350kL or more of beverage per year. • For non alcoholic beverage manufacturing (e.g. fruit juice) the threshold design capacity is the capability to produce 200kL or more of beverage, per year. • If an operation produces both alcoholic and non-alcoholic beverages, then the threshold design capacity is 200kL of beverage per year. <p>It is important to note that the above thresholds are based on the capacity of the infrastructure to produce these volumes in one year. This can only be deviated from if the production can be limited to below the threshold by another lawful approval (e.g. planning approval).</p> <p>Regulation will be required when a proposal is received for:</p> <ul style="list-style-type: none"> • A new operation that meets the threshold criteria detailed above. • An expansion of an existing operation that results in it meeting the threshold criteria detailed above. • A change in beverage manufacturing, e.g. from wine to beer, for an existing licensed operation. <p>For the third point above, the change in beverage being produce will result in a change in the nature and volume of wastewater produced, and hence the waste management approach and/or infrastructure will be required to be reassessed.</p> | <p><u>Minimum required information in development approval applications</u></p> <p>Application must provide the maximum design capacity or capability of beverage manufacturing infrastructure:</p> <ul style="list-style-type: none"> • For beer and wine the limiting factor is usually the fermentation tank volume. • For a distillery the limiting factor is usually the stills capacity in L/hour x 365 days. and consider whether product is fermented on-site or already fermented product brought in to be processed through the still. <p>Where a limiting factor is being claimed to be used to keep the annual volumes below threshold limits, then clear evidence of the lawful approval is required, for example a development approval condition can be applied.</p> <p><u>Rationale</u></p> <p>There is a need to assess all the documentation and approvals to ensure that the proponent has provided a consistent message about the volume of waste that are to be managed. And where available this may include development approval, Works Approval application, approval to construct or install an apparatus, and/or liquor licence application and any supporting documents.</p> |

Advice noted for further development of scheme and policy. Not appropriate for the Strategy to contain detailed guidance for development assessment, including standard conditions.

| | | Items | Discussion | Mitigations opportunities in the planning system | |
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| | | | <p><u>Approval to construct or install an apparatus for commercial onsite wastewater system</u></p> <p>In accordance with the <i>Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974</i>, approval must be gained for the installation of a commercial onsite wastewater system.</p> <p>All systems (including those processing trade waste) require approval. Systems with a capacity of greater than 540L/day are to be approved by the Department of Health, with system of a capacity of less than 540L/day are to be approved by the Local Government. For more detailed see: https://ww2.health.wa.gov.au/Articles/A_E/Apply-to-install-a-wastewater-system.</p> <p>Regulation will be required when a proposal is received for:</p> <ul style="list-style-type: none"> • A new operation that meets the threshold criteria detailed above. • An expansion of an existing operation that results in it meeting the threshold criteria detailed above. <p>Other key consideration include:</p> <ul style="list-style-type: none"> • Generally, all wastewater must be discharged onto the site it was generated i.e. wastewater may not be discharged or irrigated over the lot boundary. • The assessment for approval to construct or install an apparatus will consider: <ul style="list-style-type: none"> ○ human health risk and the hydraulic capability of the land to infiltrate the waste, but not consider environmental contamination risk, and ○ set back distances from infrastructure and receptors. • Where treated wastewater is to be used for beneficial uses further assessment may be required in accordance with the Guidelines for the non-potable uses of recycled water in WA. | | |

| | | Items | Discussion | Mitigations opportunities in the planning system |
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| | | <p>Incompatible waste management systems</p> | <p>The beverage manufacturing wastewater stream needs a fit for purpose treatment technology with consideration given to peak daily flows and high concentrations of BOD, TDS (salt), cleaning chemicals and total suspended solids which could lead to hydraulic failure if the correct technology is not selected.</p> <p>Untreated brewery wastewater can have a BOD that ranges from between 1200 to +3000mg/L, therefore:</p> <ul style="list-style-type: none"> Septic tanks and leach drains, which are designed for domestic strength wastewater, are not an appropriate treatment and disposal technology for beverage manufacturing waste as this will lead to hydraulic failure due to clogging. A waste stream with a BOD of > 350mg/L is not suitable for subsurface infiltration proposals (e.g. leach drains). Domestic secondary treatment systems are not an appropriate treatment and disposal technology for beverage manufacturing waste systems, and as detailed in <i>AS 1546.3 On-site domestic wastewater treatment units, Part 3: Secondary treatment system</i> the inflow BOD range that these systems can manage is between 150-750mg/L. <p>Points to consider when assessing if the chosen treatment and disposal systems for beverage manufacturing is appropriate:</p> <ul style="list-style-type: none"> Proponents should be encouraged to engage a suitably qualified professionals to advise on the selection of the most appropriate treatment and disposal system given the chemicals identified in the waste stream and the environmental constraints of the disposal area. Use of the DoH "OWSAST" tool is not appropriate, given the tool has been designed to work with domestic-strength wastewater, whereas the BOD, TDS (salt), and total suspended solids levels in beverage manufacturing wastewater are much higher than in domestic wastewater. | <p><u>Assessment inputs for development approval applications</u></p> <p>When Local Government Planning officers are assessing the waste management component of planning applications input must be sought from the Local Government's EHO, who may seek assistance from DoH, DWER and/or DPIRD.</p> <p><u>Rationale</u></p> <p>A suitable and sustainable wastewater treatment and disposal system should be proposed for the trade waste. This is to be proven in documentation supplied to support the development application and associated regulatory approvals. This documentation is to be developed by a suitably qualified professional, for the purpose of waste analysis, system design, and soil assessment; and including consideration of environmental values of the areas, soil properties, topography, etc.</p> |

