

24 March 2025

Email: stan@lbplanning.com.au
Ref: 1060

Shire of Denmark
PO Box 183
DENMARK WA 6333

Attention: Mr Craig Pursey

Dear Sir/Madam,

RE: Proposed Shopping Centre Development – Lot 50 South Coast Highway, Denmark

1.0 INTRODUCTION & BACKGROUND

This application has been prepared to seek approval for a new Shopping Centre to be developed on No. 82-90 (Lot 50) South Coast Highway, Denmark (**the site**)

A similar proposal was considered and refused by the Great Southern Joint Development Assessment Panel on 13 November 2013.

On 10 April 2014, the Panel considered an amended proposal (as per SAT Order dated 21 February 2014) and resolved to approve the development, subject to certain conditions.

The approved development at the time as follows:

- A supermarket and several specialty shops with an overall building footprint area comprising approximately 3150m²;
- 130 car parking bays (inclusive of 3 disabled car parking bays, 1 x taxi parking bay, 5 x motorbike parking bays and 2 x long vehicle/trailer parking bays) (*Note: plans reference 132 bays however this is incorrect*);
- Access/egress to the site via Hardy Street and a left in-left out access/egress arrangement via South Coast Highway; and
- Associated service facilities (toilets, bin storage area etc).

Following approval in 2014, the proponent decided to review and work through several design elements, in order to improve the eventual development outcome and consequently, a revised version of the proposal, with a slightly smaller overall building footprint of 3058m², was presented to the Shire of Denmark for its consideration as an amendment to the original planning approval.

On 20 October 2017 Amended Development Approval was granted by the Shire, the notice of which is **attached**.



2.0 SITE DESCRIPTION

The site is currently zoned 'commercial' pursuant the Shire of Denmark Town Planning Scheme No. 3 and is approximately 9986m² in size.

It is located on the corner of South Coast Highway and Hardy Street opposite the Denmark Visitor Centre. Other surrounding land uses include, low to medium density residential, day care centre, service station, church and various other commercial uses (e.g. Mitre 10).

The site is suitably located to facilitate the proposed shopping centre development and has previously been approved accordingly.

3.0 SHIRE OF DENMARK LOCAL PLANNING STRATEGY

Public consultation for the Draft Local Planning Strategy was undertaken by the Shire between October 2023 and January 2024 and following a review of all submission received, Council resolved at its meeting of 28 May 2024 to endorse the Draft Strategy, subject to several modifications. One of the modifications included maintaining the 'commercial' zoning of the site to enable a future supermarket development.

The Draft Strategy was subsequently forwarded to the Western Australian Planning Commission (WAPC) for its consideration and at its meeting of 12 February 2025, the Statutory Planning Committee resolved to endorse the Strategy, subject to the various modifications being satisfactorily undertaken. In the context of this proposal, one of the modifications which relates to the supermarket development of the site, included the following wording:

“This Strategy recommends consideration of an appropriate limitation on the number of speciality tenancies within a future supermarket development at Lot 50, as outlined in Action (e) (iv) below, to ensure the proposal does not significantly impact on the commercial primacy of the Town Centre main street environment.”

In this regard Action (e) is stated below and for ease of reference, please refer to yellow highlight for point (iv):

e. Notwithstanding provision d (i), support a retail complex on Lot 50 D098777 (#82-90) South Coast Highway, and introduce planning controls within LPS 4 to ensure future development considers the following matters:

i. The development of pedestrian linkages and connectivity to the surrounding area and the existing Town Centre, and provide for development that activates the public realm and fosters a pleasant pedestrian environment;

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 through a Needs Assessment and Net Benefit Test 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.

v. Built form considerations including appropriate scale, function and context of the area in consideration of:

- ***topography and important views***
- ***the local urban morphology (pattern of streets and blocks)***
- ***building proportions, scale and heights***
- ***intended future precinct character***
- ***scale and design of the public realm***

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.

In response to point (iv), a Net Benefit Test report has been prepared, a copy of which is **attached**. The Net Benefit Test report has been prepared by Taktics 4 and its findings are summarised in Section 5.1 of this report.

Additionally, the other elements outlined in Action (e) above are also addressed in Section 5.0 below.

4.0 THE PROPOSAL

Given the attached Amended Development Approval for a proposed supermarket development on the site lapsed on 20 October 2019, the proponent now seeks a fresh development approval by way of this application.

A copy of the proposed development plans, which are the same as those approved in 2019, is **attached**.

As shown on the attached development plans, the overall shopping centre building footprint is 3058m² and incorporates a supermarket and six specialty shop tenancies (not including a proposed ATM and Liquor Store).

The building structure design responds to the natural contours of the site by stepping down the building to more closely match the land and minimise the requirement for extra fill and retaining walls. This outcome intends to present a more appealing, less imposing and softer urban form to the surrounding street frontages.

The attached development plans have been prepared by J. Prestipino Building Designs and include an existing site plan, proposed site location/landscape plans, floor plan, roof plan, building elevations, perspective views and cross section detail.

The plans also include the following information:

- Landscaping detail to reflect envisaged development interface (including car parking areas) with adjoining properties and the streetscape;
- Car parking layout;
- Detail regarding the pedestrian movement network and relationship with the streetscape and external shopping area (e.g. forecourt meeting place);



- Specialty shops along on the eastern elevation that will facilitate safe pedestrian movement and present well to the carpark area;
- Landscape buffer to Amaroo Retirement Village that abuts the northern boundary of the site;
- Existing and proposed site levels; and
- Detail regarding proposed the servicing area at the rear of the shopping centre.

As part of the pre-lodgement discussions with Shire staff during the amended approval process in 2017, it was suggested a revised Acoustic Report be provided to address concerns raised by adjoining residents regarding noise emissions from the loading dock, mechanical services and refrigeration equipment at the rear of the shopping centre.

A copy of the revised Acoustic Report, prepared by ND Engineering, is **attached** which also provides preliminary advice for future tenancies and incorporates a “*Construction Noise Management Plan*”.

Although not limited to, other features included in the **attached** development plans are summarised as follows:

- Car parking layout, design and site levels;
- Disabled ramp from Hardy Street to main forecourt;
- Footpath connecting South Coast Highway to main entry forecourt area;
- Changes as per acoustic report recommendations;
- Caravan/Trailer drive through car bays;
- Ramp and path connection from POS to car park;
- Floorspace areas including specialty shops to face the eastern car park;
- Elevations which show façade detail and height measurements;
- Stepped retaining walls with landscaping to Amaroo retirement village to minimise and soften the height of retaining walls;
- Proposed shopping centre site levels to more closely match the land contours and reduce filling and retaining walls;
- 6m landscaped setback to Amaroo Retirement Village;
- Connection to nearby POS;
- Undercover walkways and main entry canopy feature to the shopping centre; and
- Fencing to northern car park area to minimise any headlights shining through to Amaroo Retirement Village.

In addition to the above, sustainability elements such as EV Charging stations, bicycle parking and use of solar roof panels will be also considered.

Finally, use of Public Art in consultation with a local artist is also intended for the development, and will be determined at a future date following development approval.

5.0 PRE-LODGEEMENT CONSULTATION AND ADDITIONAL INFORMATION

Prior to lodgement of this application, considerable consultation with Shire Staff was undertaken, primarily to address any issues that may have arisen since amended approval was granted in 2017. This included elements of the Shire’s Draft Local Planning Strategy, which as mentioned above was endorsed earlier this year.



The following information is provide below to address the Local Planning Strategy and preliminary feedback received from Shire Staff to the proposed development plans.

5.1 Retail Analysis

In order to expel concerns on the matter of the number of small tenancies within the proposal, that may impact on the commercial primacy of the Town Centre main street environment, a Net Benefit Test report has been prepared by Taktics 4 (**attached**) and its findings are summarised below:

- The proposal will retain a greater proportion of the market capture in supermarket spending and convenience retail spending and trips which are currently being captured by supermarkets in Albany City Centre.
- It will translate to all Denmark Town Centre retailers having the potential to capture additional convenience retail spending.
- It will Increase economic opportunities to all Denmark Town Centre retailers.
- It should not be assessed against potential impacts on shifting retail spending outside the Denmark Town Centre. It should instead be assessed against its potential re-introducing (retaining) additional retail spending available to all retailers in the Denmark Town Centre.
- The proposal is likely to result in the opportunity to refit the existing supermarket floor space for non-retail purposes.
- It will only provide a limited amount of additional convenience retail floor space compared to the existing convenience retail offer in the Town Centre.
- It will create an additional 850sqm NLA of supermarket floor space to the existing offer and an additional 500 sqm NLA of convenience retail offer to Denmark Town Centre.
- It will have no undue impact on the trading potential of centres in Albany Town Centre or neighbouring townships.
- It will reduce/retain up to 155 person trips per day (57,000 person trips p.a.) to Albany which will instead now shop in the Denmark Town Centre, creating greater vibrancy and vitality for the Denmark Town Centre.
- The proposal subsequently represents a reduction of more than 6.25 M km of vehicle travel each year and save residents and visitors an additional 57,000 hours of travel time p.a.
- It will increase spending over time as population and visitor numbers increase in the catchment.
- It represents an economic and social gain to the Denmark community by providing greater choice and convenient access to a wider range of goods and services that some residents currently consider necessary to travel to Albany to access.
- The proposal has the potential to create an additional 62 full time equivalent jobs.



- The proposal satisfies the objectives and outcomes established by WAPC Statement of Planning Policy 4.2 which deals with the assessment for out of centre developments.

5.2 Traffic Generation

As part of the original shopping centre proposal that was approved in 2014, a Traffic Assessment was prepared to inform issues associated with future traffic movements in and around the site.

Given the transpiration of time and in the context of increased traffic experienced in the town since 2014, at the request of Shire Staff, an updated traffic assessment has been prepared and is **attached**.

In summary the report concludes as follows:

- The proposal is predicted to generate fewer traffic movements for all peak hours when compared with both previous proposals we assessed,
- Traffic generated by the current proposal would cause no discernible detriment to the surrounding roads and intersections,
- There is no nexus to require AUR treatments at the South Coast Highway intersections with Ocean Beach Road and Hardy Street,
- The treatments required by the Planning Permit would more than suitably accommodate the traffic predicted to be generated by the current development proposal,
- Articulated vehicles up to 14m in length can satisfactorily access the subject site via surrounding intersections, consistent with the development that was initially approved, and;
- There are no traffic generation associated reasons why the current development proposal should not be approved.

5.3 Pedestrian Access

Safe and easy accessibility to the site for pedestrians/cyclists with strong connections to the main street are particularly important in the context this proposal. Accordingly and as part of the carparking layout/design on the proposed development plans, the proposed footpath network provides strong connections towards the main street and the town centre.

Furthermore, the proponent is willing to consider a fair and reasonable contribution to the development of a dual use path from the subject site through to Millar Street on the northern side of South Coast Highway.

Opportunities for pedestrian linkages through Hamilton Reserve, to link directly into the site along the eastern boundary has also been raised. In this regard, the proponent is prepared to explore potential opportunity for a connection onto Hamilton Reserve and possibly provide a link between the path on South Coast Highway and the adjoining retirement village.



Finally, the proponent is also willing to consider a safe pedestrian link to the existing 'Visitors Centre' on the southern side of South Coast Highway.

5.4 Building Elements, Visual Amenity, Scale and Height

As part of the building design and as outlined below, strong consideration to use of building materials, scale appearance has been given during formulation of the proposal:

- The building structure is proposed to be constructed with concrete tilt up panels to be treated with appropriate colours and patterns to soften its appearance and roofing will be non-reflective;
- Use of colorbond metaldeck roof including pitched roof to specialty shops and surrounding veranda;
- Attempts to minimise the 'Box' effect of Supermarket by minimising the heights of the parapet walls and set well back from the main street frontage;
- Use of different heights and finishes to loading dock area to minimise its impact;
- Use of soft colours, using muted tones to match surrounding areas;
- Incorporate a 'Break-out' area to the main entry with landscaping & seating;
- Retain as many trees as possible around the site;
- Landscaping to suit local context and used to soften the building structure;
- The building heights and proportion are appropriate for this type of development and the height of the condenser deck and mezzanine roof to the supermarket has been minimised as far as practical and set back from the main street. The condenser wall has also been reduced in height by 1m from the previously approved plans;
- Building scale to both street frontages is maintained as low as practical with a pitched roof and verandah;
- The building is well setback from the street and its design incorporates minimal heights to parapets;
- All A/C plant & equipment hidden inside roof space or acoustic walls to match main building;
- In order to visualise what the development may look like from the north (near Smith Street) and from South Coast Highway (approximately 100m west and east of the Hardy Street intersection) renders that superimpose the proposed development within photo imagery have been prepared and are **attached**.
- To create a welcoming entry statement that is visible from the main street, a 'wave like' translucent canopy is proposed over the main entrance to the shopping centre. An example of the type of material to be used can be viewed by following this link <https://danpal.com.au/roofing-systems/>



- Finally, signage will be subject to a separate application during the building licence stage.

6.0 CONCLUSION

The proposed development (which has been approved previously) will provide a more suitably located and functional shopping centre for Denmark in a manner that will complement and activate an underutilised parcel of land in the town centre.

It will increase economic opportunities to all Denmark Town Centre retailers and spending over time as population and visitor numbers increase in the catchment.

It will also create a safer pedestrian and traffic environment for the main street and help minimise congestion presently experienced during the busy holiday periods.

Accordingly, please find attached the proposed development plans, revised acoustic report, revised traffic assessment, retail net benefit test report, renders to show superimposed image of the proposal from certain vantage points and the signed development application form.

We trust the information provided is sufficient for the Shire of Denmark to assess and determine the proposal and should you have any queries or require further information, please do not hesitate to contact the undersigned.

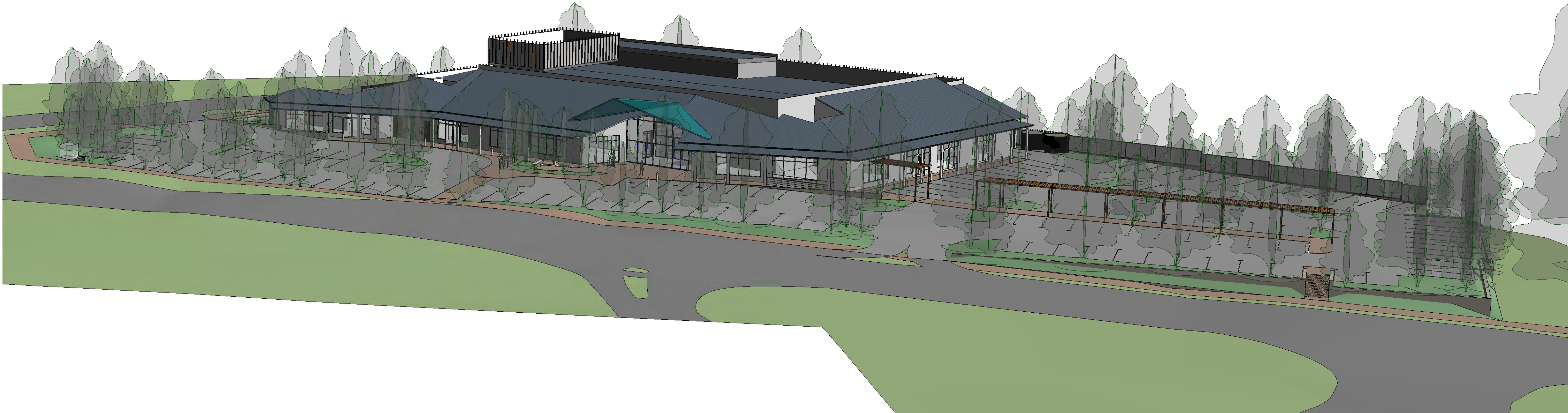
Yours sincerely

Stan Lawrence-Brown
Director – LB Planning

PROPOSED SHOPPING CENTRE

SOUTH COAST HIGHWAY CNR HARDY STREET

DENMARK WA

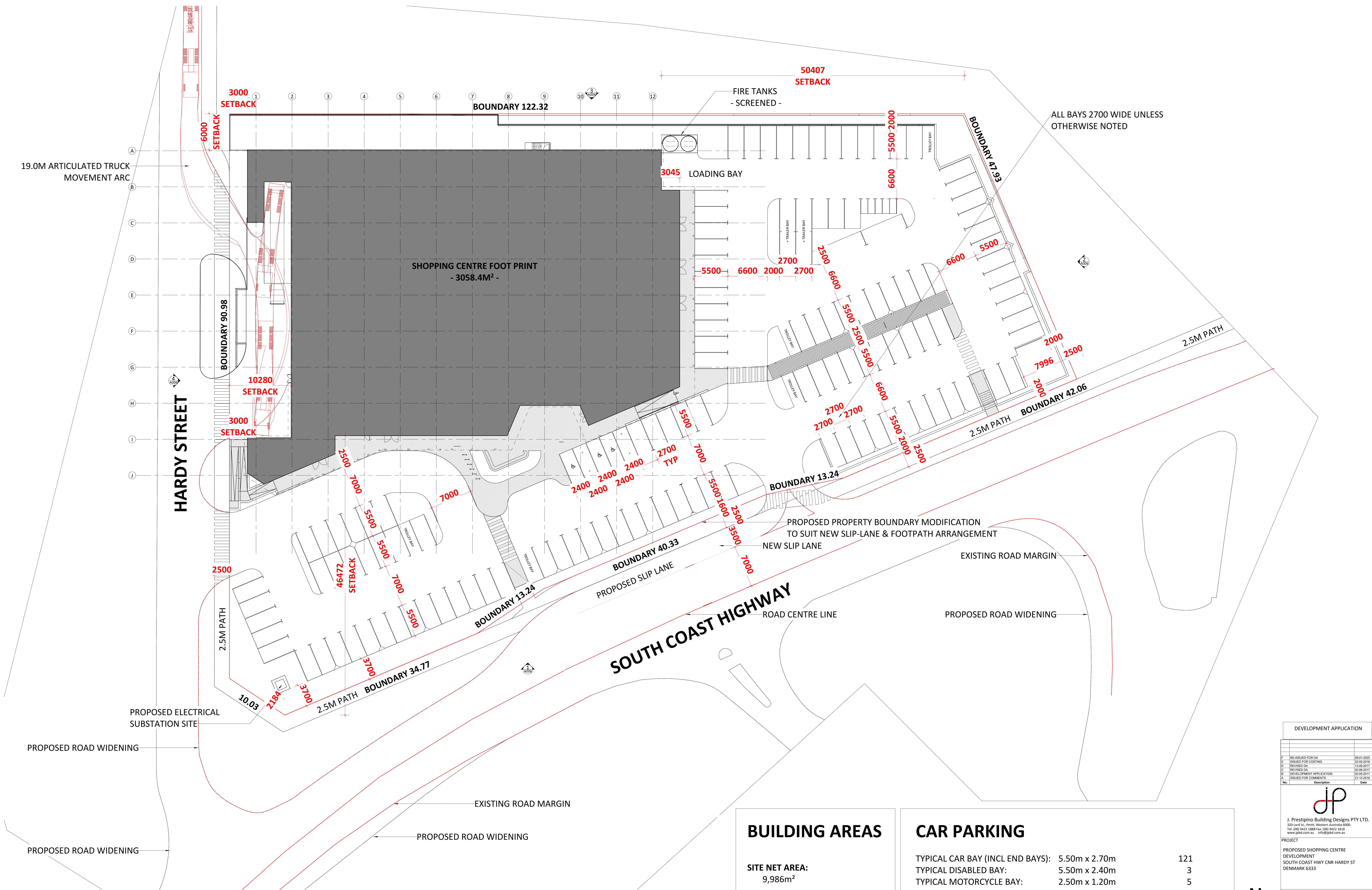


ARCHITECTURAL DRAWING SCHEDULE

SHEET No.	SHEET NAME	SCALE	SHEET SIZE
A000	COVER	NA	A0
A001	EXISTING SITE PLAN	1:200	A0
A002	PROPOSED SITE LOCATION PLAN	1:200	A0
A003	PROPOSED SITE LANDSCAPE PLAN	1:200	A0
A004	PROPOSED FLOOR PLAN	1:100	A0
A004a	PROPOSED MEZZANINE FLOOR PLAN	1:100	A0
A005	ROOF PLAN	1:100	A0
A006	BUILDING ELEVATIONS	1:100	A0
A007	PERSPECTIVE VIEWS	NA	A0
A008	SECTIONS	1:100	A0
A009	SECTIONS	1:100	A0
A010	SITE SECTIONS & ELEVATIONS	1:200	A0

30 September 2025 - Attachment 9.1.1a(ii)

DEVELOPMENT APPLICATION			
F	RE-ISSUED FOR DA	29-01-2025	
E	ISSUED FOR COATING	22-02-2018	
D	REVISED DA	13-09-2017	
C	REVISED DA	26-06-2017	
B	DEVELOPMENT APPLICATION	02-05-2017	
A	ISSUED FOR COMMENTS	21-12-2016	
No.	Description	Date	
			
J. Prestipino Building Designs PTY LTD. 320 Lord St, Perth, Western Australia 6000. Tel: (08) 9422 1888 Fax: (08) 9422 2818 www.jpbd.com.au info@jpbd.com.au			
PROJECT			
PROPOSED SHOPPING CENTRE DEVELOPMENT SOUTH COAST HWY CNR HARDY ST DENMARK 6333			
DRAWING			
COVER			
drawn	SG	sheet size	dwg No
		A0 sheet	A000
date	29-01-2025	revision No	
scale	A B C D E F	project No	
	checked	JP	167-015
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1 **PROPOSED SITE LOCATION PLAN**
NOT TO SCALE

BUILDING AREAS

SITE NET AREA:
9,986m²

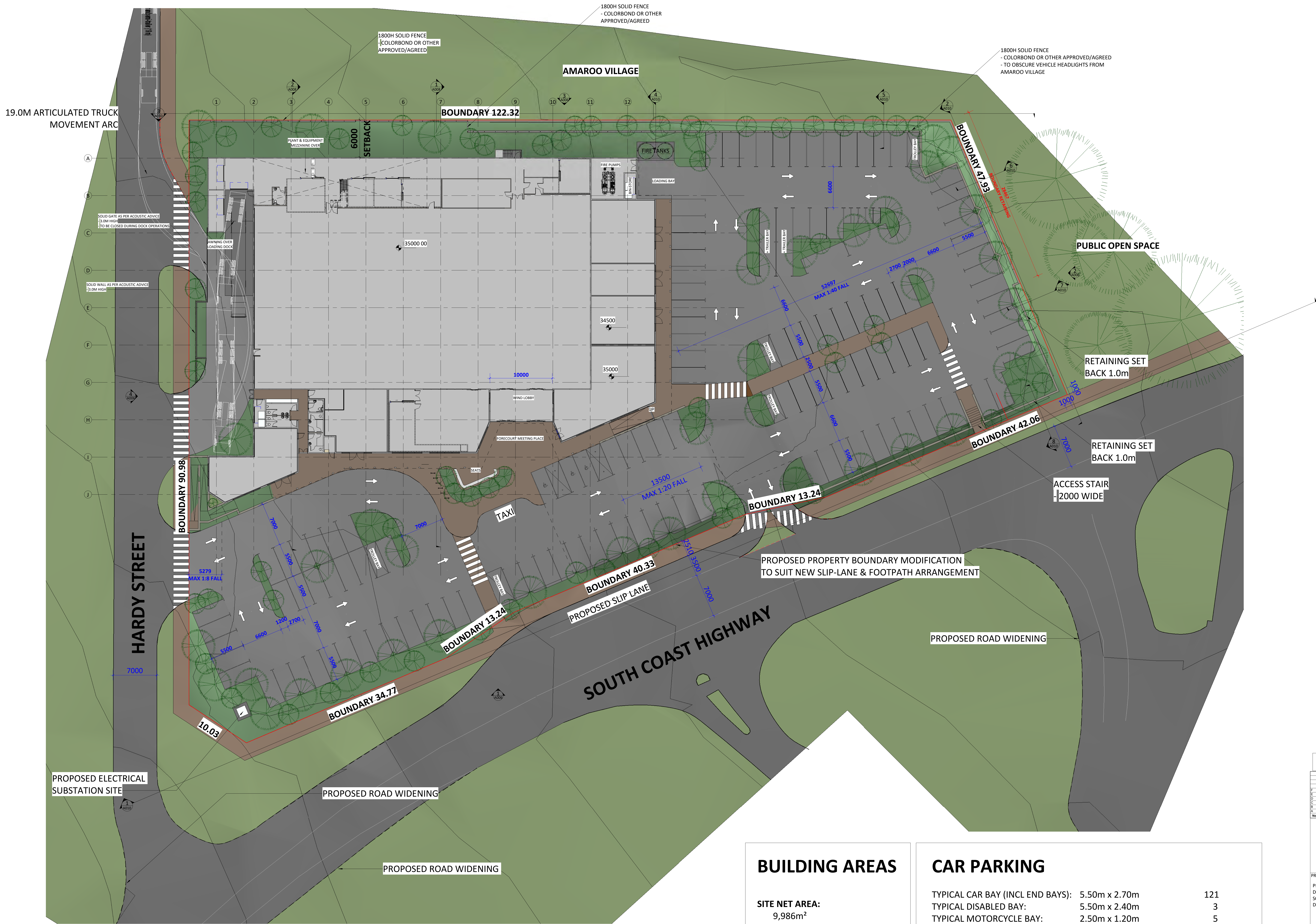
BUILDING AREA TOTAL:
3,058m² (inc external walls)

CAR PARKING

TYPICAL CAR BAY (INCL END BAYS):	5.50m x 2.70m	121
TYPICAL DISABLED BAY:	5.50m x 2.40m	3
TYPICAL MOTORCYCLE BAY:	2.50m x 1.20m	5
TYPICAL DOUBLE LENGTH BAY:	11.0m x 2.70m	2

TOTAL PARKING BAYS: **131**

DEVELOPMENT APPLICATION			
PROJECT	PROPOSED SHOPPING CENTRE DEVELOPMENT SOUTH COAST HWY CNR HARDY ST DENMARK 6333		
DRAWING	PROPOSED SITE LOCATION PLAN		
drawn	SG	sheet size A0 Sheet	dwg No A002
date	29-01-2025	checked	JP
scale	1 : 200	project No	167-015
COPYRIGHT	DO NOT SCALE DRAWING		



PROPOSED SITE LANDSCAPE PLAN
SCALE 1 : 200 (A0 Sheet)

BUILDING AREAS

SITE NET AREA:
9,986m²

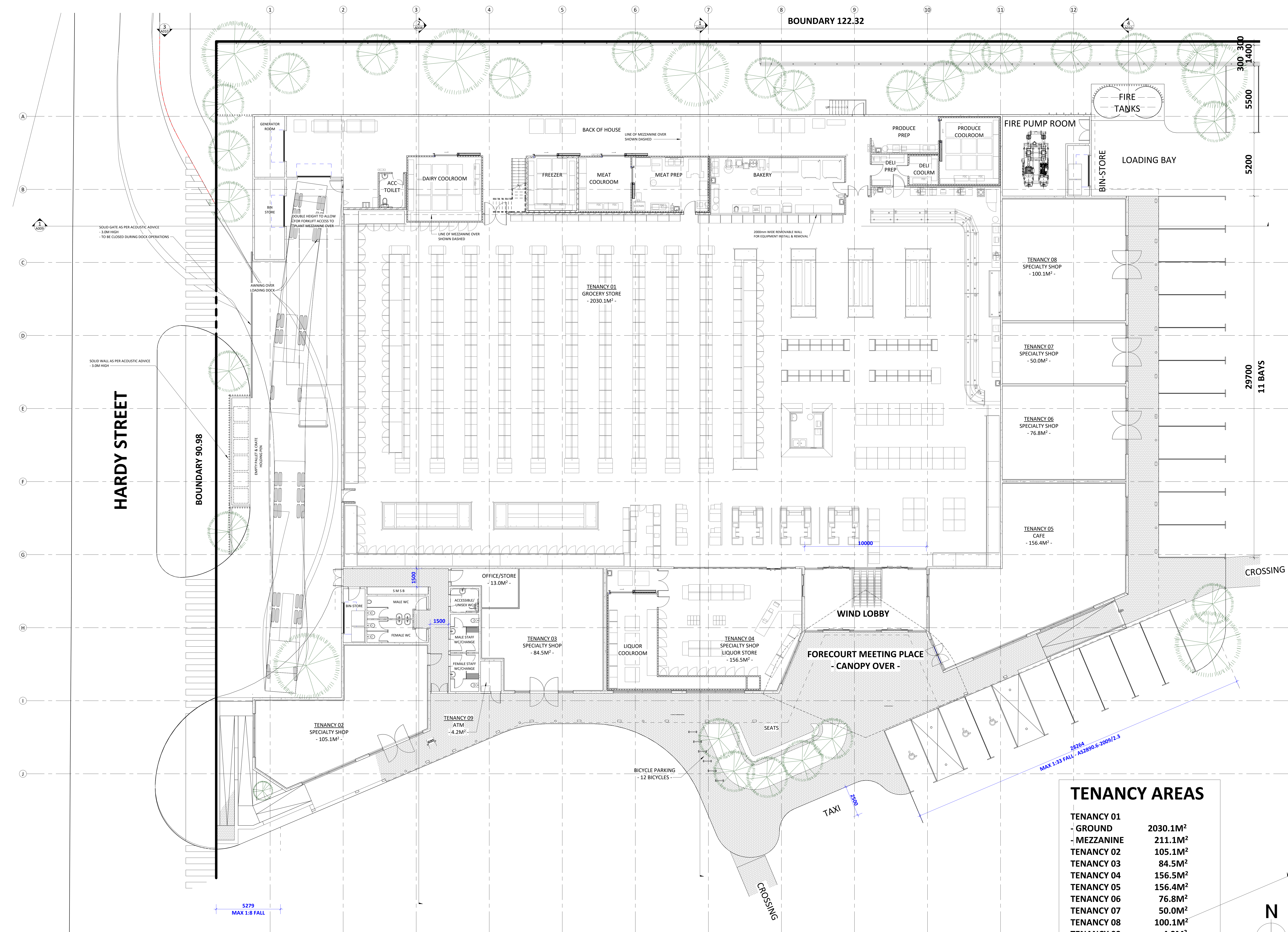
BUILDING AREA TOTAL:
3,058m² (inc external walls)

CAR PARKING

TYPICAL CAR BAY (INCL END BAYS):	5.50m x 2.70m	121
TYPICAL DISABLED BAY:	5.50m x 2.40m	3
TYPICAL MOTORCYCLE BAY:	2.50m x 1.20m	5
TYPICAL DOUBLE LENGTH BAY:	11.0m x 2.70m	2

TOTAL PARKING BAYS: **131**

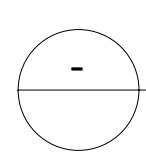
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D	REVISED DA	13-09-2017	
C	REVISED DA	28-08-2017	
B	DEVELOPMENT APPLICATION	02-06-2017	
A	ISSUED FOR COMMENTS	21-12-2016	
J. Prestipino Building Designs PTY LTD.			
320 Lord St, Perth, Western Australia 6000.			
Tel: (08) 9422 1888 Fax: (08) 9422 1818			
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PROJECT			
PROPOSED SHOPPING CENTRE			
DEVELOPMENT			
SOUTH COAST HWY CNR HARDY ST			
DENMARK 6333			
DRAWING			
PROPOSED SITE LANDSCAPE PLAN			
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SG	A0 Sheet		
date	29-01-2025	revision No	A003
scale	1 : 200	checked	
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TENANCY AREAS		
TENANCY 01 - GROUND	2030.1M ²	
- MEZZANINE	211.1M ²	
TENANCY 02	105.1M ²	
TENANCY 03	84.5M ²	
TENANCY 04	156.5M ²	
TENANCY 05	156.4M ²	
TENANCY 06	76.8M ²	
TENANCY 07	50.0M ²	
TENANCY 08	100.1M ²	
TENANCY 09	4.2M ²	
TOTAL NLA	2974.8M²	

1 PROPOSED FLOOR PLAN
A006 SCALE 1 : 100 (A0 Sheet)

DEVELOPMENT APPLICATION		
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Project Description	PROPOSED SHOPPING CENTRE DEVELOPMENT	
Project Location	SOUTH COAST HWY CNR HARDY ST DENMARK 6333	
Project Owner	J. Prestipino Building Designs PTY LTD.	
Project Manager	JP	
Project Engineer	JP	
Project Architect	JP	
Project Designer	JP	
Project Drafter	JP	
Project Checker	JP	
Project Approver	JP	
Project Date	29-01-2025	
Project Scale	1 : 100	
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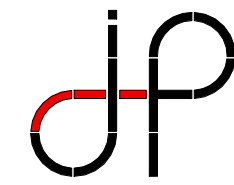
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			JP		project No		167-015	
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DEVELOPMENT APPLICATION

No.	Description	Date
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E	ISSUED FOR COASTING	20-02-2018
D	REVISED DA	13-09-2017
C	REVISED DA	28-08-2017
B	DEVELOPMENT APPLICATION	02-08-2017
A	ISSUED FOR COMMENTS	21-10-2016

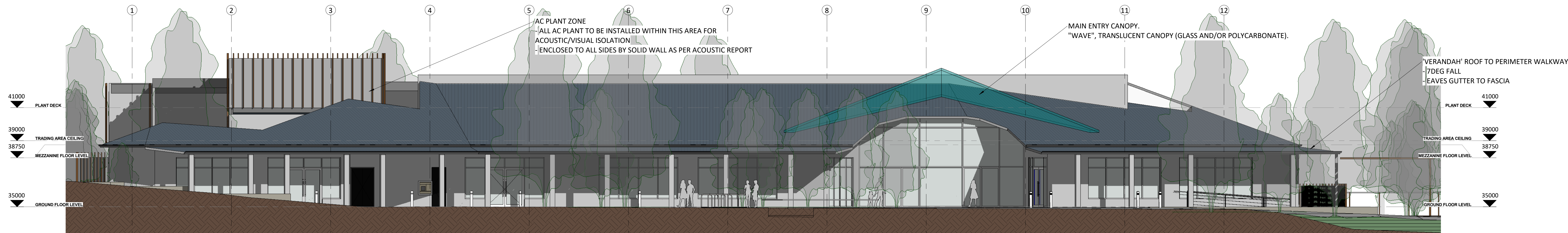


J. Prestipino Building Designs PTY LTD.
320 Lord St, Perth, Western Australia 6000.
Tel: (08) 9422 3888 Fax: (08) 9422 3118
www.jpbd.com.au info@jpbd.com.au

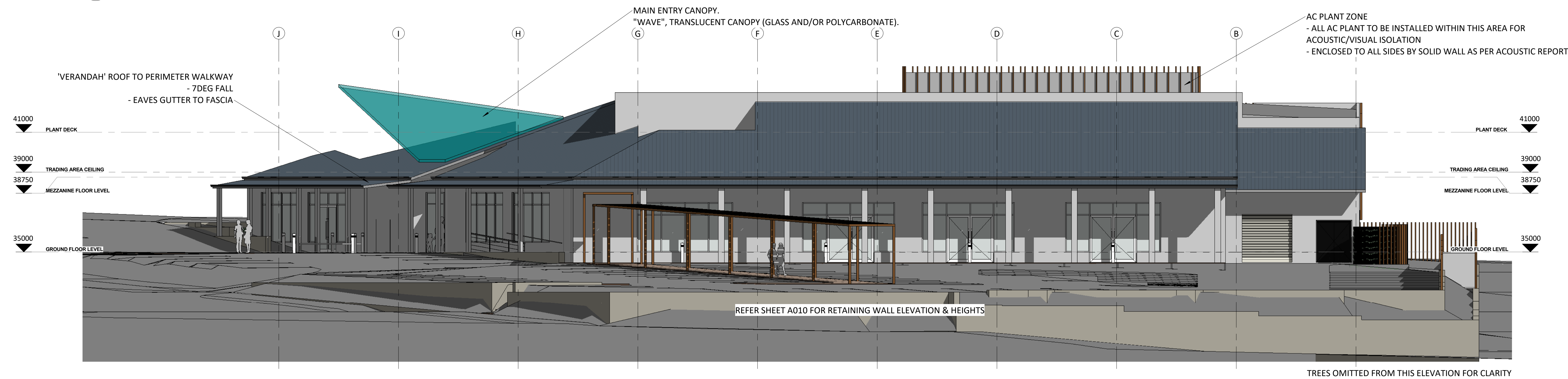
PROJECT
PROPOSED SHOPPING CENTRE
DEVELOPMENT
SOUTH COAST HWY CNR HARDY ST
DENMARK 6333

DRAWING
ROOF PLAN

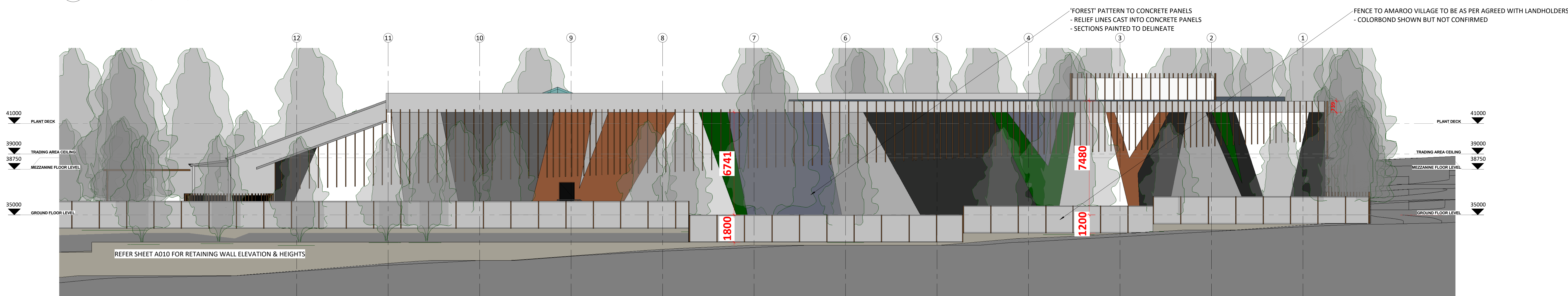
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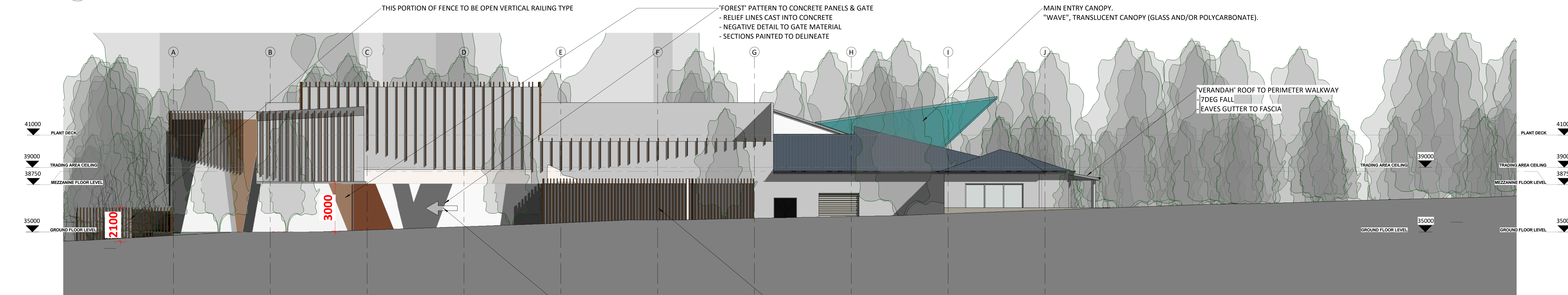
1 **ELEVATION 01 - SOUTH COAST HIGHWAY**
A002 SCALE 1 : 100 (A0 Sheet)



2 **ELEVATION 02 - PUBLIC OPEN SPACE**
A002 SCALE 1 : 100 (A0 Sheet)



3 **ELEVATION 03 - AMAROO COTTAGES**
A002 SCALE 1 : 100 (A0 Sheet)



4 **ELEVATION 04 - HARDY STREET**
A002 SCALE 1 : 100 (A0 Sheet)

DEVELOPMENT APPLICATION

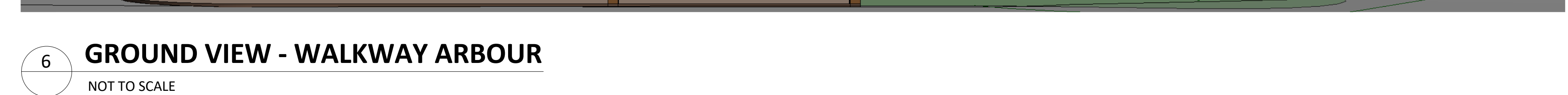
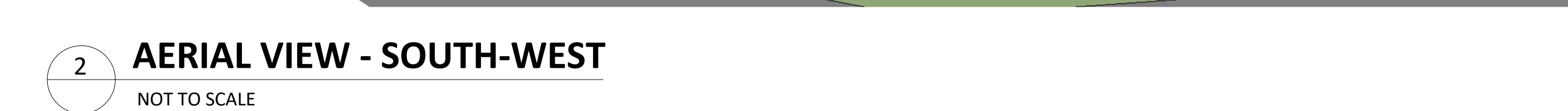
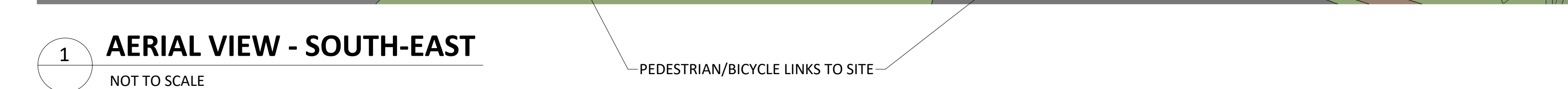
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A	ISSUED FOR COMMENTS	21-12-2016

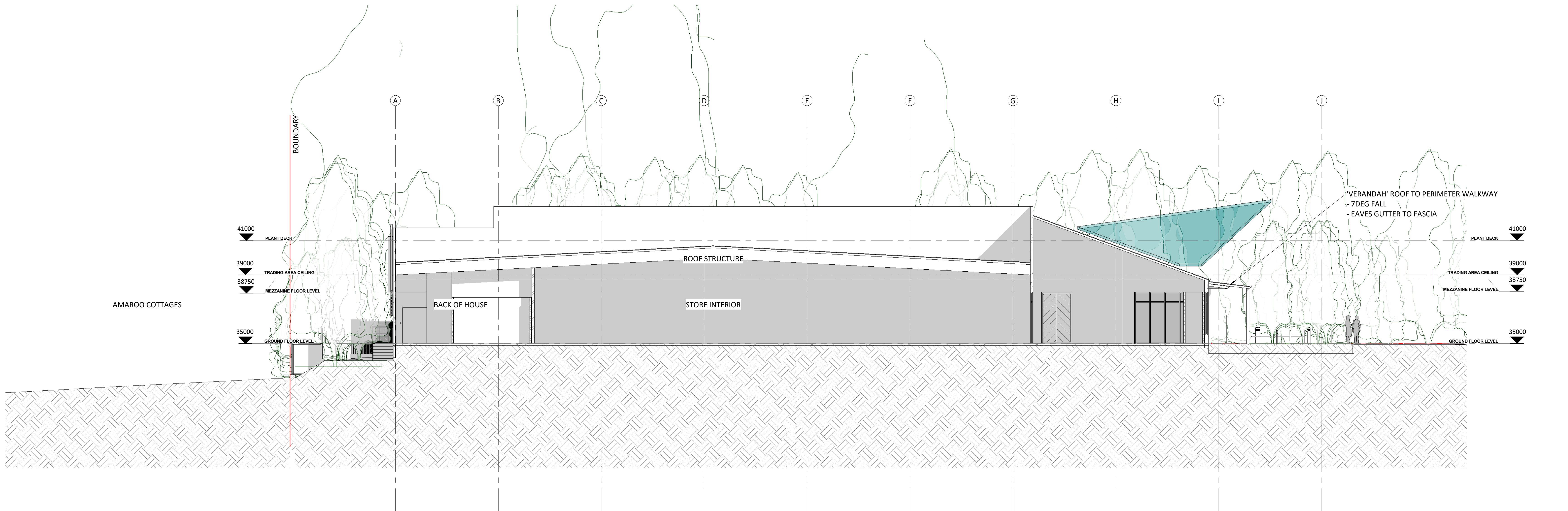


PROJECT
PROPOSED SHOPPING CENTRE
DEVELOPMENT
SOUTH COAST HWY CNR HARDY ST
DENMARK 6333

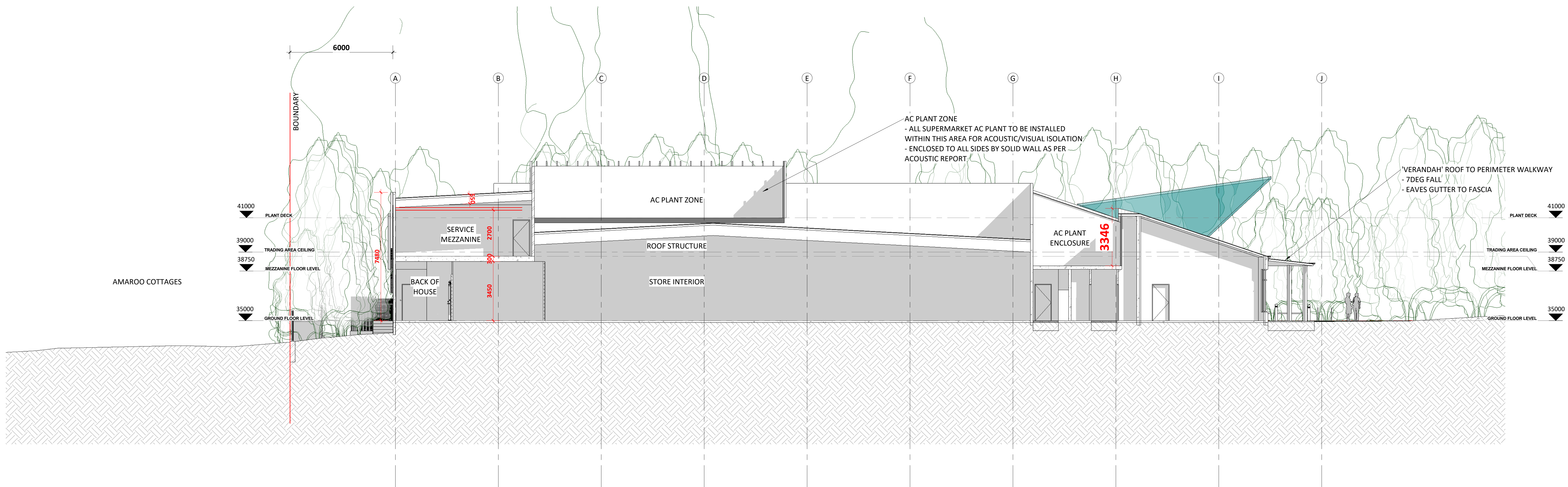
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BUILDING ELEVATIONS

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1 Section A
A003 SCALE 1 : 100 (A0 Sheet)



2 Section B
A003 SCALE 1 : 100 (A0 Sheet)

DEVELOPMENT APPLICATION

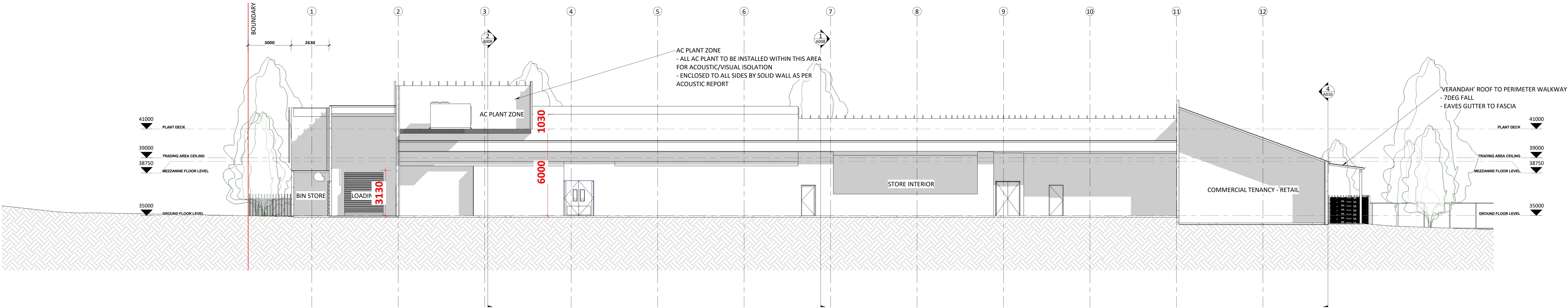
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D	REVISED DA	13-09-2017
C	REVISED DA	29-08-2017
B	DEVELOPMENT APPLICATION	02-08-2017
A	ISSUED FOR COMMENTS	21-03-2016