| | Items | Discussion | Mitigations opportunities in the planning system |
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| | | <ul style="list-style-type: none"> Furthermore, the methodology outlined in AS/NZS 1547 for sizing leach-drains is likely to be the limited value for water with a high dissolved organic carbon content (Beal et al. 2006). This is because the initial hydraulic testing of the soils in a proposed infiltration area does not indicate the long-term acceptance rate of the wastewater after a period of about a year, when a microbial biomat has become established in soils adjacent to the leach drains. High BOD loads and discharge rates are considered the most significant impediments to subsurface wastewater disposal. Furthermore, the highly anaerobic conditions that occur from the discharge of high BOD wastewater to soil poses a significant risk of arsenic leaching from iron-rich soils into groundwater (Julien, 2014; Julien and Safferman, 2015). | |
| | Managing trade waste | <p>The management of trade waste from beverage manufacturing is one of the key risks that is overlooked during business development. For sites that do not have the option of disposing trade waste to a reticulated sewerage system, the only option is to dispose of this waste to land. The risks include sterilisation of land, due to salt build up making it infertile and leaching of nutrients into ground and surface water resources resulting in deteriorating water quality.</p> <p>There are two aspects that require careful consideration, which are the area of land required (as a rule of thumb 200kL of beer may require on hectare of land) and the period in which waste can be managed by disposal to land due to the plants inability to assimilate the contaminants and soils inability to infiltrate water due to being water logged during wetter and colder months (as a rule of thumb 200kL of beer may require 350-550kL of winter storage).</p> | <p><u>Recommended development approval conditions and advice notes</u></p> <p>For operations that do not trigger the requirement for a Works Approval and environmental licensing process under the <i>Environmental Protection Act</i>, consider the following conditions and advice notes:</p> <p>Conditions:</p> <ul style="list-style-type: none"> If irrigation of wastewater is proposed as a disposal method: A Nutrient and Irrigation Plan (NIMP) is to be developed and implemented to the satisfaction of the Shire, in consultation with DPIRD and DWER. The annual beverage manufacturing volume is limited to XXXX KI per year, as detailed in the development approval application and supporting documentation. The type of beverage manufacturing is limited to XXXXX, as detailed in the development approval application and supporting documentation. <p>Advice notes:</p> |

| Items | Discussion | Mitigations opportunities in the planning system |
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| | | <ul style="list-style-type: none"> If the annual beverage manufacturing volume is proposed to be increased, a separate Development Approval will be required. If a different type of beverage manufacturing is proposed to replace or be added to that approved, a separate Development Approval will be required. <p><u>Rationale</u></p> <p>A NIMP is required as even if approval to construct or install an apparatus is required under the <i>Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974</i>, this assessment considers human health risk and the hydraulic capability of the land to infiltrate the waste, and does not consider environmental risk.</p> <p>The volume and beverage type conditions will avoid production creep and diversification, which could result in regulatory approval being required. For more information see the regulatory requirements below.</p> |
| Managing production creep | <p>As operations established become successful, there is a risk of the operational capacity being increased and for this to be assumed to be acceptable under the approvals gained for the original operations, which may include development application, Works Approval, and/or approval to construct or install an apparatus for commercial onsite wastewater system.</p> <p>Another risk is the perceived notion that a development approval for beverage manufacturing may also be an approval to switch between different beverages. However, the waste stream from different beverage manufacturing can be very different both in terms of quantity and contaminants and will therefore require consideration of whether a new or amendment to an existing environmental works approval and license is required.</p> | <p><u>Recommended development approval conditions and advice notes</u></p> <p>To avoid proponents unknowingly or knowingly triggering thresholds that require regulation or an amendment to regulation, it is recommended to apply development conditions (and advice notes) to limit the volume and type of beverage manufacturing to that which has been assessed, as detailed above in relation to managing trade waste:</p> <p>Conditions:</p> <ul style="list-style-type: none"> The annual beverage manufacturing volume is limited to XXXX KI per year, as detailed in the development approval application and supporting documentation. The type of beverage manufacturing is limited to XXXXX, as detailed in the development approval application and supporting documentation. |
| Items | Discussion | Mitigations opportunities in the planning system |
| | | <p><u>Advice notes:</u></p> <ul style="list-style-type: none"> If the annual beverage manufacturing volume is proposed to be increased, a separate Development Approval will be required. If a different type of beverage manufacturing is proposed to replace or be added to that approved, a separate Development Approval will be required. |

Additional/ supplementary advice received on 9/5/24:

Please find Department of Water and Environmental Regulation (DWER) advice in response to the following queries received on 1 March 2024, which relate to flood risk within the Shire catchment areas. In the context of this advice, DWER would support removal of a recommended action for incorporation of flood prone land as a special control area. DWER is supportive of proposed text (as outlined in the table below) to be included within section 3.3.2.3 of the Draft Local Planning Strategy, 2024 as this is consistent with previous advice provided.