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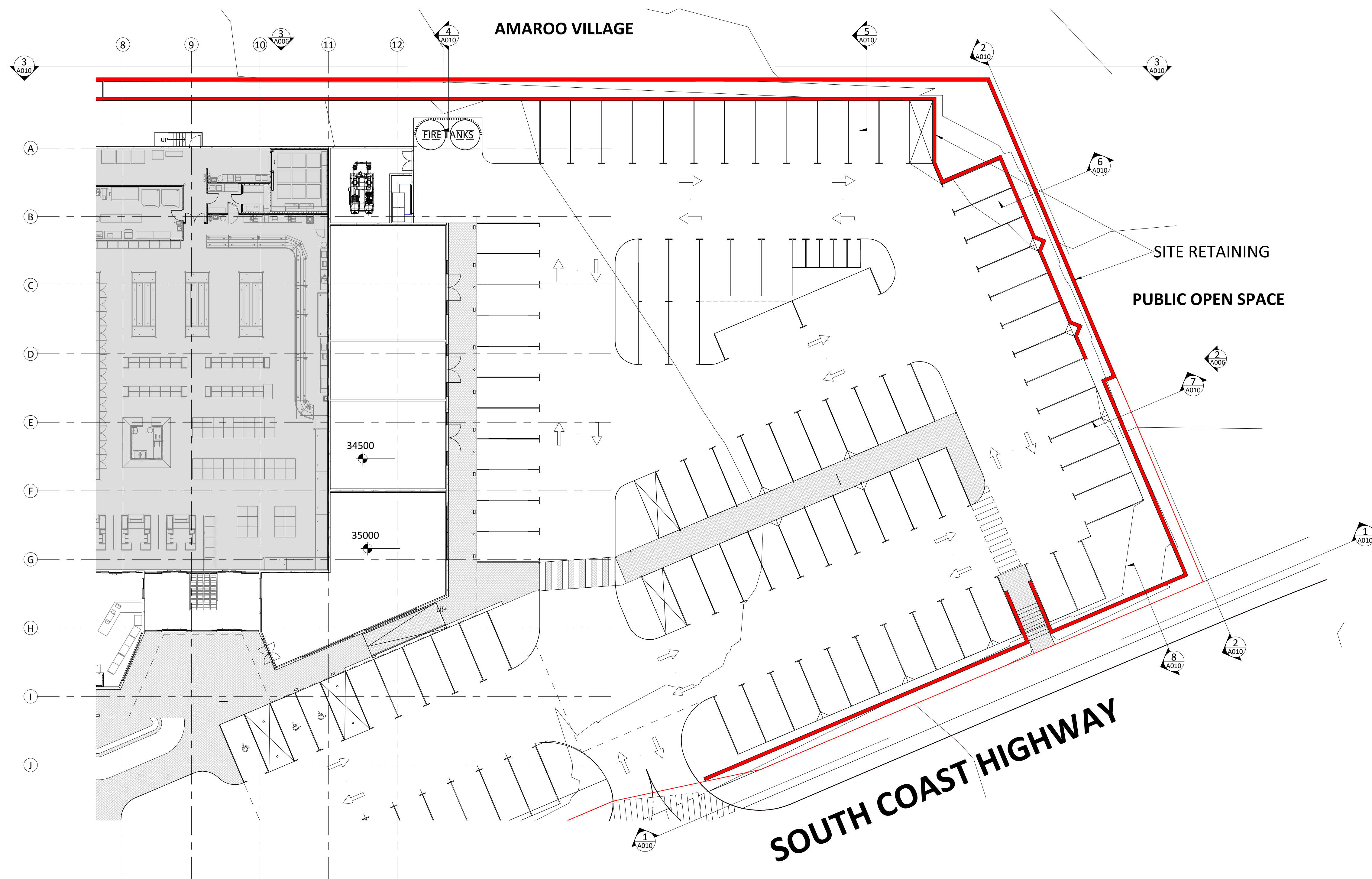
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SECTIONS

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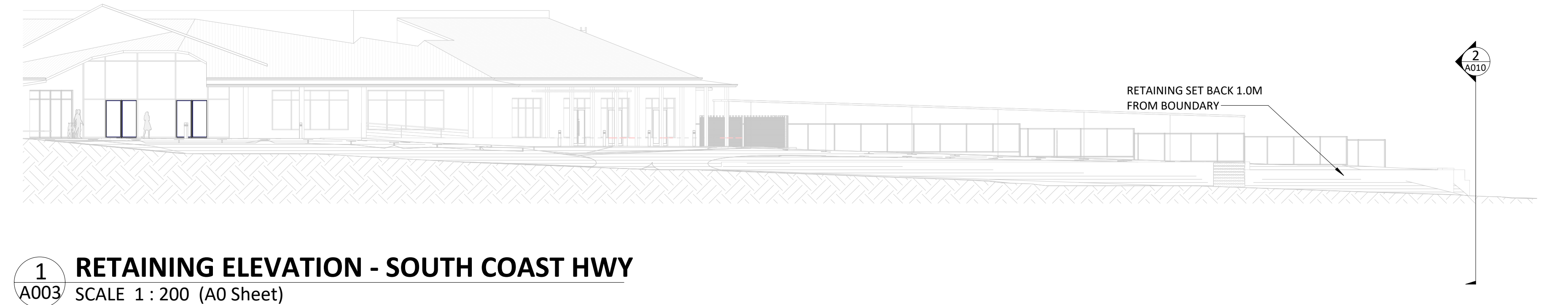


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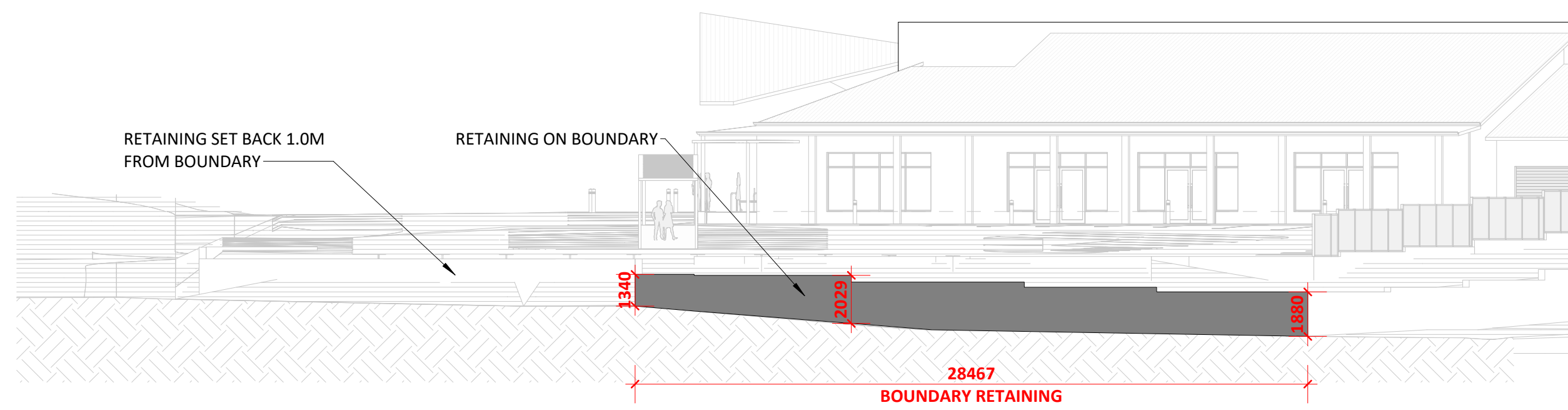
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E	ISSUED FOR COSTING	29-01-2025
D	REVISED DA	13-09-2017
C	REVISED DA	26-06-2017
B	DEVELOPMENT APPLICATION	02-05-2017
A	ISSUED FOR COMMENTS	21-12-2016
No.	Description	Date
		
J. Prestipino Building Designs PTY LTD. 320 Lord St., Perth, Western Australia 6000. Tel: (08) 9422 5888 Fax: (08) 9422 5818 www.jpbd.com.au info@jpbd.com.au		
PROJECT PROPOSED SHOPPING CENTRE DEVELOPMENT SOUTH COAST HWY CNR HARDY ST DENMARK 6333		
DRAWING SECTIONS		
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	SG A0 Sheet	
date	29-01-2025	revision No A009
scale	1 : 100	project No 167-015
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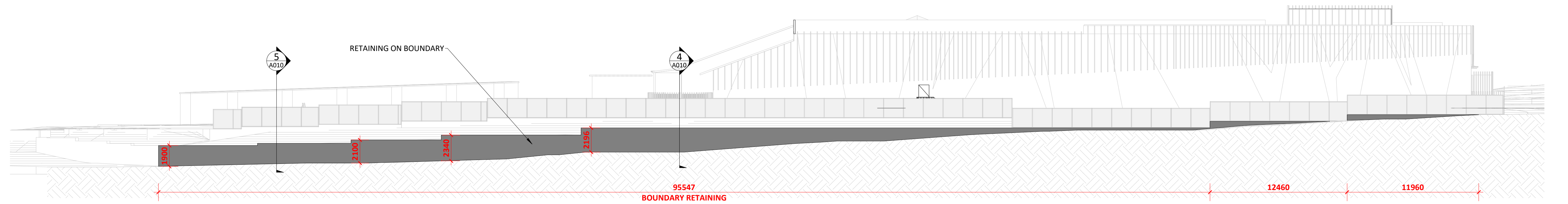
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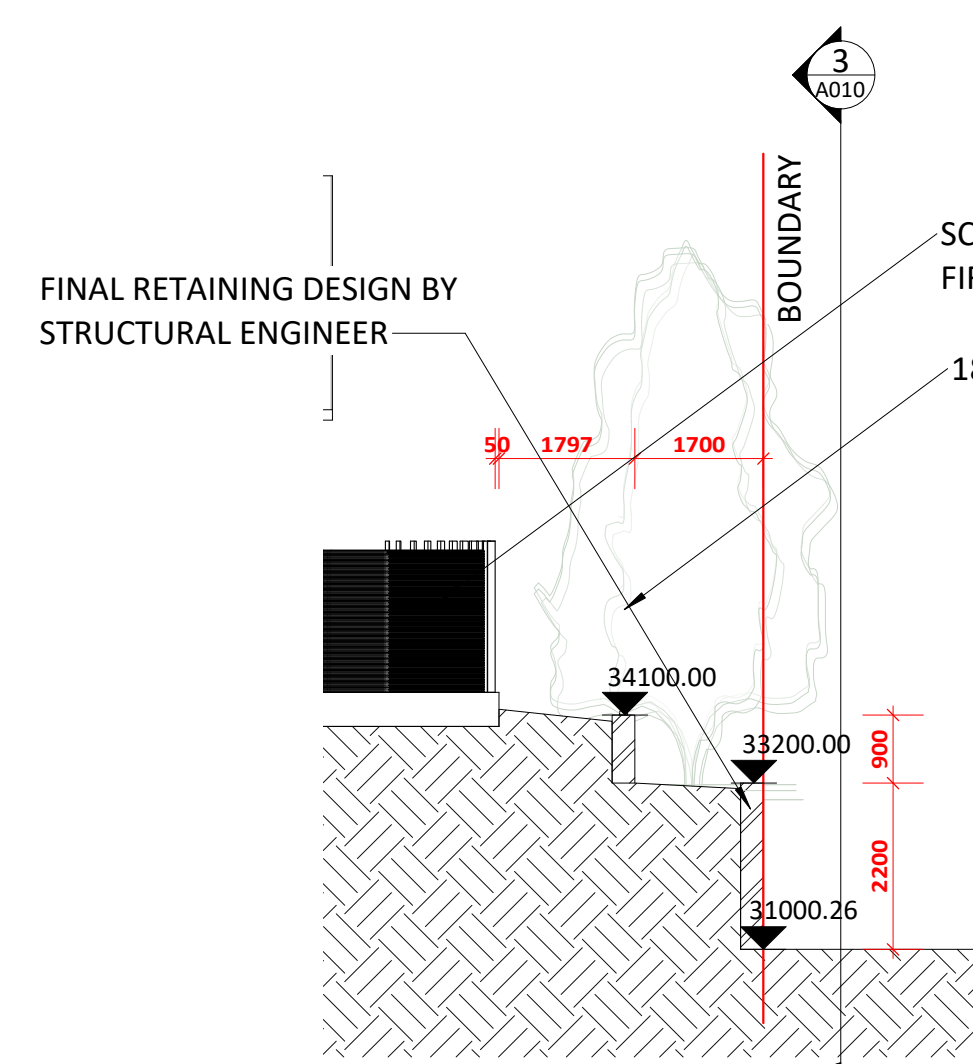
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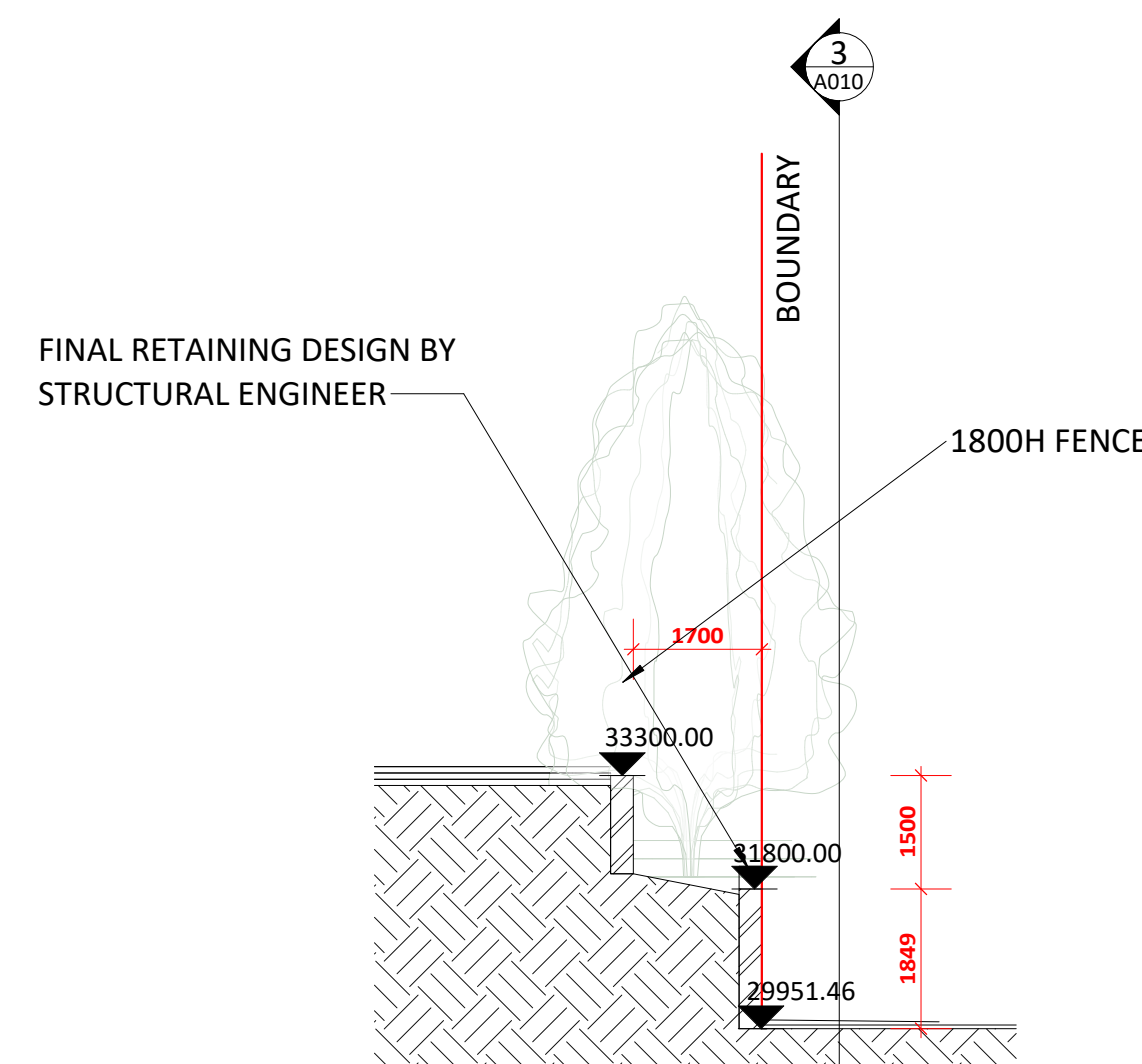
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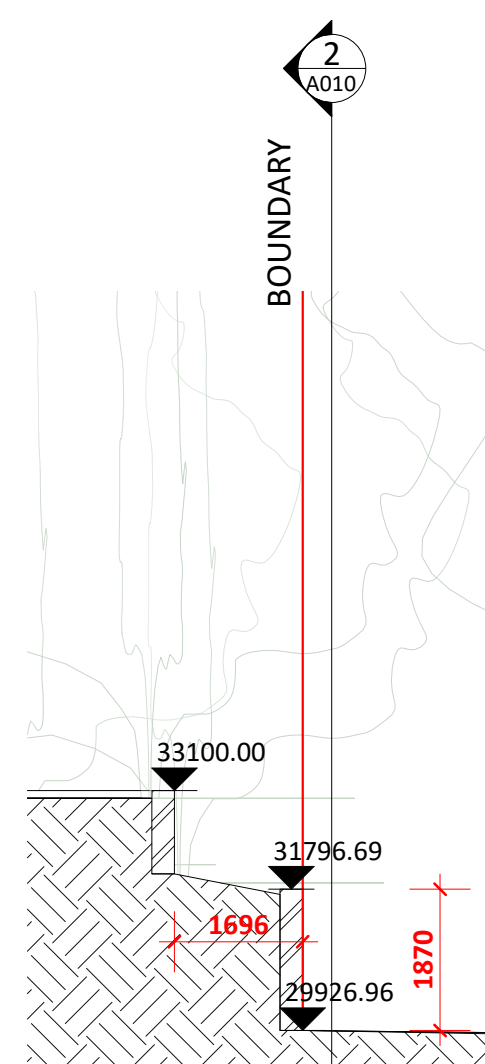
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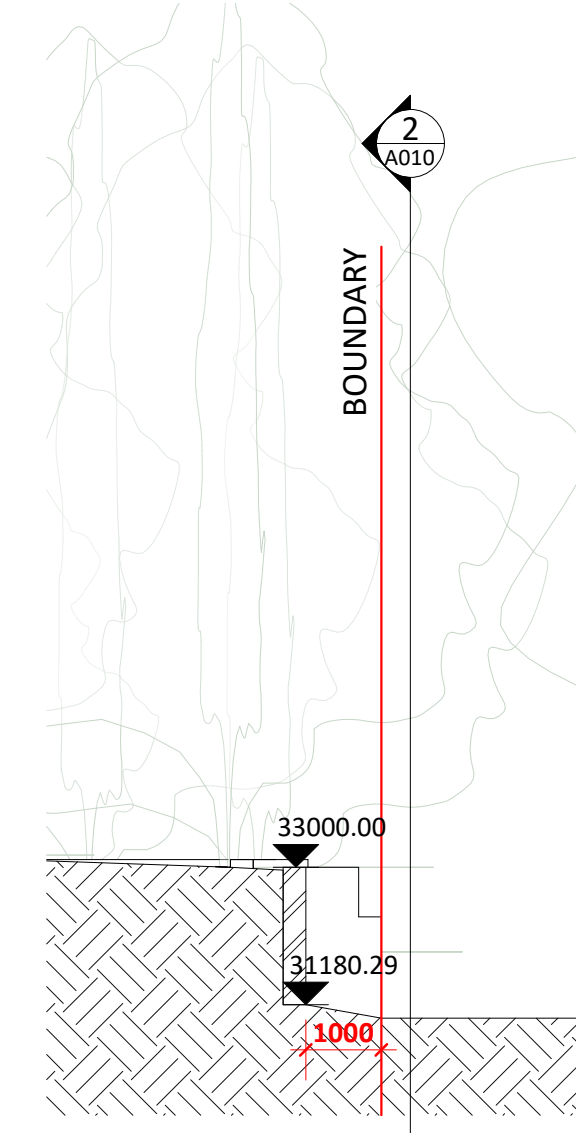
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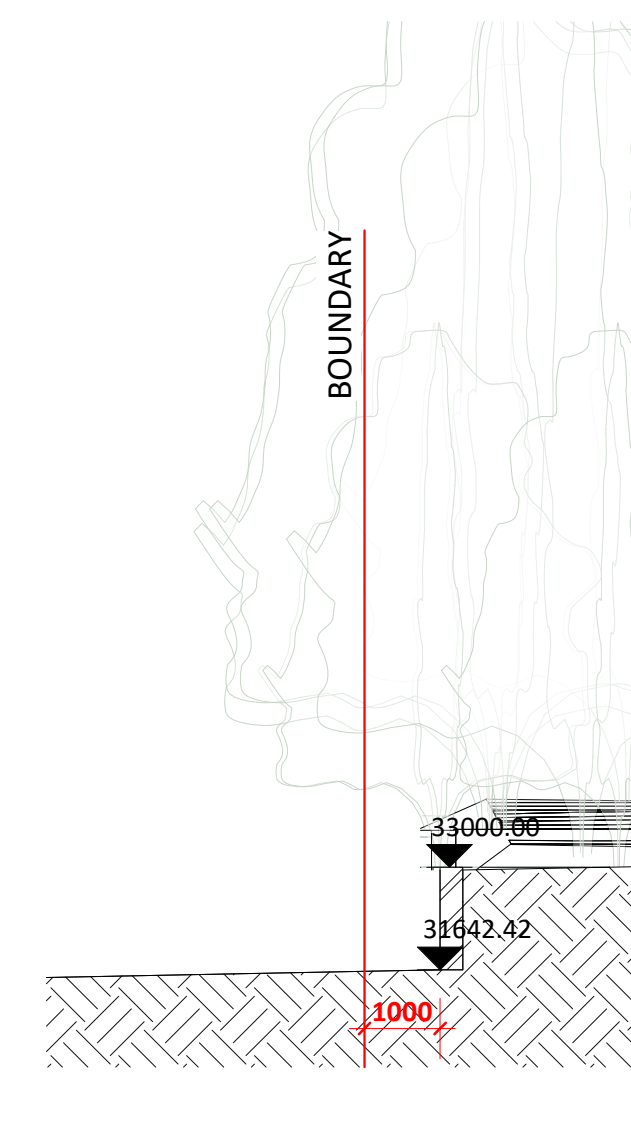
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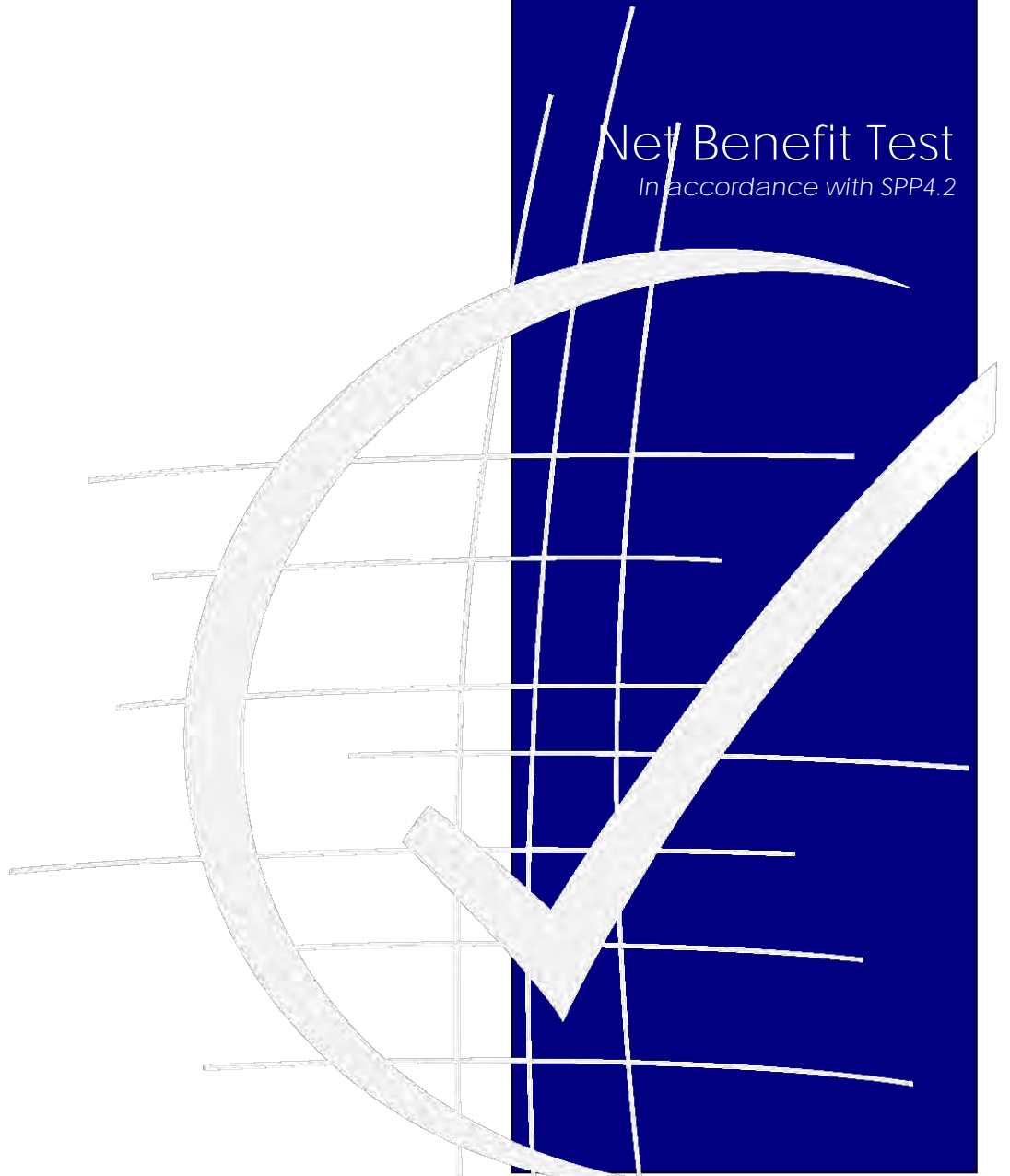
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B	REVISED DA	22-02-2018
C	REVISED DA	13-09-2017
D	REVISED DA	13-09-2017
E	DEVELOPMENT APPLICATION	10-09-2017
F	ISSUED FOR COMMENTS	21-12-2016
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J. Prestipino Building Designs PTY LTD. 230 Lord St, Perth, Western Australia 6000. Tel: (08) 9422 1888 Fax: (08) 9422 1118 www.jpbd.com.au info@jpbd.com.au		
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Tactics4
Proposed Development
Denmark Town Centre

Net Benefit Test

In accordance with SPP4.2



Project

Project name	Denmark Town Centre
Project number	2426
Prepared for	Lawrence Brown Planning

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Version

Document Name	Date	Description	Prepared
2426-Denmark-Net Benefit Test-Final-01.docx	Nov 2024	Final for Lodgement	GRD

Distribution

Document Name	Date	Distribution	Format	Delivery
2426-Denmark-Net Benefit Test-Final-01.docx	Nov 2024	SLB	PDF	email

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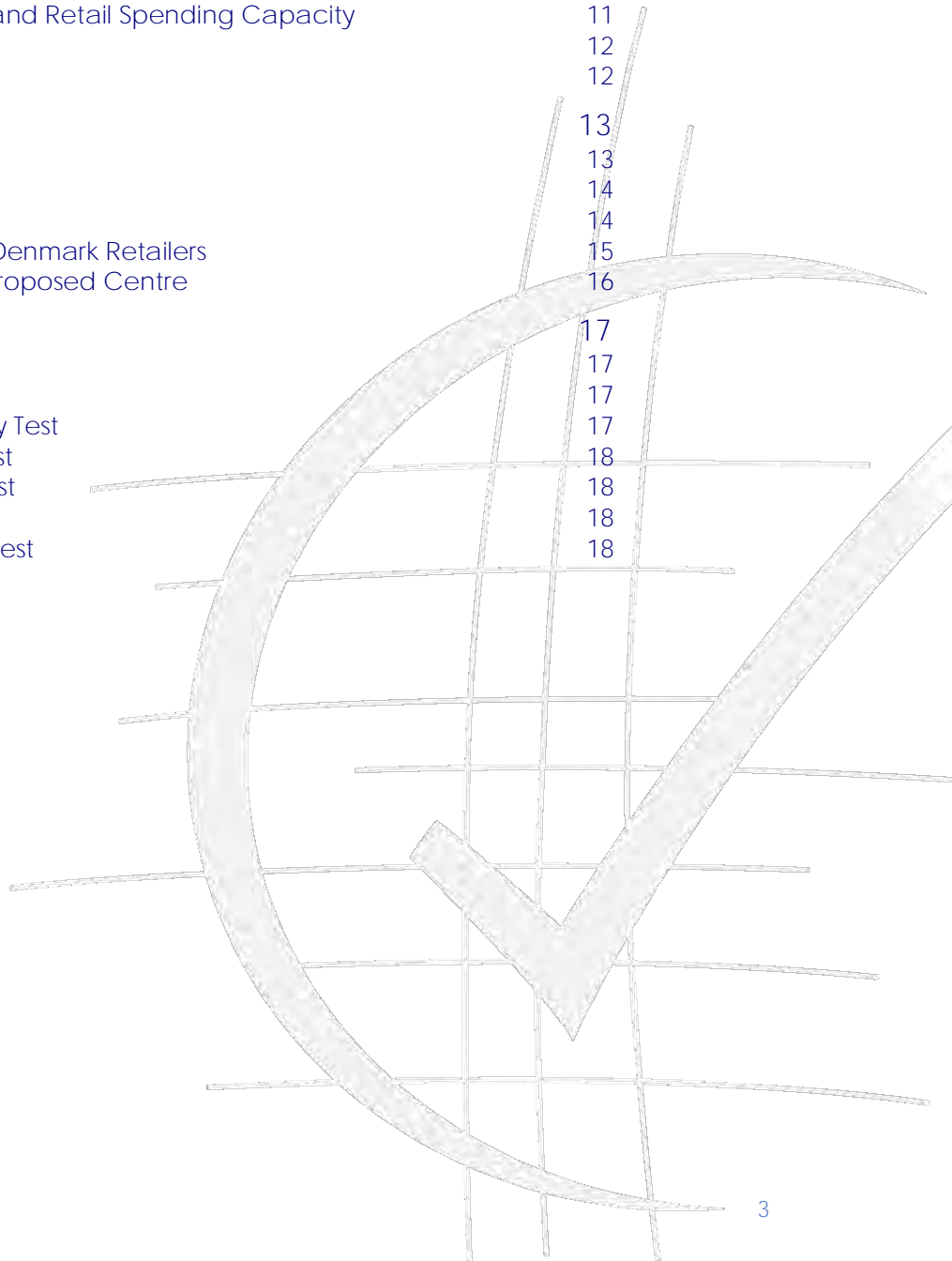
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Acknowledgement of Country

Tactics4 acknowledges the First Nations people as the custodians of the land which is the subject of this assessment. We pay our respect to their continuing culture, and to Elders past, present, and emerging.

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1 EXECUTIVE SUMMARY

The Net Benefit Test concludes that the proposed retail development in Denmark Town Centre:

1. Will retain a greater proportion of the market capture in supermarket spending and convenience retail spending and trips which are currently being captured by supermarkets in Albany City Centre.
2. Will translate to all Denmark Town Centre retailers having the potential to capture additional convenience retail spending.
3. Increase economic opportunities to all Denmark Town Centre retailers.
4. Should not be assessed against potential impacts on shifting retail spending outside the Denmark Town Centre.
5. Should instead be assessed against its potential re-introducing (retaining) additional retail spending available to all retailers in the Denmark Town Centre.
6. Is likely to result in the opportunity to refit the existing supermarket floor space for non-retail purposes.
7. Will only provide a limited amount of additional convenience retail floor space compared to the existing convenience retail offer in the Town Centre.
8. create an additional 850sqm NLA of supermarket floor space to the existing offer and an additional 500 sqm NLA of convenience retail offer to Denmark Town Centre.
9. Will have no undue impact on the trading potential of centres in Albany Town Centre or neighbouring townships.
10. Will reduce/retain up to 155 person trips per day (57,000 person trips p.a.) to Albany which will instead now shop in the Denmark Town Centre, creating greater vibrancy and vitality for the Denmark Town Centre.
11. Subsequently represents a reduction of more than 6.25 M km of vehicle travel each year and save residents and visitors an additional 57,000 hours of travel time p.a.
12. Will increase spending over time as population and visitor numbers increase in the catchment.
13. Represents an economic and social gain to the Denmark community by providing greater choice and convenient access to a wider range of goods and services that some residents currently consider necessary to travel to Albany to access.
14. Has the potential to create an additional 62 full time equivalent jobs.
15. Satisfies the objectives and outcomes established by SPP4.2 to deal with the assessment for out of centre developments.

2 INTRODUCTION

2.1 Location

This report assesses the net benefit of a proposed retail development in Denmark Town Centre. The proposed development includes a 2,750 sqm NLA retail centre including a 2,050 sqm NLA supermarket and seven retail tenancies totalling 700 sqm NLA. The proposed development is located on the corner of Hardy Street and South Coast Highway immediately west of the Denmark Town Centre. Denmark Town Centre is in the Shire of Denmark, 420 km south of Perth and 55 km west of Albany, in the Great Southern Region of Western Australia.

2.2 Policy

State Planning Policy 4.2 – Activity Centres was adopted in July 2023. SPP4.2 adopts the position that activity proposed outside of existing or planned activity centres has the potential to undermine the planning and delivery of the activity centre hierarchy. SPP4.2 subsequently establishes a requirement to undertake a Net Benefit Test to assess activity proposed in out-of-centre developments and/or major developments which exceed a prescribed floor space allocation. A net benefit occurs when the benefits (pros) to the community arising from a proposal outweigh any identified impacts (cons) to the community arising from a proposal. A Net Benefit Test is prepared for:

- A proposal that introduces floorspace in an existing or planned activity centre which exceeds the floorspace identified in a current Needs Assessment.
- A proposal that introduces new land or rezones land to facilitate major development or out-of-centre development.
- Development applications for major development.
- Development applications for out-of-centre development.

The Net Benefit Test assesses the potential impacts and benefits of a proposal to the community and on existing and planned activity centres, including:

- Is there a demand for additional floorspace, and how does the proposal meet this demand?
- How will the proposed development impact on the role of the activity centre?
- How will the proposal impact the viability and vibrancy of other activity centres in the hierarchy?
- Are any potential impacts reduced over the longer term?
- What is the anticipated loss and/or gain of services to the community?
- What is the anticipated impact on access (distance, time, mode of travel) to services by the community?
- Will the proposal contribute to a net increase in employment?
- Does the proposal align with the objectives and outcomes of this policy and the planning framework?

2.3 Retail Gravity Modelling

Retail Gravity modelling is a method used to simulate / calculate the probability of consumer patronage to a location, such as a store or shopping centre. According to Retail Gravity theory, consumer choice to frequent a location is based on three fundamental considerations

1. customer convenience (drive or travel times/distance)
2. extent/size of the offer (amount of floor space)
3. brand attractiveness (the preference for one store over another – i.e. Coles / Woolworths)

The power of retail gravity modelling lies in the fact that it simulates and is representative of real consumer behaviour – the choices that consumers make in the real world. The use of the model requires the collection and collation of market data variables including:

- Resident and visitor population (potential consumers) by consumer catchments
- Retail spending by retail category by consumer catchments
- Location of activity centres by retail category
- The size of activity centres by retail category
- The distance between consumer catchments and activity centres
- Empirical attractiveness factor by store brands and centre hierarchy

This report sets out the market variables and the model findings to determine:

- a) The propensity (market share) of a resident in a catchment shopping at a centre.
- b) The total sales that may be captured by a centre from each market catchment
- c) The impacts of changing variables (i.e. introducing a proposed development) to the change in propensity (market share) and sales for a centre.



2.4 Terminology

The retail sector categorises retailers according to their consumer behaviour and catchment needs. A summary of the categories and basic principles for consumer behaviour are listed below. This report is focused primarily on the relationship between supermarket activity and convenience-based activity.

FIGURE 1 – RETAIL CATEGORIES

Retail Category	Key Retail Components	Key Consumer Markets
Supermarket	Stores over 500 sqm serving a variety of fresh and packaged food and beverage for consumption off premises.	Serves a local market with frequent trips and therefore benefits from convenience.
Food/Grocery	Stores under 500 sqm selling fresh food and grocery goods – usually of a specific food type – butcher, baker, etc.	Serves a local market with frequent trips and linked to supermarket trips.
Café/Takeaway/restaurant	Stores which provide either dine in or takeaway – pre-prepared meals and beverages (does not include hotels/taverns).	Serves both a local and wider catchment – can be linked to supermarket trips, shopping trips or destination-based trips.
Convenience	All supermarket, food/grocery, café/takeaway/restaurant.	As shown above
Comparison non-food	All other retail activity which does not involve food/grocery, eating & dining – typically fashion, household goods, sports and recreation goods, personal goods and services etc.	Serves a wider catchment with less frequent trips as spending is typically higher with consumers prepared to travel further to compare prices and products and requires a larger catchment as these purchases are less frequent and
Non retail	Office, banking, real estate, travel agents, industrial, vehicle. And not included in retail category of floor space or spending profiles.	Often destination trips that are typically not related to retail trips.

3 COMPETITIVE ACTIVITY CENTRE ENVIRONMENT

Supermarkets represent a key driver of decision making for food and grocery-based retail consumer trips. They capture up to 40% of all retail spending and over 60% of all convenience retail spending. Retailers in Denmark Town Centre are therefore typically competing to varying degrees with retailers in centres with a much larger convenience retail offer including:

- Albany City Centre
- Albany Suburban Centres

And to a lesser extent centres with a comparable or smaller convenience offer and located closer to some consumer markets, such as:

- Mount Barker
- Walpole
- Pemberton
- Manjimup

3.1 Denmark Town Centre

Existing Centre

The Denmark Town Centre is currently estimated to contain:

- an IGA store with a floor space of 1,200 sqm NLA.
- 18 convenience-based retailers comprising a combined floor space of 2,000 sqm NLA.
- a subsequent total convenience-based retail floor space of 3,200 sqm NLA.

Development Proposal

The proposed development is planned to contain:

- a supermarket with a floor space of 2,050 sqm NLA.
- convenience retail floor space of 500 sqm NLA.
- non convenience / non retail floor space of 200 sqm NLA.
- a subsequent total retail floor space of 2,750 sqm NLA.

Change

The proposed development is intended to:

- replace the existing supermarket which may subsequently revert to non-retail uses.
- Subsequently represent an 850 sqm NLA increase in the supermarket floor space available to consumers in the Denmark Town Centre.
- add an additional 500 sqm NLA of convenience retail to the Denmark Town Centre.
- add an additional 200 sqm NLA of non-retail/non convenience retail to the Denmark Town Centre.

3.2 Albany City Centre

- The Albany City Centre is located 55km east of Denmark Town Centre.
- It contains five main supermarket chains – Coles (Albany and Orana), Woolworths (Dog Rock and Chester Pass), and Aldi.
- These operators are estimated to contain a combined total of 16,400 sqm NLA.
- It is likely that this offer has a significant drawing power for residents and visitors shopping in the region – either as a dedicated supermarket shopping trip or as part of a non-related trip.

3.3 Albany Suburban Centres

- Albany also contains some suburban centres which are located predominantly north of the Albany City Centre.
- They contain four supermarket chains – Woolworths (Bayonet Head), Supa IGA (North Road), and IGA's (Albany and Spencer Park)
- These operators are estimated to contain a combined total of 6,400 sqm NLA.
- It is less likely that consumers from outside of Albany would travel to Albany to shop at these stores which have a similar size and offer to stores in their respective town centres.

3.4 Mount Barker

- Mount Barker Town Centre is located 55km north of Denmark Town Centre.
- It includes an IGA store with an estimated retail floor space of approximately 1,500 sqm NLA.
- It is likely that this operator caters primarily to residents and visitors in and around the Mount Barker Town Centre with some spending escaping to Albany.

3.5 Walpole

- The Walpole Village is located 65km west of Denmark Town Centre.
- It includes a relatively small independent grocer with an estimated retail floor space of approximately 600 sqm NLA.
- It is likely that this operator caters primarily to residents and visitors in and around Walpole with considerable spending escaping to Albany, and/or Denmark, and Manjimup.

3.6 Manjimup and Pemberton

- Manjimup (and Pemberton) are located 185 km north west of Denmark Town Centre.
- Manjimup includes both a Coles and a Woolworths with an estimated retail floor space of 5,800 sqm NLA.
- Pemberton includes a small IGA operator with an estimated retail floor space of 700 sqm NLA.
- It is likely that Manjimup and Pemberton play a relatively small role in catering to resident shopping behaviour in and around Denmark Town Centre, although they are more likely to cater to some extent to Walpole residents.

FIGURE 2 – SUPERMARKET BASED ACTIVITY CENTRES

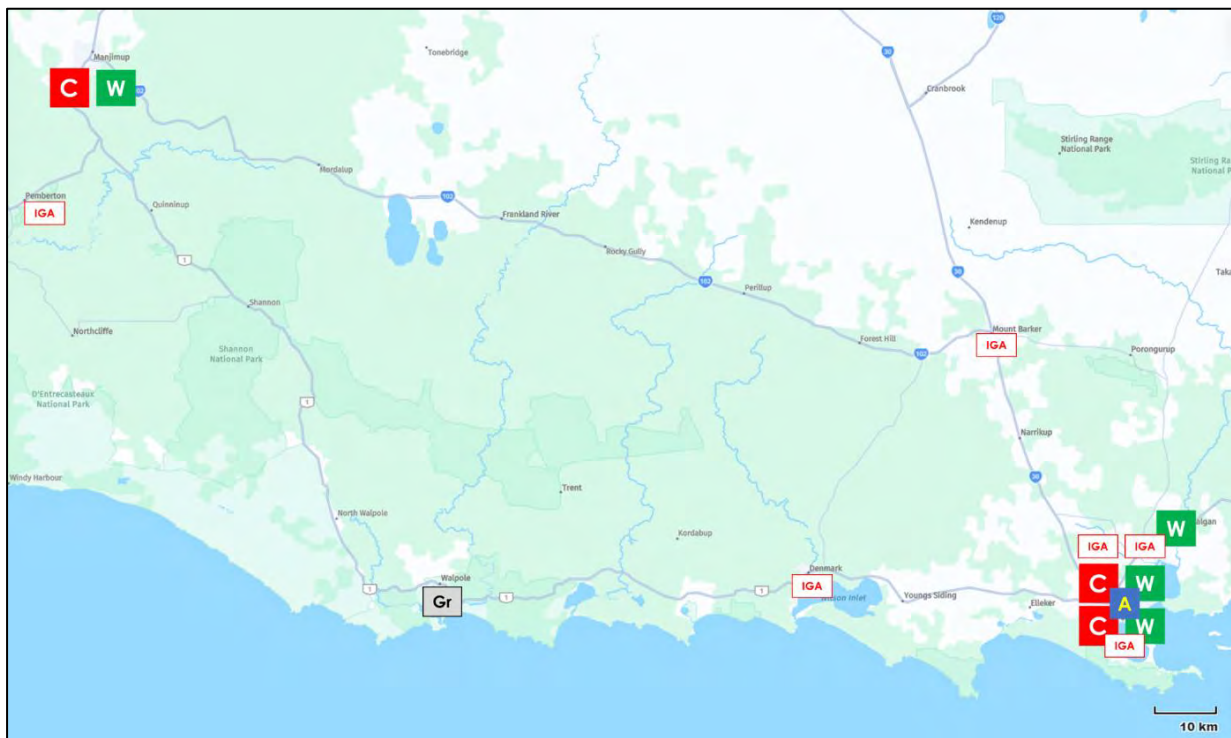
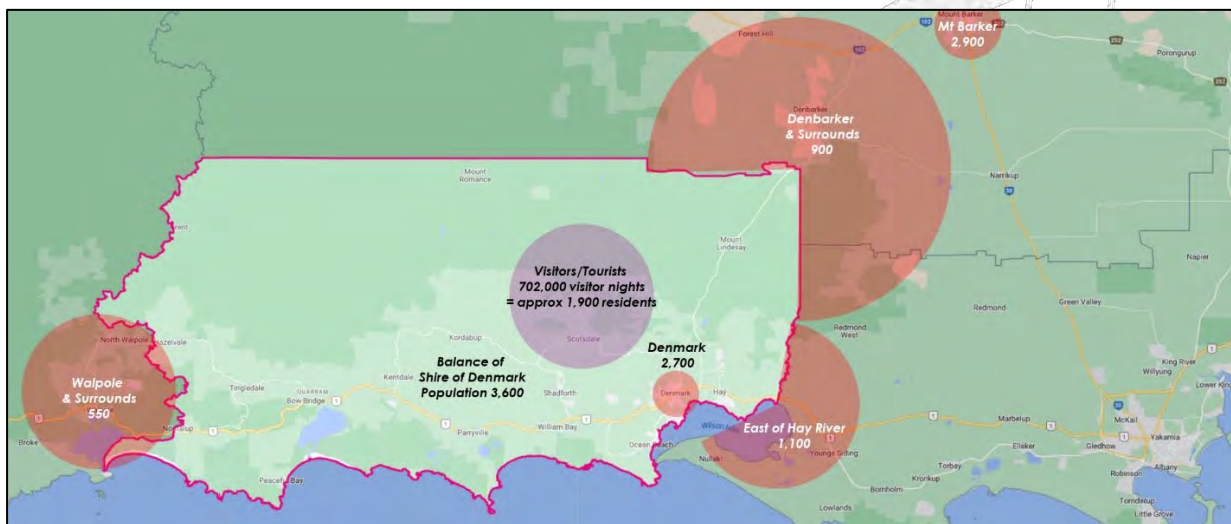


FIGURE 3 – POTENTIAL RESIDENT AND VISITOR CONSUMER MARKETS



4 CONSUMER MARKETS

Analysis of the location, distance and extent of the convenience retail offer in the region suggests that retailers in Denmark Town Centre are likely to primarily serve residents and visitors from:

1. Denmark Township
2. Broader Shire of Denmark
3. Walpole – beyond Walpole residents are more likely to travel to Manjimup.
4. Residents in the Denbarker area outside the Shire of Denmark between Denmark and including Mt Barker – beyond Mt Barker, residents are more likely to travel to Albany.
5. Residents outside the Shire of Denmark immediately east of the Hay River – beyond which residents are more likely to travel to Albany.

Residents in these catchments are therefore expected to contribute most of the resident retail spending available to be captured by retailers in the Denmark Town Centre.

4.1 Resident Population and Retail Spending Capacity

The combined resident catchment area incorporates a current population of 11,750 residents which is estimated to be generating a total of \$90M p.a. in total convenience-based retail spending including \$62M p.a. in supermarket spending and \$28M p.a. in other convenience retail spending, comprising:

Denmark Township which has a population of 2,700 residents and estimated to be generating \$17.1M p.a. in convenience retail spending, representing 19% of the total resident catchment convenience spending.

Balance of the Shire of Denmark which has a population of 3,600 residents and estimated to be generating \$30.6M p.a. in convenience retail spending, representing 34% of the total resident catchment convenience spending.

The area immediately **East of the Hay River** with a population of 1,100 residents and estimated to be generating \$10.2M p.a. in convenience retail spending, representing 11% of the total resident catchment convenience spending.

Walpole and surrounds with a population of 550 residents and estimated to be generating \$3.2M p.a. in convenience retail spending, representing 4% of the total resident catchment convenience spending.

Mount Barker Township with a population of 2,900 residents and estimated to be generating \$21.6M p.a. in convenience retail spending, representing 24% of the total resident catchment convenience spending.

Denbarker and surrounds north of the Shire of Denmark to Mt Barker with a population of 900 residents and estimated to be generating \$7.3M p.a. in convenience retail spending, representing 8% of the total resident catchment convenience spending.

Not all these residents will shop/spend at Denmark Town Centre, or shop/spend in Denmark frequently. These respective values are modelled to assess the extent of the market capture estimated for Denmark Town Centre retailers.

4.2 Visitor Market

In addition to resident retail spending, the Shire of Denmark is currently estimated to accommodate 177,000 visitors (in 2021/22) with an average stay in the region of four nights, equating to a total of 702,000 visitor nights in the Shire. This equates to the equivalent of 1,900 permanent residents year-round – although retail spending patterns for visitors differs to that of residents. Visitors are estimated to generate an average of \$64 per person per day on convenience retail goods and services, reflecting:

- An average of \$14 per day (\$9.9M p.a.) on supermarket spending.
- An average of \$22.50 per day (\$15.8M p.a.) on food/grocery/café/takeaway/restaurant spending.
- A total of \$25.8M p.a. on convenience spending.
- Up to 22% of the total convenience retail market spending capacity.

4.3 Summary

The sum of all relevant resident and visitor consumer markets are currently estimated to generate a total of **\$116M p.a.** in total supermarket and convenience retail spending.

FIGURE 4

ESTIMATED ANNUAL RESIDENT RETAIL SPENDING CAPACITY (\$M p.a.)
By Trade Area by Year
Total Convenience Retail

Market	(\$M p.a.)	% of total market	% of resident market
Denmark (Town)	\$17.1	15%	19%
Denmark (Balance)	\$30.6	26%	34%
East of River	\$10.2	9%	11%
Walpole & Surrounds	\$3.2	3%	4%
Mt Barker	\$21.6	19%	24%
Denbarker & Surrounds	\$7.3	6%	8%
Resident Spending	\$90.1	78%	100%
Visitor Spending	\$25.8	22%	-
Total Trade Area	\$115.9	100%	-

Not all this potential consumer retail spending capacity will be captured by retailers in the Denmark Town Centre.

5 MARKET BEHAVIOUR

Retail consumers typically form shopping habits based around three distinct characteristics.

1. The size/extent of the retail (supermarket) offer likely to satisfy their needs.
2. The distance/time required to access the retail (supermarket) offer likely to satisfy their needs.
3. The attractiveness of additional retail (supermarket) and non-retail related activity which might influence their travel needs – non retail related trips.

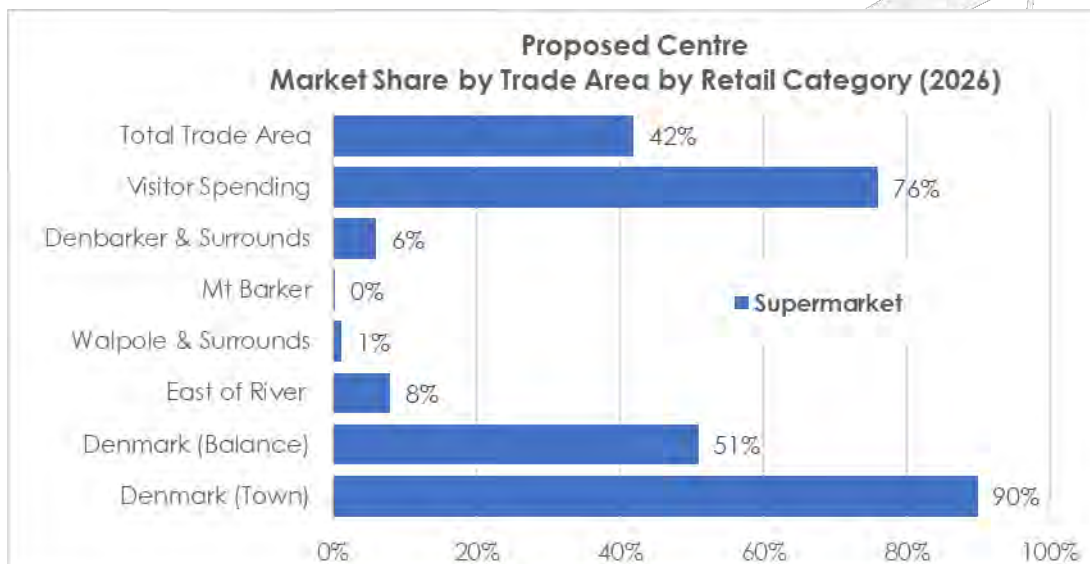
Retail consumer theory indicates that modelling of these characteristics by each of the consumer markets may be used to assess the propensity for which consumers in each catchment are likely to shop/spend at each location.

5.1 Current Behaviour

Modelling of the characteristics influencing the Denmark Town Centre catchment reveals that the existing Denmark Town Centre supermarket currently has the potential to be capturing 42% of all supermarket spending, including:

- 90% of all supermarket spending generated from residents in the Denmark township.
- 76% of all supermarket spending generated from visitors to the Shire of Denmark.
- 51% of all supermarket spending generated from residents in the balance of the Shire of Denmark.
- 8% of all supermarket spending generated from residents from East of Hay River.
- 6% of all supermarket spending generated from residents from Denbarker and surrounds.
- 1% of all supermarket spending generated from residents from Walpole and surrounds.

FIGURE 5



That subsequently:

- 10% of all supermarket spending generated from residents in the Denmark Town Centre is escaping to other commercial centres, the majority of which (9%) is being captured by the major supermarket chains in Albany City Centre.

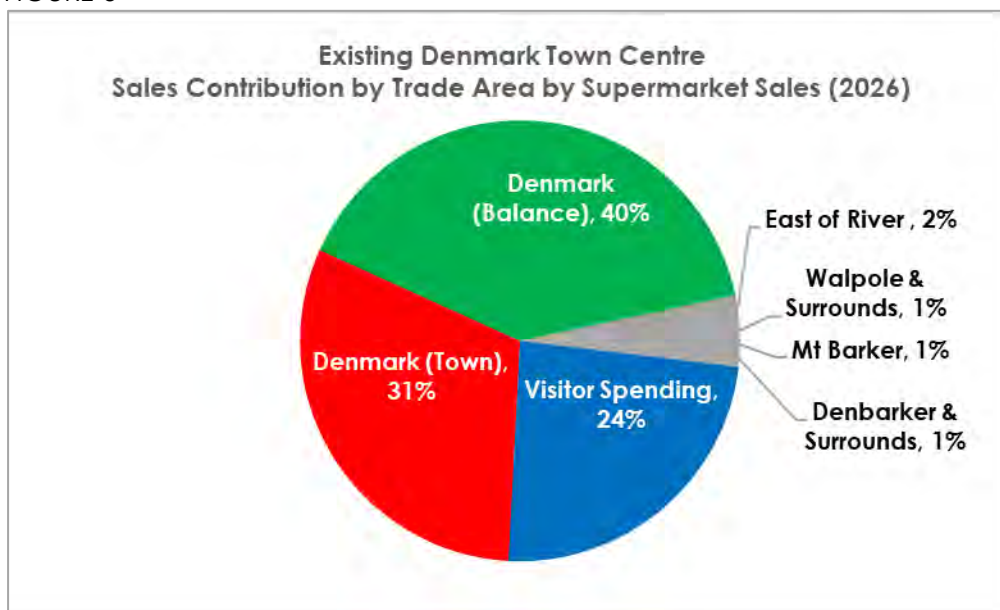
- 22% of all supermarket spending generated from visitors in the Shire of Denmark is escaping to other commercial centres, the majority of which (19%) is being captured by the major supermarket chains in Albany.

5.2 Contribution to Sales

Achieving these market capture rates from each catchment area will result in the proposed Denmark Town Centre supermarket capturing:

- 31% of its total sales from residents in Denmark
- 40% of its total sales from residents in the balance of the Shire of Denmark
- 24% of its total sales from visitors to the Shire of Denmark

FIGURE 6



Leaving only 5% of all sales being contributed from residents in the rest of the catchment.

5.3 Potential Behaviour

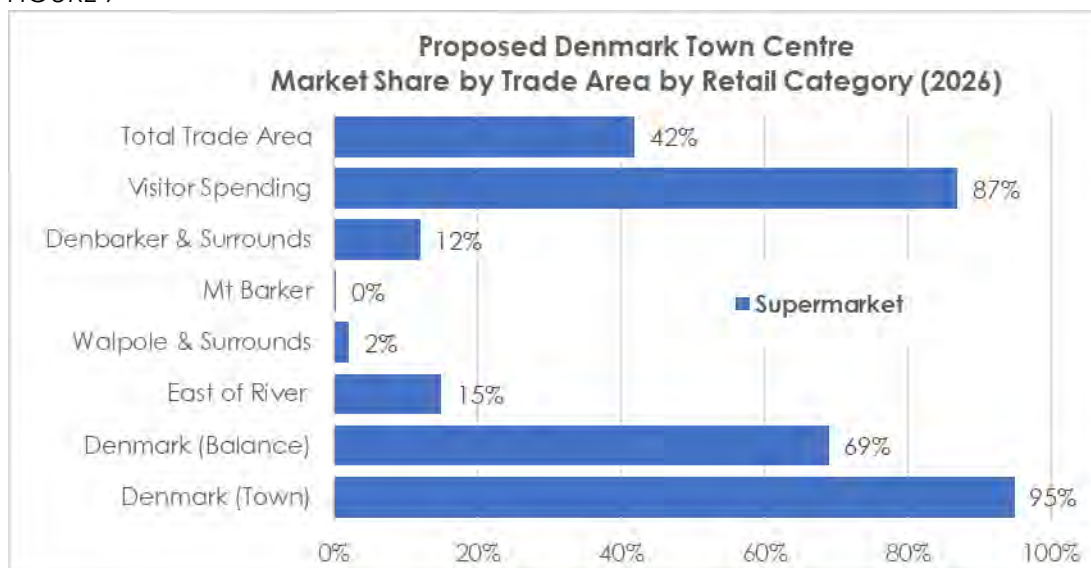
Modelling of the characteristics influencing the Denmark Town Centre reveals that the proposed Denmark Town Centre supermarket has the potential to capture:

- 95% of all supermarket spending generated from residents in the Denmark township.
- 87% of all supermarket spending generated from visitors to the Shire of Denmark.
- 69% of all supermarket spending generated from residents in the balance of the Shire of Denmark.
- 15% of all supermarket spending generated from residents from east of Hay River.
- 12% of all supermarket spending generated from residents from Denbarker and surrounds.
- 2% of all supermarket spending generated from residents from Walpole and surrounds.

That subsequently this equates to the proposed Denmark Town Centre being able to:

- Retain an additional 5% of supermarket spending generated from residents in the Denmark Town Centre that is currently being captured by the major supermarket chains in Albany.
- Retain an additional 13% of supermarket spending generated from visitors in the Shire of Denmark that is currently being captured by the major supermarket chains in Albany.

FIGURE 7



5.4 Potential Impact on Denmark Retailers

Supermarkets represent the key driver of decision making for food and grocery-based retail consumer trips. Supermarket based trips also typically incorporate non-supermarket-based spending at other food/grocery/café/takeaway (convenience) activity.

The proposed development is subsequently expected to reduce the number of supermarket-based shopping trips and the amount of supermarket-based spending currently escaping to Albany supermarkets. When consumers do not have to travel to Albany for their supermarket spending, they are therefore also not travelling to Albany for their non supermarket convenience spending. The proposed development will also reduce the amount of non-supermarket convenience spending escaping to non-supermarket convenience retailers in Albany.

Residents and visitors in the designated catchment are currently estimated to generate \$44M p.a. available to be captured in non-supermarket convenience retailers. The non supermarket convenience-based retail offer in Denmark Town Centre is currently estimated to have the potential to capture \$21.0 M p.a. from the designated markets.

The proposed development is estimated to increase market retention of non-supermarket convenience spending in Denmark from 48% to 56%. This equates to the retention of up to 155 person trips per day (57,000 person trips p.a.) that are currently spending in non-supermarket convenience retailers at centres outside the Denmark Town Centre.

The increase in market retention therefore equates to the potential for an additional \$3.8M p.a. in non-supermarket convenience spending to become available for non-supermarket convenience-based retailers in Denmark Town Centre.

5.5 Town Centre versus Proposed Centre

The Denmark Town Centre is currently estimated to contain 18 non-supermarket convenience shops comprising up to 2,000 sqm Net Lettable Area (NLA). The proposed development is planned to accommodate 7 shops (725 sqm NLA) in addition to the supermarket.

Retail based leasing models for this centre type suggest that convenience retail would take up to 500 sqm NLA (5 of the 7 tenants) of this space. Non retail (office/real estate agents/bank etc) expected to take up the remaining 225sqm NLA / or 2 tenants.

The Denmark Town Centre therefore currently contains four times (2,000 sqm NLA) more convenience retail activity than that which is likely to be leased at the proposed development (500 sqm NLA).

All convenience retailers, both in Denmark Town Centre and the proposed development, will have the opportunity to capture their share of the additional \$3.8M p.a. made available from the retention of person trips that would otherwise be going to Albany retailers.



6 NET BENEFIT

The Net Benefit Test assesses the potential impacts and benefits of a proposal to the community and on existing and planned activity centres, including:

6.1 Demand Test

Demand for additional floorspace? / Does Proposal meet this demand?

The modelling results indicate that there is potential for the proposed development to retain a greater proportion of the market capture in supermarket spending and convenience retail spending.

The proposed development achieves this by retaining a greater proportion of supermarket spending and trips which are currently being captured by supermarkets in Albany City centre.

The retention of supermarket trips has a correlating effect on convenience retail spending, as convenience retail spending is often completed in conjunction with supermarket trips.

Therefore, fewer trips to Albany for convenience retail spending will result in a greater potential for Denmark Town Centre retailers to be able to capture the additional convenience retail spending.

6.2 Change of Role Test

How will Proposal impact the activity centre?

In the context of the existing distances associated with commercial consumer travel times – the distance of 500 metres from the town centre seems to be outweighed by the greater opportunities presented to all Denmark Town Centre retailers.

The proposed development will only provide a limited amount of additional convenience retail floor space compared to the existing convenience retail offer in the Town Centre.

In addition, the traditional concerns over the potential impact of a proposed development supermarket outside the town centre, is largely offset by the potential refit of the existing supermarket floor space for non-retail purposes.

The proposed development will therefore only create an additional 850sqm of supermarket floor space to the existing offer and an additional 500 sqm NLA of convenience retail offer.

The proposed development should not be assessed on its impact on shifting retail spending outside the town centre. It should instead be assessed as being responsible for re-introducing (retaining) additional retail spending available to all retailers in the Denmark Town Centre.

6.3 Viability and Vibrancy Test

How will the proposal impact the viability / vibrancy of other activity centres?

This issue is largely redundant once the issue of the proposed development is expected to have a positive effect on the Denmark Town Centre rather than a negative one.

The retention of spending from Albany Mt Barker and other locations will be insufficient and does not warrant consideration in relation to impact on vitality and vibrancy.

The only implication of the proposed development is that an estimated additional 155 person trips per day (57,000 person trips p.a.) will instead now shop in the Denmark Town Centre, creating greater vibrancy and vitality for the Denmark Town Centre.

6.4 Impact Reduction Test

Are any potential impacts reduced over the longer term?

The modelling has been based on current resident and visitor numbers and spending profiles. The increase in visitor and resident numbers and spending profiles in the catchment over the short, medium and longer terms will further add to the growth opportunities for all retailers in Denmark Town Centre.

6.5 Access to Services Test

What is the anticipated loss and/or gain of services to the community?
What is the anticipated impact on access to services by the community?

The proposed development represents a gain to the community by providing greater choice and convenient access to a wider range of goods and services that some residents currently consider necessary to travel to Albany to access.

As highlighted, the retention of an additional 155 person trips per day (57,000 person trips p.a.) represents a reduction of more than 6.25 M km of vehicle travel each year. And save residents and visitors an additional 57,000 hours of travel time p.a.

6.6 Employment Test

Will the proposal contribute to a net increase in employment?

Retail employment is a major contributor to any economy. On average one resident is employed for every 25 sqm NLA of retail floor space. The proposed development represents a net increase of 850 sqm NLA supermarket and 700 sqm NLA convenience retail. An additional 1,550 sqm NLA of retail has the potential to create an additional 62 full time equivalent jobs. Importantly, retail employment is over represented by residents with the following characteristics:

- Youth employment
- Part time employment
- Female employment
- Second household income employment
- Residents with limited access to vehicles/transport

6.7 Planning Objectives Test

Does the proposal align with the objectives and outcomes of SPP4.2 policy and the planning framework?

The findings from this Net Benefit Test indicate that the proposed development satisfies the objectives and outcomes established by SPP4.2 to deal with the assessment for out of centre developments.

The proposed development is expected to have an overall positive influence on residents and visitors' ability to access a wider range of goods and services within the Town Centre and without having to travel to Albany City Centre.

ACOUSTIC REPORT 1704042

of the

PROPOSED SHOPPING CENTRE DEVELOPMENT 90 SOUTH COAST HIGHWAY (Cnr Hardy St) DENMARK WA 6333



prepared for

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REFERENCES:

- A. Environmental Protection Act (Noise) Regulations 1997
- B. EPA Guidance for the Assessment of Environmental Factors - Environmental Noise No 8 draft, dated May 2007, page 19 Default Meteorological Conditions (re CONCAWE).
- C. Shire of Denmark GSJDAP/12, 12 June 2014,
 - Conditions: 1 b), 24, 25, 26, 27, 32
 - Advice Notes: 4 a), b), c), d).
- D. J. Prestipino Building Designs Pty Ltd, Architectural Drawing Schedule @ April 2017:

SHEET No.	SHEET NAME	SCALE	SHEET SIZE
A000	COVER	NA	A0
A001	EXISTING SITE PLAN	1:200	A0
A002	PROPOSED SITE LOCATION PLAN	1:200	A0
A003	PROPOSED SITE LANDSCAPE PLAN	1:200	A0
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A008	SECTIONS	1:100	A0

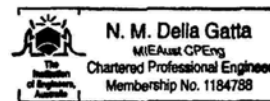
REVISIONS:

Revisions to the report compared to the previous report, if any, are contained in *italics* for the paper copy and in *blue italics* text for the PDF copy of the report.

Revision N°:	Date:	Comment	Status
0	28 April 2017	Development Application	Current

AUTHOR:

Nicolo (Nick) M. DELLA GATTA
BE (Mech) UWA
M.IEAust, M.AIE, M.AIRAH



EXECUTIVE SUMMARY

- 0.1 ND Engineering's opinion is that the Loading Dock, Mechanical Services and Refrigeration Equipment can comply with Reference A subject to the 'Assumptions, Limitations and Exclusions' and the implementation of the 'Recommendations'.
- 0.2 The principle outcomes of the assessment for the:
- a. **COMPACTOR**, there is no compactor briefed for this store.
- b. **LOADING DOCK**, see Annex L for full details, relates to the following:
- (1). Provide fixed and sliding noise walls, **top of wall RL 38.000**, to the Loading Dock area; and
 - (2). The large reticulated trucks shall follow the operation sequence contained in Annex L Table L1; and
 - (3). Total time from time of entry to reversing into the loading dock and shut down shall be less than 1 minute; and
 - (4). Engines and refrigeration equipment shall be shut down during unloading; and
 - (5). Signage to be provided for loading dock staff and service vehicle operators advising them to take care with regards to noise events such as shouting, revving of truck engines, banging, dropping of pallets, slamming of vehicle doors, etc; and
 - (6). Loading dock staff and service vehicle operators shall need to be trained to take care with regards to noise events such as shouting, revving of truck engines, banging, dropping of pallets, slamming of vehicle doors, etc; and
 - (7). Radios and other similar devices are not permitted within the loading dock area; and
 - (8). Refrigeration trucks that are capable of operating off mains power be provided with mains power in order to minimise truck engine operating noise when in the loading dock; and
 - (9). The metal deck roof of the loading dock shall have a minimum of 50 mm anticon applied to the underside of the roof, in direct contact with the metal roof; and
 - (10). The following shall be noted with regards to the loading dock being expected to:
- c. Not comply for
- (a). Comply for: Monday to Saturday 7am to 7pm; and
 - (b). Potentially comply for: Sunday & Public holiday 9am to 7pm subject to very short Entry to Loading Dock times; and.
 - (c). Not comply for: Evenings every day 7pm to 10pm; Monday to Saturday 10pm to 7am.

However, it should be noted that if the loading dock cycle from arrival on site to leaving the site is greater than 20 minutes then the tonality penalty may not apply in which case night time operation may comply. The easiest way to do this is to instruct the truck driver that he must not depart for 30 minutes after arriving on site. If this is to occur then the best way to confirm is to conduct some night time trials later.

c. **MECHANICAL SERVICES**, see Annex M for full details, relates to the following:

- (1). Provide a noise wall enclosure as per Figure M1 to the Plant/Condenser Deck; and
- (2). The top of all of the roof top mounted minor equipment not located in the Plant/Condenser Deck shall be located a minimum of 6000 mm from the parapet walls and shall be below the main building parapet wall height so that there is no direct line of sight to the roof top mounted equipment from any of the noise sensitive premises; and
- (4). All roof top condenser fans for air conditioning equipment shall be continuously modulating variable speed drive or inverter drive. Two step speed or Multi step speed or On/Off condenser fan speed control is not permitted; and
- (5). All roof top air conditioning equipment shall be resiliently mounted to minimise the transmission of noise and vibration into the supporting roof structure; and
- (6). All roof top ventilation fans be either variable speed drive or two step speed or multi step speed all under thermostatic or timer control or manual control. Single speed On/Off ventilation fans' speed control is not permitted; and
- (7). Sound Power Levels shall not exceed that contained in Table M1; and
- (8). A second acoustic report be undertaken at the time of Building Permit Application once the proposed details of the mechanical services are more fully documented.

d. **REFRIGERATION EQUIPMENT**, see Annex R for full details, relates to the following:

- (1). Provide a noise wall enclosure as per Figure M1 to the Plant/Condenser Deck; and
- (2). The top of all of the roof top mounted minor equipment not located in the Plant/Condenser Deck shall be located a minimum of 6000 mm from the parapet walls and shall be below the main building parapet wall height so that there is no direct line of sight to the roof top mounted equipment from any of the noise sensitive premises; and
- (4). Two step or Multi step speed or On/Off condenser fan speed control is not permitted; and
- (5). All roof top refrigeration equipment shall be resiliently mounted to minimise the transmission of noise and vibration into the supporting roof structure; and
- (6). Sound Power Levels shall not exceed that contained in Table R1; and
- (7). A second acoustic report be undertaken at the time of Building Permit Application once the proposed details of the refrigeration equipment are more fully documented.

0.3 **NOISE MANAGEMENT PLAN** for the construction phase to be prepared by the Builder's acoustic consultant.

0.4 **FUTURE TENANCIES** will each require acoustic assessments to be provided at fitout to assess their particular requirements. Preliminary advice has been provided in Annex F.

0.5 Further details are contained in the recommendations in the report including the relevant annexes.

INTRODUCTION

Preamble

- 1.1 This report covers noise emissions for the Loading Dock, Mechanical Services and Refrigeration Equipment associated with the proposed supermarket.
- 1.2 Preliminary advice has also been provided for:
 - a. Future tenancies; and
 - a. A construction Noise Management Plan.

Building Description

- 1.2.1 The site location is located at the corner of South Coast Highway and Hardy Street, Denmark WA.
- 1.2.2 The proposed development comprises:
 - a. Supermarket to IGA requirements;
 - b. Roof mounted equipment platform (and roof equipment wells for future tenancies);
 - c. Back of House (BOH) building and associated loading dock; and
 - d. Proposed tenancy buildings for future tenancies.
- 1.2.3 The nearest noise sensitive premises, for the purposes of this acoustic assessment, are the noise sensitive premises:
 - a. Residential premises adjoining to the North of the site;
 - b. Residential premises across to the West of Hardy Street;
 - b. Childcare centre to the South of South Coast Highway.
- 1.2.4 See Annex B for more details.

ASSUMPTIONS, LIMITATIONS AND EXCLUSIONS

- 2.1 The following assumptions, known limitations and conditions are made:
- a. The proposed building is correctly constructed, and maintained in good ongoing condition, in accordance with the Building Code of Australia and State Regulations, and
 - b. That building components are fabricated and installed in accordance with suppliers and/or manufacturer's requirements; and
 - c. That equipment and plant are installed and operated in accordance with suppliers and/or manufacturers requirements; and
 - d. Reversing beepers on loading dock vehicles is a mandatory work related safety requirement and are therefore excluded from the noise regulations assessment; and
 - e. The assessment is limited to the generic mechanical services details as per Annex M; and
 - f. The assessment is limited to generic refrigeration equipment details as per Annex R; and
 - g. Other assumptions, limitations and exclusions contained within the annexes; and
- 2.2 The report is limited to the
- a. Future Tenancies see Annex F (NB preliminary advice only).
 - b. Loading Dock see Annex L.
 - c. Mechanical Services see Annex M.
 - d. Noise Management Plan see Annex N (NB preliminary advice only).
 - e. Refrigeration Equipment see Annex R.

ASSESSMENT

3.1 The assessment comprises:

Assigned Noise Level	see Annex A.	
Future Tenancies	see Annex F	(NB preliminary advice only).
Loading Dock	see Annex L.	
Mechanical Services	see Annex M.	
Noise Management Plan	see Annex N	(NB preliminary advice only).
Refrigeration Equipment	see Annex R.	

3.2 **Please note that where ND Engineering provides advice or expresses an opinion with regards to compliance with all or part of Reference A the Noise Regulations this advice/opinion is always subject to the 'Assumptions, Limitations and Exclusions' and the implementation of the 'Recommendations'**

Assigned Noise Levels - Assessment

3.2.1 Essentially the assigned noise levels of interest are:

- a. LA10 = 46 dB(A) which occurs during the Daytime 0700-1900 hours Monday to Saturday; and
- b. LA10 = 41 dB(A) which occurs during the Daytime 0900-1900 hours Sunday & Public holidays and Evenings 1900-2200 hours all days; and
- c. LA10 = 36 dB(A) which occurs during the Night 2200-0700 hours Monday to Saturday and 0900-1900 hours Sunday & Public holidays.

3.2.2 See Annex A for details.

Future Tenancies - Assessment

3.3 See Annex F for details and preliminary recommendations noting that a separate acoustic assessment will be required by each tenant to suit their particular requirements.

Loading Dock - Assessment

3.4 See Annex L for details and recommendations.

Mechanical Services - Assessment

3.5 See Annex M for details and recommendations.

Noise Management Plan - Assessment

3.6 The noise management plan is essentially in outline format, for guidance purposes, with the final details to be complete by the Builder's acoustic consultant. See Annex N for more details and recommendations.

Refrigeration Equipment - Assessment

3.7 See Annex R for details and recommendations.

CONCLUSION

4. ND Engineering's opinion is that the Loading Dock, Mechanical Services and Refrigeration Equipment can comply with Reference A subject to the 'Assumptions, Limitations and Exclusions' and the implementation of the 'Recommendations' contained within this report including the relevant annexes.

RECOMMENDATIONS

5.1 The following recommendations are made:

- a. Future Tenancies. see Annex F (NB Preliminary advice only).
- b. Loading Dock, see Annex L.
- c. Mechanical Services, see Annex M.
- d. Noise Management Plan, see Annex N (NB preliminary advice only).
- e. Refrigeration Equipment, see Annex R.

5.2 The recommendations presented in this report are in outline format only and require:

- a. Detailed final design of components by appropriately experienced persons in accordance with the current relevant editions of Australian Standards, Regulations, Gas Code/s and the NCC/BCA.
- b. Completion of minor details on site by competent and qualified tradesmen and technicians.
- c. New materials and equipment: shall be installed in accordance with the manufacturer's and/or supplier's instructions; and shall also comply and be installed in accordance with the NCC/BCA.
- d. Installer of materials and/or equipment shall comply with: Regulatory safety requirements. The safety procedures on the relevant Materials Safety Data Sheets (MSDS). The site safety requirements including the wearing of protective clothing such as safety boots, safety glasses, safety goggles and hard hats.
- e. A site inspection to fully determine the extent of the work and the nature of the site.
- f. A professional Structural Engineer shall be engaged to provide structural advice on any recommendations that impose additional loads on the building structure.
- g. A Building Designer and/or Builder shall be engaged to arrange for development application, building licence and any documentation and submissions required by the local government authority.

ANNEXES:

- A. ASSIGNED NOISE LEVELS.
- B. BUILDING DRAWINGS.
- F. FUTURE TENANCIES (NB preliminary advice only).
- L. LOADING DOCK.
- M. MECHANICAL SERVICES.
- N. NOISE MANAGEMENT PLAN (NB preliminary advice only).
- R. REFRIGERATION EQUIPMENT.

ANNEX A – ASSIGNED NOISE LEVELS

- A1. The Assigned Noise Level (ANL) comprises a Base Noise Level (BNL) and Influencing Factor (IF) calculated in order to account for increases over the BNL associated with the local environment associated with commercial and industrial premises. The IF is based on Shire of Denmark planning scheme zoning. The resulting IF is for the noise sensitive premises immediately surrounding the shopping centre and is shown in the table below.

INFLUENCING FACTOR CRITERIA			ASSESSMENT		
Item	Criteria	Value	Criteria	Value	Totals
Major Road within the					0
- 100 m radius inner circle	veh/day > 15000	6 dB	-	0	(Transport Factor ≤ 6)
- 450 m radius outer circle		2 dB	-	0	
Secondary (Minor) Road within the					
- 100 m radius inner circle	15k > veh/day > 6k	2 dB	-	0	
Type A 'Industrial and Utility premises' within the					
- 100 m radius inner circle	1/10 x Area%	≤ 10	0 %	0	
- 450 m radius outer circle	1/10 x Area%	≤ 10	0 %	0	
Type B 'Commercial premises' within the					
- 100 m radius inner circle	1/20 x Area%	≤ 5	17 %	0.9	
- 450 m radius outer circle	1/20 x Area%	≤ 5	6 %	0.3	
INFLUENCING FACTOR = 1 dB(A)					

- A2. The following ANL table for the residences to the North and East of the proposed supermarket includes an IF = 4 dB(A).

Noise sensitive premises at locations within 15 m of a building directly associated with a noise sensitive use.	Time of day		Assigned Noise Levels dB(A)		
			L _{A10}	L _{A1}	L _{Amax}
	Day	0700-1900 hrs Monday to Saturday	46	56	66
			72 hrs/wk		
		0900-1900 hrs Sunday, Public holidays	41	51	
	Evenings	1900-2200 hrs all days	31 hrs/wk		56
	Night	2200-0700 hrs Monday to Saturday	36	46	
		2200-0900 hrs Sunday, Public holidays	65 hrs/wk		

End Annex A

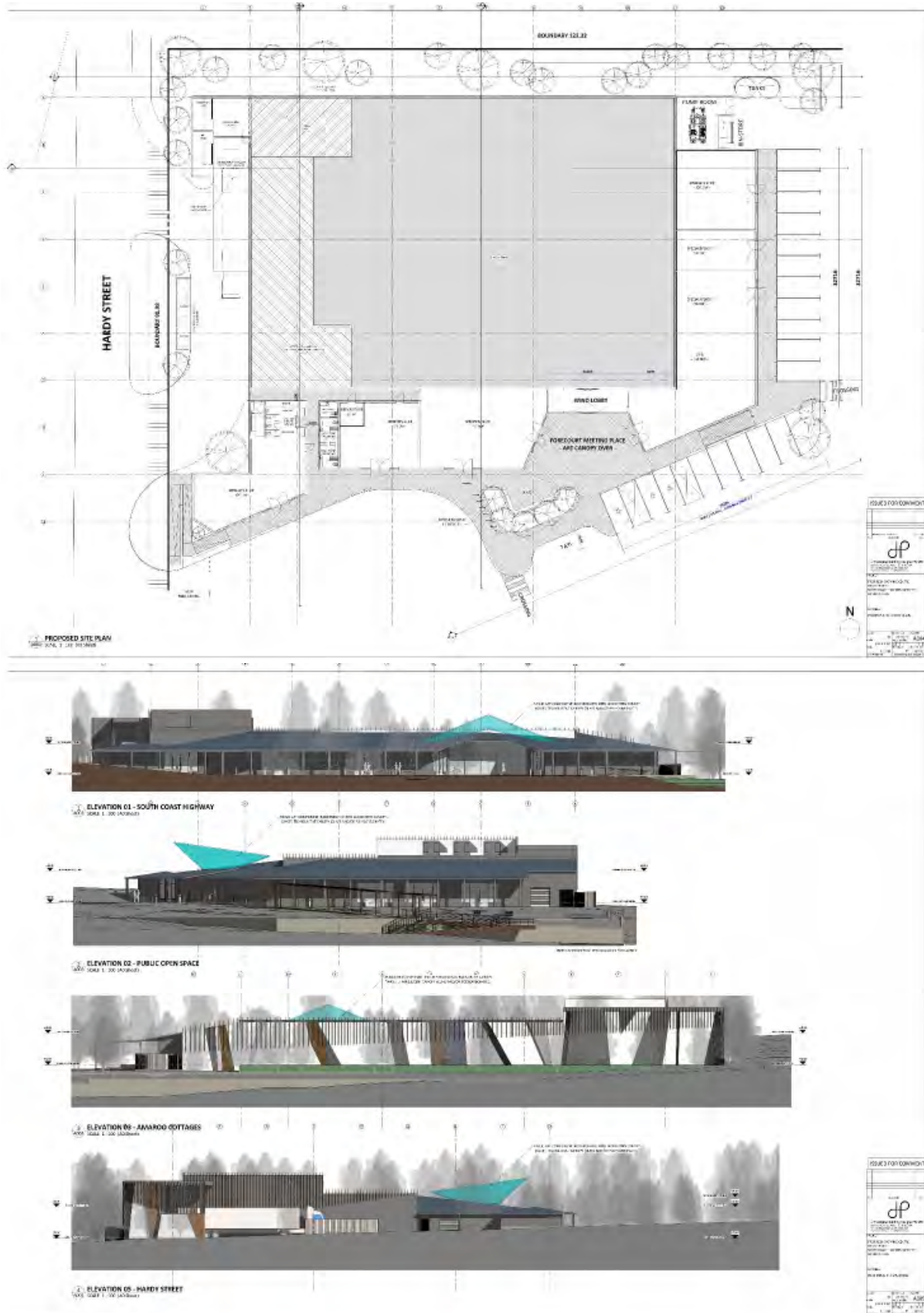
Annex B – BUILDING DRAWINGS

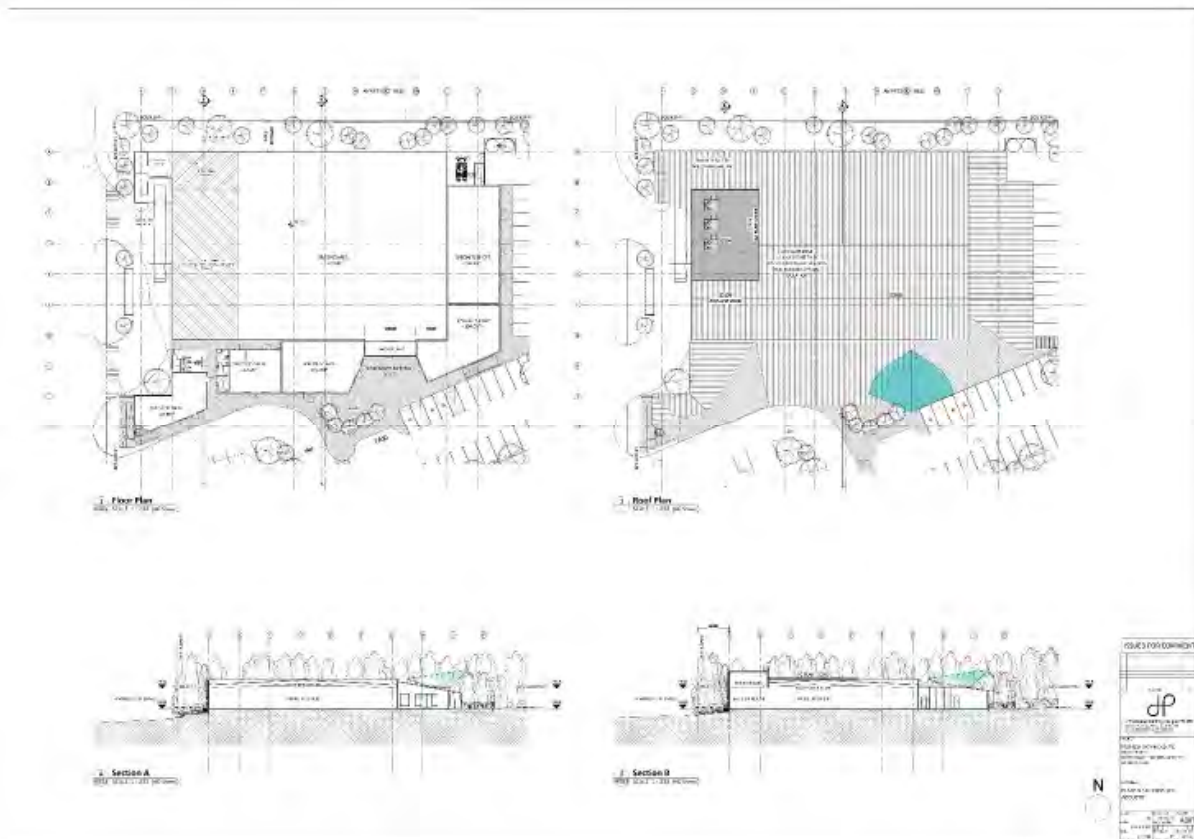
B1. This annex contains the following drawings:

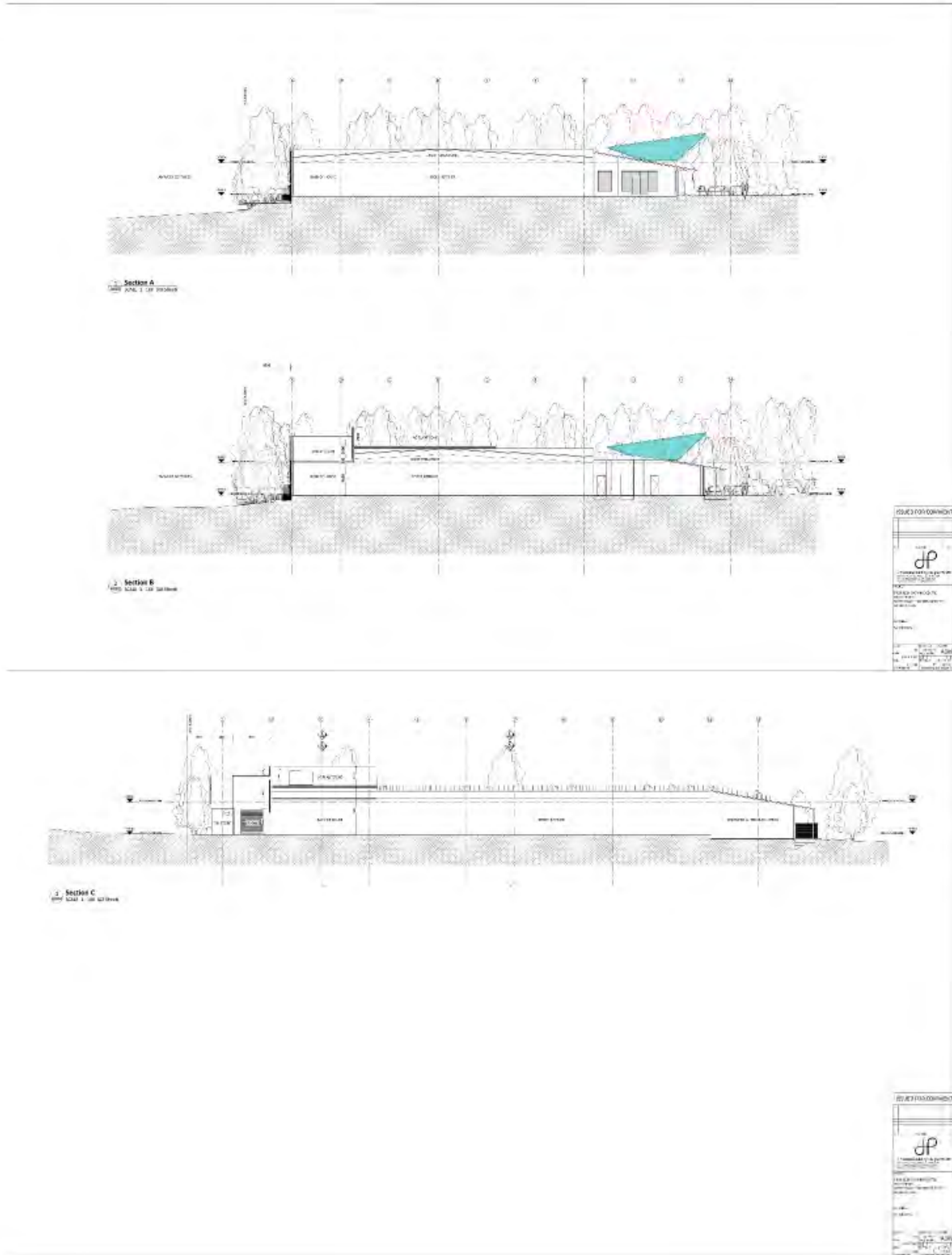
SHEET No.	SHEET NAME	SCALE	SHEET SIZE
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A002	PROPOSED SITE LOCATION PLAN	1:200	A0
A003	PROPOSED SITE LANDSCAPE PLAN	1:200	A0
A004	PROPOSED FLOOR PLAN	1:100	A0
A005	BUILDING ELEVATIONS	1:100	A0
A006	PERSPECTIVE VIEWS	NA	A0
A007	ACOUSTIC DRAWINGS	1:200	A0
A008	SECTIONS	1:100	A0

B2. The drawings do not show any recommendations.









End Annex B

Annex F - FUTURE TENANCIES

- F1.1 The assessments contained in this report, other than Annex F, are for the purposes of the IGA facilities and are not intended to be applied to the future tenancies.
- F1.2 All future tenancies will require their own acoustic assessment to be done as part of their fitout and tenancies operating during the Evenings, Sundays and Public holidays will also need a Noise Management Plan.
- F1.3 Future tenancies could include but are not limited to the following:
- a. Non-food associated use including but not limited to:
 - Bank
 - Office
 - Veterinary Consulting Rooms
 - Betting Agency
 - Consulting Rooms
 - Health Studio
 - Medical Centre.
 - b. Food associated uses including but not limited to:
 - Convenience Store
 - Lunch Bar
 - Shop
 - Fast Food Outlet
 - Restaurant/Cafe.
- F3.1 The following preliminary advice is provided regarding refrigeration and mechanical services:
- a. Non-food associated use should not have any significant impact as is assumed that they will only have:
 - (1) A toilet ventilation system with fan speeds below 960 RPM and located in the two **roof wells**; and
 - (2) Split INVERTER air conditioning systems located in the two **roof wells**;
 - b. Food associated uses will have the same requirements as for non-food associated uses but with the following additional considerations:
 - (1) Kitchen exhaust fans will need to be vertical discharge, low fan speed below 960 RPM, have two speed operation, located in the two **roof wells**;
 - (2) Refrigeration equipment, to be located in the two **roof wells**, will need to be low noise type suitable for use in a residential environment, vertical condenser fan discharge, variable speed condenser fans' head pressure controlling all condenser fans simultaneously, reciprocating compressors are not permitted, compressors shall be rotary type;
 - (3) Alfresco areas will require a Noise Management Plan to include addressing music and patron behaviour in particular for evening or night usage.
 - c. Indicative roof well locations and section are contained in Figures F.1 and F.2.
 - d. Sound power levels have currently been set at 70 dB(A) for the purposes of noise modelling with indicative noise contours are contained in annex M – Mechanical Services.

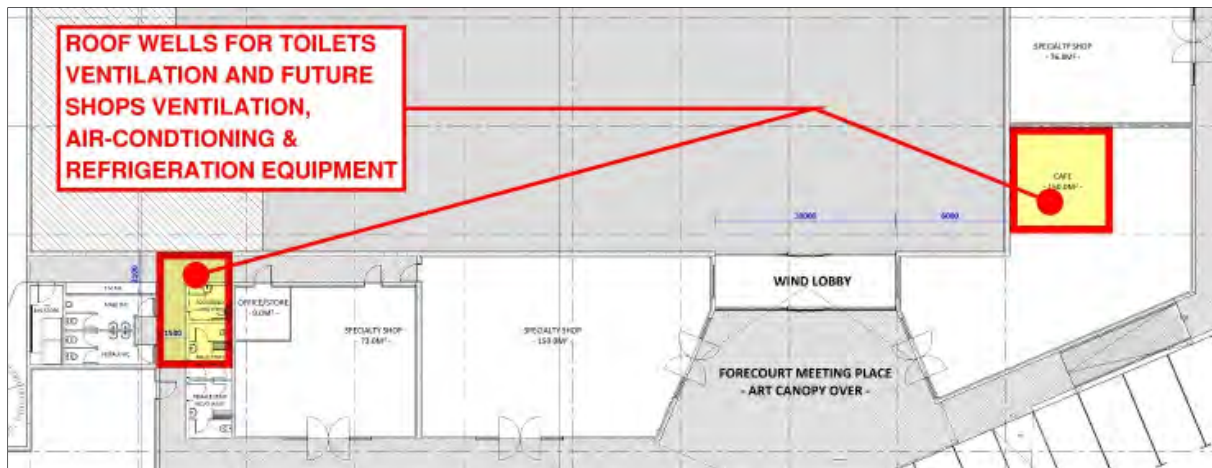


FIGURE F.1 – ROOF WELLS NOMINAL LOCATION



FIGURE F.2 – ROOF WELL NOMINAL SECTION

End of Annex F

Annex L – LOADING DOCK

L1.1 The Loading Dock (LD) assessment is based on the following:

- a. The following activities being exempt from Reference A:
 - (1) Noise emissions from vehicles on footpaths, cross overs and public roads all as defined in Section 5(1) of the Road Traffic Act 1974. Refer Reference A Regulation 3 (a).
 - (2) Reversing beepers on vehicles is a warning device required by Acts and Regulations in particular those associated with Worksafe. Refer Reference A Regulation 3 (c).
- b. Operation of the loading dock is generally as per Annex O – Operational Matters.
- c. The operating sequence for a large reticulated truck as per the following tabulation:

TABLE L1 – OPERATION SEQUENCE (LARGE RETICULATED TRUCK)					
From	To	Motion	Distance	Velocity	Time Allocation
Entry	Reversing position	Forward	29 m	2.2 m/s	15 seconds
Reversing position	Loading Dock	Reversing	14 m	1.4 m/s	10 seconds
Loading Dock	Exit	Forward	24 m	1.4 m/s	20 seconds
Total time from ENTRY to LOADING DOCK = 25 seconds < 30 seconds					

L1.2 The assessment is carried out in the following figures:

- a. Appendix L1 – Weekdays.
- b. Appendix L2 – Sunday & Public Holidays.
- c. Appendix L3 – Evenings.

L1.3 The assessment is based on the minimum representative assessment period of 15 minutes as required by Reference A, Noise Regulations, however the total cycle time could be as high as 40 minutes which means that the tonality penalty applied to the assessment figures would be removed resulting in all noise levels to drop by 5 dB(A). As a consequence the assessments are considered to be conservative.

L1.4 The assessments are subject sensitivity analysis of comparing the LA10 assessment with a LAmax assessment because as the operational time frame from entry to loading dock decreases the LA10 becomes less critical.

L2.1 The following discussion points are made:

- a. There are a variety of vehicles providing a delivery services to the Loading Dock (LD). The most critical vehicles would be a large reticulated delivery truck with a Sound Power Level (SWL or Lw) of Lw = 97 dB(A) or Sound Pressure Level (SPL or Lp) of Lp = 69 dB(A) @ 10 metres in an open area. Other vehicles such as small rigid trucks and light vehicles would have substantially lower noise

levels and provided they adhere to the same regime as for the large reticulated trucks then there should be no issues associated with these vehicles.

- b. The delivery vehicles are to enter the loading dock area at the North Eastern entry at a signed speed limit of 8 kilometres per hour (kph) which is equivalent to 2.2 metres per second (m/s). Reversing movements into the loading dock is expected to be at walking speed of 5 kilometres per hour (kph) which is equivalent to 1.4 metres per second (m/s).
- c. Observations at other loading docks shows that the from the moment the delivery vehicle commences reversing and then final shut down is usually less than 1 minute with a driver experienced with the loading dock.
- d. Behavioural issues for the loading dock during movement along the service road, departure, reversing and unloading need to managed. Behavioural issues including excessive revving of engines, rapid acceleration, exceeding the speed limit, shouting, playing radios, dropping pallets into the ground are often the source of complaint as they will often create high noise level events that annoy and in particular cause startling of the nearby residences from their sleep.

L3.1 The following LOADING DOCK recommendations are made:

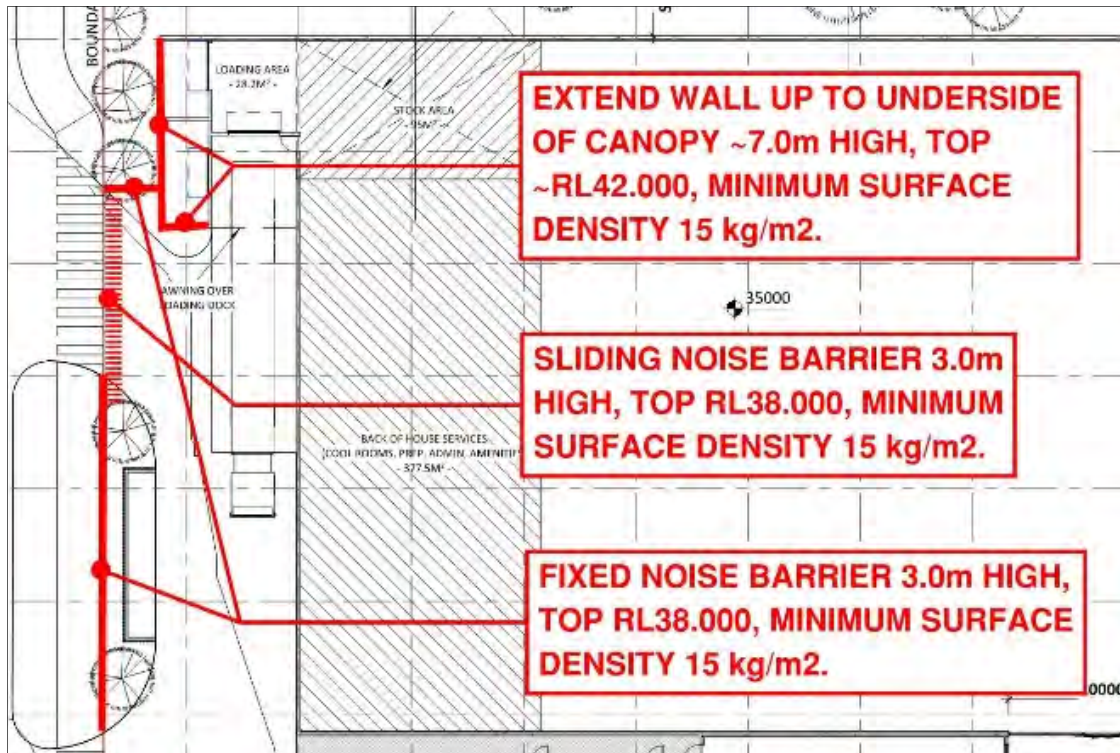
- a. The large reticulated trucks shall follow the operation sequence contained in Table L1; and
- b. Total time from time of entry to reversing into the loading dock and shut down shall be less than 30 seconds; and
- c. Engines and refrigeration equipment shall be shut down immediately prior to and during unloading; and
- d. Signage to be provided for loading dock staff and service vehicle operators advising them to take care with regards to noise events such as shouting, revving of truck engines, banging, dropping of pallets, slamming of vehicle doors, etc; and
- f. Loading dock staff and service vehicle operators shall need to be trained to take care with regards to noise events such as shouting, revving of truck engines, banging, dropping of pallets, slamming of vehicle doors, etc; and
- g. Radios and other similar devices are not permitted within the loading dock area; and
- h. Refrigeration trucks that are capable of operating off mains power be provided with mains power in order to minimise truck engine operating noise when in the loading dock; and.
- i. The metal deck roof of the loading dock shall have a minimum of 50 mm anticon applied to the underside of the roof, in direct contact with the metal roof; and
- j. Provide both fixed and sliding noise walls as per Figure L.1.