This supplementary advice reflects discussion between Shire and DWER officers regarding the potential introduction of a Special Control

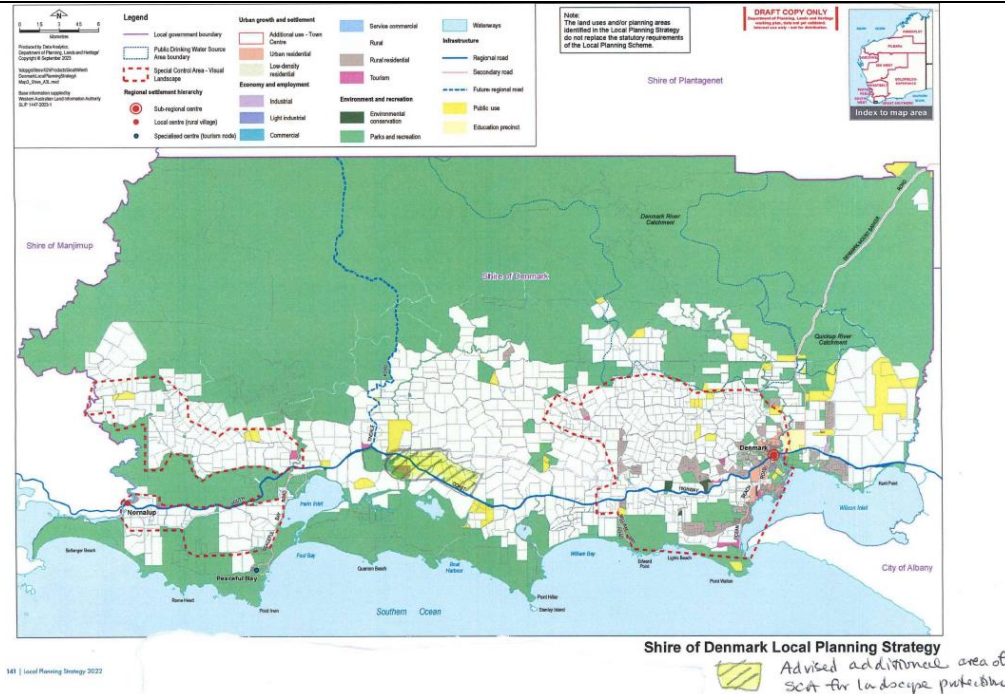
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| | | <p>Does DWER envisage a Special Control Area applying to mapped 1% AEP areas and/or other flood prone land?</p> <ul style="list-style-type: none"> ○ Based on further input received from our Water Data and Science Branch, the extent of the Denmark and Bow River 1% AEP flooding (refer to Western Australia floodplain mapping (arcgis.com)) covers a relatively small and restricted areas of these catchments. Existing DWER datasets show that the use of Special Control Areas for delineating mapped 1% AEP areas/and or other flood prone land in the Local Planning Scheme is not required and may be counterproductive by suggesting other areas are not floodprone when there is in fact a history of inundation. There are a few other tools that have greater coverage but the quality of the information may not be adequate for the purposes of defining a special control area and supporting planning and development advice (FloodMap (landgate.wa.gov.au) and Hydro Guide (arcgis.com)). These tools and any monitoring undertaken by the Shire of areas identified as flood prone, including information on depth to groundwater, could assist with future mapping flood prone areas. <p>Does DWER have recent mapping of 1% AEP areas within the Shire? For all or just some catchments?</p> <ul style="list-style-type: none"> ○ Recent flood mapping studies have not been undertaken by DWER within the Shire. ○ Previous flood mapping for the Denmark River catchment was undertaken in 1988 and represents a simulated event with a probability of 1% AEP. Streamflow records for the Denmark River dating back to the 1960s show that large events however occurred in 1978 and 2003. ○ DWER information for the event of June 2021 from its streamflow monitoring stations and surveyed peak flood levels and photographs for the Denmark River at the Denmark townsite suggest the event was ~ 2% (1 in 50) AEP and confirmed the previous mapping was adequate for defining the 1% (1 in 100) AEP flood risk. ○ The Bow River floodplain mapping study undertaken in 2008 is the most recent undertaken for this area. <p>How is this affected by the Wilson Inlet opening protocols?</p> <ul style="list-style-type: none"> ○ The Wilson Inlet Sandbar Opening Protocol primarily focuses on managing the sandbar formation and opening in the Wilson Inlet itself to assist Water Corporations drainage operations in the low-lying areas north and east of the estuary, rather than directly addressing riverine flooding. The Wilson Bar opening does not impact riverine flooding upstream of the old railway bridge near the townsite. Riverine flooding is affected by factors including rainfall intensity, catchment area, and river flow dynamics. | <p>Area over identified flood prone areas as was initially identified in DWER's submission (above). On the basis of this discussion/ advice, it is not proposed to introduce a Special Control Area for this purpose.</p> |
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| G5 | <p>Department of Planning Lands & Heritage (DPLH) Stephanie Clegg Senior Planning Officer – Strategy and Engagement stephanie.clegg@dph.wa.gov.au 6551 9364</p> | <p>I am attaching a tracked changes version of Section 3.3.1.3, plus a separate Word document with additional longer pieces of text.</p> <p>I have provided more strategies and actions than you currently have, and probably some have too much detail for your strategy. Many of these may be better located in the LPP, eg some of the more detailed, technical actions such as reference to 500m from tourist routes.</p> <p>The landscape character units need to be reviewed before using them in the LPP, and it would probably be useful to also review the selected tourist routes and key views, as several highly significant locations have been overlooked – in particular, the bridges at Denmark and Nornalup as viewpoints as well as landmark features, and the crossing with featured built node at Bow Bridge. I would be happy to have input into the LPP.</p> <p>I believe that the SCA areas should be altered to include an additional area along South Coast Highway that includes Bow Bridge (see attached draft Strategy map). I think this area was referred to by some community members. The tourist routes could also be added to this map, then potentially removed from the Strategies text in Section 3.3.1.3.