L3.2 The following shall be noted with regards to the loading dock being expected to:

- a. Comply for: Monday to Saturday 7am to 7pm; Sunday & Public holiday 9am to 7pm; and.
- b. Potentially comply for: Sunday & Public holiday 9am to 7pm subject to very short Entry to Loading Dock times; and.
- c. Not comply for: Evenings every day 7pm to 10pm; Monday to Saturday 10pm to 7am.

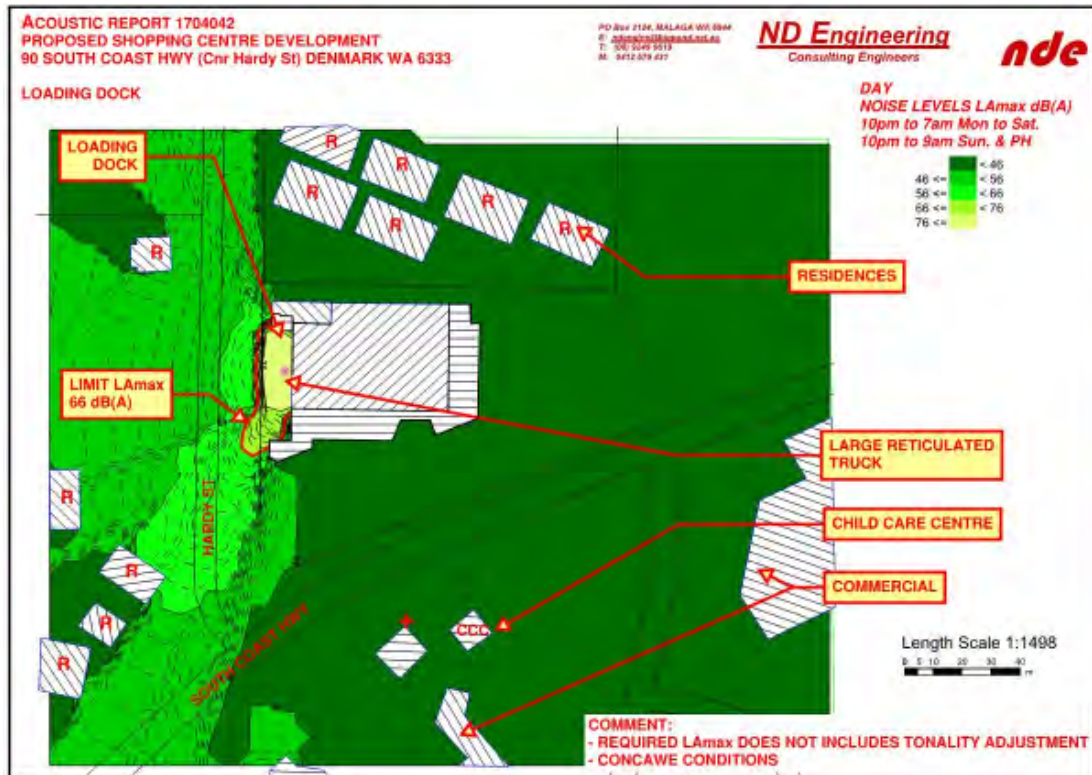
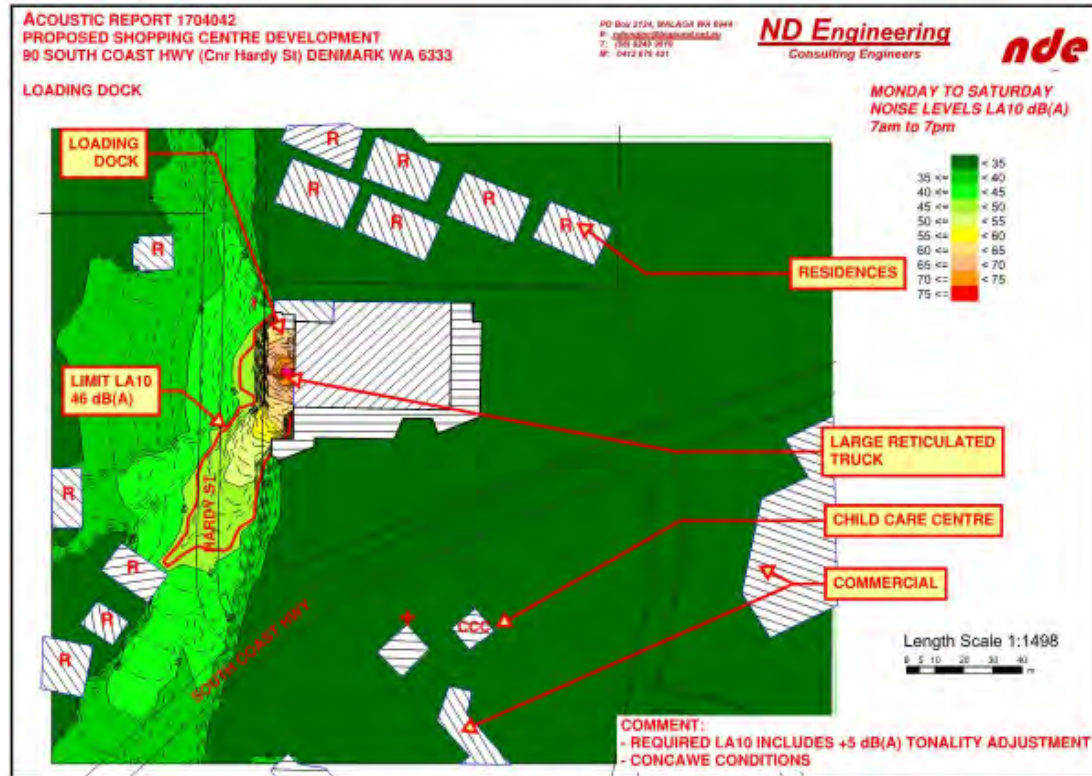
NB: if the loading dock cycle from arrival on site to leaving the site is greater than 20 minutes then the tonality penalty may not apply in which case evening operation may comply. The easiest way to

do this is to instruct the truck driver that he must not depart for 30 minutes after arriving on site. If this is to occur then the best way to confirm is to conduct some night time trials later.



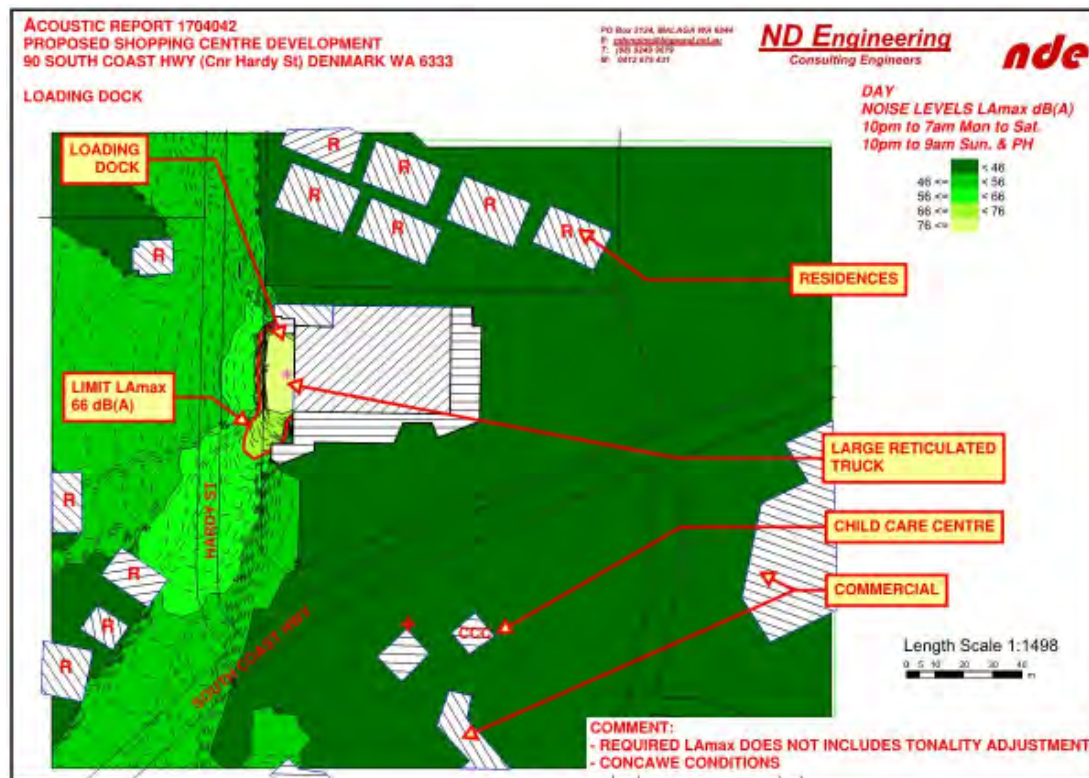
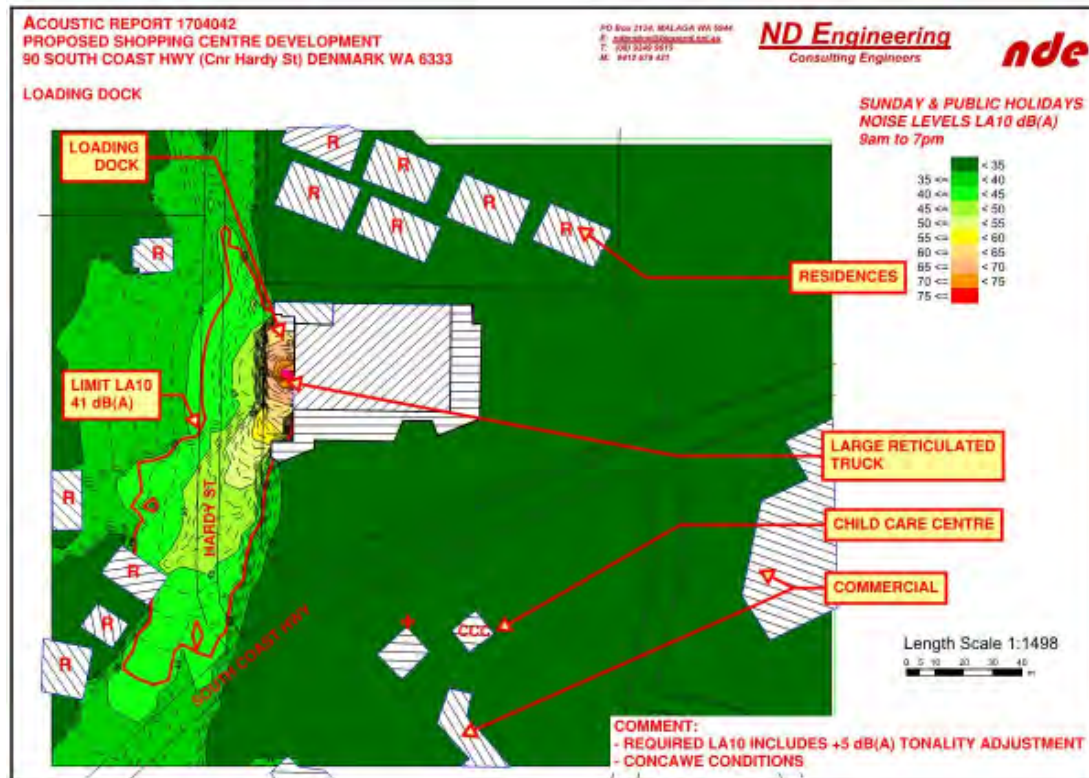
FIGURES L.1 – LOADING DOCK NOISE WALLS

Appendix L1 - WEEKDAYS



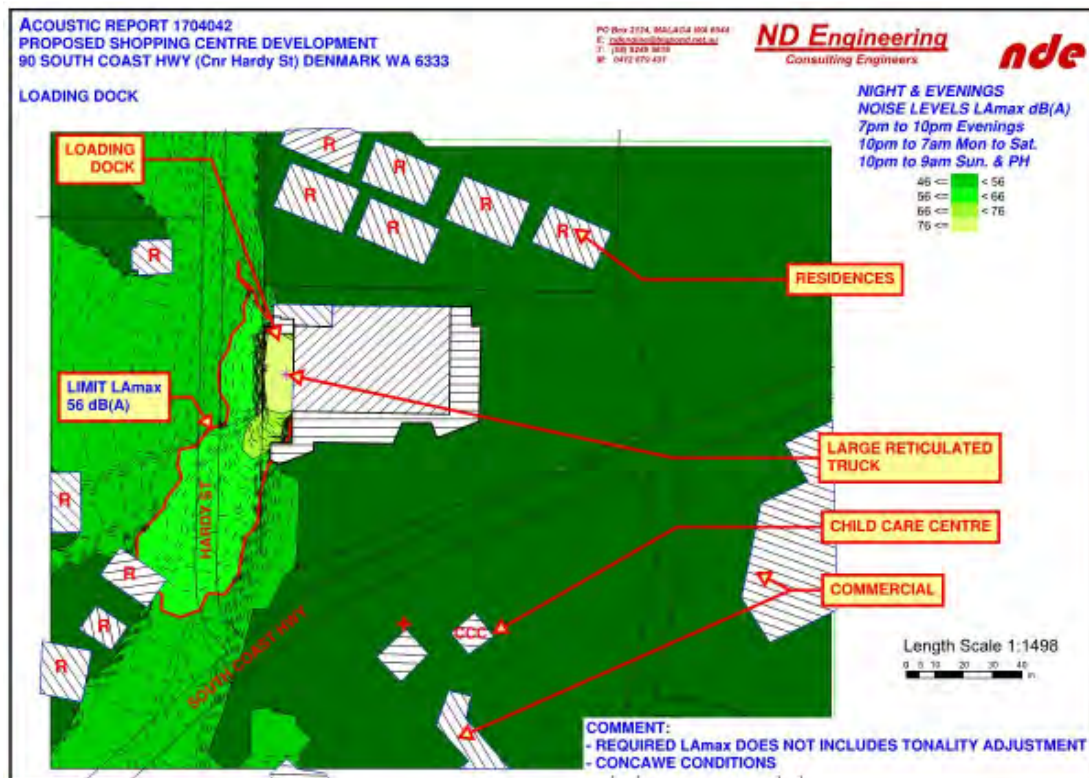
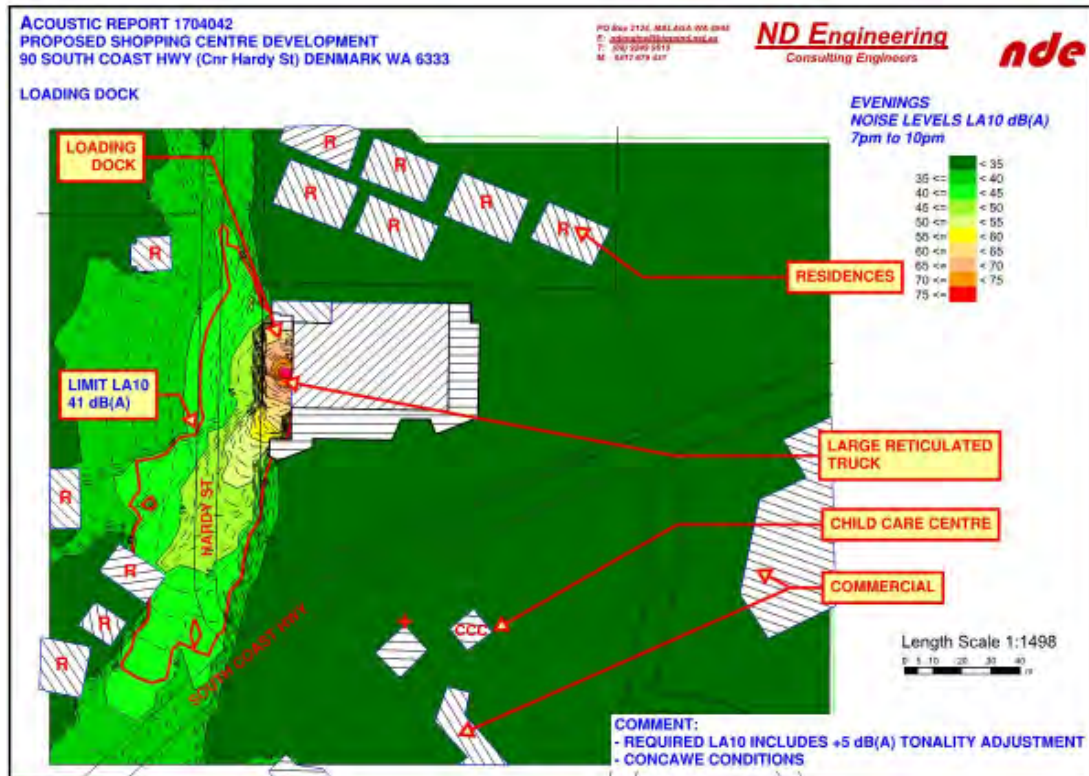
FIGURES L1.1 – WEEKDAYS LA10 & L_{max}

Appendix L2 – SUNDAY & PUBLIC HOLIDAYS



FIGURES L2 – SUNDAY & PUBLIC HOLIDAYS

Appendix L3 - EVENINGS



FIGURES L3 – EVENINGS

ANNEX M – MECHANICAL SERVICES

- M1. The assessment is carried out in the following figures:
- a. TABLE M1 GENERIC MECHANICAL SERVICES EQUIPMENT DATA
 - b. FIGURE M.1 PLANT/CONDENSER DECK SECTION
 - b. FIGURE M.2 MONDAY TO SATURDAY DAY TIME ASSESSMENT.
 - c. FIGURE M.3 SUNDAY & PUBLIC HOLIDAYS DAY TIME ASSESSMENT.
 - c. FIGURE M.4 EVENINGS ASSESSMENT.
 - c. FIGURE M.5 NIGHT TIME ASSESSMENT.
- M2. ND Engineering's opinion is that the generic mechanical services currently assessed comply with the Reference A the Noise Regulations at all times subject to 'Assumptions, Limitations and Exclusions' and 'Recommendations':
- M3. The following MECHANICAL SERVICES recommendations are made:
- a. The top of all of the Plant/Condenser Deck equipment shall be less than nominally RL47.000 with the surrounding wall at RL49.000. See Figure M1; and
 - b. The top of all of the roof top mounted minor ventilation equipment not located in the Plant/Condenser Deck shall be located a minimum of 6000 mm from the parapet walls and shall be below the main building parapet wall height so that there is no direct line of sight to the roof top mounted equipment from any of the noise sensitive premises; and
 - c. All roof top condenser fans for air conditioning equipment shall be continuously modulating variable speed drive or inverter drive; and.
 - d. Two step speed or Multi step speed or On/Off condenser fan speed control is not permitted; and
 - e. All roof top air conditioning equipment shall be resiliently mounted to minimise the transmission of noise and vibration into the supporting roof structure; and
 - f. All roof top ventilation fans be either variable speed drive or two step speed or multi step speed all under thermostatic or timer control or manual control; and
 - g. Single speed On/Off ventilation fans' speed control is not permitted; and
 - h. Sound Power Levels shall not exceed that contained in Table M1; and
 - i. Provide a noise wall surrounding the entire Plant/Condenser Deck as per Figure M1; and
 - i. A second acoustic report be undertaken at the time of Building Permit Application once the proposed details of the mechanical services are more fully documented.

- M4. The mechanical services data, based on a generic design, and associated comments are contained in the following table.

TABLE M1 – GENERIC MECHANICAL SERVICES EQUIPMENT DATA	
DESCRIPTION	COMMENT
Back of House exhaust	<p>Exact details unknown at Development Application Stage with details to be fully developed at Building Permit Stage.</p> <p>Minor fans for staff, store and toilet are expected to be low risk fans.</p> <p>Major fans for Back of House, Cold Aisle and Hoods are high risk and would require a separate assessment but essentially would require fans to be located below parapet wall height, multi or variable speed operation, fan speeds 6 pole ~960 rpm or lower.</p> <p>ND Engineering recommends that a second acoustic report be undertaken at the time of Building Permit Application once the proposed details of the development are more fully documented.</p>
Cold Aisle Return Air Fan	
Hood/s Exhaust	
Hood/s Supply	
Staff Room Exhaust	
Store Room Exhaust	
Toilet Exhaust	
Supermarket AC Units	<p>The generic design typically includes three (3) air conditioning condensing units CU-1, CU-2 and CU-3.</p> <p>The radiated Sound Pressure Level (SPL or Lp), and equivalent Sound Power Level (SWL or Lw), of each of these condensers is as follows:-</p> <p>Retail Area Condenser (CU-1) in use 8am to 8pm, SPL = 68dB(A) at 1m away & 1.5m off the slab, SWL = 76dB(A).</p> <p>Back of House Condenser (CU-2) in use 24/7, SPL = 59dB(A) at 1m away & 1.5m off the slab, SWL = 67dB(A).</p> <p>Outside Air Pre-Conditioner Condenser intermittent use (maintain CO₂ levels within the Retail Area SPL = 61dB(A) at 1m away & 1.5m off the slab, SWL = 69dB(A).</p>

- M5. The mechanical services plant details are contained in the following figure. The critical features essential to compliance with the noise regulations are the RL heights of the mechanical equipment and the noise wall.

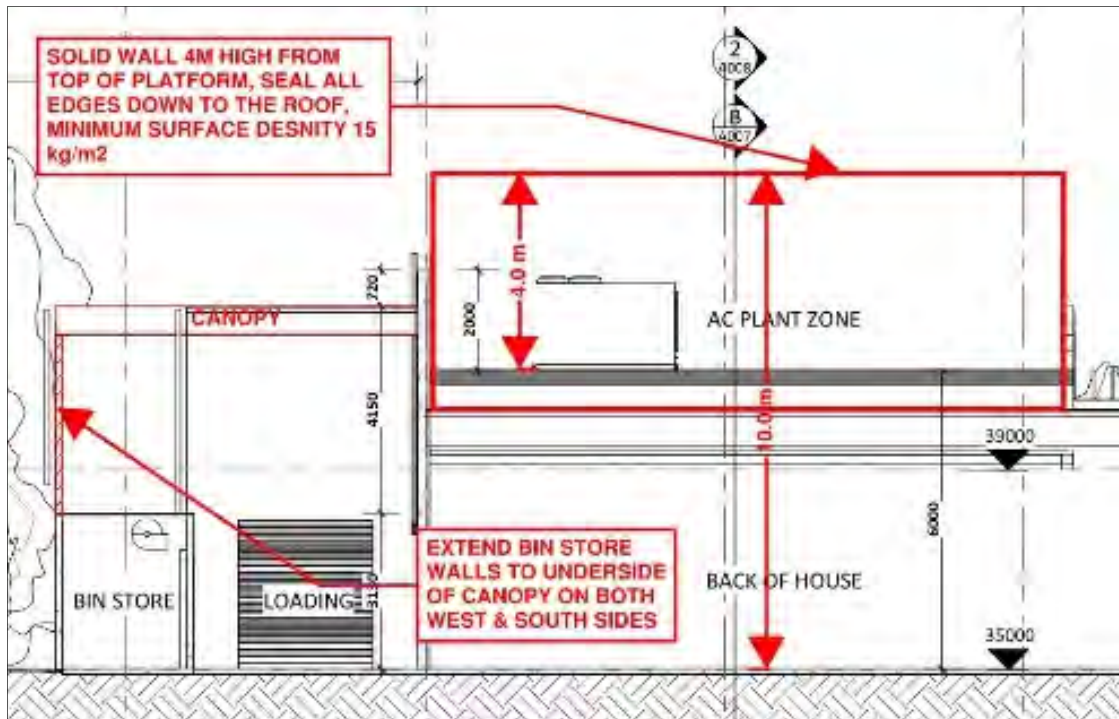


FIGURE M1 – PLANT/CONDENSER DECK NOTIONAL SECTION - (NTS)

- M6. The outcomes of the noise modelling assessment are shown in Figure M2 and Figure M3 on the following pages.

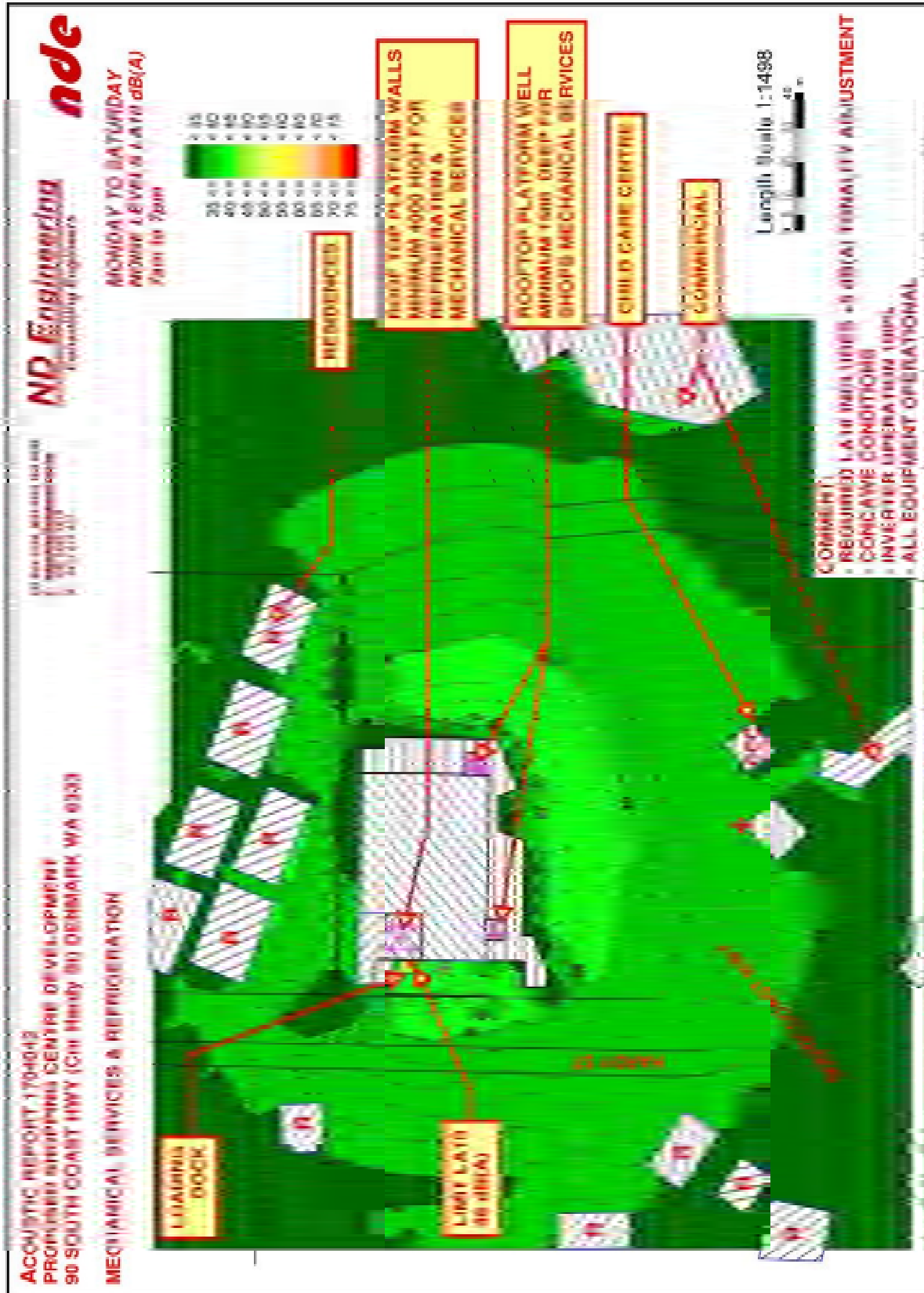


FIGURE M2 – MONDAY TO SATURDAY DAY TIME ASSESSMENT

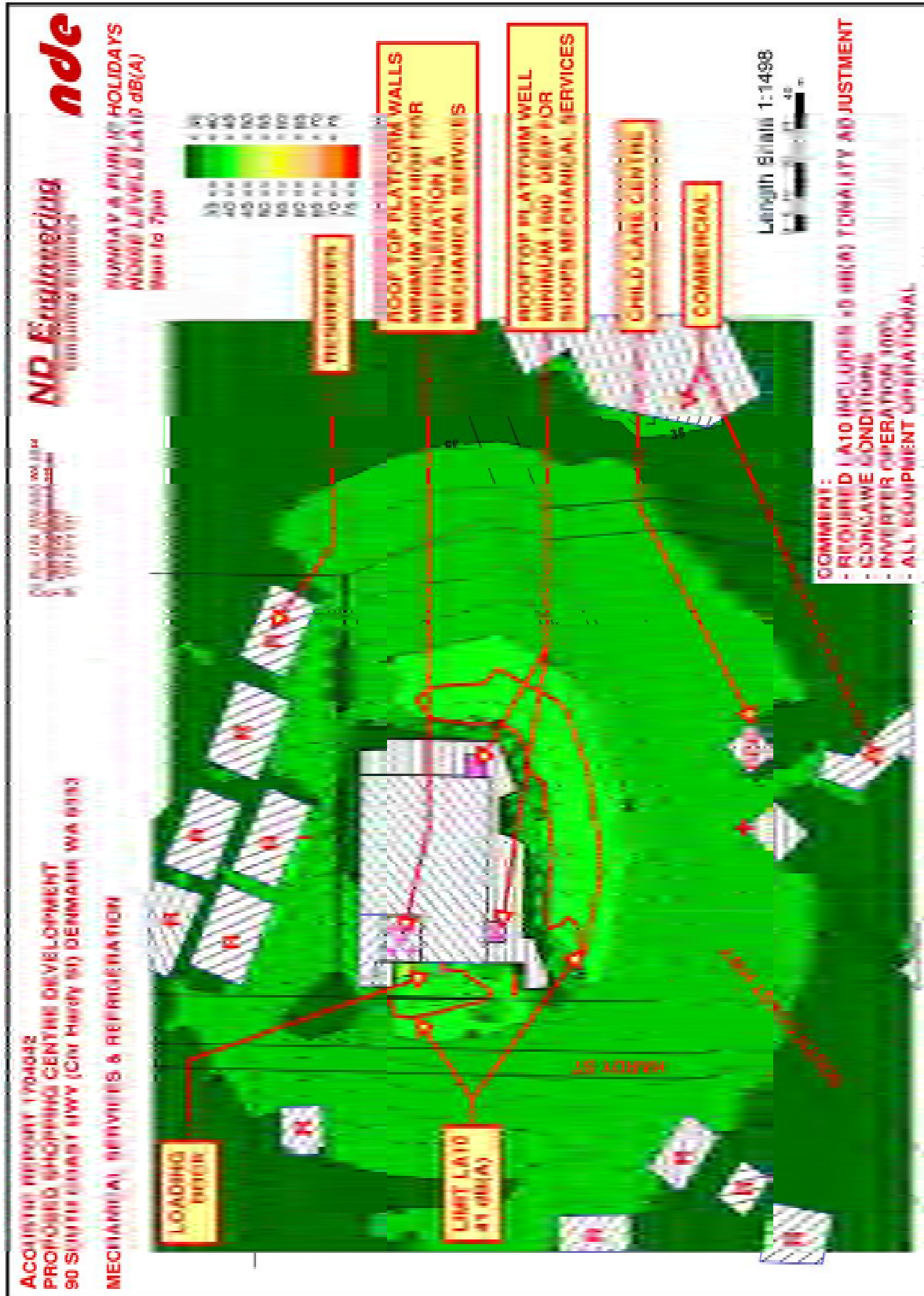


FIGURE M3 – SUNDAY & PUBLIC HOLIDAYS DAY TIME ASSESSMENT

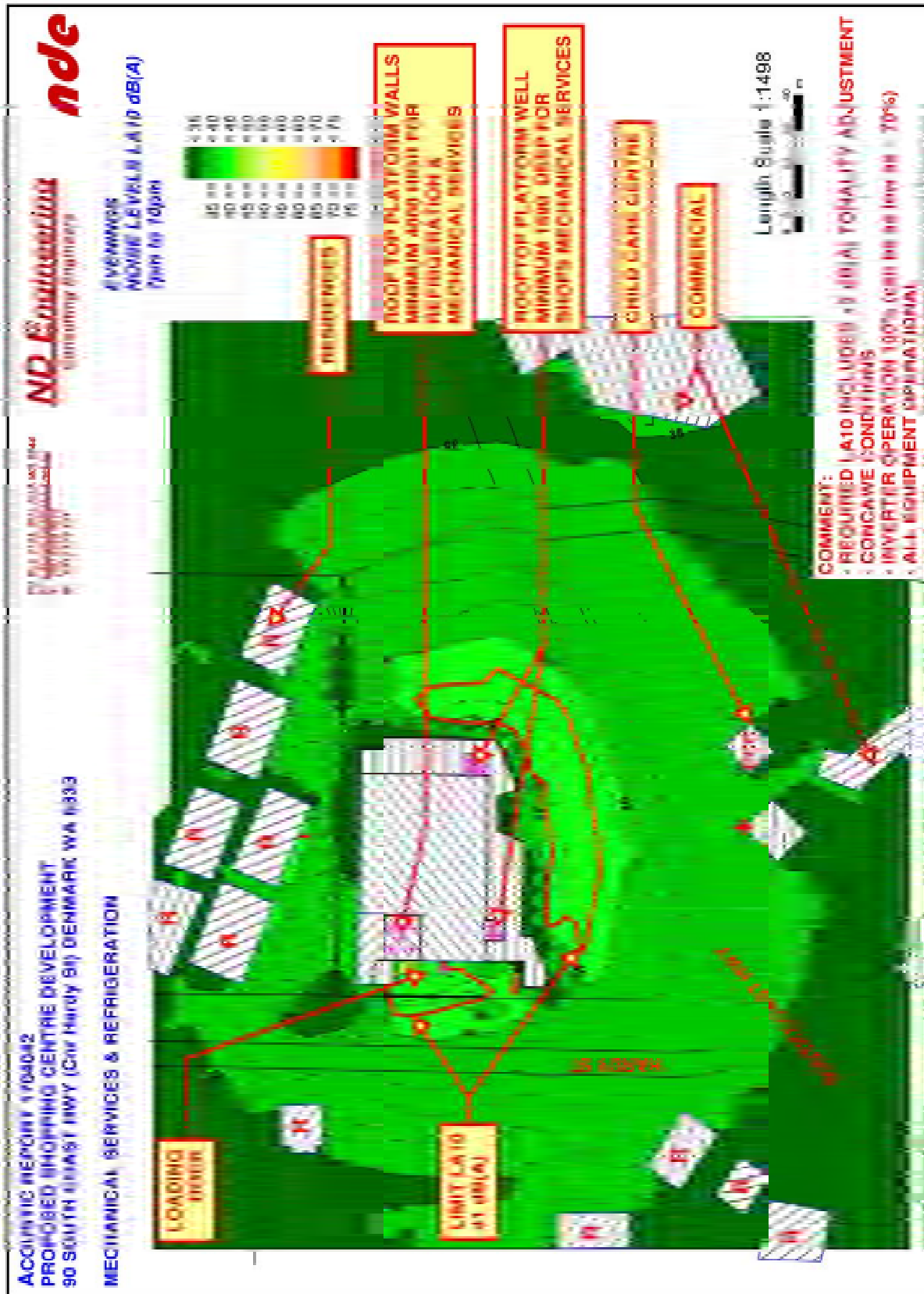


FIGURE M4 – EVENING ASSESSMENT

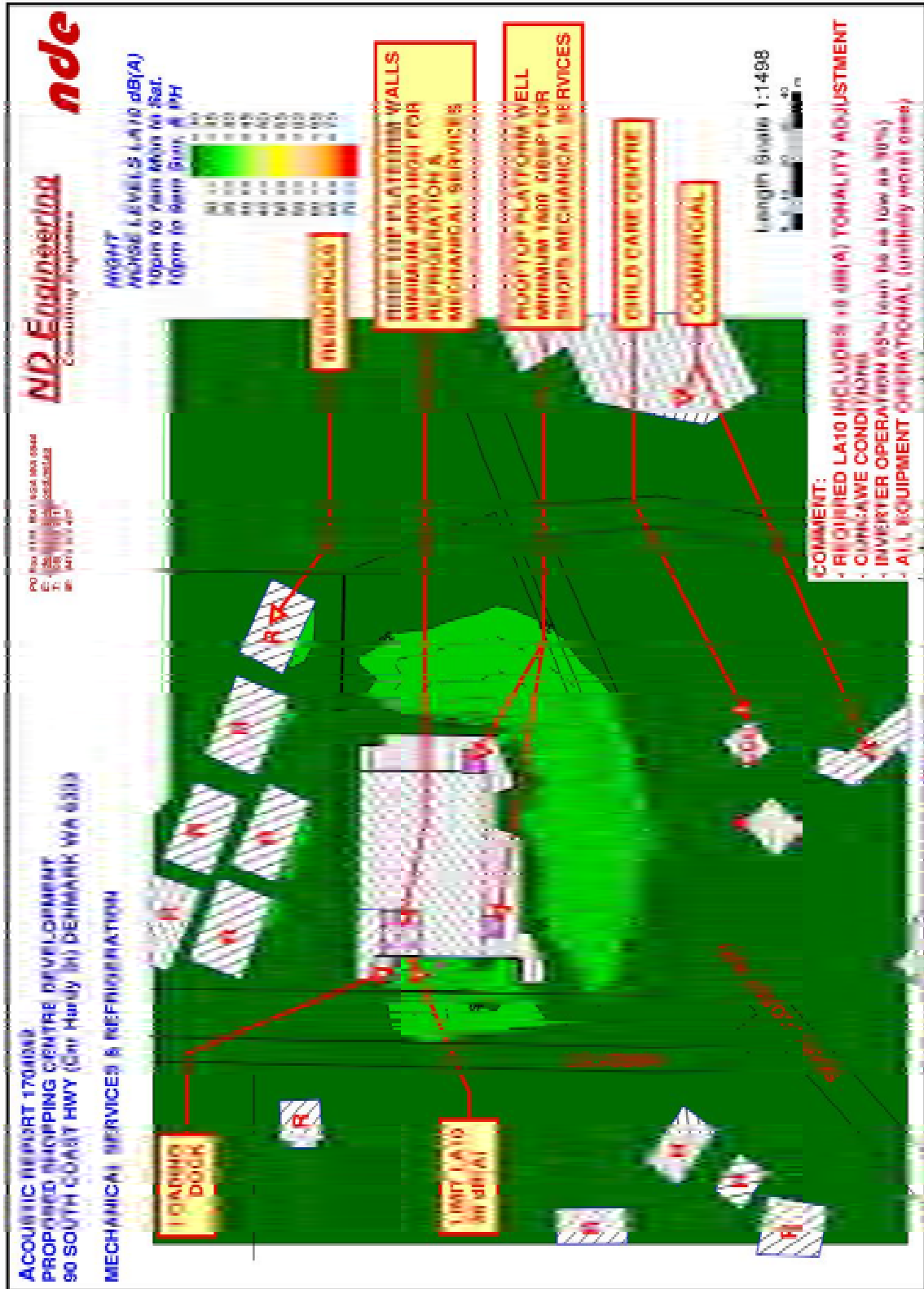


FIGURE M3 – NIGHT TIME ASSESSMENT

End of Annex M

ANNEX N – NOISE MANAGEMENT PLAN

- N1. This annex outlines preliminary requirements, and as further amended by the Council, for a construction Noise Management Plan to be submitted by the Builder.
- N2. Table N2 outlines the NMP requirements in accordance with Regulation 13 of the Environmental Protection (Noise) Regulations 1997:-

TABLE N2 – OUTLINE REQUIREMENTS		
ITEM	CATEGORY	DESCRIPTION
1.	GENERAL	<p>Construction work being undertaken should comply with the control of environmental noise practices set out in Section 6 of the AS 2436-1981 Guide to Noise Control on Construction, Maintenance and Demolition Sites;</p> <p>The equipment used for the construction work or demolition work must be the quietest reasonably available;</p> <p>The work must be carried out in accordance with a Noise Management Plan (NMP) - (prepared by a suitably qualified acoustic consultant).</p>
2.	WORKS OUT OF HOURS	<p>If it is anticipated that there will be any requirement to work outside the hours of 7am to 7pm Monday to Saturday, then an application will need to be submitted to Council, for approval of the work, at least fourteen (14) days prior to the construction work commencing.</p> <p>The application will need to include a suitably prepared Noise Management Plan.</p> <p>A sample Out-of-Hours NMP is provide in this Annex.</p>
3.	DAY TIME WORKS	<p>Notwithstanding the requirement for a Noise Management Plan (NMP) to address after hours work, large scale demolition and construction projects/sites are also required to submit a NMP for works conducted during the hours of 7am to 7pm.</p> <p>The NMP will need to address construction noise which may cause nuisance or disturbance as a result of the close proximity of any noise sensitive premises and/or the particular scope of the development or the equipment being employed.</p> <p>A NMP should be provided for demolition work and for potentially noisy building construction activities such as piling, compacting and concrete pouring processes.</p>

- N3. The construction Noise Management Plan needs to meet the minimum requirements, and as further amended by the Council, tabulated below.

TABLE N3 - MINIMUM REQUIREMENTS FOR A NOISE MANAGEMENT PLAN	
ITEM	DESCRIPTION
1.	Noise Management Plan (NMP) to be in accordance with the requirements of the Environmental Protection (Noise) Regulations 1997.
2.	Engage a suitably qualified acoustic consultant to develop the Noise Management Plan.
3.a	Provision of a construction program including details of and the duration of activities.
3.b	Identify the likely periods of noise and vibration.
4.	Provide prediction of noise emissions on the construction site, in particular of the piling, rock breaking, jack hammering and compaction processes.
5.	Identify all noise sensitive premises located in the near vicinity.
6.	Specify control measures for noise and vibration – i.e. equipment design/ site and work practices.
7.	Submit procedures to be adopted for monitoring noise emissions – i.e. verifying actual noise levels
8.	Provide details of complaint response procedure e.g. Provisions to provide notification to identified noise sensitive premises.
9.	Detail follow up procedures– investigation of ongoing or unresolved noise issues. Include contact details of persons who will be available to receive reports relating to noise issues during work time and after hours.

- N4. A sample Out-of-Hours NMP as utilised by the City of Fremantle for domestic dwellings or similar is provided on the following pages. The purposes of the sample is to provide an indication of what is expected to be provided as part of the Builders Out-of-Hours NMP to be submitted in the absence of any specific requirement by the Local Government Authority.

SAMPLE ONLY

TYPES OF WORK PERMITTED UNDER THE PLAN

GENERAL FOR ALL WORKERS BEFORE 7AM

Prohibited -

- Radios
- Deliveries of materials (apart from concrete)
- Workers on site before 6am
- Scaffolding erection or dismantling
- Work where the contractor needs less than 2 hours to complete the job

Controlled -

- All out-of-hours work is to be done-
(a) Using the quietest reasonably available equipment; and
(b) According to Australian Standard 2436-1981, Section 6. Control of Noise
- Interior workers to keep windows closed
- Voice levels to be kept to a minimum

PERMITTED ACTIVITIES FOR SPECIFIC TRADES BETWEEN 6 – 7AM

SITE WORKER

- Peg out site
- Machines not to be unloaded or used before 7am

CONCRETER/PLUMBER

- Set out job
- No mini excavators to be unloaded or used before 7am
- Concrete deliveries and pour (excluding suspended slabs)

BRICKLAYER

- Electric mixers only
- Petrol mixers not to be used before 7am
- Electric Hoist

ROOF CARPENTER

- Set out job and placement of materials
- Minimum use of saws, nailguns etc
- No cranes before 7am

ELECTRICIAN/PLUMBER/ROOF PLUMBER

- No chasing of brickwork before 7am
- No angle grinders before 7am
- Set out job and placement of materials
- Oxy acetylene, welding work
- Gutters, flashings and downpipes can be prepared for installation

ROOF COVER - TIN AND TILED

- No chainsaws before 7am
- No angle grinders before 7am
- Set out job and placement of materials
- Minimum use of saws, nail-guns, hoists etc
- Petrol hoist not to be used before 7am

PLASTERER

- Electric mixers only
- Petrol mixers not to be used before 7am
- Petrol hoist not to be used before 7am

CEILING FIXER

- Set out job and placement of materials
- Minimum use of screw-guns before 7am

BRICK CLEANER

- Machines not to be used before 7am

SITE CLEANER

- Machines not to be unloaded or used before 7am

TILER

- Electric mixers only
- Petrol mixers not to be used before 7am
- No angle grinders or mechanical cutters to be used outside before 7am

PAINTER

- No scaffold deliveries before 7am

GRANOWORKER

- Machines not to be used before 7am

PAVING

- Screeding
- Lay paving
- No cutting or compacting before 7am

SAMPLE ONLY

SAMPLE ONLY



Environmental Health Services

Noise Management Plan Application

FOR OUT-OF-HOURS CONSTRUCTION WORK ON DOMESTIC DWELLINGS OR SIMILAR

PREAMBLE

- The purpose of this noise management plan ("the Plan") is to minimise the disruption to nearby residents resulting from construction work taking place before 7am in the summer months (1st Nov-30th April), while recognising the need for workers to reduce their exposure to the sun.
- Under regulation 13 of the *Environmental Protection (Noise) Regulations 1997*, all construction work to be carried out between the hours 6am to 7am Monday to Friday, excluding Saturdays and Sundays and public holidays, shall be in accordance with this approved Plan.
- This Plan has been developed by HIA in consultation with the Department of Environmental Protection and local governments.
- If construction work is necessary on Sundays and public holidays (or outside the above hours), a separate noise management plan should be prepared and submitted for approval.

SITE DETAILS

Site Address

Building Company

Contact Person

Phone (Work)..... (Home)..... Fax

Builders Address..... Post Code

Type of Construction (e.g. new home)

Out of Hours Work:

6am – 7am Monday to Saturday from 1st October to 30th April

Start Date..... Completion Date

REASONS FOR OUT-OF-HOURS WORK

Western Australian workers are at risk of over exposure to ultraviolet radiation (UVR), which penetrates the skin and injures cells, causing sunburn and skin cancer. Australia has the highest rate of skin cancer in the world and two out of three Australians will require treatment for skin cancer in their lifetime. Over 150,000 are treated for skin cancer each year at a cost of \$326 million, and 1200 Australians die from skin cancer each year.

Exposure to UVR is greatest from 10am to 3pm when the sun is directly overhead – 70 per cent of the day's total ultraviolet radiation is received during this time. There are other major concerns raised when construction workers are limited to starting work at 7am such as heat stress and product failure due to temperatures being above 32 degrees Celsius.

Above information supplied by WorkSafe WA, The Cancer Foundation of WA and Standards Australia.

SAMPLE ONLY

SAMPLE ONLY

PREDICTION AND MONITORING OF NOISE EMISSIONS

Noise emission levels when measured at 7m from any machinery permitted under this Plan are predicted to be within the range of values for typical construction equipment given in the Table.

Plant	Sound pressure level at 7m – dB(A)	Plant	Sound pressure level at 7m – dB(A)
Concrete mixers – 10/7 electric	< 68	Hoists – Electric	< 67
Electric hand tools – Electric drill	< 69	Hydraulic hand tools – Breaker, 36kg	83 – 87
Hammer drill	76 – 87	Welders –	< 71
Screwdriver (2–4kW)	51 – 70	Oxy-acetylene	

The above Table is based on Table D2 of Australian Standard 2436-1981, with sound pressure levels at 7m taken to be 25dB(A) less than the sound powers given in AS2436.

Regular noise monitoring is not required under this Plan. However, when requested by an authorised person from the local government, the builder will arrange noise monitoring of specified machinery by a competent person.

NOTIFICATION OF NEAREST AFFECTED RESIDENTS

The following is a suggested form of words for notifying neighbours of the work to be done during the 6 – 7am period.

CONSTRUCTION WORK	
Dear Resident,	
<p>This note is to advise you that construction work will be taking place at <i>(Address of site)</i>, starting on or about <i>(Date)</i>. Because the work will be done during the warmer months, and to reduce the effects of the sun, some work will commence at 6am. In order to minimise noise and disturbance, these activities are strictly controlled under a Noise Management Plan approved by the <i>(Name of local government)</i>. Normal work will start at 7am.</p>	
<p>Some general features of the Noise Management Plan are –</p> <ul style="list-style-type: none"> ▪ No work before 6am or on Sundays; ▪ No deliveries of materials (apart from concrete) before 7am; ▪ No radios before 7am; and after this time the volume is to be maintained at a reasonable level ▪ No car radios allowed at any time.. ▪ No scaffolding erection or dismantling before 7am. 	
<p>The Noise Management Plan also places restrictions on the activities of each trade between 6 and 7am. A copy of the Noise Management Plan is available from the council or the builder. Should you be disturbed by activities on the site, require further information or have any comments with regards to health condition of any of the occupants of the residence that may be affected by the earlier start, please contact –</p>	
<p>(Name)..... of (Company)..... on (Mobile No.).....</p>	

SAMPLE ONLY

SAMPLE ONLY

MANAGEMENT OF NOISE

Out-of-hours contact for complaints

Name Phone

Affected neighbours to be notified at least 24 hrs before the job starts –

Name of street House numbers

Name of street House numbers

Name of street House numbers

FAILURE TO COMPLY WITH THE PLAN

Failure to adhere to this noise management plan renders regulation 13 of the *Environmental Protection (Noise) Regulations 1997* inapplicable, in which case the noise emissions must meet regulations 7 and 8 of those regulations.