</p> <p>ADDITIONAL TEXT PROPOSED: <u>Identifying valued landscapes and views</u> <u>[Insert paragraph below after Figure 7]</u></p> <p>The Shire’s valued landscapes are easily observed from a variety of tourist routes, from the busy South Coast Highway, to scenic routes through hilly forested areas, to spur roads that access coastal recreation sites, as well as long distance walk and cycle trails of national importance. Inlets and rivers provide views from watercraft. These routes, and the land seen from them, are mapped in the VLE. They provide a wide variety of view types, from enclosed and canopied views in the tall forests and along treelined roads in rural areas, to panoramic views across the open coastal plain, inlets and along the coastline and out to sea. River crossings and granite peaks provide additional unique views. The VLE identifies individual key views from these routes and other locations that the community is likely to value highly.</p> | <p>Noted.</p> <p>The majority of suggested changes to the Draft Strategy text are supported and will be included in the proposed Schedule of Modifications. Other recommendations will be retained and considered during the preparation of local planning scheme and/or policy provisions for the proposed Special Control Area for Landscape Values.</p> <p>As part of the preparation of the Strategy a community workshop and online survey were held requesting nomination of sites, routes or areas with visual landscape values. Other viewpoints and routes have since been suggested that could potentially be incorporated into the Visual Landscape Evaluation (noting this is not considered a comprehensive list of places with outstanding views or values), but would not change the recommended Special Control Area in the Strategy.</p> <p>Accepted</p> |
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| | <p><u>Potential Impacts and Responses</u></p> <p>[Insert paras below under this heading, either before or after the existing text]</p> <p>Development proposed for areas or sites that are valued for their inherent character, seen from tourist routes and close to viewers, requires specific planning measures that address values. Visual landscape management aims to protect and enhance the valued elements and views within <i>all</i> landscapes, not just those character units that the community values most highly. In addition, character units vary in their sensitivity to change, with landscapes that are flat and open generally being more sensitive than areas with undulating terrain and bushland.</p> <p>Planning measures therefore focus on areas that are the most visible from tourist routes, coupled with areas that are most highly valued for their inherent character.</p> <p>The VLE includes maps of land that is potentially visible from the most sensitive travel routes, if vegetation was removed. These maps enable identification of the skyline as seen from tourist routes, as well as indicating areas that are most sensitive due to proximity to roads, and position in the landscape.</p> <p><u>Strategies and Actions</u></p> <p>[The additional strategies and actions below are based on the Shire of Northam’s new Local Planning Strategy, as modified to suit the Shire of Denmark. Insert into Strategies section if/where appropriate. Some of these, especially those that are more detailed and technical, may be better located in the proposed Local Planning Policy instead of here.]</p> <ul style="list-style-type: none"> • Avoid locating new development on skylines, ridges or focal points viewed from tourist routes, especially where sites are prominent. If these sites are considered acceptable, development is to be located where it is either not apparent or is (or can be) screened with vegetation. Vegetation is to be retained on skylines. • Apply vegetation screening along tourist routes where new development is located within 500m each side of these roads or is proposed for elevated, steep slopes, provided that valued views are not screened. Elsewhere on tourist routes, development should blend with the natural, rural or built character of the surrounding landscape, and not become a dominant or prominent landscape feature. • Review local planning scheme provisions to ensure that development will not dominate the landscape in specified locations, and that land uses which do not display an agricultural character, such as plantations or renewable energy facilities, are not visible from tourist routes. | <p>The Shire does not support the introduction of a Special Control Area across the entire district. This is considered unnecessary to achieve the stated objectives and may conflict with development exemptions (existing and proposed). The Shire proposes a higher level of guidance/ control in priority areas, noting that the Visual Landscape Evaluation can inform the assessment of visual amenity as a general planning consideration (ie. outside of the proposed Special Control Area).</p> <p>Appropriate to consider as guidance within a local planning policy.</p> <p>Appropriate to consider as guidance within a local planning policy. An appropriate response will depend on the context of the site.</p> <p>Appropriate to consider as guidance within a local planning policy. Some discretionary land uses in the Rural Zone may not be supported within the proposed Special Control Area (subject to assessment).</p> |
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| | | <ul style="list-style-type: none"> • Retain vegetation on the skyline as viewed from tourist routes and waterways. • Ensure that future development maintains landscape values through appropriate general location, siting and design. • Review scheme controls and the local planning framework so that development which has the potential to negatively impact on visual landscape character in sensitive locations will be avoided, and/or impacts minimised, while not unreasonably preventing development. In addition to a landscape protection Special Control Area, or as part of it, scheme provisions could require development approval for specified types of development in sensitive locations, and the preparation of a Local Planning Policy to guide development and design. • Valued landscape characteristics and views should be protected by measures such as identifying suitable building envelopes, determining appropriate setbacks from tourist routes, introducing screen planting, siting development behind existing vegetation, and providing guidance on building specifications including foundations, height, bulk and reflectivity of materials, to be detailed in the Local Planning Policy. • Where new development is likely to adversely impact on valued or sensitive visual landscape character, proposals need to identify and address potential visual impacts in accordance with the WAPC's Visual Landscape Planning Manual. • The Local Planning Policy could contain advice in relation to the location, siting and design of development for each landscape character unit, land use (including signage), tourist route, general view type and individual key views. It would provide suggested Visual Management Objectives for character units, tourist routes and key views, and would outline the process of undertaking a visual impact assessment. • Preserve and enhance the natural and built heritage landscape elements, and the sense of place, of the Denmark and Nornalup townsites, particularly their streetscapes. | <p>Appropriate to consider as guidance within a local planning policy.</p> <p>Supported as an objective guiding the development of local planning policy provisions – to be incorporated into amended action 1c.</p> <p>Action 1b proposed in the Strategy encompasses this aim. Review of the local planning scheme will consider if additional approval requirements are necessary.</p> <p>Appropriate to consider as guidance within a local planning policy.</p> <p>Appropriate to consider as guidance within a local planning policy.</p> <p>Appropriate to consider as guidance within a local planning policy.</p> <p>Built form within the Denmark townsite is addressed at part 3.1.5.1 of the Strategy. Built form within the Nornalup townsite is supported by existing Local Planning Policy 43.</p> |
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| | | <ul style="list-style-type: none"> • Implement measures to improve first views of the townsites of Denmark and Nornalup seen from South Coast Highway and other tourist routes. • Maintain views from tourist routes over the Denmark townsite to the Wilson Inlet, and from South Coast Highway to the Frankland River at Nornalup, by preventing views from being blocked by new buildings or roadside tree planting. • Develop and implement a tree protection and planting strategy that addresses the removal of karri trees as the town expands and the general lack of trees within Denmark's town centre. • Enhance the natural character of the Denmark River by restoring fringing riverine vegetation where it has been removed. • Ensure that private structures built over the Frankland River at Nornalup blend with the existing landscape character and do not dominate views along the river. <p>Proposed additional Special Control Area around Bow Bridge (as per annotation):</p> | <p>Where this relates to improvements within publicly managed reserves this is outside of the scope of the Strategy.</p> <p>If development or land use is proposed an assessment of the view corridors that are important to maintain will be addressed.</p> <p>This is addressed as an action in part 3.3.1.1 of the Strategy.</p> <p>The character of the Denmark River includes both natural and altered parts of the River which enable interaction with this environment by our community. From an environmental perspective, this is addressed in part 3.3.1 of the Strategy.</p> <p>Built form within the Nornalup townsite is supported by existing Local Planning Policy 43.</p> <p>Proposed inclusion of additional area into SCA is supported, noting that this area is identified as having significant values in the Visual Landscape Evaluation undertaken in support of the Strategy. Initial mapping of the proposed SCA reflected large and contiguous areas of identified landscape values only, but as this area aligns with a key transport corridor it is considered</p> |
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appropriate to be included.