Any breach of this noise management plan which causes excessive noise may be treated as an emission of "unreasonable noise" by the local government, with the following possible consequences -

- An "Infringement Notice" may be issued to either the builder or the contractor, imposing an "on-the-spot" fine of \$250 for a first offence and \$500 for a second offence;
- A "Noise Abatement Direction" may be issued requiring work to cease for a specified time (up to 7 days); and
- If a Noise Abatement Direction is not being complied with, equipment may be seized and impounded for a specified time (up to 7 days).

APPROVAL

This Plan must be given to the Local Government Authority for approval at least 7 days before the start of 6am construction work.

Approved by: (Name)

Signature Date

☐ Chief Executive Officer

☐ Authorised Person under the Environmental Protection Act 1986

CITY OF FREMANTLE

Submit Form

SAMPLE ONLY

End of Annex N

ANNEX R – REFRIGERATION EQUIPMENT

- R1. The assessment is carried out in the following figures:
- a. TABLE R1 GENERIC REFRIGERATION EQUIPMENT DATA.
 - b. FIGURE R1 PLANT/CONDENSER DECK SECTION.
 - b. FIGURE R2 DAY TIME ASSESSMENT.
 - c. FIGURE R3 NIGHT TIME ASSESSMENT.
- R2. ND Engineering's opinion is that the generic refrigeration services currently assessed comply with the Reference A the Noise Regulations at all times subject to 'Assumptions, Limitations and Exclusions' and 'Recommendations':
- R3. The following **REFRIGERATION EQUIPMENT recommendations** are made:
- a. The top of all of the Plant/Condenser Deck equipment shall be less than nominally RL47.000 with the surrounding wall at RL49.000. See Figure M1; and
 - b. The top of all of the roof top mounted minor ventilation equipment not located in the Plant/Condenser Deck shall be located a minimum of 6000 mm from the parapet walls and shall be below the main building parapet wall height so that there is no direct line of sight to the roof top mounted equipment from any of the noise sensitive premises; and
 - c. Two step speed or Multi step speed or On/Off condenser fan speed control is not permitted; and
 - d. All roof top refrigeration equipment shall be resiliently mounted to minimise the transmission of noise and vibration into the supporting roof structure; and
 - e. Sound Power Levels shall not exceed that contained in Table R1; and
 - f. Provide a noise wall enclosure as per Figure M1; and
 - g. A second acoustic report be undertaken at the time of Building Permit Application once the proposed details of the refrigeration equipment are more fully documented.
- R4. The refrigeration equipment data, based on a generic design, and associated comments are contained in Table R1 on the following page.
- R5. The refrigeration equipment platform section preliminary details are contained in Annex M – Mechanical Services.
- R6. The outcomes of the noise modelling assessment are shown in Annex M – Mechanical Services.

TABLE R1 – GENERIC MECHANICAL SERVICES EQUIPMENT DATA	
DESCRIPTION	COMMENT
Supermarket Refrigeration Units	<p>The radiated Sound Pressure Level (SPL or Lp), and equivalent Sound Power Level (SWL or Lw), of each of these condensers is as follows:-</p> <p>Refrigeration compressor rack;</p> <p>SPL = 59 dB(A) at 3 meters;</p> <p>SWL = 76.5 dB(A).</p> <p>The compressor rack is typically tailor made equipment. The compressor rack includes a double insulated enclosure which is specifically designed for application and has been installed in many stores the roof or machine rooms.</p> <p><i>NB: If the refrigeration equipment is located inside a plant room then:</i></p> <ul style="list-style-type: none"> - The walls and ceilings of the plantroom shall be acoustically treated; and - The the plant room doors shall be solid doors fitted with acoustic seals and door closers; and - The plant rooms doors shall be in and be accessible from the internal loading dock area; and <p><i>Once details of the equipment are confirmed conduct a detailed acoustic assessment of the plantroom to determine construction of walls, floors and roof/ceiling.</i></p> <p>Refrigeration condenser with variable fan speed control condenser;</p> <p>SPL = 56 dB(A) @ 3 meter;</p> <p>SWL = 73.5 dB(A).</p> <p>Refrigeration switchboard;</p> <p>SPL = Nil dB(A) @ 3 meter;</p> <p>SWL = Nil dB(A).</p>

End of Annex R

Our Reference: G35886L-01A

19 November 2024

Erceg Management Pty Ltd
320 Lord Street
PERTH VIC 6000

Attention: Joe Prestipino

Dear Joe,

82-90 (Lot 50) South Coast Highway, Denmark – Approved Shopping Centre Development Traffic Engineering Assessment

We refer to Council's request for an update to the previous traffic engineering assessment undertaken for the approved shopping centre development at 82-90 (Lot 50) South Coast Highway in Denmark.

It is noted that the development was previously approved and was issued with a Planning Permit (reference: A457.A 2013/153A, dated 20th October, 2017), which is attached at Appendix A.

As mentioned above, we have previously prepared a traffic engineering assessment report that accompanied an earlier development application (our reference: 15873R#1). This report was subsequently updated to have consideration for comments received from Main Roads WA (our reference: 15873R#2), which is attached at Appendix B¹.

The current development scheme, which is the subject of this assessment, contemplates 2,241m² supermarket floor area and eight other commercial tenancies comprising a floor area of 734m².

This document provides a comparison of traffic predicted to be generated by the previous development scheme against the current scheme, in addition to the adoption of current design standards where relevant and an assessment of loading vehicle access for the site.

Our assessment follows.

Traffic Generation Comparison

As mentioned above, we have previously undertaken detailed assessments for earlier development schemes that were almost identical to each other. In particular, these development schemes included a 2,650m² supermarket and several small shops with a total floor area of 500m². This equates to 175m² more floor area when compared with the current scheme.

¹ This report is considered more relevant given that it had consideration for more conservative traffic generation and distribution assumptions that were requested by Main Roads WA when compared with the initial report.

Given that traffic generation is typically calculated on a floor area basis, it is clear that the current development scheme would generate fewer traffic movements than the previous development schemes noting that the traffic engineering assessment prepared for both schemes concluded the following:

These outputs are well within acceptable operating parameters, particularly when considering the conservative 10 year growth generation predictions that have been adopted, and we are satisfied that there would be no discernible detriment to the surrounding road and intersections as a result of the proposed development as long as the works presented in the layout at Appendix B are undertaken.

Nevertheless, for the purposes of a robust and conservative assessment, we have compared traffic predicted to be generated by the previous development scheme against traffic predicted to be generated by the current development scheme using the rates set out in the RTA (NSW) Guide to Traffic Generating Development (2002). The relevant peak hour rates set out in that guide are as follows:

- Peak Thursday Volume = $(155A(\text{SM}) + 46A(\text{SS}))/1,000\text{m}^2$
- Peak Friday Volume = $(138A(\text{SM}) + 56A(\text{SS}))/1,000\text{m}^2$
- Peak Saturday Volume = $(147A(\text{SM}) + 107A(\text{SS}))/1,000\text{m}^2$

where A(SM) and A(SS) = Supermarket and Specialty Shop floor area respectively.

The results of this assessment, in vehicle trip ends (vte), are detailed at Table 1.

Table 1: RTA Guide (2002) Assessment

	Previous Scheme	Current Scheme	Difference (+/-)
Peak Thursday Volume	434 vte	381 vte	- 53 vte
Peak Friday Volume	394 vte	350 vte	- 44 vte
Peak Saturday Volume	443 vte	408 vte	- 35 vte

It is noted that the RTA Guide has recently been updated, with the more recent copy titled 'Guide to Transport Impact Assessment' TS 00085 | Version 1.1 (2024). For the purposes of another assessment, a comparison of traffic predicted to be generated by the previous scheme against the current scheme has been undertaken. The relevant peak hour rates set out in the more recent guide² are as follows:

Wednesday/Thursday Rates

- Site AM peak hour = $0.066A + 126$
- Site PM peak hour = $0.089A + 170$

Friday Rates

- Network AM peak hour = $0.196A$

² For 'small suburban shopping centres' with a total floor area between 1,000m² and 6,000m².



Weekend Rates

- Peak hour = 0.097A + 186
where A = Total gross leasable floor area (GLFA)³.

The results of this assessment, in vehicle trip ends (vte), are detailed at Table 2.

Table 2: RTA Guide (2024) Assessment

	Previous Scheme	Current Scheme	Difference (+/-)
<u>Wednesday/Thursday Rates</u>			
Site AM peak hour	208 vte	196 vte	- 12 vte
Site PM peak hour	280 vte	265 vte	- 16 vte
<u>Friday Rates</u>			
Network AM peak hour	617 vte	583 vte	- 34 vte
<u>Weekend Rates</u>			
Peak hour	306 vte	289 vte	- 17 vte

As shown at Tables 1 and 2, all values within the ‘difference’ column (i.e. current scheme minus previous scheme) are negative, meaning that the current scheme is predicted to generate fewer traffic movements for all peak hours assessed.

Given that the traffic engineering assessment report for the previous schemes suggested that *‘we are satisfied that there would be no discernible detriment to the surrounding road and intersections as a result of the proposed development’* and that the current scheme is predicted to generate fewer traffic movements for all peak hours when compared with the previous schemes, we are satisfied that the traffic generated by the current scheme would continue to have no discernible detriment to the surrounding road and intersections.

Whilst the traffic counts used as part of the previous assessments are now outdated, a great level of conservatism was previously adopted⁴, including:

- The RTA Guide allows for a discount of up to 25% in traffic generation estimates for developments of this size to account for ‘multi-purpose’ trips. However, this discount was not applied in the previous assessments.
- The assessment conservatively assumed that all site traffic would be new and generated solely by the development. In practice, much of this traffic is likely to consist of vehicles already on the road network, redirected to the site as part of passing or ‘linked’ trips.

³ Where GLFA is defined as ‘Total floor space available to be leased, which typically excludes hallways, elevator shafts, stairways and other non-leasable space.’ For the purposes of this assessment, the net floor areas shown in the current development plan have been used.

⁴ In fact, the ‘without development’ future volumes that we were requested to adopt on the abutting road network at the time represented significant increases to recorded volumes and much more than the growth 10 years after development of the site, which is what is typically applied in order to achieve a fair and equitable outcome.



- The assessment assumed a more concentrated distribution of peak-hour traffic, while in reality, traffic is likely to be more evenly distributed throughout the day and week due to the site's location and its association with nearby recreational activities. This approach likely overestimated peak-hour traffic volumes.
- With regards to traffic distribution, the number of movements was increased to meet Main Roads WA's requirement of 65% of trips to and from the east, ensuring westbound movements were not underestimated. This adjustment resulted in the total site-generated traffic, in all directions, being conservatively adopted at 120% of the already conservatively predicted traffic volumes.

Furthermore, the results of those assessments demonstrated that there would be ample spare capacity at the associated intersections despite the highly conservative assumptions.

Accordingly, given that even less traffic is predicted to be generated by the smaller development that is now proposed, we remain satisfied that there will be a more than acceptable outcome at the associated intersections.

'Warrants' Assessment

With respect to turn lane 'warrants' stipulated within the relevant AustRoads Guide, it is noted that the second iteration of the traffic engineering assessment undertaken for the development concluded the following:

- b) *warrants **would be met for AUL(s) and AUR(s) treatments** at the South Coast Highway intersection with Hardy Street based on reasonable 10 year growth predictions without any development on the subject site,*
- c) *warrants **would be met for an AUR treatment** at the South Coast Highway intersection with Ocean Beach Road based on reasonable 10 year growth predictions **without any development on the subject site,***
- d) *warrants **would be met for AUL and AUR treatments** at the South Coast Highway intersections with Ocean Beach Road and Hardy Street based on the long-term future volumes required by Main Roads WA **without any development on the subject site,***
- e) *there would be no discernible impact on the nearby roads and intersections for at least 10 years following development of the site even if no AUR treatments were provided at the South Coast Highway intersections with Ocean Beach Road and Hardy Street and there is no Nexus to require the same,*

It is noted that the Planning Permit attached at Appendix A suggests the following upgrades are required with respect to South Coast Highway:

- provision of an 'AUR and AUL intersection treatment' at its intersection with Hardy Street, and
- provision of an 'AUR turn treatment' at its intersection with Ocean Beach Road.

Since the preparation of the previous reports, warrants included within the relevant AustRoads Guide (Guide) have been updated, noting that channelised right-turn (CHR) treatments are now preferred over auxiliary right-turn (AUR) treatments⁵.

⁵ In fact, the relevant AustRoads Guide suggests that "While AUR treatments exist at many locations, and they are safer than a basic treatment, they are not as safe as channelised treatments (i.e. CHR) in terms of protecting right turning vehicles. They are therefore not favoured by some jurisdictions for use at new unsignalised intersections."



We reiterate that our previous assessment concluded that there is no nexus to require AUR treatments at the South Coast Highway intersections with Ocean Beach Road and Hardy Street. Nevertheless, we are satisfied that the treatments required by the Planning Permit would more than suitably accommodate the traffic predicted to be generated by the current development scheme.

This opinion is further supported given that an additional “warrants” graph has been included within the Guide. In particular, three graphs now allow assessments to be undertaken for speeds up to 70km/h, between 70km/h and up to 100km/h and 100km/h and above, whereas the previous assessment was undertaken when only two graphs were provided, i.e. for speeds up to 100km/h and speeds 100km/h and above. Given that the speed limit along South Coast Highway past the site is only 60km/h, a warrants assessment under the current requirements suggests that there is even less nexus to requiring AUR treatments.

Loading Vehicle Access

It is noted that the development scheme that was granted a permit included access for trucks associated with the supermarket to a loading bay via the north of Hardy Street.

In particular, it is our understanding that these loading vehicles were approved to approach the site via the north of Hardy Street, turn left into a designated loading zone area, reverse into the associated loading bay and then exit the site by turning left onto Hardy Street, where these vehicles could then turn left or right onto South Coast Highway.

Despite being previously approved on the same basis, we understand that Council now has concern in relation to loading vehicle movements that would be required at surrounding intersections in order to access the site.

Accordingly, we have undertaken a review of the likely travel route(s) to/from the site and associated swept path assessments for the appropriate design vehicle.

In particular, we have been advised that the existing Denmark IGA supermarket (located a short distance to the northeast of the site) currently accommodates loading vehicles up to 13.5m in length, noting our expectation that these trucks are likely articulated and already enter the existing supermarket via Strickland Street’s intersections with South Coast Highway and Mount Shadforth Road. We have also been advised that the same truck would be the largest vehicle that requires access to the proposed, previously approved, development.

Swept path diagrams are attached at Appendix C which demonstrate the following appropriate movements for a 14m long articulated vehicle, noting that this is slightly longer than the largest vehicle anticipated to access the proposal and is therefore conservative:

- Access via the northeast and southwest of South Coast Highway to Strickland Street before turning left onto Mount Shadforth Road.
- A left-turn movement from Mount Shadforth Road to Hardy Street.

As shown, an option is included whereby the truck could:

- momentarily encroach into the eastbound traffic lane if another vehicle was propped along Hardy Street waiting to turn onto Mount Shadforth Road, or



- simply momentarily prop on the Mount Shadforth Road westbound traffic lane to wait whilst another vehicle exiting Hardy Street completes its movement, before entering Hardy Street itself.
 - a left-turn movement from Hardy Street to South Coast Highway after the truck exits the site.
- Alternatively, as shown, the kerb on the departure side of Hardy Street could be modified slightly to accommodate simultaneous vehicle movements of a truck exiting onto South Coast Highway whilst a passenger vehicle (99th percentile design vehicle) enters Hardy Street.

Having undertaken swept path assessments, we are satisfied that articulated vehicles up to 14m in length can satisfactorily access the subject site via surrounding intersections, consistent with the development was initially approved. In this regard it is noted that our experience clearly demonstrates that swept path assessments of articulated vehicles are conservative in nature and that associated vehicles are highly likely to be able to manoeuvre even better in reality than what is suggested by the swept path diagrams.

Conclusion

Having undertaken a review of the current development scheme, we are satisfied that:

- the current scheme is predicted to generate fewer traffic movements for all peak hours when compared with both previous schemes we assessed,
- traffic generated by the current scheme would cause no discernible detriment to the surrounding roads and intersections,
- there is no nexus to require AUR treatments at the South Coast Highway intersections with Ocean Beach Road and Hardy Street,
- the treatments required by the Planning Permit would more than suitably accommodate the traffic predicted to be generated by the current development scheme,
- articulated vehicles up to 14m in length can satisfactorily access the subject site via surrounding intersections, consistent with the development that was initially approved, and
- there are no traffic generation associated reasons why the current development scheme should not be approved.

We trust this is of assistance. Please contact Aniq Mian or Nathan Woolcock at Traffix Group if you require any further information.

Yours faithfully,

TRAFFIX GROUP PTY LTD



NATHAN WOOLCOCK

Director (RPE 6892)





Appendix A

Current Planning Permit



Our Ref: A457.A (2013/153A)
Enquiries: Planning Services

20 October 2017

LB Planning
191A Naturaliste Terrace
Dunsborough WA 6281

Dear Mr Lawrence- Brown

Re: Application for Amendment to Development Approval: Proposed Shopping Centre Development – No. 82-90 (Lot 50) South Coast Highway, Denmark

I refer to your application received on 12 May 2017 and can advise that amended Development Approval has been granted, under delegated authority, subject to the conditions contained on the attached Development Approval notice.

It is essential that you read each of the conditions contained on the Development Approval notice as some conditions may be required to be addressed prior to the issuance of a building permit and/or commencement of works on-site (dependent on the actual condition requirements). The Development Approval notice also contains advice notes that contain information to assist with interpreting the conditions, draw attention to statutory responsibilities and/or to explain the next steps in the development process.

*Please note that Development Approval is **NOT** permission to commence building. Any queries relating to Building Permit matters should be directed to Building Services - phone 9848 0312 or email enquiries@denmark.wa.gov.au.*

Should you have any further queries regarding this Development Approval, please do not hesitate to contact Planning Services on 9848 0313 or email enquiries@denmark.wa.gov.au.

Yours faithfully

Annette Harbron
Director of Planning & Sustainability

Encl.

NOTICE OF DETERMINATION ON APPLICATION FOR DEVELOPMENT APPROVAL**SHIRE OF DENMARK - TOWN PLANNING SCHEME NO.3**

OFFICE USE		
FILE REF	A457.A	2013/153A

Description of Land:

No. 82-90 (Lot 50) South Coast Highway, Denmark

Description of Proposed Development:

Shopping Centre Development

Approval to commence development in accordance with an application dated the 12 May 2017 and the plans attached thereto is **GRANTED**

subject to the following conditions:

1. Development shall be carried out and fully implemented in accordance with the details indicated on the stamped approved plan(s) dated 28 September 2017 unless otherwise required or agreed in writing by the Shire of Denmark, including the following modifications:
 - a) The footpath in the Hardy Street road reserve in the vicinity of the loading/unloading area being realigned to 'back-of-kerb', with appropriate landscaping being planted along the fence line to address the visual impact of the 3.0 metre high timber fence.
2. The South Coast Highway/Hardy Street intersection being upgraded/modified, at the developer's expense, to the standard Type AUR and AUL intersection treatment in accordance with "Guide to Road Design Part 4A: Unsignalised and Signalised Intersections" and the "MRWA Supplement to Austroads Guide to Road Design – Part 4A" to the satisfaction of Main Roads WA and the Shire of Denmark.
3. Hardy Street being widened, at the developer's expense, to a minimum width of 7.0 metres between the South Coast Highway/Hardy Street intersection and the southern-most crossover to the site to the satisfaction of the Shire of Denmark.
4. The South Coast Highway/Ocean Beach Road intersection being upgraded/modified, at the developer's expense, to provide an AUR turn treatment on South Coast Highway and AUR and AUL turn treatments on Ocean Beach Road in accordance with "Guide to Road Design Part 4A: Unsignalised and Signalised Intersections" and the "MRWA Supplement to Austroads Guide to Road Design – Part 4A" to the satisfaction of Main Roads WA and the Shire of Denmark – refer Advice Note 1.
5. The South Coast Highway eastern bound lane from Hardy Street to east of Ocean Beach Road being widened to a minimum of 7 metres to the satisfaction of Main Roads WA.
6. The vehicle crossovers to Hardy Street to be constructed, drained and sealed (concrete, asphalt or brick paved) to the satisfaction and specifications of the Shire of Denmark.
7. The vehicle crossover to South Coast Highway to be approved, located, constructed, drained and sealed (concrete, asphalt or brick paved) to the satisfaction and specifications of Main Roads of WA (noting the in principle agreement from MRWA for the crossover to the South Coast Highway).
8. In the event that the future development and improvement of the South Coast Highway/Ocean Beach Road intersection provides for alternative access to the development site, the 'left in-left out' access onto South Coast Highway will be closed and an appropriate development contribution will be sought towards such intersection treatment by Main Roads WA.
9. Provision of a minimum 2.5 metre wide footpath (compromising of brick paving and concrete with brick paving being the predominant material (i.e. at least 50%)) to the specifications and satisfaction of the Shire of Denmark.
10. All off-street car parking bays and vehicle accessways thereto shall comply with the requirements of *Australian Standard AS2890.1:2004 Parking Facilities – Off Street Car Parking* (NB: minimum bay width of 2.7 metres to apply to the 90 degree car parking bays), the Building Code of Australia and Australian Standard AS2890.6:2009 *Parking Facilities Part 6: Off-street Parking for People with Disabilities*.

11. All vehicle parking, manoeuvring and circulation areas shall be suitably constructed, sealed (asphalt, concrete or brickpavers), drained, kerbed, marked, signed (where required) and thereafter maintained.
12. All car parking areas and access ways shall only be used for their stated purpose at all times and shall not be used for display or general storage purposes.
13. No parking, display or storage of vehicles, equipment, materials or products associated with the approved landuse shall occur within the adjoining road verge area(s) at any time.
14. The installation of outdoor lighting shall be in accordance with the requirements of *Australian Standard AS4282-1997: Control of the Obtrusive Effects of Outdoor Lighting*.
15. Prior to the issuance of a building permit, engineering plans providing details on crossovers, car parking, vehicle accessways, footpaths (internal and external of the site), Hardy Street road widening works, bicycle racks and associated infrastructure works being submitted to and approved by the Shire of Denmark.
16. Prior to the issuance of a building permit, engineering plans providing details on intersection treatment upgrades/modifications, road carriageway upgrading works and associated infrastructure works being submitted to and approved by Main Roads WA.
17. Prior to occupancy of the development, such land required in association with the intersection treatment and road carriageway widening works is to be ceded to the Commissioner for Main Roads WA free of cost and without any payment of compensation.
18. All costs associated with roadworks required by Main Roads WA and/or the Shire of Denmark are to be met by the developer, including the need for relocation of utilities, street signs, street trees, existing drainage arrangements etc.
19. Existing infrastructure located within the Hardy Street and South Coast Highway road reserves shall be retained and protected during the construction period with any damage to the infrastructure to be repaired by the developer at their expense to the satisfaction of the Shire of Denmark and/or Main Roads WA.
20. Prior to the issuance of a building permit, a stormwater management plan being submitted to and approved by the Shire of Denmark, with such stormwater plan to be in accordance with water sensitive urban design principles (refer Advice Note 2).
21. Prior to the issuance of a building permit, a landscaping plan shall be submitted to and approved by the Shire of Denmark, with the landscaping areas being those identified on the approved site plan, the additional landscaping area required by Condition 1 and the Hardy Street and South Coast Highway road reserves abutting the development site. The landscaping plan shall be submitted at a scale of 1:200 or 1:100 and shall detail the following:
 - a) Proposed trees and shrubs to be planted including species, number and size of plants (NB: emphasis should be on native plants because of their general hardiness and low water requirements). Trees and plants are to be shown in exact location using clear symbols.
 - b) Site layout and context, including property boundaries, street names, building/s, parking areas, paved areas, adjacent verges, existing trees and vegetation to be retained (noting the two existing mature trees within the South Coast Highway road reserve should be retained where possible).
 - c) Reticulation methods.
 - d) Maintenance arrangements.
 - e) Weed control measures associated with existing weed infestations on-site.
 - f) Details of any hard landscaping, paving materials, street furniture, bollards, bins, lighting etc.

Refer Advice Note 3 regarding some initial comments for consideration in preparing the landscaping plan.
22. Prior to occupancy of the development, all landscaping shall be carried out in accordance with the approved landscaping plan and thereafter shall be maintained as landscaping at all times.
23. Prior to the issuance of a building permit, a site-specific noise report prepared by a suitably qualified acoustic consultant shall be submitted to and approved by the Shire of Denmark, with the recommendations of that report to be implemented to the satisfaction of the Shire of Denmark at all times. The report shall address any increase, or potential increase, in noise levels and the methods by which they can be attenuated so as not to increase the level of noise from the site to protect the amenity of the area. The report shall ensure that the loading/unloading arrangements, waste collection operations, and the refrigeration and air conditioning systems to be associated with the development are taken into account. Refer Advice Note 4 regarding comments about the noise assessment report lodged to date.

24. Within three (3) months of occupancy of the supermarket, the developer shall provide, at their expense, a post construction acoustic survey prepared by a suitably qualified acoustic consultant to the Shire of Denmark, to demonstrate that the assigned noise levels in *the Environmental Protection (Noise) Regulations 1997* have been achieved.
25. Deliveries to the shopping centre development via commercial delivery vehicles (including large articulated vehicles, refrigerated vehicles, light delivery vehicles) shall only occur between 7am and 10pm Monday-Saturday and 9am and 10pm on Sundays & Public Holidays.
26. The solid gates/doors to the loading dock are to be kept closed between the hours of 7pm and 7am daily unless a delivery vehicle is accessing or egressing the loading dock area.
27. All delivery vehicles must be located entirely on the site during loading and unloading of goods associated with the use of the site.
28. Rubbish enclosure areas adequate to service the development are to be constructed and provided in accordance with the *Shire of Denmark Health Local Laws 1998 (as amended)* – noting such areas are to have drainage sumps and hot & cold hose points.
29. All waste management operations/works to be carried out in accordance with the Waste Management Plan (Revision E dated 7 March 2014) for the life of the development.
30. A Construction Management Plan shall be submitted to and approved by the Shire of Denmark as part of the Building Permit application, with such plan to address the following:
 - a) Access to and from the site.
 - b) The delivery of materials and equipment to the site.
 - c) The storage of materials and equipment on the site.
 - d) The parking arrangements for contractors and sub-contractors.
 - e) Management of construction waste.
 - f) Dust and sand mitigation measures.
 - g) Construction times (if proposing different times to the relevant Regulations) and associated noise prevention measures.
 - h) Other matters likely to impact on surrounding properties.
31. The provision of all services, including augmentation of existing services, necessary as a consequence of any proposed development shall be at the cost of the developer and at no cost to the Shire of Denmark.
32. The development is to be connected to a reticulated water supply provided by a licensed water provider.
33. The development shall be connected to sewer.
34. The existing colorbond fencing on the entire length of the northern property boundary to be retained unless the adjoining landowner agrees to the fence being removed (refer Advice Note 5). If a new fence is required, the design of any such fence shall be approved by the Shire of Denmark, with the pre-development levels in the vicinity of such fence being retained such that the fence on both sides of the property is approximately 1.8 metres high.
35. No signage has been approved as part of this planning application – refer Advice Note 6.
36. At the time of lodgement of the building permit application, the developer to pay the Development Contributions for Road Infrastructure fee as per the Shire of Denmark's Operative Fees and Charges Schedule (refer Advice Note 7).
37. As per Town Planning Scheme Policy No. 42: Public Art, the developer shall incorporate public art within the development or contribute financially to the Shire's Public Art Fund, with the value being determined on the basis of 0.5% of the value of the construction cost of development.

Should the developer seek to comply with this condition by incorporating public art within the development, prior to the issuance of a building permit, details of the proposed public artwork/s (having regard to Clause 6.3.1 of Town Planning Scheme Policy No. 42: Public Art) are to be submitted to and approved by the Shire of Denmark – refer Advice Note 8.

Or

Should the applicant/developer seek to comply with this condition via a financial contribution, such payment shall be made prior to the issuance of a building permit.

38. Immediately prior to the occupation of the development for its approved purpose, the developer shall notify the Shire of Denmark, in writing, of the effective completion of the approved development such that a Final Inspection can be carried out to determine compliance with the conditions contained on this Development Approval.

39. This approval supersedes Development Approval 2013/153 as issued by the Great Southern Joint Development Assessment Panel dated 12 June 2014.

AND the following advice notes:

1. In relation to Condition 4, Main Roads WA have advised that dependent on the final design for the South Coast Highway/Ocean Beach Road intersection, additional land from the subject site may be required to be transferred free of cost to the Commissioner of Main Roads WA for road purposes and without any payment of compensation.
2. In relation to Condition 20, any modifications to the South Coast Highway existing drainage system that traverses the subject site will require the approval of Main Roads WA to be obtained.
3. In relation to Condition 21, Sustainability Services provides the following preliminary comments for consideration:
 - a) Where possible, and consistent with Crime Prevention Through Environmental Design principles, consideration should be given to retaining existing vegetation along the boundaries rather than removing and replacing the new stock.
 - b) Where appropriate, consideration may be given to supporting tubestock planting rather than planting advanced stock in litre bags having regard to increased rates of survival and decreased watering requirements.
 - c) Consideration should be given to looking at local native vegetation and/or landscaping methods having regard to sustainable water management practices.
4. In relation to Condition 23, approval of this DAP application does not imply acceptance and/or unconditional approval of the Noise Assessment Report (April 2017 as prepared by ND Engineering) accompanying this development application. In this regard the Shire of Denmark's Health Services highlights the following:
 - a) Reliance on refrigeration trucks turning off engines is not appropriate for although this measure could be beneficial it is too difficult for either the business to control and/or the Shire of Denmark to enforce as it assumes that the supermarket operator has control of the supply chain arrangements.
5. In relation to Condition 34, evidence of such agreement from the adjoining landowner should be provided to the Shire of Denmark prior to any portion of the fence being removed.
6. In relation to Condition 35, consultation should occur with the Shire of Denmark regarding approval requirements for signs having regard to Town Planning Scheme No. 3 and Town Planning Scheme Policy No. 32: Signs.
7. In relation to Condition 36, as per the Council's 2017/18 Fees & Charges Schedule, the applicable development contribution fee is \$1885 per 1000m² of land or floorspace, whichever is greater (GST exempt).
8. In relation to Condition 37, it is considered that the forecourt area should be the focus of such public art given this area presents an opportunity to be a 'meeting point/focal point' within the development site.
9. Approval of this DAP Application does not imply acceptance and and/or unconditional approval of the Traffic Engineering Assessment Report accompanying this planning application.
10. It is the responsibility of the developer to ensure that building setbacks correspond with the legal description of the land. This may necessitate re-surveying and re-pegging the site. The Shire of Denmark will take no responsibility for incorrectly located buildings.
11. It is the responsibility of the developer/owner to search the title of the property to ascertain the presence of any easements and/or restrictive covenants that may apply.
12. The applicant/owner is reminded of their legal obligations with respect to the *Aboriginal Heritage Act WA 1972*.
13. The proposed operations, during and after construction, are required to comply with the *Environmental Protection (Noise) Regulations 1997*.

NOTE 1: IF THE DEVELOPMENT THE SUBJECT OF THIS APPROVAL IS NOT SUBSTANTIALLY COMMENCED WITHIN A PERIOD OF TWO (2) YEARS, OR ANOTHER PERIOD SPECIFIED IN THE APPROVAL, AFTER THE DATE OF DETERMINATION, THE APPROVAL WILL LAPSE AND BE OF NO FURTHER EFFECT.

NOTE 2: WHERE AN APPROVAL HAS SO LAPSED, NO DEVELOPMENT MUST BE CARRIED OUT WITHOUT THE FURTHER APPROVAL OF THE SHIRE OF DENMARK HAVING FIRST BEEN SOUGHT AND OBTAINED.

NOTE 3: THIS IS NOT A BUILDING PERMIT. AN APPLICATION FOR A BUILDING PERMIT IS REQUIRED TO BE SUBMITTED AND APPROVED BY THE SHIRE OF DENMARK (BUILDING SERVICES) PRIOR TO ANY WORKS COMMENCING ON-SITE.

NOTE 4: It is advised that should you be aggrieved by any part of this decision, there is a right to apply for a review by the State Administrative Tribunal (SAT) - refer Part 14 of the *Planning and Development Act 2005*, noting an application for review must be lodged within 28 days from the date of determination.



DIRECTOR OF PLANNING & SUSTAINABILITY



DATE



Appendix B

Previous Traffic Engineering Assessment Report



Traffic Engineers and Transport Planners

Traffix Group Pty Ltd
ABN 32 100 481 570

Address
Suite 8, 431 Burke Road
Glen Iris Victoria 3146

Contact
Telephone 03 9822 2888
Facsimile 03 9822 7444
admin@traffixgroup.com.au
www.traffixgroup.com.au

PROPOSED SUPERMARKET AND ASSOCIATED SPECIALTY SHOPS

LOT 50, CORNER HARDY STREET AND SOUTH COAST HIGHWAY DENMARK

Traffic Engineering Assessment

Prepared for

Metcash Food and Grocery

NOVEMBER 2013

OUR REFERENCE: 15873R#2

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PROPOSED SUPERMARKET AND ASSOCIATED SPECIALTY SHOPS
LOT 50, CORNER HARDY STREET AND SOUTH COAST HIGHWAY
DENMARK

Traffic Engineering Assessment

Study Team: Nathan Woolcock
B.E. (Civil), M.I.E. Aust., M.V.P.E.L.A.

Our Reference: 15873R#2

1 INTRODUCTION

Traffix Group has been engaged by Metcash Food and Grocery to undertake traffic engineering assessments as part of the proposed supermarket and shops located at Lot 50 South Coast Highway, Denmark (W.A.).

In particular, this report includes assessments and analysis for the access and intersection arrangements associated with an amended version of the proposed development. It 'follows on' from an earlier report we prepared for an almost identical internal proposal in August 2013.

2 SUBJECT SITE AND SURROUNDS

The subject site is located on the northeast corner of the South Coast Highway/Hardy Street intersection in Denmark (Western Australian).

Immediately to the south is a Tourist Information Centre for which direct vehicle access is provided via South Coast Highway.

Further to the east, diagonally opposite the southeast corner of the site on the east side of Ocean Beach Road, are a number of other businesses including a hardware store and service station.

South Coast Highway is an arterial road that runs in a general east-west orientation adjacent to the site's southern boundary and is under the control of Main Roads WA.

It has a single carriageway and a posted 60km/h speed limit in the vicinity of the site. To the east of the site (and Ocean Beach Road) it has a typical two-way daily traffic volume of approximately 6,500 vehicles¹.

In the vicinity of the site, it has a reduced typical two-way weekday daily volume of approximately 3,530 vehicles².

To the west of the site, the volume reduces further with the most recent available data suggesting a typical two-way daily traffic volume of approximately 2,100 vehicles³.

Adjacent to the site, South Coast Highway comprises a wide sealed through lane in each direction with a footpath and kerb located on the southern side of the carriageway. A varying width shoulder is located on the north side of the carriageway adjacent to much of the site's frontage, except for a small section at its eastern end where a kerb is provided in association with the entry driveway to a tourist information bay.

Hardy Street extends to the north from South Coast Highway adjacent to the site's western boundary.

¹ Based on counts provided by Council from February, March and April 2013.

² Based on counts provided by Main Roads WA for the two full weeks commencing 11th February 2013.

³ Based on a February/March 2008 count as presented in the Transcore Traffic Impact Statement dated January 2009.

It has a single carriageway and facilitates two-way traffic flow. Traffic counts undertaken in the middle two weeks of February 2013 as provided to us by Council suggest that the average typical two-way weekday volume on Hardy Street immediately north of South Coast Highway is approximately 1,000 vehicles.

Ocean Beach Road extends to the south of South Coast Highway almost diagonally opposite the site's southeast corner.

It also comprises of a single carriageway and is predicted to have a typical two-way daily traffic volume of in the order of 4,000 vehicles⁴.

No turn lanes are currently provided at either of the Hardy Street and Ocean Beach Road T-intersections with South Coast Highway.

3 PROPOSAL

The proposal is to construct a supermarket and shops on the site generally as follows:-

- a 2,650m² supermarket
- several small shops with a total floor area of 500m².

On-site parking and loading provisions are also identified, with site access to be provided as follows:-

- left-in/left-out only on South Coast Highway approximately midway along the site's frontage (we understand that this connection may be removed in the future in the event that a northern leg is provided at the South Coast Highway/Ocean Beach Road intersection and site access is ultimately accommodated via the same),
- an all movements access on Hardy Street towards the southern part of the site, and
- separate entry and exit connections with Hardy Street accommodating for a one-way (clockwise) loading arrangement towards the northern part of the site.

A site layout plan of the proposal is attached at Appendix A.

⁴ Based on a December 2006 count as presented in the Transcore Traffic Impact Statement dated January 2009 which suggests a two-way volume of approximately 3,630vpd at that time.

4 TRAFFIC VOLUMES

4.1 TRAFFIC GENERATION

For the purposes of this assessment we have had consideration for the peak hour traffic generation rates set out in Section 3.6.1 of the RTA (NSW) Guide to Traffic Generating Development, Version 2.2 (October 2002) as follows⁵:-

- Peak Thursday Volume = $(155A(SM) + 46A(SS))/1,000m^2$
- Peak Friday Volume = $(138A(SM) + 56A(SS))/1,000m^2$
- Peak Saturday Volume = $(147A(SM) + 107A(SS))/1,000m^2$

where A(SM) and A(SS) = Supermarket and Specialty Shop floor area respectively

Application of the above formulae for the proposed floor areas calculates to a peak hourly generation of 443 vehicle trip ends on a Saturday.

The RTA Guide also sets out in the same Section that the calculated traffic generation can be 'discounted' by an average of 25% for a development of this size due to 'multi-purpose' trips. Adoption of this 'discount', which is consistent with what was accepted in the previously prepared Transcore report that was prepared for a slightly larger development proposal, calculates to a peak hourly generation of 332 vehicle trip ends. **However, consistent with our August 2013 report, we have conservatively not applied this 'discount' for the purposes of our assessments and analysis.**

We have also conservatively assumed that all site traffic will be new and that it is specifically generated in association with the site only. However, in reality, it is expected that most of the site generated traffic will be traffic that is already on the abutting road network and will simply be re-diverted to the site's proposed access points as required as part of a passing or 'linked' trip. This is particularly the case given the substantial 'without development volume' growth that Main Roads WA has requested we base our assessments on as discussed later.

It is further noted that we believe that traffic is likely to be distributed more evenly through the day/week for this site when compared with typical metropolitan sites given its location. In particular, we believe that during its busiest periods customers are likely to visit the site more randomly as they travel to and from various recreational activities which will occur at different times and days. Accordingly, we are of the opinion that the actual peak traffic associated with the site is more likely to be less than conservatively predicted rather than greater.

⁵ Note that the Thursday and Friday volumes are site movements during the evening peak hour, and the Saturday volume is the peak site volume.

It is further noted that there is no change to these predictions as a result of the more recent 2011 surveys as set out in the May 2013 Technical Direction given that the shopping centres surveyed in 2011 are much greater than proposed here.

In relation to traffic on the adjacent road network, we have conservatively assumed that 10% of the future Main Roads WA 'without development' required daily volumes as discussed later in this report would be generated during each peak hour. However, for the same reasons as mentioned previously, the daily traffic is likely to be generated more evenly throughout the day and no more than approximately 8% of the daily volume is expected to be generated during the relevant peak hour.

4.2 FUTURE TRAFFIC VOLUMES

For the purposes of this assessment we have adopted the following future traffic volumes for the adjacent road network as generally required by Main Roads WA, noting that these volumes are independent of potential development on the subject site:-

- South Coast Highway (along all sections abutting, west and east of the site)
 - 9,000 vehicles per day
- Ocean Beach Road (immediately south of South Coast Highway)
 - 8,300 vehicles per day
- Hardy Street (abutting the site)
 - 2,000 vehicles per day

The above volumes represent the following approximate percentage increase to existing volumes:-

- | | |
|--|------|
| • South Coast Highway (to the west of the site) | 428% |
| • South Coast Highway (adjacent to the site) | 250% |
| • South Coast Highway (to the east of the site) | 50% |
| • Ocean Beach Road | 208% |
| • Hardy Street | 200% |

4.3 TRAFFIC DISTRIBUTION

For the purposes of our previous assessment we adopted the distributions set out in the previously prepared Transcore report as follows:-

- 20% of site traffic would arrive from/depart to the north (Hardy Street)
- 15% of site traffic would arrive from/depart to the west (South Coast Highway)
- 35% of site traffic would arrive from/depart to the east (South Coast Highway)
- 30% of site traffic would arrive from/depart to the south (Ocean Beach Road via South Coast Highway)

Whilst this is consistent with Main Roads WA's statement that 65% of site traffic should be to and from the east, i.e. 30% to/from Ocean Beach, plus 35% to/from South Coast Highway further to the east, it is considered unrealistic to suggest that

only 15% of traffic would be to and from the west based on the Main Roads WA required future 'without development' traffic volumes along South Coast Highway to the west of the site, i.e. it is the same volume as along South Coast Highway to the east of the site.

In order to provide an even distribution of site traffic to and from the east and west of the site, the percentage of vehicles to and from the east would need to be decreased. However, as this would be contradictory to Main Roads WA's request, we have instead conservatively increased the percentage of site generated traffic to and from the west to 35%. This means the following distributions have been assumed for the purposes of our assessments.

- 20% of site traffic would arrive from/depart to the north (Hardy Street)
- 35% of site traffic would arrive from/depart to the west (South Coast Highway)
- 35% of site traffic would arrive from/depart to the east (South Coast Highway)
- 30% of site traffic would arrive from/depart to the south (Ocean Beach Road via South Coast Highway)

TOTAL SITE GENERATED TRAFFIC IN ALL DIRECTIONS = 120%

Accordingly, not only have we conservatively assumed that there would be no site generated traffic 'discount' due to multi-purpose trips (even though up to 25% is considered to be acceptable), or provided any 'discount' for linked or passing trips (which would be significant in this case in our opinion), but we have actually increased the number of movements that are already conservatively predicted to and from the site in order to maintain Main Roads WA's requirement for 65% of trips to and from the east whilst importantly ensuring that there is no under estimated distortion associated with movements to and from the west.

We have simply adopted a 50%/50% split during the peak hour given that directional volumes are unknown for existing/future through traffic on the adjacent road network. We have also assumed that approximately 75% of traffic arriving from the west would turn directly into the site via the proposed left-in/left-out arrangement on South Coast Highway, with other traffic arriving from the west entering the site after turning left into Hardy Street. All traffic arriving from the east will need to turn right at Hardy Street, whilst it is assumed that all traffic departing to the east would turn left out of the site's proposed connection with South Coast Highway.

4.4 POST DEVELOPMENT TRAFFIC

As discussed previously, the 'without development' future volumes that we have been told to adopt on the abutting road network represent significant increases to existing volumes and would be much more than the growth 10 years after development of the site⁶ which is what is typically applied in order to achieve a fair and equitable outcome.

It is also unlikely in our opinion that there will be a noticeable increase in traffic on the surrounding roads as a result of this development when the long-term ultimate

⁶ Table 4 in Section 6.3.2 of the Shire of Denmark Local Planning Strategy: Part 2-Background & Analysis (Version 5.0) suggests an average population growth of 1.812% between 2011 and 2021, with the same document suggesting an average household size of 2.5 persons (Table in Section 6.3.1).

traffic volumes are applied. In fact, there is unlikely to be any change to the future 'without development' turning and through volumes at the Ocean Beach Road/South Coast Highway intersection as a result of this development.

Nevertheless, the long-term ultimate post development traffic volumes which include all of our conservatively discussed assumptions are presented in Figure 1.

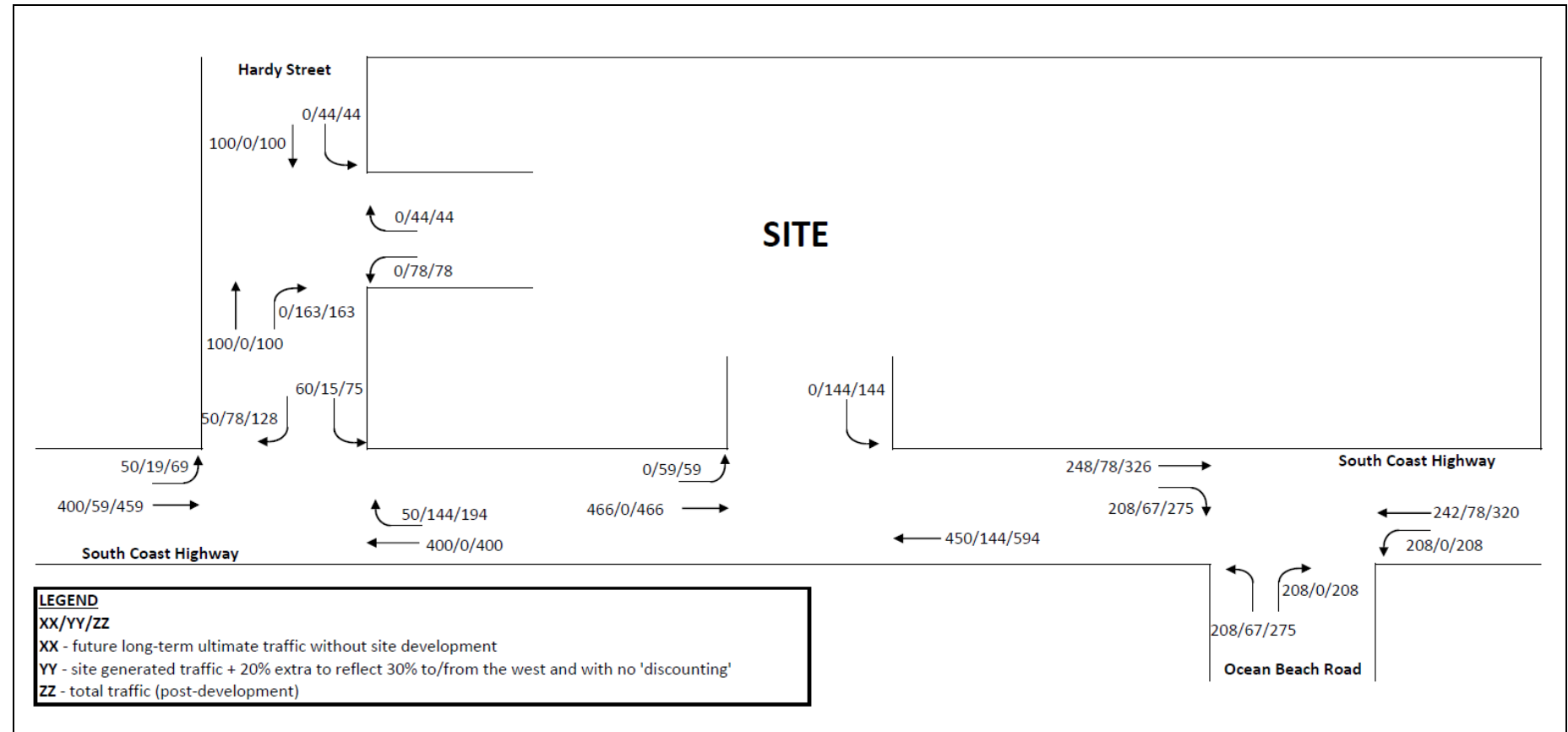


Figure 1: Conservative Long-Term Ultimate Post Development Peak Hour Turning Movements

5 INTERSECTION AND ACCESS ARRANGEMENTS

Despite the conservative analysis we presented in our August 2013 report showing that all intersections and access points would operate well within acceptable limits following development of the site, including scenarios with 40% growth plus site traffic with no 'discounts', we understand that Main Roads WA has now requested designated AUR turn lanes be provided at the South Coast Highway intersections with Hardy Street and Ocean Beach Road.

Whilst we believe that it is an inequitable outcome to require such turn treatments as part of this development⁷, we understand that the applicant would be willing to accept responsibility for upgrading the intersections to accommodate AUR treatments as desired by Main Roads WA if it assists with the approval process. We further understand that Main Roads WA requires the developer to maintain, and in some instances widen, the existing carriageway to provide for 7m of sealed carriageway either side of the centreline between the proposed left-in/left-out site connection and Ocean Beach Road and that this is also something that the applicant is willing to accept on the same premise.

Accordingly, for the purposes of analysis, we have adopted the AUR treatments detailed above. This means that the following access and intersection arrangements would be available:-

- An all movements site connection with Hardy Street.
- An movements intersection at Hardy Street and South Coast Highway which includes:-
 - widening of the Hardy Street carriageway between the intersection and the site's Hardy Street carpark connection, and
 - construction of AUR treatments on South Coast Highway.
- A left-in/left-out site connection with South Coast Highway, noting that this is located to the east of the existing driveway on the south side of the highway as requested by Main Roads WA.
- Widening of the northern end of Ocean Beach Road at its intersection with South Coast Highway to accommodate separate left and right turn exit lanes and to improve accessibility for larger vehicles.
- Construction of an AUR treatment on South Coast Highway at its intersection with South Coast Highway.
- Retention of, or additional widening to accommodate the same, a 7m sealed carriageway each side of the South Coast Highway centreline between the proposed left-in/left-out site connection and Ocean Beach Road.