Minor wording/ description changes accepted – modifications to be prepared incorporating recommendations (verbatim and modified).

TRACKED CHANGES PROPOSED:

3.3.1.3 Landscape Protection Values

The planning framework refers to landscape character and views that are most valued by the community, highlighting their amenity 'landscape values' as a way to describe the amenity, character, and sense of place that we ascribe to our surrounding views, scenery and environment. The role of this Strategy is to identify the particular landscape characteristics and views values most in need to protection, and to help to set the objectives and policies to achieve this for their protection and enhancement.

Due to the natural topography, vegetation types, and limited extent of development, The shire's inland landscape of tall forest on hilly terrain with scattered granite peaks and other outcrops, contrasts strongly with the largely cleared, flat coastal plain with its sheltered inlets, edged by tall coastal dunes adjacent to a varied coastline of sweeping sandy bays with inlet openings, punctuated by rock outcrops and headlands. T the Shire is fortunate to contain this a wide variety of unique views and landscapes which are highly valued by both the local community and visitors alike. Theyse contribute to our sense of place as well as providing a range of social and economic opportunities. This was recognised through preliminary consultation for this Strategy and featured prominently as part of community engagement for the Shire's Sustainable Tourism Strategy.

This Strategy seeks to preserve visual landscape values as a public asset, acknowledging that this may inhibit development opportunities on private land to achieve the community's preferred outcomes.

This Strategy does not consider the preservation of a view that may be evident from private land, and how a landowner may take advantage of a view through development. This approach is consistent with the established planning framework and case law which demonstrates that a private view cannot be legally owned and is not a valid planning consideration. A private view may be incidentally preserved through planning provisions that direct a consistent approach to what constitutes appropriate development in the broader context of landscape values (e.g., boundary setbacks, height restrictions).

Identifying Valued Landscapes and Views

To assess landscape values and provide advice on how the shire's planning framework may respond to preserve the Shire's unique natural landscapes, identify where landscape values exist within the district, the Shire commissioned the preparation of a Visual Landscape Evaluation (VLE). The VLE takes a methodological approach to identifying landscape areas, features and views that demonstrate certain types of characteristics that the community tends to value more highly, as outlined in accordance with the WAPC Visual Landscape Planning in Western Australia manual.

This assessment incorporates consideration of the cultural values that we ascribe to certain landscape types, view experiences and local places. This includes the landscape values that are broadly accepted within Western Australia (as described in the Visual Landscape Planning manual), those that have been put forward by our local community (including places nominated through preliminary consultation for this Strategy), and the cultural values of Traditional Custodians (through recorded heritage sites).

As outlined in Figure 7, the VLE identifies and maps highly valued landscape character unit types within the Shire, and the attributes that contribute to their perceived values are outlined in Figure 7 below. The VLE maps areas where the high value landscape types exist.

The VLE also identifies a number of key viewpoints and routes that provide vantage points of the high value landscapes within the region.

Minor wording/ description changes accepted – modifications to be prepared incorporating recommendations (verbatim and modified).

Figure 7: Valued landscape character values within the Shire

| Landscape Character Unit | Valued characteristics description |
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| Native vegetation | <ul style="list-style-type: none"> • Areas of highly diverse remnant vegetation with varying height, colour and species • Gradual and naturally appearing transition zones between rural land uses and surrounding remnant vegetation • Strongly defined patterns of coastal heaths, peppermint / paperbark woodlands and dune vegetation • Distinctive remnant vegetation located along drained lines, roadsides and in paddocks • The bushland is a valuable asset for the South Coast Noongar people and an intrinsic part of their cultural identity (Guilfoyle, 2011) |
| Forested Hills | <ul style="list-style-type: none"> • High degree of topographic variety • Hills, ridges and peaks that are focal points (Plate 57) • Undulating and steeply sloping terrain • Features such as rock outcrops • |
| Coastal Hills | <ul style="list-style-type: none"> • High degrees of perceived naturalness • High degree of topographic variety • Distinctive landform scape-features (e.g. Point Hillier) • Seascapes • Steep and irregular dunes |
| Coastal Edge | <ul style="list-style-type: none"> • Seascapes (combination of ocean, reefs, beach, <u>inlet mouths</u>, dune formation, coastal rocks, <u>cliffs, headlands</u>, coastal vegetation) |
| Waterbodies | <ul style="list-style-type: none"> • The South Coast Noongar people consider all natural water sources within the Shire to be equally important and the health of these systems are intrinsic to their culture (Guilfoyle, 2011) • Presence of water bodies (<u>waterfalls</u>, rivers, <u>streams, estuaries, inlets</u>, oceans, <u>dams/lakes</u>); <u>inundated areas</u>)(Plate 54) |
| Rural Hills | <ul style="list-style-type: none"> • High degree of topographic variety (Plate 55) • Features such as rock outcrops • Distinctive remnant vegetation located along drainage lines, roadsides and in paddocks • |
| Tall Forest | <ul style="list-style-type: none"> • Unique stands of vegetation such as tall Karri and Tingle Frees (Plate 56) • Distinctive remnant vegetation located along drained lines, roadsides and in paddocks |

Shire of Denmark Visual Landscape Evaluation, ~~Ecospace~~Ecoscape, 2024

Minor wording/ description changes accepted – modifications to be prepared incorporating recommendations (verbatim and modified).

~~The VLE maps areas where these high value landscape types exist.~~

~~The VLE also identifies a number of key viewpoints and routes that provide vantage points of the high value landscapes within the region.~~

Potential Impacts & Responses

[Insert attached text either at start or end of this section]

Landscape values can potentially be impacted by a range of insensitive forms of development, including:

- Poorly located development – for example, development that blocks valued views or is prominently sited within view corridors, ~~and above or on ridges, lines and skylines as seen from tourist routes.~~
- Incompatible development design – reflective materials, contrasting colours, inconsistency with natural landform and features (e.g., extensive cut and fill).
- Signage – inappropriate location or design ~~or location~~, clustering of signage, inconsistency of type, imposition on visual environment.
- Inappropriate land use – for example, tree farms that display character that is alien within agricultural landscapes and may block public views, or commercial development within rural character areas ~~or industrial development or within a visually sensitive location view corridor.~~
- Clearing of bushland and individual trees – reduced natural landscape character ~~diminishment of natural setting~~, loss of visual diversity/ hardening of visual environment, reduced visual screening ~~buffering~~ to development, reduction in scale of natural features such as the height of ridges, loss of enclosed and canopied views.

Potential impacts on visual amenity vary according to the character features ~~of the surrounding landscape, and~~ the form of the proposed development, and proximity to the viewers' location. Impacts are likely to be more pronounced when development occurs in elevated positions within the landscape, in other prominent locations and ~~in closer proximity~~ to viewpoints such as tourist routes.

Minor wording/ description changes accepted – modifications to be prepared incorporating recommendations (verbatim and modified).

Minor wording/ description changes accepted – modifications to be prepared incorporating recommendations (verbatim and modified).

Insensitive development is more likely to occur on private freehold land ~~in close proximity~~ to the Denmark_Townsite and on key tourist routes, due to the commercial imperatives to maximise visibility, views and accessibility.

The local planning framework can be utilised to help preserve landscape values by seeking to avoid or mitigate the impacts of changes to land use and development. This Strategy proposes a range of actions to incorporate better safeguards that achieve this outcome for the community while not unduly constraining development opportunities.

The planning responses proposed in this Strategy are targeted to locations where:

- ~~The landscape and views are highly valued. There are clusters of high value landscapes,~~ typically incorporating a variety of valued landform and vegetation features such as rock outcrops, steep slopes and tall forest trees with panoramic views across the hilly terrain or along canopied, winding roads landscape types.
- Priority areas of landscape value that are visible from key public vantage points, tourist routes and recreational trails, and other areas and individual sites that are visually sensitive due to their open character and prominent position, such as at focal points on tourist routes.
- Development pressures exist, often in valued, prominent landscapes.
- Land use change has been identified by this Strategy.
- Land ownership is predominantly private freehold.

Strategies & Actions – Visual Landscape Values Protection

I. Recognise and seek to preserve the outstanding valued landscapes, landscape features and views values of the district by providing guidance for guiding appropriate forms of land use and development and promoting the retention of remnant vegetation. Prioritise key locations that are viewed from, South Coast Highway, tourist routes, and recreational trails and sites, and other areas, including areas subject to development pressure.

a. Minimise the potential impacts on landscape values and visual amenity from residential growth:

- i. Where a structure plan has not yet been prepared or is under review, require the preparation of a Visual Impact Assessment and incorporate appropriate design modifications and/or conditions as considered necessary.
- ii. Where a structure plan is already in place, require the preparation of a landscaping plan at subdivision stage to demonstrate how remnant vegetation will be retained and how public open space and streetscapes will be developed to achieve visual landscape objectives that may include new planting which blends with remnant vegetation, development to be screened from view, or view corridors to be retained across the site.
- iii. Incorporate screen planting visual buffers on recognised tourist routes, retain tree-lined entrances to the Denmark Townsite, and retain remnant vegetation to provide visual relief in amongst developed areas.

Proposed changes to Action 1b not supported – the Shire does not intend to introduce district-wide Special Control Area.

Proposed changes to Action 1e not supported – Denmark–Mount Barker Road is correct road name.

Proposed changes to Action 1g not supported – areas to be revegetated should be determined by further study.