⁷ Warrants for turn treatments are met regardless of whether this development proceeds, and analysis shows that there is no operational requirement as a result of the development proposal. This is presented in more detailed later.

6 INTERSECTION AND ACCESS ANALYSIS

For the purposes of our analysis we have used the SIDRA 5.1 program and have undertaken analysis of the following four upgraded/new intersections/access points based on the conservative future long-term ultimate traffic volumes with no 'discounting' of site traffic for any reason as discussed previously:-

- The Hardy Street/South Coast Highway intersection
- The Ocean Beach Road/South Coast Highway intersection
- The proposed site carpark connection with Hardy Street
- The proposed site connection with South Coast Highway

We have also undertaken analysis of the Ocean Beach Road/South Coast Highway intersection under a 'without development' scenario based on the existing intersection configuration.

We have adopted SIDRA Intersection 5.1 default settings except for the critical gap and follow-up headway values where we have applied the appropriate values as set out in the relevant AustRoads Guide as follows:-

Left and right out movements

- Critical gap = 5 seconds, follow-up headway = 3 seconds

Right in movements

- Critical gap = 4 seconds, follow-up headway = 2 seconds

Attached at Appendix B is full output from the SIDRA analysis which demonstrates that the proposed intersection and access geometry and configuration at all locations will be more than sufficient under the conservative peak hour scenario we have analysed.

In particular, a Degree of Saturation, 95th percentile queue and average delay of no more than 0.665, 26.3m and 27.2 seconds respectively has been determined for any movement at any of the four analysed locations (note that all of these maximum outputs are from the Ocean Beach Road/South Coast Highway intersection).

These outputs are well within acceptable operating conditions, particularly when considering all parameters and assumptions that have been adopted, and we are satisfied that there would be no discernible detriment to the surrounding road network and intersections as a result of the proposed development. In fact, we are of this opinion even if the identified AUR treatments are not provided as part of this development.

The output also shows that the 'with development' Ocean Beach Road/South Coast Highway intersection scenario is expected to operate much better than the 'without development' scenario. In particular, a Degree of Saturation and 95th percentile queue of 0.789 and 57.1m respectively has been determined for this intersection based on existing geometry.

We further note that there appears to be no long-term requirement for the Ocean Beach Road/South Coast Highway intersection to be upgraded to traffic signals in a capacity sense.

7 CONCLUSIONS

Having perused relevant documents and plans, undertaken assessments of traffic generation and distribution, and undertaken analysis, we are of the opinion that:-

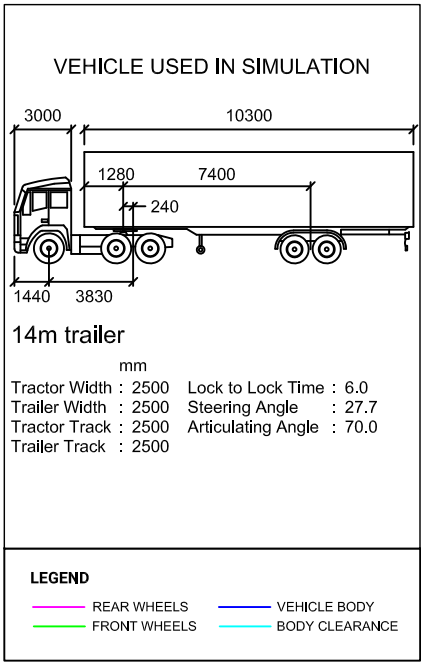
- a) the site generated traffic as presented in this report is significantly higher than what is expected in reality,
- b) warrants **would be met for AUL(s) and AUR(s) treatments** at the South Coast Highway intersection with Hardy Street based on reasonable 10 year growth predictions **without any development on the subject site**,
- c) warrants **would be met for an AUR treatment** at the South Coast Highway intersection with Ocean Beach Road based on reasonable 10 year growth predictions **without any development on the subject site**,
- d) warrants **would be met for AUL and AUR treatments** at the South Coast Highway intersections with Ocean Beach Road and Hardy Street based on the long-term future volumes required by Main Roads WA **without any development on the subject site**,
- e) there would be no discernible impact on the nearby roads and intersections for at least 10 years following development of the site even if no AUR treatments were provided at the South Coast Highway intersections with Ocean Beach Road and Hardy Street and there is no Nexus to require the same,
- f) there would be no requirement in a capacity sense to upgrade the Ocean Beach Road/South Coast Highway intersection to traffic signals in the long-term future, and
- g) there are no traffic engineering reasons to suggest that the proposed development should not be approved in terms of the nearby intersections, road network and proposed access connections, subject to the provision of necessary upgrades/design of the same.



Appendix C

Swept Path Diagrams – Delivery Vehicle Access

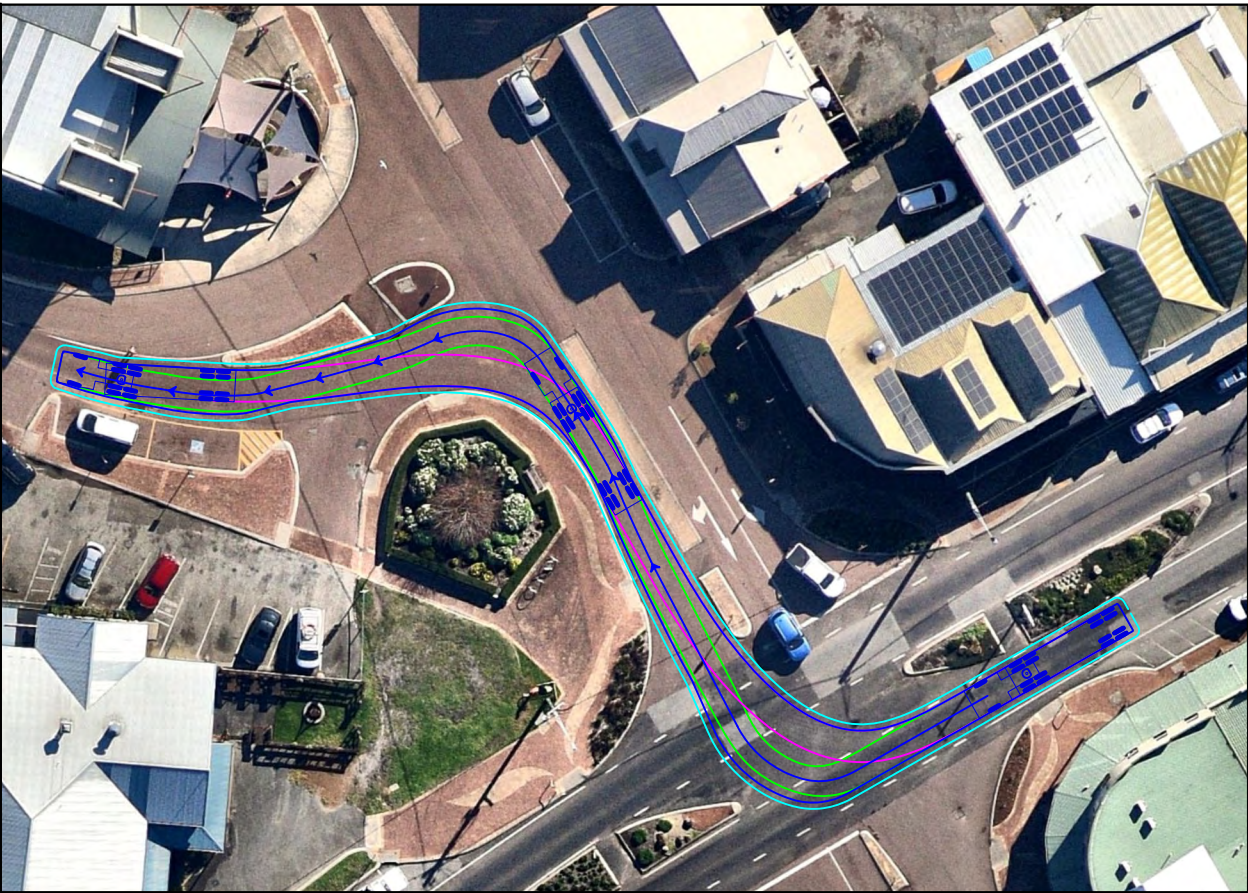
VEHICLE PROFILE



SEMI-TRAILER ACCESS - SOUTH COAST HWAY TO STRICKLAND ST TO MT SHADFORTH RD



SEMI-TRAILER ACCESS - SOUTH COAST HWAY TO STRICKLAND ST TO MT SHADFORTH RD



REV	DATE	NOTES	DESIGNED BY	CHECKED BY
A	19/11/2024	TRAFFIX FINAL	A. MIAN (RPE 16018)	N. WOOLCOCK (RPE 6892)

82-90 (LOT 50) SOUTH COAST HIGHWAY,
DENMARK, WA
SHOPPING CENTRE DEVELOPMENT

GENERAL NOTES:
DRAWN ON NEARMAP AERIAL IMAGERY
DATED 30 JUNE 2024

FILE NAME: G35886-01
SHEET NO.: 01



SCALE:
1:300 (A3)

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Traffic Group

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www.trafficgroup.com.au

VEHICLE PROFILE

VEHICLE USED IN SIMULATION

14m trailer

mm

Tractor Width : 2500	Lock to Lock Time : 6.0
Trailer Width : 2500	Steering Angle : 27.7
Tractor Track : 2500	Articulating Angle : 70.0
Trailer Track : 2500	

VEHICLE USED IN SIMULATION

99th percentile
(AS/NZS 2890.1:2004)

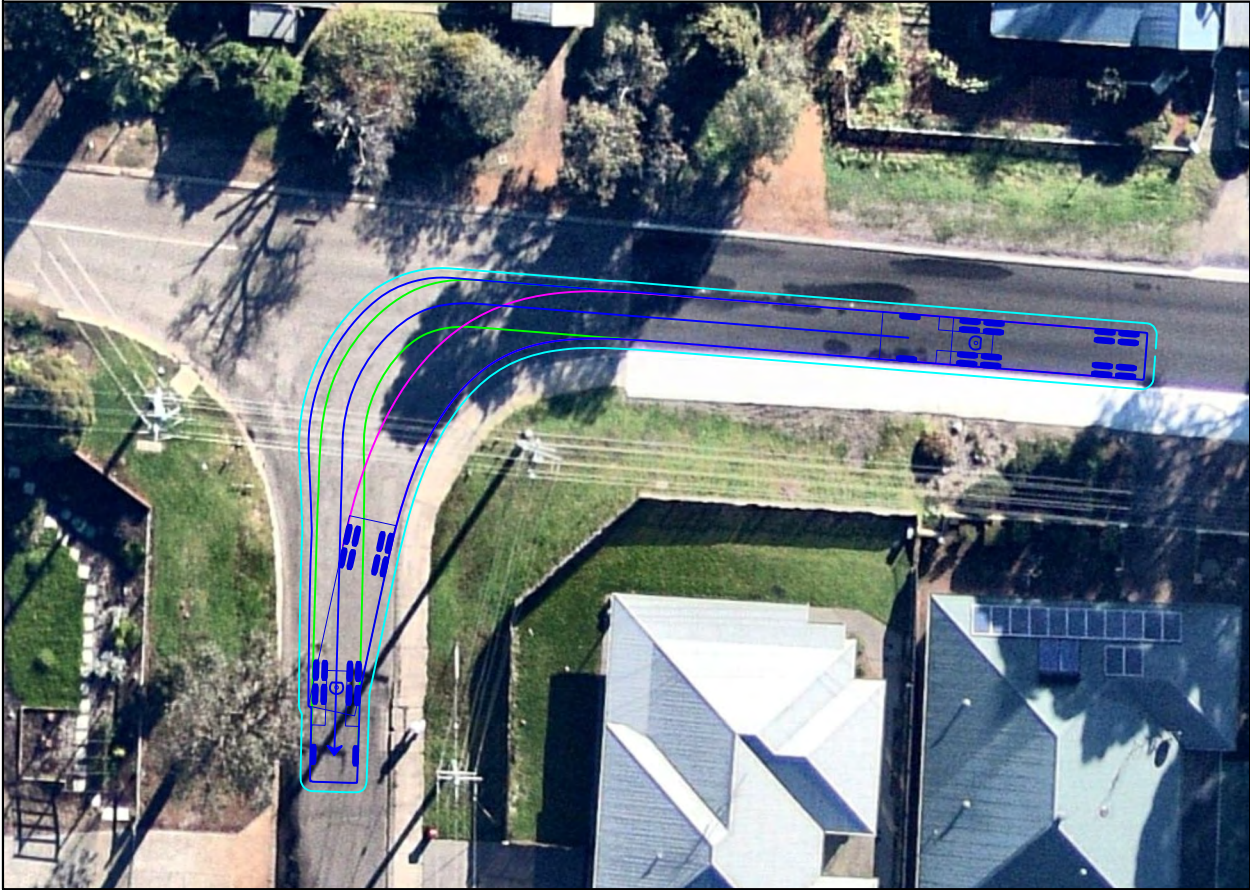
Width	: 1.94m
Track	: 1.84m
Kerb to Kerb Radius	: 6.3m

* actual template based on 'relevant longitudinal dimensions that affect swept path' as set out in Section B2.1 of AS/NZS 2890.1:2004

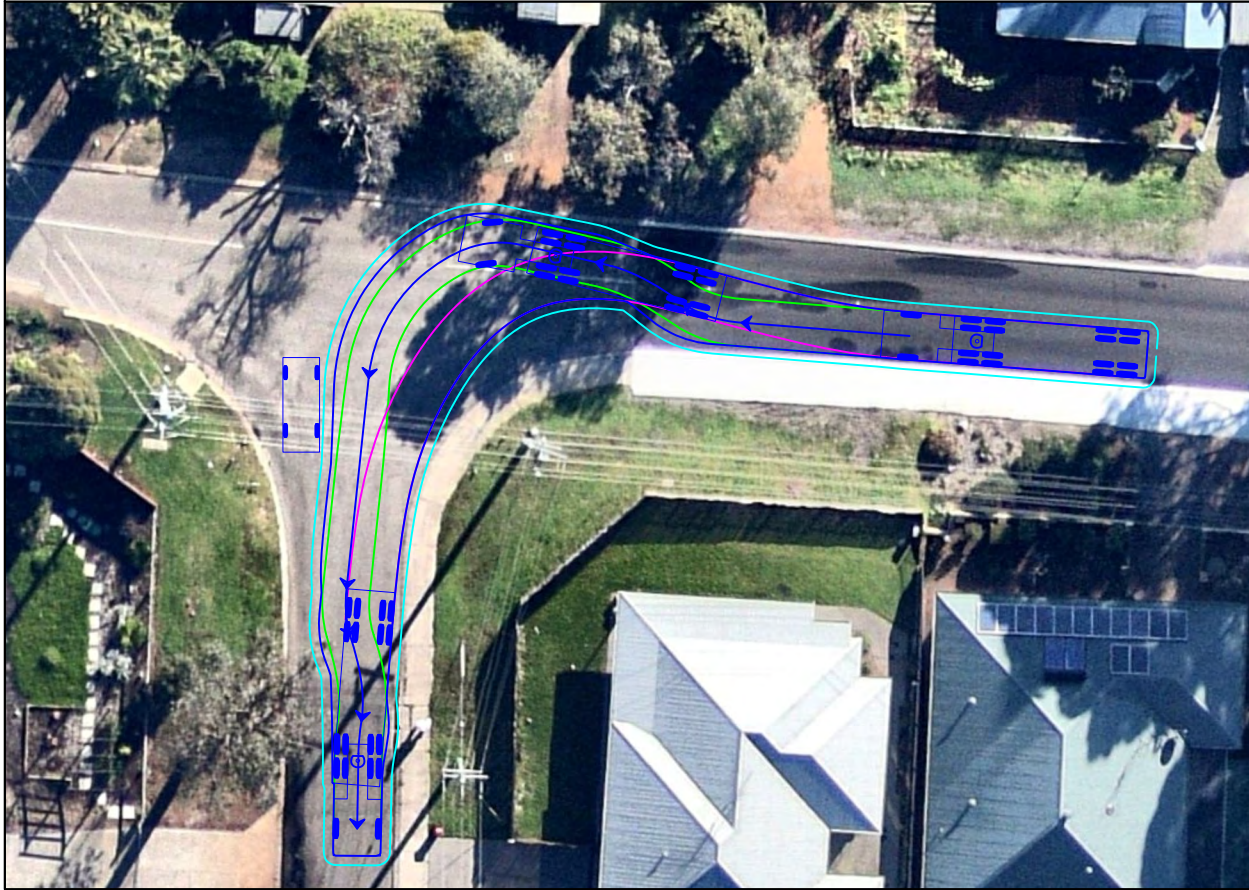
LEGEND

REAR WHEELS	VEHICLE BODY
FRONT WHEELS	BODY CLEARANCE

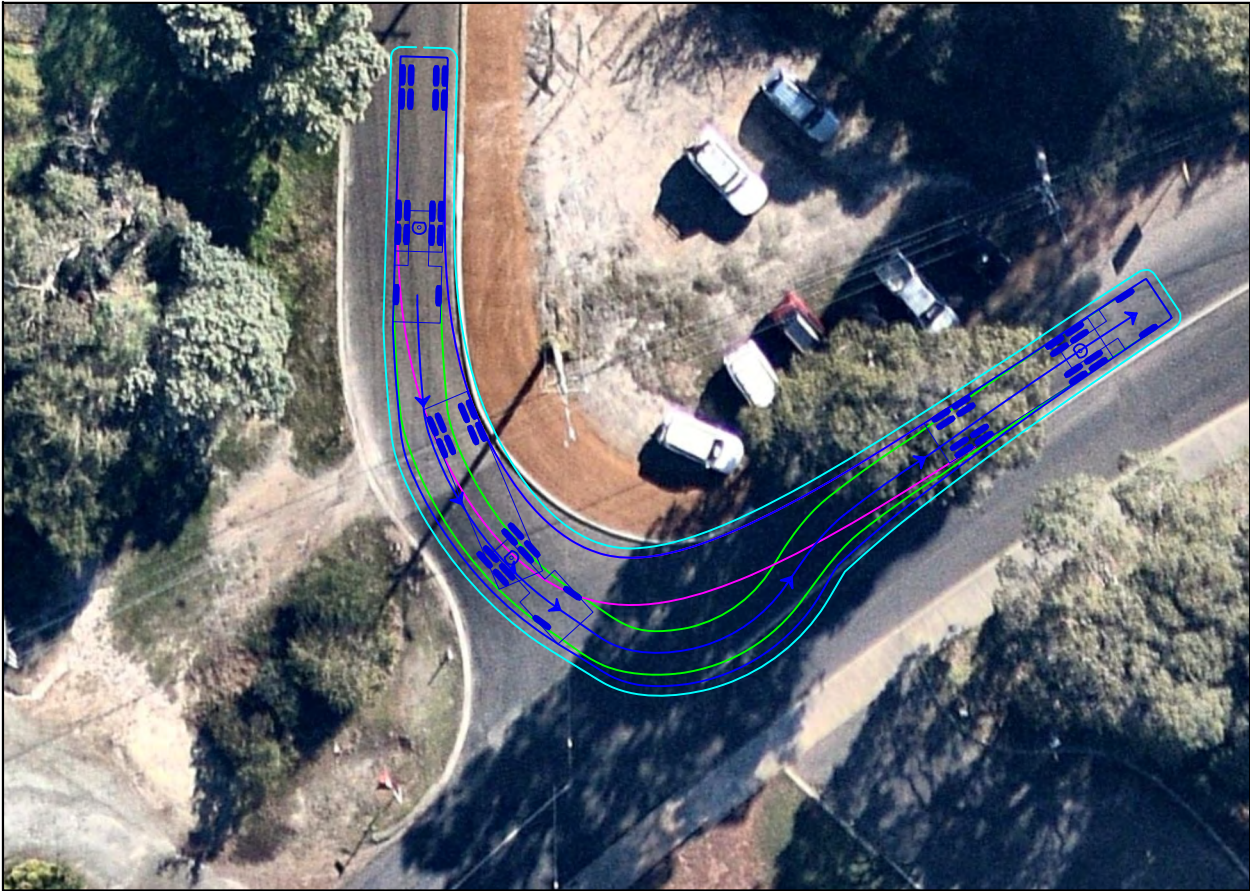
SEMI-TRAILER ACCESS - LEFT TURN FROM MT SHADFORTH RD TO HARDY ST



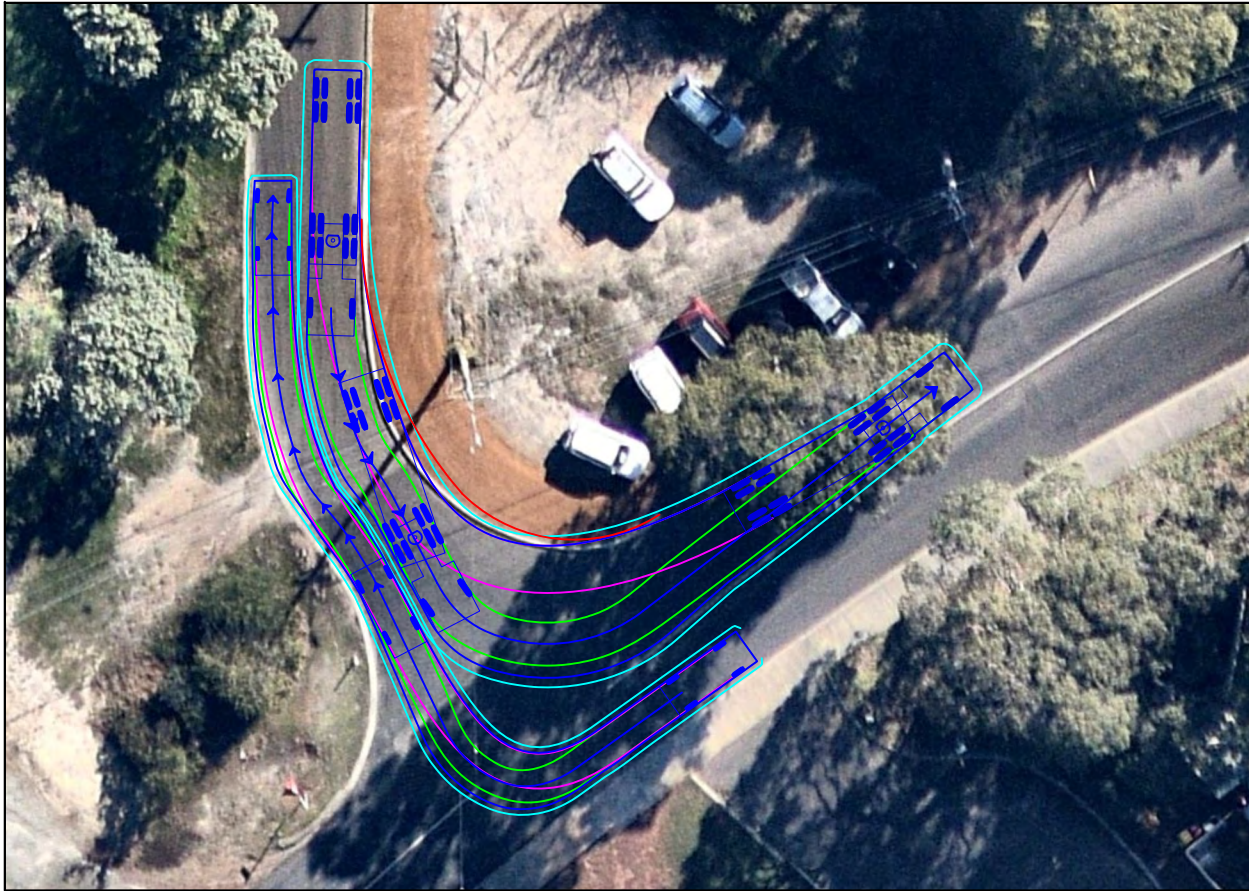
SEMI-TRAILER ACCESS - LEFT TURN FROM MT SHADFORTH RD TO HARDY ST & PASSING B99



SEMI-TRAILER ACCESS - HARDY ST TO SOUTH COAST HWAY



SEMI-TRAILER ACCESS - HARDY ST TO SOUTH COAST HWAY PASSING B99 W/ KERB MODIFICATION



REV	DATE	NOTES	DESIGNED BY	CHECKED BY
A	19/11/2024	TRAFFIX FINAL	A. MIAN (RPE 16018)	N. WOOLCOCK (RPE 6892)

82-90 (LOT 50) SOUTH COAST HIGHWAY,
DENMARK, WA
SHOPPING CENTRE DEVELOPMENT

GENERAL NOTES:
DRAWN ON NEARMAP AERIAL IMAGERY
DATED 30 JUNE 2024

FILE NAME: G35886-01
SHEET NO.: 02



SCALE:
1:400 (A3)

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Our Ref: A457.A (2013/153A)
Enquiries: Planning Services

20 October 2017

LB Planning
191A Naturaliste Terrace
Dunsborough WA 6281

Dear Mr Lawrence- Brown

Re: Application for Amendment to Development Approval: Proposed Shopping Centre Development – No. 82-90 (Lot 50) South Coast Highway, Denmark

I refer to your application received on 12 May 2017 and can advise that amended Development Approval has been granted, under delegated authority, subject to the conditions contained on the attached Development Approval notice.

It is essential that you read each of the conditions contained on the Development Approval notice as some conditions may be required to be addressed prior to the issuance of a building permit and/or commencement of works on-site (dependent on the actual condition requirements). The Development Approval notice also contains advice notes that contain information to assist with interpreting the conditions, draw attention to statutory responsibilities and/or to explain the next steps in the development process.

*Please note that Development Approval is **NOT** permission to commence building. Any queries relating to Building Permit matters should be directed to Building Services - phone 9848 0312 or email enquiries@denmark.wa.gov.au.*

Should you have any further queries regarding this Development Approval, please do not hesitate to contact Planning Services on 9848 0313 or email enquiries@denmark.wa.gov.au.

Yours faithfully

Annette Harbron
Director of Planning & Sustainability

Encl.

NOTICE OF DETERMINATION ON APPLICATION FOR DEVELOPMENT APPROVAL**SHIRE OF DENMARK - TOWN PLANNING SCHEME NO.3**

OFFICE USE		
FILE REF	A457.A	2013/153A

Description of Land:

No. 82-90 (Lot 50) South Coast Highway, Denmark

Description of Proposed Development:

Shopping Centre Development

Approval to commence development in accordance with an application dated the 12 May 2017 and the plans attached thereto is **GRANTED**

subject to the following conditions:

1. Development shall be carried out and fully implemented in accordance with the details indicated on the stamped approved plan(s) dated 28 September 2017 unless otherwise required or agreed in writing by the Shire of Denmark, including the following modifications:
 - a) The footpath in the Hardy Street road reserve in the vicinity of the loading/unloading area being realigned to 'back-of-kerb', with appropriate landscaping being planted along the fence line to address the visual impact of the 3.0 metre high timber fence.
2. The South Coast Highway/Hardy Street intersection being upgraded/modified, at the developer's expense, to the standard Type AUR and AUL intersection treatment in accordance with "Guide to Road Design Part 4A: Unsignalised and Signalised Intersections" and the "MRWA Supplement to Austroads Guide to Road Design – Part 4A" to the satisfaction of Main Roads WA and the Shire of Denmark.
3. Hardy Street being widened, at the developer's expense, to a minimum width of 7.0 metres between the South Coast Highway/Hardy Street intersection and the southern-most crossover to the site to the satisfaction of the Shire of Denmark.
4. The South Coast Highway/Ocean Beach Road intersection being upgraded/modified, at the developer's expense, to provide an AUR turn treatment on South Coast Highway and AUR and AUL turn treatments on Ocean Beach Road in accordance with "Guide to Road Design Part 4A: Unsignalised and Signalised Intersections" and the "MRWA Supplement to Austroads Guide to Road Design – Part 4A" to the satisfaction of Main Roads WA and the Shire of Denmark – refer Advice Note 1.
5. The South Coast Highway eastern bound lane from Hardy Street to east of Ocean Beach Road being widened to a minimum of 7 metres to the satisfaction of Main Roads WA.
6. The vehicle crossovers to Hardy Street to be constructed, drained and sealed (concrete, asphalt or brick paved) to the satisfaction and specifications of the Shire of Denmark.
7. The vehicle crossover to South Coast Highway to be approved, located, constructed, drained and sealed (concrete, asphalt or brick paved) to the satisfaction and specifications of Main Roads of WA (noting the in principle agreement from MRWA for the crossover to the South Coast Highway).
8. In the event that the future development and improvement of the South Coast Highway/Ocean Beach Road intersection provides for alternative access to the development site, the 'left in-left out' access onto South Coast Highway will be closed and an appropriate development contribution will be sought towards such intersection treatment by Main Roads WA.
9. Provision of a minimum 2.5 metre wide footpath (compromising of brick paving and concrete with brick paving being the predominant material (i.e. at least 50%)) to the specifications and satisfaction of the Shire of Denmark.
10. All off-street car parking bays and vehicle accessways thereto shall comply with the requirements of *Australian Standard AS2890.1:2004 Parking Facilities – Off Street Car Parking* (NB: minimum bay width of 2.7 metres to apply to the 90 degree car parking bays), the Building Code of Australia and Australian Standard AS2890.6:2009 *Parking Facilities Part 6: Off-street Parking for People with Disabilities*.

11. All vehicle parking, manoeuvring and circulation areas shall be suitably constructed, sealed (asphalt, concrete or brickpavers), drained, kerbed, marked, signed (where required) and thereafter maintained.
12. All car parking areas and access ways shall only be used for their stated purpose at all times and shall not be used for display or general storage purposes.
13. No parking, display or storage of vehicles, equipment, materials or products associated with the approved landuse shall occur within the adjoining road verge area(s) at any time.
14. The installation of outdoor lighting shall be in accordance with the requirements of *Australian Standard AS4282-1997: Control of the Obtrusive Effects of Outdoor Lighting*.
15. Prior to the issuance of a building permit, engineering plans providing details on crossovers, car parking, vehicle accessways, footpaths (internal and external of the site), Hardy Street road widening works, bicycle racks and associated infrastructure works being submitted to and approved by the Shire of Denmark.
16. Prior to the issuance of a building permit, engineering plans providing details on intersection treatment upgrades/modifications, road carriageway upgrading works and associated infrastructure works being submitted to and approved by Main Roads WA.
17. Prior to occupancy of the development, such land required in association with the intersection treatment and road carriageway widening works is to be ceded to the Commissioner for Main Roads WA free of cost and without any payment of compensation.
18. All costs associated with roadworks required by Main Roads WA and/or the Shire of Denmark are to be met by the developer, including the need for relocation of utilities, street signs, street trees, existing drainage arrangements etc.
19. Existing infrastructure located within the Hardy Street and South Coast Highway road reserves shall be retained and protected during the construction period with any damage to the infrastructure to be repaired by the developer at their expense to the satisfaction of the Shire of Denmark and/or Main Roads WA.
20. Prior to the issuance of a building permit, a stormwater management plan being submitted to and approved by the Shire of Denmark, with such stormwater plan to be in accordance with water sensitive urban design principles (refer Advice Note 2).
21. Prior to the issuance of a building permit, a landscaping plan shall be submitted to and approved by the Shire of Denmark, with the landscaping areas being those identified on the approved site plan, the additional landscaping area required by Condition 1 and the Hardy Street and South Coast Highway road reserves abutting the development site. The landscaping plan shall be submitted at a scale of 1:200 or 1:100 and shall detail the following:
 - a) Proposed trees and shrubs to be planted including species, number and size of plants (NB: emphasis should be on native plants because of their general hardiness and low water requirements). Trees and plants are to be shown in exact location using clear symbols.
 - b) Site layout and context, including property boundaries, street names, building/s, parking areas, paved areas, adjacent verges, existing trees and vegetation to be retained (noting the two existing mature trees within the South Coast Highway road reserve should be retained where possible).
 - c) Reticulation methods.
 - d) Maintenance arrangements.
 - e) Weed control measures associated with existing weed infestations on-site.
 - f) Details of any hard landscaping, paving materials, street furniture, bollards, bins, lighting etc.

Refer Advice Note 3 regarding some initial comments for consideration in preparing the landscaping plan.
22. Prior to occupancy of the development, all landscaping shall be carried out in accordance with the approved landscaping plan and thereafter shall be maintained as landscaping at all times.
23. Prior to the issuance of a building permit, a site-specific noise report prepared by a suitably qualified acoustic consultant shall be submitted to and approved by the Shire of Denmark, with the recommendations of that report to be implemented to the satisfaction of the Shire of Denmark at all times. The report shall address any increase, or potential increase, in noise levels and the methods by which they can be attenuated so as not to increase the level of noise from the site to protect the amenity of the area. The report shall ensure that the loading/unloading arrangements, waste collection operations, and the refrigeration and air conditioning systems to be associated with the development are taken into account. Refer Advice Note 4 regarding comments about the noise assessment report lodged to date.

24. Within three (3) months of occupancy of the supermarket, the developer shall provide, at their expense, a post construction acoustic survey prepared by a suitably qualified acoustic consultant to the Shire of Denmark, to demonstrate that the assigned noise levels in *the Environmental Protection (Noise) Regulations 1997* have been achieved.
25. Deliveries to the shopping centre development via commercial delivery vehicles (including large articulated vehicles, refrigerated vehicles, light delivery vehicles) shall only occur between 7am and 10pm Monday-Saturday and 9am and 10pm on Sundays & Public Holidays.
26. The solid gates/doors to the loading dock are to be kept closed between the hours of 7pm and 7am daily unless a delivery vehicle is accessing or egressing the loading dock area.
27. All delivery vehicles must be located entirely on the site during loading and unloading of goods associated with the use of the site.
28. Rubbish enclosure areas adequate to service the development are to be constructed and provided in accordance with the *Shire of Denmark Health Local Laws 1998 (as amended)* – noting such areas are to have drainage sumps and hot & cold hose points.
29. All waste management operations/works to be carried out in accordance with the Waste Management Plan (Revision E dated 7 March 2014) for the life of the development.
30. A Construction Management Plan shall be submitted to and approved by the Shire of Denmark as part of the Building Permit application, with such plan to address the following:
 - a) Access to and from the site.
 - b) The delivery of materials and equipment to the site.
 - c) The storage of materials and equipment on the site.
 - d) The parking arrangements for contractors and sub-contractors.
 - e) Management of construction waste.
 - f) Dust and sand mitigation measures.
 - g) Construction times (if proposing different times to the relevant Regulations) and associated noise prevention measures.
 - h) Other matters likely to impact on surrounding properties.
31. The provision of all services, including augmentation of existing services, necessary as a consequence of any proposed development shall be at the cost of the developer and at no cost to the Shire of Denmark.
32. The development is to be connected to a reticulated water supply provided by a licensed water provider.
33. The development shall be connected to sewer.
34. The existing colorbond fencing on the entire length of the northern property boundary to be retained unless the adjoining landowner agrees to the fence being removed (refer Advice Note 5). If a new fence is required, the design of any such fence shall be approved by the Shire of Denmark, with the pre-development levels in the vicinity of such fence being retained such that the fence on both sides of the property is approximately 1.8 metres high.
35. No signage has been approved as part of this planning application – refer Advice Note 6.
36. At the time of lodgement of the building permit application, the developer to pay the Development Contributions for Road Infrastructure fee as per the Shire of Denmark's Operative Fees and Charges Schedule (refer Advice Note 7).
37. As per Town Planning Scheme Policy No. 42: Public Art, the developer shall incorporate public art within the development or contribute financially to the Shire's Public Art Fund, with the value being determined on the basis of 0.5% of the value of the construction cost of development.

Should the developer seek to comply with this condition by incorporating public art within the development, prior to the issuance of a building permit, details of the proposed public artwork/s (having regard to Clause 6.3.1 of Town Planning Scheme Policy No. 42: Public Art) are to be submitted to and approved by the Shire of Denmark – refer Advice Note 8.

Or

Should the applicant/developer seek to comply with this condition via a financial contribution, such payment shall be made prior to the issuance of a building permit.

38. Immediately prior to the occupation of the development for its approved purpose, the developer shall notify the Shire of Denmark, in writing, of the effective completion of the approved development such that a Final Inspection can be carried out to determine compliance with the conditions contained on this Development Approval.

39. This approval supersedes Development Approval 2013/153 as issued by the Great Southern Joint Development Assessment Panel dated 12 June 2014.

AND the following advice notes:

1. In relation to Condition 4, Main Roads WA have advised that dependent on the final design for the South Coast Highway/Ocean Beach Road intersection, additional land from the subject site may be required to be transferred free of cost to the Commissioner of Main Roads WA for road purposes and without any payment of compensation.
2. In relation to Condition 20, any modifications to the South Coast Highway existing drainage system that traverses the subject site will require the approval of Main Roads WA to be obtained.
3. In relation to Condition 21, Sustainability Services provides the following preliminary comments for consideration:
 - a) Where possible, and consistent with Crime Prevention Through Environmental Design principles, consideration should be given to retaining existing vegetation along the boundaries rather than removing and replacing the new stock.
 - b) Where appropriate, consideration may be given to supporting tubestock planting rather than planting advanced stock in litre bags having regard to increased rates of survival and decreased watering requirements.
 - c) Consideration should be given to looking at local native vegetation and/or landscaping methods having regard to sustainable water management practices.
4. In relation to Condition 23, approval of this DAP application does not imply acceptance and/or unconditional approval of the Noise Assessment Report (April 2017 as prepared by ND Engineering) accompanying this development application. In this regard the Shire of Denmark's Health Services highlights the following:
 - a) Reliance on refrigeration trucks turning off engines is not appropriate for although this measure could be beneficial it is too difficult for either the business to control and/or the Shire of Denmark to enforce as it assumes that the supermarket operator has control of the supply chain arrangements.
5. In relation to Condition 34, evidence of such agreement from the adjoining landowner should be provided to the Shire of Denmark prior to any portion of the fence being removed.
6. In relation to Condition 35, consultation should occur with the Shire of Denmark regarding approval requirements for signs having regard to Town Planning Scheme No. 3 and Town Planning Scheme Policy No. 32: Signs.
7. In relation to Condition 36, as per the Council's 2017/18 Fees & Charges Schedule, the applicable development contribution fee is \$1885 per 1000m² of land or floorspace, whichever is greater (GST exempt).
8. In relation to Condition 37, it is considered that the forecourt area should be the focus of such public art given this area presents an opportunity to be a 'meeting point/focal point' within the development site.
9. Approval of this DAP Application does not imply acceptance and and/or unconditional approval of the Traffic Engineering Assessment Report accompanying this planning application.
10. It is the responsibility of the developer to ensure that building setbacks correspond with the legal description of the land. This may necessitate re-surveying and re-pegging the site. The Shire of Denmark will take no responsibility for incorrectly located buildings.
11. It is the responsibility of the developer/owner to search the title of the property to ascertain the presence of any easements and/or restrictive covenants that may apply.
12. The applicant/owner is reminded of their legal obligations with respect to the *Aboriginal Heritage Act WA 1972*.
13. The proposed operations, during and after construction, are required to comply with the *Environmental Protection (Noise) Regulations 1997*.

NOTE 1: IF THE DEVELOPMENT THE SUBJECT OF THIS APPROVAL IS NOT SUBSTANTIALLY COMMENCED WITHIN A PERIOD OF TWO (2) YEARS, OR ANOTHER PERIOD SPECIFIED IN THE APPROVAL, AFTER THE DATE OF DETERMINATION, THE APPROVAL WILL LAPSE AND BE OF NO FURTHER EFFECT.

NOTE 2: WHERE AN APPROVAL HAS SO LAPSED, NO DEVELOPMENT MUST BE CARRIED OUT WITHOUT THE FURTHER APPROVAL OF THE SHIRE OF DENMARK HAVING FIRST BEEN SOUGHT AND OBTAINED.

NOTE 3: THIS IS NOT A BUILDING PERMIT. AN APPLICATION FOR A BUILDING PERMIT IS REQUIRED TO BE SUBMITTED AND APPROVED BY THE SHIRE OF DENMARK (BUILDING SERVICES) PRIOR TO ANY WORKS COMMENCING ON-SITE.

NOTE 4: It is advised that should you be aggrieved by any part of this decision, there is a right to apply for a review by the State Administrative Tribunal (SAT) - refer Part 14 of the *Planning and Development Act 2005*, noting an application for review must be lodged within 28 days from the date of determination.



DIRECTOR OF PLANNING & SUSTAINABILITY






DATE





SCHEDULE OF SUBMISSIONS: PROPOSED COMMERCIAL PREMISES – SHOPPING CENTRE
No. 82-90 (Lot 50) SOUTH COAST HIGHWAY, DENMARK (2025/37; A457)

Submission Number		Verbatim Submission	Planning Services Comment
S1		<p>Do You Support the Proposal? Yes</p> <p>Comments. Only if it is not IGA. We need completion in this town.</p>	
S2		<p>Do You Support the Proposal? Undecided</p> <p>Comments. I don't want Big IGA...then Indians to own the new shopping centre. I'd rather a Coles. Big IGA too expensive and we need competition to keep prices fair</p>	
S3		<p>Regarding the plans for a new supermarket on the site on corner of Hardy St and South Coast Hwy. I am against this proposal.</p> <p>It is a dangerous intersection at the moment. It has a curve at its exit from South Coast Hwy entering Hardy St. Traffic often turns down there crossing the centre line of the road. There are no white lines on the road. There's a lot of traffic on South Coast Hwy and the additional cars turning into the new supermarket car park will cause chaos. In addition, the Ocean beach intersection with South Coast Hwy is a well-known traffic build up area especially in holiday times. So, when you have 2 intersections clashing in a small area there's going to be problems.</p> <p>All the cars pulling into this supermarket will cause delays on a major highway. The neighbourhood noise will increase. This is not good for the residents of Amaroo village.</p> <p>On top of all this Denmark is looking for a major supermarket away from IGA. Denmark would support a change if Woolworths or Coles were interested in coming here. There's a lot of residents getting food in Albany either online or travelling there in person. Many travellers and residents alike complain about the expensive IGA prices. There's no point in building another IGA when residents are going further away for food.</p>	
S4		<p>Do You Support the Proposal? No</p> <p>Comments. We already have an overpriced IGA, the one operated by the Guru Brothers/Met Cash group, which I avoid going to. Like so many other locals, I am doing my weekly shopping in Albany and fill up with little IGA because I don't support MetCash taking advantage of the local population. I would absolutely support a competition supermarket like Aldi or Coles/Woolies to bring prices down to a normal level and more variety. But I don't endorse the mere relocation of an enterprise that profits from a lack of choice/competition.</p>	
S5		<p>Do You Support the Proposal? No</p> <p>Comments. While I agree that the current supermarket situation is not ideal, given that the owners of this</p>	

		<p>business are holding locals to ransom with their pricing, allowing another huge structure to be built to support another supermarket is not the solution.</p> <p>The highway is already dangerous - the 40km speed limit is ignored and the local police do nothing to remedy this. Adding all of this traffic would be a nightmare to locals.</p> <p>There is a consideration to be given to the impact of the actual building - Hardy St would likely be closed allowing for redesign as it is easily the worst street in Denmark, however this would put a huge amount of pressure on all other side roads to head north within Denmark.</p> <p>Continuing on traffic, the amount of speeding and traffic that would be brought to areas that are already overburdened with traffic would be unacceptable.</p> <p>The proposed design is not the design direction I believe Denmark should be taking, with very little sympathy shown to the area and the surrounds. A lack of overall town planning has seen Denmark collect buildings that add nothing to each other aesthetically.</p> <p>Considering the location, right next door to a retirement village, is on the surface a plus. However, since supermarkets often become a local hang out, this could lead to unsuitable behaviour in the middle of suburban Denmark.</p> <p>The noise levels would also be concerning for these residents, with the existing IGA having huge levels of noise early in the morning. We have also seen how long things are taking to build at the moment - projects that should be only 4-6 months are pushing 18 months. There is a distinct impact on the neighbours of these projects that no one seems to care about. The surrounding people and the suburb at large deserve to live in a relaxing environment, to have some peace and quiet. Having lived with the non stop drone of the Smith St development, one that goes for 7 days a week, week in week out, the mental health impact on the residents is unacceptable.</p> <p>And lastly what is to happen to the tiny and small businesses that are currently in the Strickland St area that have incidental traffic brought to their business by the existing IGA? What will happen to them? Will this area of Denmark sim play become a dead zone, like so much of the southern end of Strickland St. How sad that our impressions to those all important tourists will be one of a dying town. No longer a central 'shopping street' we will be like any other over subscribed town. No thank you. That's not why any of us moved here.</p>	
S6		<p>Do You Support the Proposal? No</p> <p>Comments. My question is, will the specialty stores be independent small business and what is the other shopping centre going to be? I know from living previously in other beautiful small towns that a gentrification of chain stores can have a seriously dismal impact on a thriving town. It essentially "ruins" them. It would be very sad to see denmark with anything of this nature. The reason people love it and why I live here is because it doesn't have any of these kinds of stores. The IGA is perfect the way it is. We don't need more. Albany is a short drive for that kind of stuff.</p>	
S7		<p>Do You Support the Proposal? No</p> <p>Comments. We don't need a new IGA! Town need Coles or Woolworths so there's some competition in food</p>	

		pricing and town not running out of groceries as it currently does on a regular basis.	
S8		<p>I am writing to record my strong objections to the proposed new Supermarket development at the corner of South Coast Highway.</p> <ol style="list-style-type: none"> 1. Small shops in Denmark are perennially struggling to survive. Any new small speciality shops in the proposed development will have the huge advantage of massive shopper numbers going to the Supermarket. This will essentially kill off many of Denmark's pre-existing small shops and effectively destroy the Denmark CBD. 2. The traffic implications <ul style="list-style-type: none"> - massively further congesting the Ocean Beach Road/South Coast Highway intersection, the scene of several fatalities already in the last couple of years. In tourist season it will be even more disastrous. Log jamming the South Coast entrance to town. • -turning Hardy Road into a congested major city street for all Hardy Street residents (especially those of Amaroo Village) and, as a result, collapsing house prices in the street. • making the intersection of Hardy Road and Mt Shadforth Road into a congested inner city nightmare.. 3. Materially disadvantaging the residents of Amaroo Village and their quality of life. 4. The current owners of IGA are generally seen to have reduced the shopping experience in their supermarket in terms of prices and products stocked compared to the previous owners. There has been a large-scale migration of Denmark shoppers to Albany supermarkets as a result. This does nothing to engender confidence in their operation of a bigger retail centre. Because it relies on the same IGA Metacash buying operation, prices will not be cheaper. <p>Do You Support the Proposal? No</p> <p>Comments. I am writing to record my strong objections to the proposed new Supermarket development at the corner of South Coast Highway. Small shops in Denmark are perennially struggling to survive. Any new small speciality shops in the proposed development will have the huge advantage of massive shopper numbers going to the Supermarket. This will essentially kill off many of Denmark's pre-existing small shops and effectively kill the Denmark CBD. It will, as a result, almost certainly destroy the small town character that is one of Denmark's most enduring and appealing features.</p> <p>Traffic implications... Massively further congesting the Ocean Beach Road/South Coast Highway intersection, the scene of several fatalities already in the last couple of years. In tourist season it will be even more disastrous.</p> <p>Log jamming the South Coast entrance to town. Turning Hardy Road into a congested major city street for all Hardy Street residents (especially those of Amaroo Village) and, as a result, collapsing house prices in the street.</p> <p>Making the intersection of Hardy Road and Mt Shadforth Road into a congested inner city like nightmare.</p>	

		<p>3. Materially disadvantaging the residents of Amaroo Village and their quality of life.</p> <p>4. The current owners of IGA are seen, by and large, to have reduced the shopping experience in their supermarket in Denmark in terms of higher prices and the type of products stocked compared to previous owners. There has been a sizeable migration of Denmark shoppers to Albany Coles and Woolworths supermarkets as a result. This background does nothing to engender confidence in the current owners' operation of a bigger retail centre. Because it relies on the same IGA Metacash wholesale distribution network, prices clearly will not be any lower in a new building, the cost of shopping being a major concern of Denmark people. Yours faithfully Neil Riddell. -apologies if you have received this through other channels, thank you for taking the time to consider my opinions</p>	
S9		<p>Do You Support the Proposal? No</p> <p>Comments. I am writing as a concerned resident regarding the proposed development of an IGA supermarket on Lot 50. I respectfully urge you to reconsider allowing this project to proceed, as I believe it poses several significant issues for our community.</p> <p>Firstly, the increased traffic this development would bring is a major concern. Lot 50 is in a location that is already busy, and adding a high-traffic commercial outlet would place further pressure on local roads and create safety concerns for pedestrians and nearby residents.</p> <p>Secondly, while the promise of competitive grocery pricing is often cited as a benefit, experience in other towns shows that simply adding another chain store albeit the same store does not always result in meaningful price reductions. Instead, it risks undermining our existing local businesses without delivering real cost-of-living relief.</p> <p>Finally, on a personal note, the proposed site is very close to my home. The increased noise, traffic, and activity would have a direct and negative impact on my quality of life. I chose to live in this area because of its relative peace and sense of community, and I fear this development would compromise both. I appreciate the efforts of Council to support growth and development, but I believe this particular proposal is not in the best interests of our town's long-term well-being. Please consider the broader impacts on residents and explore alternative solutions that better align with our community values. Thank you for your time and consideration.</p>	
S10		<p>Do You Support the Proposal? Yes</p> <p>Comments. The current IGA is too expensive to shop at forcing us to drive a further 30 minutes to access Cole's or Woolies. Car parking at current IGA is terrible and undercover dangerous. Please allow enough parking at the new sight. As long as prices come down the new shopping centre will be my new local shop for groceries.</p>	
S11		<p>Do You Support the Proposal? No</p> <p>Comments. Definitely NO to a shopping centre on corner Hardy and South Coast Hwy, not fair on residents in Hardy St, too noisy too much more traffic, increase of pedestrians, increase of people doing burglary's etc, and definitely not IGA!!! It's not suitable for a shopping centre at all!!!</p>	