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| | | <p>b. Introduce a Landscape ProtectionValues Special Control Area into the Shire's local planning scheme, <u>to apply across the shire but with particular emphasis on the area as shown in the Strategy mapping, which comprises hilly terrain with either forested or rural character</u>. This Special Control Area will be applied to all zones within this area excluding land within the Residential, Commercial, Service Commercial and Industrial zones.</p> <p>c. Prepare a local planning policy for land use and development proposals within the Landscape ProtectionValues Special Control Area.</p> <p>d. Introduce provisions into the local planning scheme and/or policy establishing appropriate minimum setback distances to development from recognised tourist routes within the Rural, Environmental Conservation and Tourism zones, with site by site exceptions considered through planning assessment.</p> <p>e. Recognised tourist routes (<u>see Strategy Map</u>) include: South Coast Highway, Denmark—Mount Barker Road, Nornalup – Tindale Road, Scotsdale Road, Mt Shadforth Road, McLeod Road, Happy Valley Road, Mt Lindesay Road, Churchill Road, Ocean Beach Road, Lights Road, William Bay Road, Parry Beach Road, Boat Harbour Road, Peaceful Bay Road, Valley of the Giants Road, Conspicuous Beach Road, Ficifolia Road, Bibbulmun Track, Munda Biddi and Denmark-Nornalup Heritage Rail Trail.</p> <p>f. Consider landscape values and reference the Visual Landscape Evaluation as part of the assessment of all relevant planning proposals.</p> <p>g. Support strategically coordinated revegetation initiatives (ecological linkages, urban greening, etc.) into <u>prioritising</u> landscape values, <u>including restoration of vegetation that has been removed from skyline locations viewed from tourist routes and sites</u>.</p> <p>h. Support review of scheme and policy provisions for signage and entry statements to minimise negative impacts on identified <u>valued</u> landscapesvalues, tourist routes and viewpoints.</p> | |
| G6 | <p>Water Corporation Luke Gabriel Senior Planner Development Services land.planning@watercorporation.com.au 9420 2099</p> | <p>We offer the following comments regarding this proposal.</p> <p>Water and Wastewater Reticulated water and sewerage are currently available throughout parts of the subject areas proposed in the Local Planning Strategy, there is conceptual planning in place for these areas. If our assets are affected, any future developer may be required to fund new works or the upgrading of existing works and protection of all works.</p> <p>Further information is required to identify the extent of any upgrades required particular in regard to developer's intentions and the yield and/or demand of these areas.</p> <p>Water Reticulated water is currently available to the subject area. Any development proposals outlined in the Local Planning Strategy may require mains extensions at the cost of the proponent. New mains must be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice.</p> | <p>Noted.</p> <p>The Draft Strategy identifies growth areas and provides indicative dwelling yields where possible to assist with the Corporation's forward planning for reticulated water and sewerage services. Further information will be required of landowners/ developers in the event of structure planning and subdivision proposals.</p> <p>The Shire acknowledges that growth of the Denmark townsite will require</p> |

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| | <p>Wastewater</p> <p>Reticulated sewerage is currently available to the subject area. All sewer main extensions, if required for the development site, should be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice.</p> <p>There are no permanent pump stations for some of the catchments proposed in the Local Planning Strategy. If a wastewater connection is required, the development will require headworks infrastructure to be constructed. The headworks infrastructure may be required to be constructed as part of the subdivision process of this or other proposed developments in the surrounding area.</p> <p>Consideration must be made to the location of a proposed pump station. A pump station will require appropriate land to be provided for the works and the odour buffer that will surround the works. Buffer size will be determined based on the size of the pump station required, this will be confirmed at subdivision stage. A route 20 metres wide for the headworks mains will also be required. The route should be in the form of a road reserve.</p> <p>Our long-term wastewater planning for the subject area indicates that large, headworks-sized sewerage mains will be required to service land in the area.</p> <p>These headworks wastewater infrastructure items are not scheduled on Water Corporation's 5-year Capital Investment Program.</p> <p>The future headworks are currently un-planned and un-programmed and therefore there will be a requirement that all the costs associated with the delivery of the services to the land will be met by the proponent.</p> <p>A wastewater treatment plant or pumping station is located within the subject area. Under normal operating conditions there will be minimal odour emanating from the wastewater treatment plant, however, during maintenance and abnormal operating or weather conditions, an increased level of odour may occur that will be of nuisance to persons within the odour buffer area. Only compatible land use should be developed within the buffer.</p> <p>General Comments</p> <p>The developer is expected to provide all water and sewerage reticulation if required. A contribution for Water and Sewerage may also be required. In addition, the developer may be required to fund new works or the upgrading of existing works and protection of all works. Water Corporation may also require land being provided for works.</p> | <p>infrastructure upgrades to provide reticulated sewerage to new housing. The Draft Strategy aims to increase the proportion of housing being developed in areas that are already serviced and growth in areas where infrastructure is accessible, providing opportunities for new housing and making the most efficient use of public infrastructure.</p> <p>The Draft Strategy proposes the introduction of Special Control Areas to protect critical water and wastewater infrastructure and will consider the compatibility of land uses when relating local planning scheme provisions are drafted.</p> |
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| | | <p>The information provided above is subject to review and may change. If the proposal has not proceeded within the next 12 months, please contact us to confirm that this information is still valid.</p> <p>Please provide the above comments to the landowner, developer and/or their representative.</p> | |
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