S12		<p>Do You Support the Proposal? Yes</p> <p>Comments. Ensuring the plan allows for the increase in traffic volumes. Possibly a median strip on South Coast Hwy for vehicles turning right into the centre or a roundabout at Hardy St.</p>	
S13		<p>Do You Support the Proposal? Yes</p> <p>Comments. This development would be a fantastic improvement for the community. Personally, I find the current IGA location extremely stressful to navigate—especially with parking challenges and the steep hill, which makes it difficult to manage a trolley and children. More often than not, I find myself shopping outside of Denmark, even though I would much prefer to support local businesses.</p> <p>Denmark is in serious need of more accessible parking and level ground, particularly for the elderly, people with disabilities, and families. it's not just inconvenient, it's unsafe. Finding parking is difficult even outside of peak holiday times, and it's only getting worse</p> <p>Like it or not, Denmark is growing. It's time we plan for a future that is inclusive and safe for everyone. Please consider this development for the good of our entire community.</p>	
S14		<p>Do You Support the Proposal? Yes</p> <p>Comments. Yes!!! This would be such an amazing development for the community. I personally find it extremely stressful going to the current IGA with parking and on the hill is extremely difficult to maneuver with a trolley and family. I tend to find myself shopping out of Denmark. I would prefer to shop locally. Denmark is in dire need for more parking and level ground for the elderly, disabilities and even families I have seen on numerous times over the years, trolleys going flying down the hill. Finding parking is extremely difficult not just in holiday times and is only getting worse especially not being able to park at Den Burger (private property). Denmark is growing whether we like it or not. Let's make it more family, elderly and disability friendly! Please consider this for the community!</p>	
S15		<p>Do You Support the Proposal? No</p> <p>Comments. The position in regards to entry straight onto the Highway for the Hardy Road intersection on a curve and rise. The Ocean Beach Road intersection especially at tourist time is dangerously congested without adding more traffic.</p> <p>The noise especially at night for the residents at Amaroo but also during the day</p> <p>Moving shops from the centre of town leaving buildings empty.</p> <p>Parking especially in tourist season where is the room for cars and caravans etc</p> <p>Metcash. Same old same old. People are still going to shop Coles and woolies in Albany whether by delivery or going into town. When they go to Albany they go to Bunnings and other businesses which affects other Denmark businesses. So for no gain as the price and quality from the Guru Brothers will not change it it not</p>	

		<p>worth going through the above issues.</p> <p>Many elderly people that I know get their groceries delivered or happily shop at the little IGA where much of the fresh produce is locally sourced and the prices are very similar to the big IGA No way that this will be a positive for this town</p>	
S16		<p>Do You Support the Proposal? No</p> <p>Comments. What is the plan for the current site?</p> <p>How is the Shire going to address the changing landscape of retail in Denmark as this will shift current foot traffic away from Strickland St.</p> <p>How is the traffic management going to be rectified with a new busier intersection on an already dangerous spot? This includes managing the traffic flow from Ocean Beach Road. How does this fit into the Shires strategic plans, including environmental impact?</p>	
S17		<p>Do You Support the Proposal? No</p> <p>Comments. I don't think Denmark needs a development of that magnitude. We need to support our small businesses. Besides, how many supermarkets one owner should have in Denmark? It's like opening 2 x Coops or 2 x Green Pantry's... What is the benefit of that complex for Denmark? I do not see it</p>	
S18		<p>Do You Support the Proposal? Undecided</p> <p>Comments. We need diversity in shopping. The IGA prices are taking the Micky, and we need a competitor in town to help drive cheaper prices.</p>	
S19		<p>Do You Support the Proposal? Yes</p> <p>Comments. None I think it's a great idea It will be easier to get in and out ,easier parking specially for older people I just wish we could get a Woolies or Coles then IGA wouldn't screw people over with their prices</p>	
S20		<p>Do You Support the Proposal? Undecided</p> <p>Comments. I'm concerned more for what specialty shops may go into the space & also the proposed liquor store. Do we really need another one (already have BWS plus the drive throw pubs nearby).</p> <p>I'm worried the specialty shops may be foreign owned instead of local small businesses. I'd hate to see fast food chains put in there.</p> <p>The reason we moved here is because of Denmark's uniqueness, village/country town style. I'm also curious about what will become of the space in the current IGA location. I'm not against IGA improving its space, though I do feel for the noise level that Amaroo residents will now hear (notice the loading dock backs onto their fence).</p>	
S21		<p>Do You Support the Proposal? No</p> <p>Comments. The "speciality" shops are a concern for our already existing shops. The location is a terrible choice and a traffic nightmare. We came to Denmark for the small town village feel. We don't want this.</p>	

S22		<p>Do You Support the Proposal? No</p> <p>Comments. Small businesses in Denmark struggle to find employees already. Adding 7 new stores to the town will only make it harder for these small businesses to find employees and the proposed location is right next to a retirement village which would ruin the peace and quiet the older generation in this town enjoy and love so much</p>	
S23		<p>Do You Support the Proposal? No</p> <p>Comments. That the character of Denmark will change, too many people, too many shops, no workforce as shop workers can't afford to live here, no parking, the charm of Denmark will be lost. No locals can afford to buy houses anymore.</p>	
S24		<p>Do You Support the Proposal? No</p> <p>Comments. Don't want the specialty stores or either of the major supermarkets. Small country towns need to support small business and if large specialty stores come into town there is a chance they will force out small local business to close. If we need these large stores we can go to Albany</p>	
S25		<p>Do You Support the Proposal? Yes</p> <p>Comments. I think it would be good for the town. More choice and more employment opportunities for local people. Needed as the town grows</p>	
S26		<p>Do You Support the Proposal? No</p> <p>Comments. We do not need another supermarket or Hardware store. Nowhere for staff to live if from out of town. Would much prefer to see Council support the shops we already have. Our small town.is beautiful, don't try and clone it into every other town!</p>	
S27		We have no problems with the application for the new supermarket building.	
S28		<p>Do You Support the Proposal? No</p> <p>Comments. Why does Denmark need more shops? People move to Denmark knowing what they are getting.</p>	

		<p>Isn't that the whole point of moving to Denmark? To escape the hustle and bustle of city life and to be in a small village type community. Albany has lost its charm because people move here and then complain because there isn't Macca's and the rest of the things they left behind. Margs has been runes, Dunsborough...Yallingup next. People go on and on about needing to bring more jobs to the town or needing more people to move to the town, but has anybody considered one of the main reason tourists go to Denmark and places like it, is to get away from the city and to unwind in a more peaceful place. That's why a lot of people move there too. Do we have to destroy every small town?</p>	
S29		<p>Do You Support the Proposal? No</p> <p>Comments. A lot more traffic on Hardy Street & South Coast Hwy will become congested.</p> <p>On going noise due to deliveries etc any time of the day. Too close to the retirement village Shopping centre should be kept near the main town site</p>	
S30		<p>Do You Support the Proposal? No</p> <p>Comments. Concerns - traffic - that location is already becoming hazardous, imagine more cars in that area/people trying to crossroads.</p> <p>Operator - already unpopular in town and continuation of no competition Would force existing small businesses to move into centre</p> <p>Noise pollution for local residents</p>	
S31		<p>Do You Support the Proposal? No</p> <p>Comments. I have concerns that the claim that local people will show at this new Shopping Precinct is based on incorrect assumptions. Denmark people will continue to shop in Albany as the proposed IGA will not have competitive pricing with Woolworths and Coles. People will continue to travel to Albany to do a supermarket shop and attend to other matters, shop at other stores not available in Denmark or engage in social activities.</p> <p>Further, the new shopping may be better in terms of parking and access but at what cost to the residents of Hardy Street, particularly the elderly at Amaroo who will have noise issues with trucks and air conditioners, cars and increased vehicle movements.</p> <p>I would like more detail on road widening and the impact on the local streetscape and entry to town. Overall, I think this feeds into the idea that bigger is better, and is catering to the tourist dollar without proper consultation with the community.</p> <p>Issues around staffing for the shopping centre, accommodation for workers, truck flow and broader issues of the sustainability of the build, issues around food transport miles have not been addressed or considered. Denmark can be different and should not have to bend to market forces above environmental and social needs of the local community.</p>	
S32		<p>Do You Support the Proposal? No</p> <p>Comments. Increased congestion and safety concerns, risk of traffic accidents on South Coast Hwy.</p>	

		Money generated not serving the local community. Increased financial pressure on independent local business (which makes our community so special!) and financial gains made by non-local residents.	
S33		<p>Do You Support the Proposal? Yes</p> <p>Comments. Denmark's population has grown substantially since the IGA supermarket was first built. The car parking bays are limited, and site ground level is not ideal, for any one especially with a trolley full of groceries pulling away from you, down the slope to the carparking area... The proposal should be adopted.</p> <p>Any growth for Denmark in which infrastructure is improved, and provides employment opportunities for our town, should be considered with a positive outlook.</p>	
S34		<p>Do You Support the Proposal? Yes</p> <p>Comments. I feel a new shopping centre would be wonderful for Denmark. Having more parking, level ground to push trolleys to car, more jobs for our towns people and youth and easier accessibility for our older people to enter (no steps and uneven pathways)</p>	
S35		<p>Do You Support the Proposal? No</p> <p>Comments. Decentralizing to one of the busiest intersections, rude to purchasers of Amaroo, shopping trolleys and trucks and kids crossing, not a great combo.</p> <p>A Deli and lunch bar yes, not a shopping centre. The bulge of tourists will be a nightmare there. Probably another Burke fuel station next. Yes we have to grow but isn't Metcash a duplicate?</p> <p>Let's go for spudshed, at least something completely competitive and put it Albany side of town or a farmer's market in the industrial area</p>	
S36		<p>Do You Support the Proposal? No</p> <p>Comments. What's to stop people at the intersection at OBR to drive across both lanes of traffic of south coast hwy straight into the shopping centre via the slip lane? Concern over traffic at an already nuts intersection. It'll be dangerous during tourist time! Already need a slip lane to turn left at the intersection of OBR and SC Hwy.</p> <p>Why do we need another liquor store? So unnecessary!</p>	
S37		<p>Do You Support the Proposal? Undecided</p> <p>Comments. I would be open to a local /locally owned /Australian supermarket that is more affordable being built there (spud shed?) with adequate roads and car parks - concern would be that turning on to south West highway is dangerous, especially during peak season it is notoriously dangerous.</p> <p>If there are longer cues / waits along a highway it would increase road accidents. How will this be managed?</p> <p>As for "speciality stores" I don't believe it is fair to community to use blanket wording without specifically stating what type of stores are in mind/the works? Denmark is a town like no other and to have tourists and our community funnelled towards supporting small businesses is much more community minded and important than to have the same copy pasted generic stores in a supermarket complex just like in every other town. Speciality stores could, instead, be left as a space only for local communities businesses. No generic</p>	


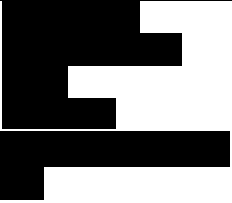


		<p>businesses to be built.</p> <p>Stores like this are not necessary, nor wanted, or needed, Denmark having its own unique expression expressed through small businesses is what makes it beautiful. I've heard from countless people that they stopped visiting Margaret River because of these reasons, so they visit Denmark instead for its "small town feel"</p> <p>In conclusion, only fix what needs fixing, without additional fluff and Denmark would have more movement in a positive direction rather than the backlash usually felt. The community want affordable groceries and safe roads / car parks when in peak season. Putting intention and focus on what is needed rather what isn't needed.</p>	
S38		<p>Do You Support the Proposal? Undecided</p> <p>Comments. I realise the site is owned by Metcash. Having a bigger IGA with better parking would certainly be helpful...however will it make me shop in Denmark more often? No. Price differences between IGA (especially during peak seasons) versus Aldi, Coles and Woolies in Albany can be so ridiculously high.</p> <p>There isn't much incentive to shop local when Coles and Woolies offer deliveries and it's even worth it spending fuel on going to Aldi once in a while. I wish there was real consideration for more competition instead. Put one of the other 3 big guns into town as well to encourage Metcash Denmark to be more price competitive and let us do our bulk shopping local again.</p>	
S39		<p>Do You Support the Proposal? No</p> <p>Comments. Currently there are a lot of empty shops here in Denmark, we don't need more. Many of our current shops struggle to survive during off season, also can be difficult to find staff, a new shopping complex would only exacerbate these issues. I do acknowledge the location of IGA is far from ideal and never should have been on that difficult site.</p>	
S40		<p>Do You Support the Proposal? No</p> <p>Comments. Not all new developments are bad or should be discouraged and I don't like being negative about this....but I have to say I disagree with this location for a shopping centre... moving the current IGA would be great and needed but not to this location. Surely this is an opportunity to move this traffic attracting business to an outer area? People will find a food shopping mall wherever it is located surely?</p> <p>This proposed location is a really bad idea for local residents and Amaroo elderly village and it does not solve the traffic / parking issues we already have. I used to live opposite the current IGA (9 Mt Shadforth Rd) and the trucks are awful at night...really loud and beeping at all hours and the forklifts also unloading... Now they seem to want to have access through Hardy St right next to the lovely Amaroo village where my mother lives.</p> <p>My mother is about 20m from the back of the proposed shopping site. She hates the idea as its already a busy street/area and this will be noisy for her in particular as she is probably the closest at Amaroo but she is 90 and unlikely to protest to the council. I also live along the part of Mt Shadforth road where the trucks are likely to pass on their way to the new site right in front of my studio at the front that I Airbnb so guests will be disturbed.</p> <p>The location is the issue... I hate to stop business but agree we don't want to keep growing at the cost of our enjoyment of the town..... I'm sure they could sell this block for much needed smaller businesses or housing and buy something else further out for such a large development.... ??? I can see some major delays through</p>	

		local protests and more headaches for the hard-working council staff in this.	
S41		<p>Do You Support the Proposal? No</p> <p>Comments. 1.) Traffic concerns</p> <p>2) Having 7 speciality shops when Wholly Local & Provincial House on Hollings have recently closed down. Are we going to have more empty shops ?</p> <p>3.) Location or parking is not a reason why folk are shopping in Albany, it's prices. We get better prices at Coles, Woolies and Aldie. People go to work in Albany or play sport in Albany so we shop whilst we there. Coles/Woolies delivery is becoming more popular nationwide, this is not a Denmark specific trend or a reaction any aspect of the Big IGA.</p> <p>4.)There is no economic advantage for IGA moving to Hardy Street except Metcash improving the property portfolio and gaining leasing opportunities.</p> <p>5.) Who will take over the existing IGA building?</p> <p>6.) Currently, most businesses are centralised... you can do grocery shopping, go to the library, grab a pie without moving your car. With the proposed centre, you will need to drive from one location to the next, causing more traffic congestion.</p> <p>7.) On the proposal, 2 trailer park bays is not enough for regular use never mind during high tourist times.</p>	
S42		<p>Do You Support the Proposal? No</p> <p>Comments. I am against a new shopping precinct as I don't believe our community needs it. We already struggle to find our community members housing and there are already not enough workers in town to support the businesses we already have. I am also against chain stores coming to our town and would like to see locally owned stores only.</p>	
S43		<p>Do You Support the Proposal? No</p> <p>Comments. We do not want to become like a Margaret River. And this is how it starts. We don't want it to get too big or busy - that's the reason why the people have moved down here to Denmark. A shopping centre does not fit the current aesthetic of Denmark town. Denmark town will lose its quaint small country town feel.</p> <p>The shops currently in Denmark already struggle sometimes - how will they go with this competition? We don't want more chain stores we want to support local owners and produce. There isn't enough accommodation to suit the increases in employment. Fix the air bnb overkill first. Please don't let our town turn into Margaret River.</p>	
S44		<p>Do You Support the Proposal? No</p> <p>Comments. It's very concerning given it's not actually creating any competition. Theres already specialty store locations that are vacant and it's just another move towards an overcrowded, overpopulated, very non Denmark Denmark! I strongly oppose this plan.</p>	

S45	[REDACTED]	<p>Do You Support the Proposal? Yes</p> <p>Comments. I support the proposal because the current IGA site is impractical and the parking is terrible. There aren't enough bays. During holiday season it's particularly difficult to navigate.</p> <p>My questions about the proposed site are the types of shops attached to the complex. Will they fit into the town? Will they prioritise local businesses? Also, if this goes ahead what is the plan for the old IGA site? My concerns are the traffic flow in and out of the new complex onto Hardy Street and South Coast Highway.</p>	
S46	[REDACTED]	<p>Do You Support the Proposal? No</p> <p>Comments. I do not agree with the proposal of a new site for the building of a new IGA. REF NO DA2025/37. MY CONCERN IS FOR THE ELDERLY AT AMAROO.</p>	
S47	[REDACTED]	<p>Do You Support the Proposal? Yes</p> <p>Comments.</p>	
S48	[REDACTED]	<p>Do You Support the Proposal? Yes</p> <p>Comments. This town definitely needs something like this. Travelling to Albany to do all our shopping is expensive and exhausting when you are time poor from working full time.</p>	
S49	[REDACTED]	<p>Do You Support the Proposal? No</p> <p>Comments. Too large. Does not consider the native flora and fauna. Does not support local competition.</p>	
S50	[REDACTED]	<p>Do You Support the Proposal? No</p> <p>Comments. My concerns for the proposed development are with the location. The intersection of the Highway and Ocean Beach Road is already such a busy intersection, and I believe the extra traffic movement could create hazardous conditions, particularly during holiday peak times and during before and after school pick up times.</p> <p>My other concern is regarding the design of the 'Articulated Truck Movement Arc' adjoining Hardy Street. The design of the entry point shows that truck movements for deliveries would need to travel along Mt Shadforth Road and then turn left and travel up Hardy Street to turn into the delivery bay of the complex. I believe this would create significant noise disturbances for the residents of Amaroo Village and the surrounding residences on Hardy Street as the trucks travel uphill for deliveries. Not to mention the ongoing noise and lighting disturbances that would be experienced by Amaroo Residences on an ongoing basis as well.</p>	
S51	[REDACTED]	<p>Do You Support the Proposal? Yes</p>	

		Comments.	
S52		<p>Do You Support the Proposal? Undecided</p> <p>Comments. Firstly, the intersection of Ocean Beach Road & South Coast Hwy is in much need of an upgrade. There should be provision for a left hand turning lane prior to any new undertaking, regardless of proposed shops.</p> <p>Secondly, we do not require another overpriced grocery store, especially as the current IGA building will most likely remain empty, for an extended period. Much like the white elephant (half done) buildings across the road from the current store.</p>	
S53		<p>Do You Support the Proposal? Yes</p> <p>Comments. Great plan, more room and takes some of the traffic away from the centre of town, as someone who shops weekly in Denmark is think this plan is great for the town and the smaller towns that denmark services.</p>	
S54		<p>Do You Support the Proposal? No</p> <p>Comments. This development will decentralise the town hub and exacerbate traffic issues on the Ocean Beach Road Highway intersection. How does this project coexist with the “town planning “ to date??</p>	
S55		<p>Do You Support the Proposal? No</p> <p>Comments.</p>	
S56		<p>Do You Support the Proposal? Undecided</p> <p>Comments. A bigger, more accessible supermarket is required. Concerns are:</p> <ol style="list-style-type: none"> 1. How are the trucks getting to the loading bay. The traffic report suggests via South Coast Hwy, Strickland, Shadforth to Hardy. That intersection is dangerous already with pedestrians. 2. Proper high noise reducing fencing needed for the Amaroo residents. Not just colourbond and a few shrubs. Supermarkets are very noisy and messy places. 3. The intersection on South Coast Hwy and Ocean Beach already a dangerous nightmare to turn right out of due to the highway traffic and traffic going in and out of the service station. Need a left turn lane onto highway. How will the extra traffic and pedestrians be dealt with? The attached traffic report very out of date with current conditions. 4. Parking for caravans, campers, cars with trailers should all be across the road near the tourist bureau otherwise too many trying to park will cause problems and dangers to pedestrians in the carpark. Make sure it is all one way traffic flow in supermarket carpark for safety. Go look at Esperance Boulevard for what not to do 	



		- its a shopping centre parking nightmare.	
S57		<p>Thank you for the opportunity to be able to comment on the proposal for a shopping centre at the corner of South Coast Hwy and Hardy St Denmark.</p> <p>I can only see the positives to go ahead with this proposal LB Planning have listed and covered all considerations....</p> <ul style="list-style-type: none"> • Parking, on level ground no steep hill to cross and have your trolley run away trying to load shopping into the car. • Not having to cross a road and dodge traffic to get to your vehicle. • Aging community, accessible to all, disability, elderly, and families. • Away from the main street and traffic congestion. • Having accessible paths to link in with the CBD • Denmark is a growing community; this is an appropriate location and will benefit all. • Keeping the money in our town. • Employment opportunities. <p>My only concern is only having 3 x ACROD Parking Bays, currently SUPA IGA has 5 ACROD Bays which are always in use, also the access to the caravan and trailer drive through bays, will they have enough egress to turn in and out of the bay?</p>	
S58		<p>Hi, my only objection to the new shopping complex is</p> <ol style="list-style-type: none"> 1, noise from early morning, late night unloading fork lifts, truck etc. and 2. That it will split the town again, ie palm court area is only just coming back to life, Potentially killing the now CBD area. 	
S59		<p>Do You Support the Proposal? Yes</p> <p>Comments. Some thoughts are –</p> <ol style="list-style-type: none"> 1) the new location will decrease car traffic and parking around town centre. – 2) likely not going to stop people ordering from woolies coles, if IGA same owners keep prices high 3) not clear what extra stores will be there - will it take away from other local businesses or add new life to town 4) what would replace current IGA location - would this nonretail space be a benefit to town centre community. So maybe some pluses maybe some downsides. 	
S60		<p>Do You Support the Proposal? No Comments. We would lose the village of town - the speciality stores then may compete with current small businesses as traffic diverts to new location.</p>	

S61		<p>I object to the proposed Metcash development, reasons being:</p> <ol style="list-style-type: none"> 1. Proximity to Ocean Beach Rd/Street Coast Hwy intersection. Even with the modified road layouts proposed, exiting Ocean Beach road turning right will still be a challenge. Although currently the challenge is around peak times - school drop off/pick up and end of working day, with increased traffic to the west of the intersection to access the shopping centre, the challenge would be all day long and be unbearable at peak times. 2. Proximity to Amaroo Village, noise and light pollution will impact the quality of living in the village. 3. This development does not add value to the community as it is not bringing in a competitor and therefore prices will continue to rise and the impact will be mainly felt by the elderly who may not have the confidence to shop online to get better value. 4. An equivalent of 62 FTE jobs! Where will these people live? The demand for affordable housing is already an issue in the Shire. 5. The belief that people will shop at the new building with the same IGA installed in it is naive. There has been a lot of public discussion around the IGA since the takeover and none of it has been positive. People are shopping in Albany when they travel over for kids sport and people are making use of Coles & Woolies home delivery as they travel as far as 20km West of town and delivery from only \$2. 	
S62		<p>Do You Support the Proposal? No</p> <p>Comments. There is already a lot of shops empty in the town and or struggling.</p> <p>The location is next to a retirement village, which should be a calm, relaxing place, low noise, low traffic, this particularly would be a hazard for elderly.</p> <p>Traffic looks like would be difficult. The volume of cars around and people, tourists who have no clue of the town.</p> <p>Denmark needs more housing that's shops and maybe a swimming pool before a shopping centre. I do not think a shopping centre is a priority to the town at all at the moment.</p>	
S63		<p>Do You Support the Proposal? No</p> <p>Comments. We live in Denmark because it's a small town. We don't live here, hoping it will turn out like Margaret River. We have an two IGAs already, so please what is the point of putting in a third IGA?</p>	
S64		<p>Do You Support the Proposal? Yes</p> <p>Comments. Suggest fixing road infrastructure prior to building the shopping complex.</p> <p>Suggestion of a roundabout at the intersection of South Coast Hwy, Ocean Beach Road at the shell garage.</p> <p>Increase an extra filter lane starting from the visitor centre land (opposite Offer street) for cars to turn left. That whole strip of lawn could be replaced with a road lane without impacting the visitors centre.</p> <p>The roundabout large enough to help ease congestion but small enough that trucks can glide over/through.</p>	

		And potentially add another roundabout at the corner where the proposed IGA will reside. Roundabouts can very very positive. If there is minimal or reduced traffic congestion I'm all for the new shopping complex.	
S65		<p>Do You Support the Proposal? Yes</p> <p>Comments. With regard to development proposal DA2025/37 The existing junction between the southwest coastal highway and Ocean Beach Road already suffers from severe congestion during peak periods. With the proposed development the traffic volumes will obviously increase substantially and ability of traffic to turn right out of Ocean Beach road will be further compromised.</p> <p>The proposal to widen Ocean Beach Road, and I assume include a left turn filter lane, will do little to prevent a further substantial build up of right turning traffic at this junction. What alternative design options are there to address this issue? For example: 1: Develop an alternative westbound route onto the Southwest Coastal Highway by opening Buckley Street to one way west bound traffic and bypassing the shopping precinct entirely 2: A roundabout at the existing junction 3: Traffic lights at the existing junction</p>	
S66		<p>Do You Support the Proposal? No</p> <p>Comments. This proposed development will seriously affect the uniqueness of Denmark and turn it into another overpriced, overdeveloped cookie cutter town.</p> <p>We have all the shopping outlets we need and many existing shops are empty. Having lived here for 56 years and considered an old local(60) I have travelled and have seen what has happened to other unique towns and communities that have expanded beyond what is necessary and it has spoilt them forever.</p> <p>Please please don't approve this proposal, it is not in the best interests of the town and the wonderful people who live here</p>	
S67		<p>Do You Support the Proposal? Yes</p> <p>Comments. Absolutely support any private sector investing in the town of Denmark, shows gumption in improving services and facilities</p>	
S68		<p>Do You Support the Proposal? Yes</p> <p>Comments. I think this a good idea, too many times have new plans been denied because the older demographic believes they have more of a right to the new development in Denmark. As a Denmark local and someone who plans to raise my future family here more job opportunities and shopping choices is a much needed addition to Denmark.</p> <p>Tourism is a peak point in Denmark wouldn't it be better to provide more local business opportunities to start a shop and have more sales because of it.</p> <p>Additionally, the parking situation at the current IGA is chaotic and this new complex could offer a solution to the parking problems, especially during tourist seasons.</p>	
S69		<p>Do You Support the Proposal? No</p> <p>Comments. It would be great to have a new, larger shopping centre with more parking but I think it is a</p>	

		terrible location for the proposed shopping centre.	
S70		<p>I have carefully considered the information, and local opinions of my fellow community members, to shape my own view on this proposal.</p> <p>I can understand the positives of this type of development for Denmark, in terms of servicing our community (particularly if it were actually for an additional competitive supermarket) and the poor location of the existing IGA shop, for access and parking.</p> <p>However I am opposed to the current proposal as I think it is definitely the wrong location for the shopping centre, for the following reasons.</p> <p>The noise of deliveries, refrigeration, airconditioning, at all hours, and constant traffic coming and going, is not appropriate for the Amaroo village next door. Retirement in this beautiful village suddenly becomes much less attractive, and more risky, for these folk.</p> <p>Traffic on South Coast Highway, near the busy Ocean Beach Rd intersection, will increase with people entering and leaving the site. This creates additional accident risk for vehicles and pedestrians, combined with unnecessary increased frustration for locals and holidaymakers.</p> <p>Moving the current IGA would be great, and is much needed, but definitely not to this proposed location. This is an opportunity to consider moving this traffic-attracting business to an outer area, not to the busy highway. People will find a food shopping centre wherever it is, so the location is not critical to this business. Moving IGA to this site does not solve the traffic / parking issues it already has.</p> <p>The location is the stumbling block for this proposal...this site should be used for housing and IGA moved to somewhere (on flat ground) with more space around it, for locals and holidaymakers to easily access, with adequate caravan parking.</p> <p>Thank you for the opportunity to give feedback.</p>	
S71		<p>Do You Support the Proposal? No</p> <p>Comments. As the document reads, there will be lots of change to Hardy Street and the amount of trucks/ cars. I believe the Hardy Street residents, including all Amaroo, should meet with the Shire to be briefed on what the proposal actually means for the Street. This meeting should be now and not after granting the proposal. Why? Because, it may mean Hardy Street needs to be widened. If so, trees will also be lost. My concern is the amount of constant traffic which could be mitigated if the Highway entrance to the supermarket was not a left only turn. Having right turning lanes from the Highway into the supermarket will mean some folk and some trucks will not have to use Hardy Street.</p> <p>I am not against the supermarket tho don't believe the location is the best site for it. My concern, given my address and given our friendships with many living in Amaroo, is the use of Hardy Street as the main access and therefore the traffic etc accessing Hardy. The supermarket must not be a left lane entry only as this means most Denmark folk will be made to use Hardy Street and a residential street becomes commercial with heavy car and truck access.</p>	

		The highway must be a right and left turn into the supermarket as is for all other commercial sites on the Highway. If the shire considers this too unsafe, then do not give permission to the site. If you, and the IGA, consider Hardy Street to be the best and easiest newer, then do not give permission. Otherwise, limit the access to Hardy and find other possibilities.	
S72		<p>Do You Support the Proposal? Yes</p> <p>Comments. I own [REDACTED]. I have previously requested a footpath to be built on my side of South Coast highway but was told that a footpath would not happen until the corner block was developed. Does this development include a footpath linking the current paths along Hardy St to the footpath on the corner of SCH and Millar St?</p>	
S73		<p>Do You Support the Proposal? Yes</p> <p>Comments. Fully support the proposal. The current location of the supermarket is not ideal. Sloping site means its hard to access. Parking is difficult and limited. Leaving the carpark gets quite congested at times and attempting turn onto SC Highway when its busy is a nightmare. Denmark needs more developments like this.</p>	
S74		I support the proposed shopping centre subject to the condition that fork lifts operating at night be required to have muffled low tone reversing beeps.	
S75		<p>Do You Support the Proposal? No</p> <p>Comments. I do not agree with the Denmark town centre being taken away from where it is now. The village atmosphere is an important feature of Denmark and will likely be diminished if there were a competing centre at Hardy Road.</p> <p>Currently visitors and locals alike, park near the supermarkets then walk around town. Doing some shopping at the health shop, one of the butchers, the newsagents, the co op, the IGA Xpress, or any one of the great retailers we have in town.</p> <p>We do not need a city style mall or plaza, the two main ones in Albany are full of empty shops. We do not need chain stores that sell the same thing all around the country. I believe we need to cherish our individual retailers that add so much character to our town.</p> <p>Having a shopping centre away from our village centre will detract from our local retailers and make business difficult for them. Having these shops move into the new shopping centre will destroy the charms of our town, leaving it lifeless. I do not believe we need ungoverned growth of our town. We do not need more tourists, we do not need people moving here in droves. so therefore, we don't need a bigger supermarket or shopping mall. What we do need is more housing.</p> <p>One of my big issues with this proposal, is that the supermarket will most likely be an IGA. IGA's are more expensive than a Coles or Woolworths and way more expensive than an ALDI. If this is built, people will still travel to Albany to do their shopping or get a delivery from Albany. The net benefit test is incorrect in the assumption that more people would shop here as it will still be the most expensive groceries around. This makes their argument for benefit defunct. Tourists may use the facility, not knowing that anything else is in</p>	

		<p>town and seeing this first as they drive into town. This will once again detract from our village centre, and detract from the tourists experience of our town.</p> <p>I also have concerns about the proximity to the retirement homes. Our elderly deserve the respect of aging peacefully and this development will be anything but peaceful. Late night and early morning delivery trucks, cars coming and going constantly, will be a massive intrusion to the people who live there. I also have concerns about congestion on the highway as people enter and exit.</p>	
S76		<p>Do You Support the Proposal? Yes</p> <p>Comments. This new Supermarket is a vital necessity as the current old building has very inadequate parking in the street and ridiculously small bays under the building with high steps and a steep ramp on one side and a footpath that is underwater every winter on the other.</p> <p>HOWEVER, it is an absolute MUST that the Hardy Road intersection with South Coast Highway be realigned and a roundabout be installed to obviate the hopeless design of this intersection and provide safe and easy access to the new shopping centre.</p> <p>With the increased traffic flow that this new shopping centre will bring to this section of South Coast Highway, it is also a MUST that a roundabout be installed on the intersection of Ocean Beach Road and South Coast Highway. At the moment this is an extremely dangerous intersection with long waiting times to exit Ocean Beach Road, therefore vehicles often just shoot out in front of oncoming traffic travelling on South Coast Highway creating an extremely high accident risk .</p> <p>A new Shopping Centre is long overdue in Denmark BUT IT MUST ONLY PROCEED WITH UPGRADED ROUNDABOUT ACCESS AT THE TWO CLOSEST LEADER ROADS TO THE AREA OR IT WILL ONLY CREATE A MUCH HIGHER RISK OF ROAD ACCIDENTS IN THE AREA.</p>	
S77		<p>Do You Support the Proposal? No</p> <p>Comments. I do not support the new shopping centre complex for various reasons, as follows.</p> <ol style="list-style-type: none"> 1. It is not improving/increasing shopping choices for Denmark residents or visitors, it is simply moving the current outlet to a different location. This does not benefit residents at all. Nor do we need new speciality shop spaces when there are retail premises in the main shopping area that are empty. 2. The proposed design is large, intrusive and ugly and does nothing to enhance the visual appeal of the town, in fact it actively detracts from the visual appeal. Visitors would be welcomed by the sight of a large concrete building set within a 131 vehicle capacity grey concrete carpark, rather than the much more appealing trees and bush there now. We already have a substantial amount of grey concrete parking area on the opposite side of the road at the visitors' centre, why would Denmark wish to make the main western approach even more unappealing? 3. The approvals for this site were done some time ago and as far as I understand, there has always been substantial opposition to the development of this site into a completely unnecessary shopping complex. Since the shire opened up the new light industrial area, it would seem far more logical to situate any new developments that ARE necessary at the LIA, or in the case of a grocery supermarket, perhaps in the old industrial area, where it would be both convenient regarding location, and also NOT an eyesore on the main approach into town. 4. Building what is essentially an entirely new shopping precinct away from the main shopping area of the 	


		<p>town will draw customers away from the main street shopping and this will have a detrimental effect on those established businesses, splitting the town into two. Why would Denmark even want a 'shopping mall' complex, when most of the people who live here, and who visit, come here to get away from that kind of homogenous, urban development?</p> <p>5. It is also likely to cause noise and traffic/parking issues for residents of Hardy Street, particularly at Amaroo, as visitors with large RVs etc who can't find parking within the shopping carpark (I note there are only two long parking bays included in the plan) park along the road instead. Parking is also likely to be taken up with vehicles not actually visiting the shopping complex, as it may simply become a convenient place for visitors to park so they can walk into the main part of town.</p> <p>6. Finally, I do not understand the desire of Denmark Shire Council to rush Denmark into the same sort of over development that has ruined other towns like Mandurah and Busselton. The approaches into these towns are now just miles of large, ugly tilt-up concrete buildings surrounded by miles of equally ugly and depressing car parks. Surely we can do better, for both the residents who love the quiet beauty of Denmark, and for the visitors who come seeking a place that DOESN'T look like yet another metropolitan urban shopping precinct. Keep the town beautiful and small, and put any new (and then only strictly necessary) developments, away from the main streets. This is the approach taken in many historic towns and cities in Europe, and it seems to work well. It certainly makes those town much more appealing to tourists,</p>	
S78		<p>Do You Support the Proposal? No</p> <p>Comments. I regularly use Hardy St when going into and out of town. This road is very narrow and generally unsuited to large vehicles which, based on the obstructions that occur when delivery trucks are offloading produce at the current IGA site in Mount Shadforth Rd, will be a constant problem.</p> <p>I am concerned about the potential damage to the trees and other flora that are present in Hardy St should the road be widened to accommodate trucks.</p> <p>I am also concerned that the small-town character off our shopping precinct and the of the specialty shops and businesses will be adversely affected with a shopping centre on the outskirts of town. Shopping centres are soulless places.</p> <p>I am also concerned about the traffic snarls that exist at the corner of Ocean Beach Rd and South Coast Highway. Having vehicles turning out of a shopping centre at the Hardy St location has the potential to cause greater traffic jams and threaten the safety of all road users. I really think the proposal is flawed and an alternative site should be found - perhaps in the old industrial area .</p>	
S79		<p>Do You Support the Proposal? Yes</p> <p>Comments. No Answer</p>	
S80		<p>Do You Support the Proposal? Yes</p> <p>Comments. I feel the present location of IGA is not very user friendly, as it has poor access on the Strickland St side due to the gradient of the pathways & underground parking area. Trolleys get away from some</p>	

		<p>customers and end up in places that become a nuisance to others.... Eg..In parking areas behind the BWS & the Butcher. Some even get left in CRC areas & in the Millers Creek & Denmark River.some.</p> <p>Mainly because patrons find it difficult or can't be bothered pushing empty trolleys uphill to return them. Employees do round them up but there's always quite a few left behind. Also some customers often need help from friendly passer-byers to control the trolleys full of shopping.</p> <p>The building would be better used as a library / entertainment/ events or civic centre. Though I know this may be out of our control. The proposed site opposite the Ocean Beach Rd, combined with a round-about seems to me to be a better option. It's reasonably flat, will have better parking facilities and residents in Amaroo can safely access this site. The plan to plant trees or bushes on the boundary to Amaroo should act as a sound buffer. The proposed plan isn't perfect but it's better than the present location.</p>	
S81		<p>Do You Support the Proposal? No</p> <p>Comments. I might support a new supermarket building, but not the 7 speciality shops. Is there an alternative plan in place without those shops? Denmark is very seasonal for visitors and small business is already struggling, we already have empty shops, don't make it worse. There are specialty shops closing in Albany so don't put the same burden on Denmark. DA2025/37</p>	
S82		<p>Do You Support the Proposal? No</p> <p>Comments. Given the current shopping centre proposal stipulates vehicle entry via a left-hand only entry and exit off South Coast Highway, I am particularly concerned about the risks posed by increased traffic along Hardy Street. With no right hand turn entry from South Coast Highway, most road users will use Hardy Street to access the precinct. Hardy Street is ZONED RESIDENTIAL and is flanked by private homes as well as the Amaroo Retirement Village where many aged residents live and walk.</p> <p>Verges lined with tall established trees also provide home to various species of native birds and animals including kangaroos, known to be a particular hazard to vehicles.</p> <p>I've noted that the last road traffic assessment of Hardy Street was undertaken in 2013 and as a full-time resident can say road traffic has noticeably increased since then, especially over the past 5 years. According to the Traffic Assessment Report included in the proposal, estimated traffic use along Hardy Street will increase by an amount of 200%. It seems fair to assume that this level of increased traffic will pose an even greater risk to residents and habitat alike.</p> <p>Additionally, the condition of the road is poor; being peppered with large potholes and in places, severely damaged curbing. The street is also a narrow one, making it barely adequate for the current level of traffic use, especially, as regular users will know, in instances where two vehicles travelling in opposite directions need to pass. Hardy Street is not suitable for use as an access road to the proposed shopping centre site.</p> <p>I also have concerns about the level of disturbance created by large delivery vehicles as well as constant machinery noise generated by the continuous operation of associated plant and equipment.</p> <p>Additional to these issues, there is the visual impact of the centre to consider, particularly for those residents living at the highway end of Hardy Street and in the Amaroo complex nearest to the proposed site. I do agree that the current location of the IGA is not ideal, and a relocation would be beneficial, but in my view, the proposed site at South Coast Highway/Hardy Street is not fit for this purpose and a more suitable alternative location needs to be considered. Thank you for the opportunity to raise my concerns and those of the</p>	

		residents of Hardy Street. We welcome the opportunity for further discussion on this matter.	
S83		<p>Do You Support the Proposal? Yes</p> <p>Comments. I fully support the building of a second large supermarket in Denmark town, it will increase the social amenity value of Denmark and provide for consumer shopping choice, and residents of Denmark and visitors will benefit by not being restricted to a sole supermarket provider. In the past, Denmark's IGA grocery prices and the quality and availability of items has been an ongoing problem for residents and visitors, particularly during peak visitor seasons (Easter and Christmas).</p> <p>I cannot afford to shop at the small Local Grocer IGA, which is more of a boutique and overpriced corner-store, so would appreciate a second large supermarket which would be competitive with the current Denmark large IGA.</p> <p>A second modern and more accessible (better parking than the current IGA) supermarket complex in town will also make Denmark more attractive to new residents and future young families considering to live in Denmark. A growing residential population is critical for all small business success and sustainability, and for the general social well-being in Denmark . The supermarket will also be an important employee of local staff from across the age spectrum, which builds our rural community resilience to the financial and social hardships of living in a regional town.</p>	
S84		<p>Thanks for the plan of the new shopping centre!</p> <p>I observe that there are 130 parking bays which is similar to the current parking situation at IGA.</p> <p>Even in non tourist season I find it difficult to find a parking place and with the new shopping centre with one exit on to the the highway will cause major congestion!</p> <p>I propose that the new shopping centre be built on a 30 acre site opposite to the new estates of Springdale [which is now for sale] where there would be space for much more parking and many other shops.</p> <p>Denmark is a growing town and more parking space will become essential in the near future!!</p>	
S85		<p>In regards to this proposal I strongly recommend not accepting it as not only will it split the town shopping centre up and cause traffic congestion at an already busy intersection and cause noise for residents already trying to enjoy a quiet life (retirement village) by truck traffic and over stocking the town of bottle shops and gift shops (the shops already in town struggle) . I believe that the town needs a plan for expansion but not to divide the village and cause residents duress.</p> <p>In my opinion I would move the library to the IGA building where it can develop into arts/ IT .</p> <p>And the library building/ civic centre develop to become shopping centre and car park. I think it is important to keep the town shopping traffic on one side of the highway as much as possible. Feel free to request consultation 😊.</p> <p>As you may see I have spent time thinking this through.</p> <p>We do not want to create another Dunsborough!</p>	
S86		Do You Support the Proposal? No	

		<p>Comments. Not enough disabled parking, public toilets and the parking area sizes are too small for a country town and elderly people. I don't understand the gradients of the land? It appears it will be a sloping car park?</p>	
S87		<p>Do You Support the Proposal? No</p> <p>Comments. I think it is the wrong location. SC Hwy is a busy road and Ocean Beach Rd is also busy and in close proximity. Ocean Beach Rd and SC Hwy already really congested at holiday periods and tourists from Big 4 all leaving town at the same time. Traffic backs up a long way down OB road. This will become an even more congested area if the shopping centre goes to proposed location. And Denmark is only going to grow and get busier. I feel like this is a short sighted location.</p> <p>Current shopping centre is in town and not really impacting any residents unlike the new proposed location even though it is far from perfect with its own parking and traffic issues. I think an in town location with a very long sighted view is required. The Shire seems quite happy to continue approving tourist accommodation and increasing the amount of visitors to town while not considering the impacts on town i.e more traffic, but no extra parking. So this proposal must be considered with an overarching long term plan for the town. I really don't see how this location can fit a growing town.</p>	
S88		<p>I would like to voice my opposition to the development of the shopping centre at this site in Denmark.</p> <p>I do not believe this is an appropriate site for this development.</p> <p>The noise, at all hours of the day, will severely impact the older people residing in Amaroo, as it backs onto their properties, and would be upsetting for elderly folk who have chosen a quiet spot in which to live.</p> <p>I also feel it would be unwise to have seven speciality shops in this new area. This would undoubtedly mean that shops would close on Strickland Street.</p> <p>Currently Strickland Street has developed a lovely "vibe", with a variety of shops and cafes, which is a delight for locals and tourists alike.</p> <p>It would be very detrimental to the town to have empty shops along that street.</p> <p>I would like Council to think very carefully about the effects of this proposed development and its negative effect on a beautiful and thriving town.</p>	
S89		<p>I am writing as a local resident to OBJECT to the above application for the development approval for a proposed SHOPPING CENTRE (SUPERMARKET & SEVEN SPECIALTY STORES) at No. 82-90 (Lot 50) South Coast Highway, Denmark WA</p> <p>As recorded on the "Proposed Site Location Plan [Plan]" (by J.Prestipino Building Designs Pty Ltd - dwg No A002/project No 167-015 - Rev F), I'm greatly concerned that this building proposal, if it goes ahead, will have significant detrimental effects on the local communities traffic flow.</p> <p>As a local resident this is a matter of concern which affects me is as follows:</p> <p>1. South Coast Highway (from Hardy Street intersection to Murphy Lane):</p> <p>1.1 There are no requirements recorded on the Plan for either traffic lights or a roundabout to assist customers driving along the South Coast Highway to enter or exit the shopping centre complex between</p>	

		<p>the intersections of Hardy Street until Murphy Lane.</p> <p>1.2 Widening this section of this highway, as proposed, indicates no improvement to the flow of traffic to handle the increased truck and other vehicles entering or exiting the shopping complex. For example, customers turning going towards Walpole who wish to turn right from the South Coast Highway into the complex may block the Ocean Beach Road exit, thus causing congestion for those wishing to exit Ocean Beach Road. An intersection that is already congested.</p> <p>1.3 The increased traffic flow will also affect the clients entering and exiting the Day Care Centre at No. 81, the Anglican Church at No. 83, the Visitors Centre and the Shell Service Station, for the reasons outlined in 1.2 above.</p> <p>1.4 Apart from the proposed road widening of Ocean Beach Road intersection, there are no indications of traffic lights or roundabout to assist vehicles entering or exiting the South Coast Highway.</p> <p>2 South Coast Highway (Footpaths from Hardy Street intersection to Strickland Street):</p> <p>2.1 On the Plan there is a 2.5m path, along the boundary of the shopping centre, but no indication of how far that said path extends for any footpaths for both pedestrians and bicycles.</p> <p>2.2 The current footpaths are on the opposite side of the highway, from the centre of town, past Murphy Lane to the Denmark Tavern, along the South Coast Highway.</p> <p>3. Hardy Street:</p> <p>3.1 Widening this entire street to handle the increased truck and other vehicles entering and exiting the shopping complex for deliveries is not shown on the proposed Plan, except at the intersection of Hardy Street and the South Coast Highway. The remainder of Hardy Street to Mt Shadforth Road may become a safety issue from the increased traffic that will cause potholes and road deterioration.</p> <p>3.2 The increased traffic flow of delivery vehicles and trucks will also hinder residents entering and exiting the Amaroo Village.</p> <p>4. Proposed carparking – Safety issue:</p> <p>4.1 The total parking bays is proposed as 131, with 3 bays designated for disabled parking, 5 bays for motorcycles and 2 bays for double length vehicles (or caravans). Due to the lack of disabled and caravan bays could result in customers parking in the Visitors Centre (across the highway) forcing them to cross the busy South Coast Highway without pedestrian mechanical assistance.</p> <p>5. Corner of Ocean Beach Road and South Coast Highway – Safety issue:</p> <p>5.1 The increase traffic flow exiting and entering the shopping centre will further put strain on this already busy intersection, adding to the current safety issue of locals and tourists trying to leave or enter this road.</p> <p>6. Amaroo Village, 12 Hardy Street, Denmark – Road safety issues:</p> <p>6.1 Residents of neighbouring senior properties will experience privacy, extensive noise and amenity loss issues due to the proximity and size of the proposed shopping centre and carparks.</p> <p>6.2 Hardy Street roadworks will be increased due to additional traffic flows to the shopping complex (as outlined in 3.2 above).</p>	
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S90		<p>Do You Support the Proposal? No</p> <p>Comments. Is the proposed Denmark Shopping Complex including seven speciality shops really taking into consideration Community needs? For the greed of one business and the catering of Tourism, there are far too many negatives.</p> <ul style="list-style-type: none"> ♦ Taking business away from Central shopping precinct would increase shop vacancies, and community and town would lose their vibe. ♦ Oversupply of one particular product. Additional Liquor, Pharmacy, Hardware and fast food is not the answer for competitive pricing. As is one Supermarket Brand. (Albany is already experiencing closures within shopping centres) ♦ Increased traffic congestion and queuing with caravans, trucks and large vehicles on already dangerous intersections. ♦ Inadequate parking spaces and sizes that do not cater for large vehicles, caravans and campers . ♦ Are the Residents of Amaroo being really considered and respected? 24/7 delivery, offloading, forklift use, pollution and noise. Pedestrian security. ♦ Increase of litter will be an eyesore for approach to Denmark. Already happening at Lower Strickland Street Carpark . ♦ Hamilton Reserve and surrounding areas will suffer from development and water run off. Deterioration of 	




		<p>Park setting used for access.</p> <p>♦ Has it been considered that further development is restricted on this allotment? Have these considerations been overlooked with previous location of Supermarket? Short term thinking for, population growth, future land division and progress is a long term disaster. Denmark has a choice of doing it differently, and possibly without the issues that other regional areas now face. Are we prepared too? Let's value quality over Greed.</p>	
S91		<p>Do You Support the Proposal? No</p> <p>Comments. LB PLanning highlights in their proposal the impact on the commercial primacy the seven speciality stores may have on the Town Centre. There are unleased shops in Strickland Street now! In the village of Kalamunda, which I was familiar with, in the 1980s, a similar development gutted the local shops and they took a decade to recover.</p> <p>IDEALLY if the development were to go ahead:</p> <p>1) the old IGA becomes the Shire offices</p> <p>2) the Shire offices become desperately needed Residential Care.</p> <p>3) the owners of unleaseable commercial properties in Strickland Street are encouraged to convert their buildings into apartments for essential workers. BUT what is the likelihood of 1-3. SO WITH REGARD TO PROPOSAL DA2025/37 lets preserve our beautiful and vibrant town centre as it is. It only becomes unmanageable when we try to accommodate too many tourists for a few weeks of the year.</p>	
S92		<p>Do You Support the Proposal? No</p> <p>Comments. According to the Metcash website, they support independent business which I am in favour of however, the only grocery style business on their list is IGA. I recognise the increasing demand for day to day shopping in growing Denmark however, the Supa IGA needs meaningful local competition not more floorspace and better parking.</p> <p>Moving into the new development would be a step forward for IGA but not for Denmark. The Guru Bros. enjoy dominance in this small town as well as others and their prices are reflective of this. I am one of many who earn money in this town and choose to spend it in Albany (Aldi, Coles, Woolies) where my money goes significantly further towards stocking our cupboards. I feel for those here who have trouble putting food on the table because there is no cheaper option locally. So, if Metcash are putting an IGA in the proposed development, it does not have my support and, although it is inconvenient, I will continue to shop in Albany. Thankyou for your time.</p>	
S93		<p>Do You Support the Proposal? No</p> <p>Comments. I provide services to the residents of Amaroo and am deeply concerned with the extra traffic in this area that is frequently used by the residents on their walks, I believe the increased traffic in this road will negatively impact the residents of Amaroo with increased noise particularly when loading docks are utilised at nighttime and early morning for offload of consumables.</p> <p>The fact that the shopping centre will be Metcash and not a different shopping centre ensures this company which is rapidly buying up our small town maintains a monopoly and strangle hold and the prices that people</p>	




		have to pay for their shopping. Disaster waiting to happen	
S94		<p>Do You Support the Proposal? Yes</p> <p>Comments. would it be possible to have both entrances to the car park to be on the South Coast Hwy so as not to congest Hardy St with cars and trucks both via for access.. Common sense</p>	
S95		<p>Do You Support the Proposal? No</p> <p>Comments. I suppose eventually Denmark will need a large shopping centre due to population increased but I don't believe we are there yet.</p> <p>I am concerned that the small cluster of shops we do have receive support to remain viable to maintain the village character. I note small shops such as wholly local and provincial have recently gone missing. If we cannot sustain these great local shops I do not believe we should get new ones particularly as they are likely to be generic franchise type rather than interesting locally driven enterprises.</p> <p>I am supermarket shopping via delivery from Albany since the drastic increase in Supa IGA prices. My refusal to shop at supa IGA is more an issue of inflation caused by the new owner than needing another supermarket. The one we have is sufficient size just needs to be re acquired by the community.</p>	
S96		<p>Do You Support the Proposal? No</p> <p>Comments. Aren't we creating more empty shops in central area?</p> <p>Dangerous intersection already.</p> <p>What are the seven speciality shops?</p> <p>More of the same is taking away from existing business.</p>	
S97		<p>Do You Support the Proposal? No</p> <p>Comments. Priority needed for affordable/ potential tiny home living</p> <p>Proximity too far from town centre -patrons won't park & walk from town or visa versa More adjacent shops seem unnecessary when already empty shops in town Denmark slowly losing the charm & beauty for which folk were attracted.</p> <p>Losing our unique place step by step</p>	
S98		<p>I stand opposed to this idea. For the following reasons.</p> <ol style="list-style-type: none"> 1.Ocean Beach Rd turning onto or across the Hwy. Traffic is already bad with the current volume of traffic. 2. Will heavily in pact on residential properties on Hardy st. 3. Will split the Commercial centre between local shops and the super market. <p>All said and done it is the wrong place for a supermarket. Far better to build a bigger site in the East Denmark industrial complex.</p>	

S99		<p>In relation to the proposed shopping centre I would like to share our concerns:</p> <ul style="list-style-type: none"> - moving IGA draws attention away from Strickland street and the 'main drag' leaving independent shops at risk of less trade, and the heart of the town is split in two - Doesn't promote walking around town. More car parks needed - Traffic will be tight and chaotic at the ocean beach turn off. Are you putting in a roundabout? - There are approximately 4 spaces opposite the existing IGA that remain empty. Aren't these specialty shops spaces? - Where will the staff for these specialty shops live given the housing crisis? 	
S100		<p>Do You Support the Proposal? No</p> <p>Comments. It is utterly unsound to put a shopping centre next to a Retirement home. Amaroo Owned the land in August 2004.. Metcash purchased in November 2013. It will make life unbearable for the residents nearest the boundary.</p> <p>Apart from this the chaos it will create with traffic on the Highway will be devastating. Ocean Beach Road for a start is named as one of the worst inter junctions in the State and Getting across the South Coast Highway is very hazardous living in Hardy Street.</p> <p>You also have the Uniting Church and a Childcare centre opposite, not to mention the school children who use Hardy Street.</p> <p>It will also split the town in two and Denmark has always been thought of as a village. Do we have to give in to greed. When the tourists come to town, which is great for the town , it is chaotic. Tourism is great and to be encouraged, but why put a shopping centre next to a Retirement Village, with resulting traffic chaos for everyone. Surely another solution can be found - the last thing we need are crashes and even loss of life. We are better than that !</p>	
S101		<p>I wish to speak up against the proposed shopping centre, including and especially the 7 specialty shops.</p> <p>Already there are several empty shops in the centre of town, proving that we do not need more shops.</p> <p>Having a shopping centre away from the centre of town is likely to suck the vitality out of the now lively central part of our beautiful Denmark.</p> <p>More empty shops in our town centre may turn Denmark into a ghost town.</p> <p>What is needed is more affordable housing, as those people who are likely to work in the service industry can hardly afford to live in Denmark.</p> <p>I know of several businesses in town struggling to find enough employees.</p> <p>I really don't see that we need more shops in Denmark.</p>	
S102		<p>POSITIVES</p> <ul style="list-style-type: none"> • Close for those living in Hardy Street to pop in shopping 	

		<ul style="list-style-type: none">• Centre on a flat surface unlike the steep IGA site now.• More dedicated parking areas unlike currently in Strickland and surrounding streets, although not as many Acrod Parking spots as in town.• A roundabout at the junction of Ocean Beach Road and South Coast Highway MAY help traffic congestion.• It MAY produce more employment for the area. <p>URGENT NEGATIVES</p> <ul style="list-style-type: none">• Hardy Street is already busy, especially in tourist season and with all of the building sites around the area. and this would drastically increase traffic and noise.• Turning into the proposed centre would cause delays and be dangerous.• The corner of Hardy Street and South Coast Highway is already dangerous. It isn't a 90deg angled T junction. It is difficult turning off the highway onto Hardy Street now, especially when another vehicle is coming up Hardy Road to the highway.• It is currently difficult seeing vehicles coming into town from the Walpole area as there is such a short distance from the crest of the hill to Hardy Road. Increase in traffic and heavy vehicles would make this worse and again a potential accident Hassard.• Articulated vehicles turning into Hardy Street from Mt Shadforth Road is dangerous with 4 massive electricity poles on each corner, restricting their turning abilities. They would infringe on traffic rules by crossing onto the opposite side of the road and open up to delays and potential traffic accidents.• There is a Gas tank in corner of Amaroo Lifestyle village, right behind where articulated vehicles enter and reverse. If and accident occurred, dangerous indeed.• Transport and delivery trucks would break up the road and curb sides.• It is very difficult and dangerous for pedestrians crossing the South Coast Highway to go to the Uniting Church, the Child Day Care Centre and the Information Centre now, let alone when there is increased traffic and a vehicle slip way present. <p>SIGNIFICANT NEGATIVES</p> <ul style="list-style-type: none">• The proposed development will divide the town and severely affect the current businesses. There are already vacant premises and many of those filled are Allied Health or Alternative Therapy Centres which would be possible more suited to this site instead of a shopping centre.• The proposed site is too close to the main shopping centre (I would readily agree to one say 10kms away.) While on the other hand it is to far away from the main shopping centre. With the aging population, it is to far and to steep to walk from one area to the other carrying one's shopping. Why should we have to jump in the car, if we can, to visit both areas.• People are already getting their groceries via transport from Albany Woolworths and Coles, and this trend is going to expand. This started during Covid and with the ease of delivery, not having to go shopping and the prices from these stores being less than current prices, many people are converting	
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		<p>to this way of shopping. People love the convenience. Prices are cheaper as well even including the delivery cost.</p> <ul style="list-style-type: none"> • People go to Albany for more reasons than just shopping. This will increase as the number of Medical Specialists providing services there is expanding, so wouldn't change people going there. • Look at Manjimup and how the Woolworth complex has divided the town and really affected the main shopping centre. • The majority of people I converse with, as well as Amaroo residents are very negative and extremely concerned re this proposal and how the town will be affected. • Pedestrian Access is going to be difficult with articulated lorries entering, many cars and caravans etc trying to enter as well. <p>PERSONAL NEGATIVES AFFECTING MYSELF AND AMAROO ESPECIALLY</p> <p>I live in Unit 2 , 12 Hardy Street in Amaroo Lifestyle Village, where the units facing this proposal directly, are Units 1 to 8.</p> <ul style="list-style-type: none"> • The value of our units will fall drastically • It is proposed that there will be a 6ft high barrier along our boundary – how unsightly and who wants a painted streetscape? • There will be excessive noise even if buffers in place. Buffers don't stop noise from traffic entering the centre, let alone being in the centre. • Delivery trucks make a lot of noise whatever time of day or night they deliver. • It will increase the number of people around the area, including the youth and the antics and noise they get up to both during business hours and afterwards. Our security will be impacted. • Are there going to be security people present and covered overnight as our great police force are not around after dark, all the time? What security systems will be in place? • With the proposed forecourt meeting place, it will be an ideal place for a variety of people to meet after hours with out being under the eye of the general population. • There will be rubbish bins behind the shops of course. Consequently, there will be an increase of vermin and birds to say nothing of the smells produced. More impact on our Village. • Pollution from exhaust emissions of all vehicles including cars, articulated lorries • Is there no notice taken from the protests when the proposal was submitted previously and held back? • Why build a shopping centre right next to a retirement village or independent living village? I know of no other villages, that have had this inflicted upon them. <p>Please don't let this go ahead. Improve what we already have in the main shopping area, not create more disharmony.</p>	
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S103		<p>Do You Support the Proposal? No</p> <p>Comments. Is the proposed Denmark Shopping Complex including seven speciality shops really taking into consideration Community needs? For the greed of one business and the catering of Tourism, there are far too many negatives.</p> <ul style="list-style-type: none"> ◇ Taking business away from Central shopping precinct would increase shop vacancies, and community and town would lose their vibe. ◇ Oversupply of one particular product. Additional Liquor, Pharmacy, Hardware and fast food is not the answer for competitive pricing. As is one Supermarket Brand. (Albany is already experiencing closures within shopping centres) ◇ Increased traffic congestion and queuing with caravans, trucks and large vehicles on already dangerous intersections. ◇ Inadequate parking spaces and sizes that do not cater for large vehicles, caravans and campers ◇ Are the Residents of Amaroo being really considered and respected? 24/7 delivery, offloading, forklift use, pollution and noise. Pedestrian security. ◇ Increase of litter will be an eyesore for approach to Denmark. Already happening at Lower Strickland Street Carpark. ◇ Hamilton Reserve and surrounding areas will suffer from development and water run off. Deterioration of Park setting used for access. ◇ Has it been considered that further development is restricted on this allotment? <p>Have these considerations been overlooked with previous location of Supermarket?</p> <p>Short term thinking for, population growth, future land division and progress is a long term disaster.</p> <p>Denmark has a choice of doing it differently, and possibly without the issues that other regional areas now face. Are we prepared too? Let's value quality over Greed.</p> <p>I particularly fear the loss of atmosphere in our Main Street. There're shopping complexes all over Perth with specialty shops, why would tourists come to Denmark for what they can experience at home.. z horrible. Worship of the dollar, and the little businesses of Denmark would go under. If big IGA catered better prices for locals, there would be less need to go to Albany for shopping. I don't think we need another supermarket for that though.</p> <p>Please think carefully before depersonalising our wonderful town.</p>	
S104		<p>Concerns Regarding the Proposed Shopping Centre in Denmark</p> <p>, and I am a third-generation resident and business owner. I reside at 2 Marlow Road, Ocean Beach, and commute daily to my business in town. The intersection at Ocean Beach Road and South Coast Highway has become increasingly congested, particularly during the tourist season, when traffic is a nightmare. On many occasions, I have found myself waiting in long queues to enter the highway, with delays often extending up to five minutes during peak hours between 8:00 am and 9:00 am.</p> <p>Before considering any developments in the area, it is crucial to address this issue. The construction of a roundabout at this intersection should be seriously considered.</p>	


		<p>Regarding the proposed shopping centre aimed at reducing trips to Albany, I believe this plan is flawed. Residents of the town who regularly travel to Albany will often state that they viewed trips to Albany as an enjoyable day out, combining shopping, health appointments and leisure activities, thus making cost of fuel and other expenses irrelevant to their choice. In a survey conducted by the Chamber of Commerce and published in the Bulletin on this same matter some years ago, respondents echoed these same sentiments.</p> <p>If this shopping centre proceeds, especially with the inclusion of seven specialty shops and the possibility of another liquor outlet, Denmark risks resembling Albany with numerous empty shops scattered throughout the town. Currently, Denmark is already witnessing businesses closing down and others being listed for sale. This trend will likely accelerate with the addition of new retail outlets. Denmark's proximity to Albany, only 40 minutes away, coupled with its reliance on the tourist trade during the summer months, makes its economic sustainability precarious.</p>	
S105		<p>Do You Support the Proposal? No</p> <p>Comments. This development would be a major problem and huge mistake for the residents especially the people who live in Amaroo Village.</p> <p>With parking inadequacy and traffic problems on the entrance off Hardy and South West Highway and proposed roundabout with proposed tracks</p> <p>Not allowing for large vehicles not to mention dangerous walkways for children. There is also the overall effect this development will have on all the existing small businesses in Strickland Street. This is an appeal to the Shire to say NO to this disastrous development</p> <p>Thank you for listening to the community we need this to be stopped NOW</p>	
S106		<p>Do You Support the Proposal? No</p> <p>Comments. I would like to see competition not the transfer of the current IGA. My concerns being a pensioner is cost of everyday items when every cent counts.</p> <p>Also, how on earth is parking for 130 vehicles going to be anywhere near adequate especially during holiday season?</p> <p>Then there is the shambles of Ocean Beach Road to consider, in reality that issue should have been dealt with years ago, just imagine having the shopping centres entry and exit to deal within such close proximity?</p> <p>Plus entry and exit from the Service Station! Another consideration is children going to and from school trying to cross the Highway! Another Crosswalk??</p> <p>If we really must have another supermarket why situated on the Highway at all? Personally I will still continue to do my shopping in Albany if it is still the current IGA with the occasional home delivery from Albany. If only for once the Shire would take heed and listen to the people who pay their wages!</p>	
S107		<p>I am writing to lodge my objection to the above Scheme, Proposed Shopping Centre. I am not against development in Denmark and my objection is not a case of NIMBY I believe that the proposal has not been submitted with sufficient detail, there is no data to support the Retail Analysis and the Traffic report has not considered the impact to the residents of Hardy Street.</p> <p>I have made comments in red to the relevant parts of the proposal in particular the required left hand turn into Hardy Street from Mt Shadforth Road by a 14.5 metre articulated vehicle this will cause problems and the</p>	

		<p>intersection is a designated Black Spot. I have also included a technical opinion on the left hand turn.</p> <p>4.0 THE PROPOSAL</p> <p>Given the attached Amended Development Approval for a proposed supermarket development on the site lapsed on 20 October 2019, the proponent now seeks a fresh development approval by way of this application.</p> <p>A copy of the proposed development plans, which are the same as those approved in 2019, is attached.</p> <p>As shown on the attached development plans, the overall shopping centre building footprint is 3058m2 and incorporates a supermarket and six specialty shop tenancies (not including a proposed ATM and Liquor Store). A liquor store is already proposed ?</p> <p>The building structure design responds to the natural contours of the site by stepping down the building to more closely match the land and minimise the requirement for extra fill and retaining walls. This outcome intends to present a more appealing, less imposing and softer urban form to the surrounding street frontages.</p> <p>The attached development plans have been prepared by J. Prestipino Building Designs and include an existing site plan, proposed site location/landscape plans, floor plan, roof plan, building elevations, perspective views and cross section detail.</p> <p>The plans also include the following information:</p> <ul style="list-style-type: none"> • Landscaping detail to reflect envisaged development interface (including car parking areas) with adjoining properties and the streetscape; • Car parking layout; Car Park. 130 spaces, 60+/- taken by staff leaving 60+/- for customers. Disable Parking Spaces are under the recommended width for disabled bays which is 2.50Mt, they need to be wider enough to allow for doors to open wide, also there are insufficient numbers of Disabled bays. Long Bays, A caravanner would not enter a large carpark without knowing if they can get a space and that they can safely exit the area. (Exmouth town centre has an excellent long parking at the rear of the shopping mall 6 plus rigs) Caravans will most likely park in the Visitor Centre cross South Coast Highway to the supermarket. • Detail regarding the pedestrian movement network and relationship with the streetscape and external shopping area (e.g. forecourt meeting place); • Specialty shops along on the eastern elevation that will facilitate safe pedestrian movement and present well to the carpark area; • Landscape buffer to Amaroo Retirement Village that abuts the northern boundary of the site; • Existing and proposed site levels; and • Detail regarding proposed the servicing area at the rear of the shopping centre. <p>As part of the pre-lodgement discussions with Shire staff during the amended approval process in 2017, it was suggested a revised Acoustic Report be provided to address concerns raised by adjoining residents regarding noise emissions from the loading dock, mechanical services and refrigeration equipment at the rear of the shopping centre.</p> <p>A copy of the revised Acoustic Report, prepared by ND Engineering, is attached which also provides</p>	
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		<p>preliminary advice for future tenancies and incorporates a "Construction Noise Management Plan".</p> <p>5.1 Retail Analysis</p> <p>In order to expel concerns on the matter of the number of small tenancies within the proposal, that may impact on the commercial primacy of the Town Centre main street environment, a Net Benefit Test report has been prepared by Taktics 4 (attached) and its findings are summarised below:</p> <ul style="list-style-type: none"> • The proposal will retain a greater proportion of the market capture in supermarket spending and convenience retail spending and trips which are currently being captured by supermarkets in Albany City Centre. If this is true item 8 cannot be true. If the new supermarket captures a portions of the spending that is current spent in Albany then it will impact on the Albany Super Markets, both statement cannot be correct. • It will translate to all Denmark Town Centre retailers having the potential to capture additional convenience retail spending. A motherhood statement with no fact. • It will Increase economic opportunities to all Denmark Town Centre retailers. Again motherhood statements not back by fact. • It should not be assessed against potential impacts on shifting retail spending outside the Denmark Town Centre. It should instead be assessed against its potential re-introducing (retaining) additional retail spending available to all retailers in the Denmark Town Centre. There are still empty shops in the village centre and the proposal would place additional pressure on tenancies. • The proposal is likely to result in the opportunity to refit the existing supermarket floor space for non-retail purposes. The only possible business suitable to move into the existing space would be the CO-OP • It will only provide a limited amount of additional convenience retail floor space compared to the existing convenience retail offer in the Town Centre. What type of stores are expected, will any existing retail outlets move in leaving empty shops in town? • It will create an additional 850sqm NLA of supermarket floor space to the existing offer and an additional 500 sqm NLA of convenience retail offer to Denmark Town Centre. • It will have no undue impact on the trading potential of centres in Albany Town Centre or neighbouring townships. (See Above) • It will reduce/retain up to 155 person trips per day (57,000 person trips p.a.) to Albany which will instead now shop in the Denmark Town Centre, creating greater vibrancy and vitality for the Denmark Town Centre. Not factual. There are any number of reasons why Denmark Residents travel to Albany, employment, Doctors, Bunnings, also many will not change their shopping habits unless there is an economic reason for doing so. • The proposal subsequently represents a reduction of more than 6.25 M km of vehicle travel each year and save residents and visitors an additional 57,000 hours of travel time p.a. (See above). • It will increase spending over time as population and visitor numbers increase in the catchment. Visitors numbers cannot increase without additional accommodation and residential accommodation is already limited. 	
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		<ul style="list-style-type: none"> • It represents an economic and social gain to the Denmark community by providing greater choice and convenient access to a wider range of goods and services that some residents currently consider necessary to travel to Albany to access. • The proposal has the potential to create an additional 62 full time equivalent jobs. How is this true? What extra jobs, with self checkout becoming the norm. <p>5.2</p> <p>The proposal satisfies the objectives and outcomes established by WAPC Statement of Planning Policy 4.2 which deals with the assessment for out of centre developments. The proposed development will split the town into two shopping areas. A larger super market may be of some benefit to the community and one at "street level" would certainly be an improvement, however the traffic issue and the impact on Hardy Street has not been considered.</p> <p>Other sites within the current village domain are available.</p> <p>5.2</p> <p>The proposal satisfies the objectives and outcomes established by WAPC Statement of Planning Policy 4.2 which deals with the assessment for out of centre developments.</p> <p>Traffic Generation</p> <p>As part of the original shopping centre proposal that was approved in 2014, a Traffic Assessment was prepared to inform issues associated with future traffic movements in and around the site.</p> <p>Given the transpiration of time and in the context of increased traffic experienced in the town since 2014, at the request of Shire Staff, an updated traffic assessment has been prepared and is attached.</p> <p>In summary the report concludes as follows:</p> <p>5.3</p> <p>The proposal is predicted to generate fewer traffic movements for all peak hours when compared with both previous proposals we assessed,</p> <p>Traffic generated by the current proposal would cause no discernible detriment to the surrounding roads and intersections, This Statement is without fact. There has been no consultation with the residents of Hardy Street who are the most affected by the untried and possibly dangerous additional traffic movements.</p> <ul style="list-style-type: none"> • It is impossible for a 14.50mt articulated truck to turn into Hardy Street from Mt Shadforth Road without taking up the opposite lane when turning into Hardy Street and would be blocked if a car travelling North was stationary at the junction. • In the process of turning left into Hardy Street the truck would need to track right in Mt Shadforth Road crossing over the centre line to initiate the left hand turn. This would be in the face of oncoming traffic descending Mt Shadforth,(this intersection is a designated Black Spot). • A standard articulated vehicle is approx. 2.5 metres wide (not including wing mirrors) the truck will have to travel up Hardy Street keeping tight to left side. This could result in the wing mirrors protruding over the pedestrian footpath. 	
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		<ul style="list-style-type: none"> Hardy Street is a busy road and traffic would back up whilst waiting for the truck to complete the turn. This could require cars having to reverse back up Hardy Street to make room for the truck to finalise the turn. Hardy Street is a residential Street not designed to be used as commercial access road. Once the truck has made the turn it will then have to proceed uphill changing gears a number of times then coming to a dead stop before entering the delivery bay once again backing up traffic and blocking the entrance to the first lane into Amaroo Village. Has a trial run been undertaken? if not it would be advisable to undertake one carried out under the supervision of qualified road engineers. If the proposed development goes ahead and it is later decided that movement of 14.5m articulated truck turning into Hardy Street is deemed unsafe then deliveries cannot be made. <p>There is no nexus to require AUR treatments at the South Coast Highway intersections with Ocean Beach Road and Hardy Street,</p> <p>The treatments required by the Planning Permit would more than suitably accommodate the traffic predicted to be generated by the current development proposal,</p> <p>Articulated vehicles up to 14m in length can satisfactorily access the subject site via surrounding intersections, consistent with the development that was initially approved, and; See Above for comments.</p> <p>There are no traffic generation associated reasons why the current development proposal should not be approved. Also not factual. Cars exiting the parking area into Hardy Street will either turn left or right, if left then make another left or right turn onto South Coast Highway, this will cause a backup into the carpark and in Hardy Street causing a gridlock.</p> <p>It's unlikely a 14.5m articulated truck could make a left turn into a 6.0m road without crossing the centre line. The truck's length and turning radius would likely prevent it from navigating the turn within the confines of a single 6m road without encroaching on the other lane.</p> <p>Explanation:</p> <ul style="list-style-type: none"> Turning Radius: Articulated trucks have a large turning radius due to their length and the articulation point between the cab and the trailer. Road Width: A 6.0m road is a relatively narrow width. <p>Considerations:</p> <ul style="list-style-type: none"> Specific Geometry: The exact possibility of turning without crossing the centre line depends on the specific geometry of the intersection, including the radius of the turn, the angle of the entry, and any other obstructions. Legality: In many jurisdictions, crossing the centre line is illegal and can be a very dangerous manoeuvre. Safety: 	
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		<ul style="list-style-type: none"> • A manoeuvre that requires crossing the centre line is likely unsafe and should be avoided. <p>Alternatives</p> <ul style="list-style-type: none"> • Using a wider route: <p>If possible, consider using a road that offers wider turning lanes and greater space for the truck to turn without crossing the centreline.</p> <ul style="list-style-type: none"> • Adjusting the turn point: <p>If possible, adjust the point at which the truck begins the turn to ensure it has more space to manoeuvre within the available road width.</p> <ul style="list-style-type: none"> • Seeking guidance: <p>If there are any doubts about the manoeuvrability of the truck, consult with experienced truck drivers or seek advice from local transport authorities.</p> <p>Recommendation:</p> <p>In most situations, it's best to avoid attempts to turn a 14.5m articulated truck into a 6.0m road without crossing the centre line. The risk of a collision, damage, or even a violation of road laws is too great to make it a viable option.</p>	
S108		<p>For a community that benefits from tourism for its economic stability, Denmark has yet to address traffic issues, particularly for caravans and campervans..</p> <p>Currently they spread out along the river front down to Annie Harrison Reserve plus squeeze in spaces closer to the shops when possible.</p> <p>We also have congestion at Ocean Beach Rd/South Coast Highway at all times of the year, not just holiday periods and emergencies. [Congestion is a subjective term based on off peak traffic movements]</p> <p>The only provision for a truck to stop is adjacent Ocean Beach Rd and that is to be removed.</p> <p>I am asking Planning and the Council – will this development as presented be an asset to future growth of Denmark township?</p> <p>The following comments are raised without knowledge of Council's forward looking solutions to these issue.</p> <p><u>ISSUES RELATING TO TRAFFIC</u></p> <p>Our experience with Planning Applications is that applications once GRANTED have an expiry date.</p> <p>It does not appear that an extension of time was requested, therefore this application and all the documents provided should be assessed as a new application applying current regulations and conditions.</p> <p><i>Q1_Is that the case for this Application?</i></p> <p>It does not appear to be.</p> <p>SAT approval was in 2014. A lot has changed since then including an unfortunate fatality in this location.</p> <p>The UPDATED TRAFFIC ENGINEERING ASSESSMENT [TEA] is based on a 2017 application.</p>	

		<p>That document is OUT OF DATE and the numbers and assumptions nominated are questionable given the impacts of Covid on both population and tourism growth to the Denmark region.</p> <p>TRAFFIC GENERATION is based on the 2002 RTA standard. It should be 4/11/2024 Standard. The TEA is dated 19/11/2024 and not lodged until March 2025.</p> <p>There is no indication of the time period for the traffic study in 2017 or a newer study if one actually happened.</p> <p><i>Q2_Did they occur during a similar time period and did they include a similar holiday period?</i></p> <p>If not the comparisons raised are not valid.</p> <p>There are 3 blank pages in the online report so it's possible some information we are seeking was in those pages.</p> <p>ROAD WIDENING_South Coast Highway [SCH]</p> <p>The extent of road widening to the EAST and WEST of the development is not clear.</p> <p><i>Q3_How will the road lanes be marked up?</i></p> <p>Is it proposed that there will be dual lanes in both directions?</p> <p>Will SCH traffic have a clear path past this development in both directions?</p> <p>There would be 6 roads and or commercial driveways accessing SCH in this area.</p> <p>[Shell Garage; Ocean Beach Rd including Mitre 10 traffic; Denmark Visitors Centre; Gumnut Child Care; Hardy Rd; SCH left In, left out access to the Development]</p> <p>To the WEST there is a rise in the road and a bend in the road approaching Hardy St reducing vision to/from the west.</p> <p><i>Q4_Has traffic movement interaction to and from all of the above locations been considered given the concentration of traffic to be generated and not just shopping centre traffic?</i></p> <p>DEVELOPMENT CARPARK</p> <p>Complying with or even exceeding some of requirements for the 99 percentile car bay requirements would in a metropolitan location be automatically approved.</p> <p>Given the semi-rural population of Denmark and their requirement for 4x4 utilities and wagons, our assumption [phase quite often used in the traffic study] is that 40% of vehicles are over 5.2m long and that 70% of tourists with campers or caravans also exceed 5.2m. Many exceeding 6.0m given the trend for "truck" style 4x4 being manufactured and the need for bigger vehicles to compliantly tow large semi and off-road caravans.</p> <p><i>Q5_What consideration for larger vehicles has been given in this layout?</i></p> <p>There are 2 bays dedicated for cars with a trailer [or a very small caravan]</p> <p><i>Q6_Is that enough bays even to provide for tradies working in Denmark?</i></p> <p>The parking at the existing IGA is not great but there is long vehicle space within a reasonable distance to that</p>	
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		<p>outlet.</p> <p>TOURIST PARKING</p> <p>This may not be a requirement for this application, but it must be a very serious consideration for the future of Denmark residents, Council and even SAT.</p> <p>Denmark survives on tourism.</p> <p>It lacks dedicated caravan/campervan parking. Ad-hock provisions along the river or to the south of the town centre are anything but tourist welcoming.</p> <p>This is nothing new to the Council and finding a long term viable solution that permits the town to expand in an orderly way while enhancing the town has not as yet been presented.</p> <p><i>Q7_ How will this development improve this situation given its extending the distance to the towns major grocery shopping outlet by 500m.</i></p> <p><i>Q8_ What pressure will this have on the Tourist Centre parking and surrounding streets - Hardy & Millar?</i></p> <p>From SCH/Strickland St to this development is approx 500m. With another 300m to the Post Office/Doctor etc.</p> <p>For most people irrelevant of age that means shifting the car, which in turn increases traffic movement within the township and eliminated any parking bay gains.</p> <p><i>Q9_How will this benefit local residents or visitors?</i></p> <p>This is contradictory to the unsupported outcome presented by LB Planning.</p> <p>HARDY STREET</p> <p>The percentage assumption of traffic using Hardy street is questionable given that all traffic from Scotsdale Rd and Mt Shadforth Rd would use Hardy Rd as the most direct path to the Development.</p> <p>The truck turning patterns also indicates the need to cross over the centre line of the street thus impeding other vehicle movements.</p> <p>Road widening to 7.0m is mentioned - once from SCH to the southernmost crossover. Should that have been the northern most crossover as shown on the plans and the other is from SCH to the car parks connection which we take to be a typing error.</p> <p><i>Q10_ Will Hardy Steet remain an unclassified road Rd or will it be upgraded to a C road?</i></p> <p><i>Q11_ How has the increase in vehicle numbers and the increase in truck movements [bigger store/more stores = more truck movements than required to service the existing IGA] been evaluated to improve safety in Hardy St?</i></p> <p>TRUCK MOVEMENTS & PARKING</p> <p>The number and timing of delivery truck, service truck or rubbish truck movements in Hardy St is not stated in the TEA.</p> <p>There is no reference to home delivery services in the TEA nor any consideration for that service on the plans.</p> <p><i>Q13_ Will truck delivery times be regulated so as to not disturb residents in Millar St, Mt Shadforth Rd or Hardy</i></p>	
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		<p>St?</p> <p><i>Q14_ What provision is in place for parking and the day to day operations of a home delivery service?</i></p> <p>LEFT IN, LEFT OUT ACCESS TO SCH</p> <p>There is mention of a roundabout at Ocean Beach Rd. Would that not be a better solution to traffic flow and congestion.</p> <p>The assumption here is that as a main highway the roundabout would need to be quite large to cater for trucks etc and meet longer term traffic requirements.</p> <p><i>Q15_Main Roads control the Highway and the roundabout – How can that a be included in the Planning Approval Conditions?</i></p> <p>CONCLUSIONS</p> <p>We have used SIDRA analysis to verify intersection performance only to see in reality the impact of traffic to and from other sites impacting of road traffic movement.</p> <p>This does and will continue to occur at this location - Morning school & work traffic, mass exodus from caravan parks, turning right, then attempting to get fuel at Shell, tradies at Miter10, then popping across the road for morning tea, mum after dropping a child at day care heading for yoga or to the shops etc and its all happening at one location.</p> <p><u>ITEMS RELATED TO PLANNING APPLICATION COVERING LETTER</u></p> <p>2.0 SITE DESCRIPTION</p> <p><i>The site is suitably located</i> – it may have been in 2014 & 2017, but is it still, if it divides the Towns retail area and adversely fuels the failing traffic flow and parking inadequacies.</p> <p>3.0 SHIRE OF DENMARK LOCAL PLANNING STRATAGY</p> <p>(e) (iv) <i>proposal does not significantly impact on the commercial primacy of the Town centre</i> – Any development away from Strickland street precinct will impact on the Town centre. Maybe the community needs to be realistic and plan towards the old & the new Denmark. If Denmark is to grow its unavoidable for it not to modernise.</p> <p>Finding a parking location that's central to both the old and the new Denmark will be the key to connectivity and economic resilience. If tourists can walk up the hill to stock the larder and down the hill to stock the sole with entertainment, food and atmosphere it's a win win.</p> <p>4.0 THE PROPOSAL</p> <p>Why would bicycle racks be something to consider? Afterall they are shown on the plans.</p> <p>In Metropolitan Councils contributions towards public art is a mandatory fixed sum. \$20k in Kalamunda 4 yrs ago.</p> <p>The Centres operating hours are not nominated.</p> <p><i>Q15_ Would a liquor outlet have longer trading hours?</i></p>	
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		<p>5.0 PRE LODGEMENT CONSULTATION AND ADDITIONAL INFORMATION</p> <p>5.1 RETAIL ANALYSIS</p> <p>Don't believe a word of it. There is no supporting documentation to back any of it up.</p> <p>Not that it matters – Denmark will grow – This development offers an attractive facility which should present well and enhance the highway streetscape.</p> <p>It should set the minimum standard for all future developments outside the old town centre.</p> <p>Unfortunately it won't prevent travel to Albany unless it offers goods at competitive price and provides service to its customers that they deserve.</p> <p>It will increase travel miles within Denmark unless there is a mid-way parking solution.</p> <p>People will not carry bags of groceries 1 km to the caravan parked b the river, nor will they walk 1.6 km [return] from the shops to the post office or similar venue.</p> <p>They will drive their car to a closer location which results in added travel within Denmark and removes any parking space benefits that would be gained from a central parking location.</p> <p>5.2 TRAFFIC GENERATION</p> <p>Discussed these concerns above.</p> <p>5.3 PEDESTRAIN ACCESS</p> <p>Connecting paths should be included.</p> <p>Hamilton Park – could the cleared portion of that be set aside for drive through caravan parking? At Councils expense.</p> <p>With a contribution from Developer towards refining the tree line area.</p> <p>5.4 BUILDING ELEMENTS ETC</p> <p>Colours to be approved before Building Permit.</p> <p>Landscaping and reticulation to be approved before those works can commence of site.</p> <p>BUILDING PLANS</p> <p>There does not appear to be a public universal access toilet facility or nappy change facility. More a building matter.</p> <p>Will delivery trucks actually need to manoeuvre into the garden or crash the loading dock store room?</p> <p>EXISTING IGA BUILDING</p> <p>The applicant has raised this in their application so it opens the door for comment relevant to this application.</p> <p><i>Opportunity to refit the existing supermarket floor space for non-retail purposes</i> – Why would that be proposed in this application? - To prevent competition from another grocery chain?</p> <p>If Metcash own both buildings, is it their position to prevent competition by applying for a Change Of Use to</p>	
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		<p>the old building.</p> <p>For a Change of Use, the old building - Retail [class 6] changed to say Office [Class 5] – requires both Planning and Building approval. For Planning that's up to Council. For Building that's based on the current NCC22 regulations.</p> <p>For an old building, NCC22 building regulations can be difficult to meet and expensive.</p> <p>It also puts this prominent building out of commission for many months.</p> <p>The parking at the northern end of Strickland Street is devalued as there is limited reasons for tourists to venture that side of the Highway.</p> <p>Hypothetically, should there be no takers to lease a large office building or limited uptake of smaller office spaces, then that building sits vacant or partially occupied which detracts from any commercial area.</p> <p><i>Q16_How will blocking retail competition or displaying vacant offices enhance the Town Centre or be of benefit to Denmark?</i></p> <p>Of concern and without prejudice:</p> <p>It has been mentioned that the Shire of Denmark is considering a move to that location.</p> <p>If that be the case, even if that consideration has been rejected, it should be declared prior to any decision on this application as it could otherwise be construed as possible collusion with the applicant in the planning process by the Council.</p> <p>In summary I support the Proposed Shopping Centre provided a better solution to traffic movement is achieved. A roundabout would appear to be the best long term solution to most of the issues raised.</p> <p>I encourage the Council to create a midpoint parking facility for tourists and rezone as needed to create an area within close proximity to the Towns centre precinct to enable space for future growth.</p> <p>Every effort should be made to maintain the option of competition with business's in Denmark.</p> <p>Planning Law is about the land and its use, not ownership or competition.</p>	
S109		<p>Thank you for the opportunity to provide public comment on the above-mentioned Shire Reference.</p> <p>We would like to provide the following feedback regarding our concerns about the proposed building of a supermarket and additional 7 shops at Lot 50 South Coast Highway (SCH).</p> <p>This is already an extremely busy area of the Denmark township, with a Mitre 10 Trade Centre, a BP Service Station, the Information Centre, a Childcare Centre, a Church and the Amaroo Village for over 50s, which immediately adjoins Lot 50. The following issues are of concern in relation to the proposal for further building in this area, as follows:</p> <ul style="list-style-type: none"> During holiday periods the busy intersection of SCH and Ocean Beach Road (OBR) is already overloaded with vehicles, many of which are towing caravans or boats. It can take significant time for traffic to turn either left or right at this T Junction, and significant delays occur. It is difficult for tradespeople to either enter Mitre 10 and then exit to rejoin the queue of traffic endeavouring to turn left or right from OBR. 	

		<ul style="list-style-type: none"> • The bottleneck of traffic during any kind of emergency, i.e. a fire during the summer months, when tourists abound, could result in loss of life. • Thus, the building of the proposed supermarket and 7 shops would further exacerbate an already extremely busy, and at times, overloaded location. • We understand there has already been a death involving a motor cyclist on SCH near the BP Service Station. <p>Proposed Resolution:</p> <ul style="list-style-type: none"> • Build a roundabout. There appears to be plenty of land that could be available to provide for this vital improvement to road safety. <p>The next issue, and the one of most serious concern, is the proximity of the proposed supermarket and 7 shops to the Amaroo Village in Hardy Street.</p> <ul style="list-style-type: none"> • Although the village is for people over the age of 50, the current residents are mainly retirees. The peace, tranquillity and safety of their lives will be heavily impacted by the noise and additional traffic in the area, especially Hardy Street, where the driveway to the proposed supermarket and 7 shops is planned to be located. • Supermarket deliveries usually occur from 4.30 am onwards. The noise of trucks arriving and departing, forklifts with their reversing beeps going on and off will be the first thing that will awaken them from sleep. After that there will be the constant traffic and general noise of a busy hub full of people and their vehicles. • During busy holiday periods when parking is at a premium, the parking bays at the proposed supermarket could very possibly be used by people who don't use the supermarket but then walk into town, thus further impacting the busy area. <p>Proposed Resolution:</p> <ul style="list-style-type: none"> • Find an alternate place for the supermarket and 7 shops. • There is a block of land at the end of the Mt Barker Denmark Road, where the metal sculptures were once installed. This could be developed as a wonderful entry to the township of Denmark and include space for the proposed supermarket and 7 shops. • Another roundabout at that T junction, would also assist traffic flows. • It would provide people Living east of the township with a shopping market enabling them not having to drive into the busy Denmark township. • Being a more rural area, it would not impact on a local community. • This in turn would relieve traffic in the Denmark township. <p>We trust the above comments wll be of use to the Shire in their decision making.</p>	
S110	<div></div> <div></div>	I write this email with much haste to meet the June 6th. 2025 deadline in expressing my very FIXED and FIRM	

	<div></div> <div>RESPONSE (aka VOTE) re the Proposed Shopping Centre DA2025/37; A457.</div> <div><i>I cannot scream loud enough, from each and every rooftop, of each and every business house, for each and every business owner and each and every thread, some century's old, which are respectfully woven into the recognised tapestry that is</i></div> <div><i>Denmark's TOWN HUB.....</i></div> <div><i>I DECLARE NO! NO! NO!.....</i></div> <div><i>Please Please NO! NO!.....</i></div> <div><i>Speaking solely from my point of view, I foresee our 'Town' being split in half & separated New businesses moving into shopping centre, in direct competition to a 'town' business, which many can only just tick over during the off season, and many, as we are unfortunatley witnessing, are just closing their doors and shutting shop!.</i></div> <div><i>Quite simply</i></div> <div><i>THIS TOWN AIN'T BIG ENOUGH (yet)</i></div> <div><i>FOR THE BOTH OF US!!!!!!</i></div> <div><i>SSSOOOO.....</i></div> <div><i>We have businesses already up and running within our town hub, some only ticking by during the offseason, and more empty shops are becoming apparent within our already developed town hub.....</i></div> <div><i>We have businesses in town that have been on the market 2+yrs, but cannot sell.....</i></div> <div><i>and some</i></div> <div><i>just close their doors!!!!!!!!!!</i></div> <div><i>Cut their losses and...</i></div> <div><i>FINITO.....</i></div> <div><i>So..</i></div> <div><i>WHY ??</i></div> <div><i>WHY THEN ??</i></div> <div><i>Why on earth would anyone in sound mind even toy with this proposal of</i></div> <div><i>" MORE BUSINESS SPACE & OPPORTUNITIES" ????????</i></div> <div><i>All of which shall be in competition to an already established business in the town 'hub' trying to make a buck??????</i></div> <div><i>It just does not make ANY SENSE to me at all.....</i></div> <div><i>This proposal, if approved</i></div> <div><i>Will immediately, in one foul sweep.....</i></div>	
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		<p><i>DIVIDE, DESTRICT & DESTROY DENMARK</i></p> <p><i>The whole dynamic of the town will immediately be fractured.....</i></p> <p><i>You will have already, successfully, divided the town in half.....</i></p> <p><i>The “FOR”</i></p> <p><i>and</i></p> <p><i>The “AGAINST”</i></p> <p><i>Armies shall take fruition.....</i></p> <p><i>The infra-structure, which is already feeling the tragic and beaten effects from the swarms of visitors responding to the ‘Tourist Town’ promotions and advertising.....</i></p> <p><i>All very well bringing money into the town, but at what expense????</i></p> <p><i>All these people with vehicles the size of army tanks, towing caravans the size of a house but NO WHERE TO PARK!!!!</i></p> <p><i>Forced to then, upset every local in town, by parking in some random spot and manner creating chaos.</i></p> <p><i>Chaos is already alive and kicking at the Ocean Beach Road/South Coast Highway intersection without adding any more components or hazards.....</i></p> <p><i>This to me seems a most UNSUITABLE ZONE for a Shopping Centre proposal such as this.....</i></p> <p><i>I noticed the afore proposal put forward for development of similar nature was declined with the 4m proximity from “Amaroo Village” being a contributing reason.</i></p> <p><i>I see the proximity for this proposal is stated at 6m....</i></p> <p><i>OK so an extra 2m given to ‘gloss it over’ with the Amaroo residents?????</i></p> <p><i>No 2m is going to dull the noise and interruptions that shall be a constant in this line of business.....</i></p> <p><i>All hours of the night and early mornings trucks are in and out delivering stock etc.</i></p> <p><i>Headlights, beep beep beeping, huge motors and machinery running all day and night keeping industrial sized refrigeration , lighting etc etc etc etc etc running all day and all night.....</i></p> <p><i>We can hope that a % of the residents suffer with hearing loss and oblivious to the constant noise.</i></p> <p><i>But no extra 2m is going to help the constant interruptions and unrest that this kind of outlet shall generate with the residents of Hardy St, and primarily the residents of Amaroo being gravely affected, disturbed and deeply disrupted.</i></p> <p><i>THIS SIMPLY SHOULD NOT BE ALLOWED.....</i></p> <p><i>Anybody who does not give consideration to the horrid impact and it’s grave consequences that shall disrupt and derail the peaceful, safe, and comfortable retirement life style the residents signed up for.....</i></p> <p><i>A ‘new shiny shop’ in a ‘new shiny mirage’ will of course be inviting for all to come and see, and be seen.....</i></p>	
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		<p><i>However....after the glitter settles, the novelty is no longer, all the destructive damage firmly in place.....</i></p> <p><i>The “CUSTOMERS” the “BREAD & BUTTER” in keeping businesses alive.....well they shall split up into individual preferences and convenience loyalty as was before the new shiny toy came to town.....</i></p> <p><i>You will have the % who will be loyal Shopping Centre’ shoppers....</i></p> <p><i>(But can they survive with only this loyal % as their clientele)????</i></p> <p><i>You will have a % who will go back or continue to order their groceries online and have them delivered by Coles and Woolies trucks, which I see more and more deliveries being made more and more frequently just in my block alone.....</i></p> <p><i>You will have a % who will continue making a trip to shop at Aldi, as a special day out in Albany.</i></p> <p><i>You will have a % who will continue to support the already established Good Food Company BOTH THE LARGE and SMALL here in town.</i></p> <p><i>Now we have little pockets of people everywhere....</i></p> <p><i>All divided by this extra choice.....</i></p> <p><i>But can the DIVIDED be enough to keep all the businesses afloat and healthy?????</i></p> <p><i>I BELIEVE AT THIS POPULATION POINT.....</i></p> <p><i>NO THEY CANNOT!!!!!!!!</i></p> <p><i>Being a 3rd generation “LOCAL” I have witnessed some great, and some not so great proposals and go aheads in the little town of Denmark.....</i></p> <p><i>I work and interact within, and amongst, the 'town hub' in my general day to day life and respect growth and progress is moving forward.....</i></p> <p><i>BUT THIS IS NOT A MOVE FORWARD RIGHT AT THIS TIME!!!!</i></p> <p><i>THIS IS NOT THE SITE FOR THIS PARTICULAR PROPOSAL.....</i></p> <p><i>ANOTHER PROPOSED SITE AT</i></p> <p><i>ANOTHER TIME FURTHER DOWN THE TRACK</i></p> <p><i>MAY BE ABSOLUTELY BRILLIANT</i></p> <p><i>However at this time,</i></p> <p><i>To this particular proposal and site I say....</i></p> <p><i>NO! NO! NO!</i></p> <p><i>Oh please please, NO!!!!!!!!!!!!</i></p>	
S111		<p>Do You Support the Proposal? Undecided</p> <p>Comments. Hi, we are worried about the supply route delivery trucks will take. The plans show delivery</p>	



		<p>access via Hardy Street only. This will require the delivery trucks to enter Hardy Street coming from Mount Shadforth Road. We do not see this route addressed in the traffic study.</p> <p>Our concern is that this will increase traffic through Mount Shadforth Road (already identified as Black Spot towards Peace Street) and also town centre. Please consider updating the traffic study to include impact of truck routing via Mount Shadforth Road. Alternatively consider delivery truck access directly from South Coast Highway to the site or Hardy Street (with an onsite truck turning circle).</p>	
S112		<p>It is with some regret that I specify my objections to the building of a self service store -namely IGA- next to the established Amaroo Village which was designed to accommodate citizens from age 55 onwards. My wife and I chose to live in Amaroo Village because of the solitude and peacefulness of the site. It looks as if our declining years will be fraught with angst.</p> <p>Since we moved to Unit 1 Amaroo Village eight years ago traffic has increased dramatically in Hardy St increasing the awkwardness of traffic entering and exiting Hardy St into South coast Highway. Cars queue up to negotiate the corner and at the same time trying to avoid the many cars "cutting" the corner.</p> <ol style="list-style-type: none"> 1. Regarding the proposed supermarket the building is too close to the Amaroo southern boundary. There should be a generous setback between the proposed building and Amaroo's southern fence of 10 metres. In addition there should be a buffer wall to shield the resident's view of the building in question. The generous setback would allow the planting of noise reduction vegetation. 2. A loading bay is planned on the western end of the supermarket, situated adjacent to the inadequate foot path beside Hardy St. Allowance has been made in Hardy St for a movement arc for articulated vehicles to access said loading bay. This will impact on the accessibility of cars into Amaroo. The noise factor of heavy vehicles and forklifts will affect the sleeping patterns of residents so I suggest a curfew of 8.00pm -8.00am. I also suggest that the western loading bay be incorporated with the loading bay on eastern end of the complex. It would centralise the storage areas. 3. There is little need for extra shops within the supermarket building as there are vacant premises opposite the existing SIGA and also vacancies in the Strickland St shopping area. If the planned SIGA Shopping mall goes ahead it will draw custom away from Strckland St and split the Town of Denmark in two. 4. It would appear from the site plan that there will be one entry and one exit point to the car park The exit is placed going into Hardy St, an already congested traffic spot. More consideration should be given to both the entry and exit points of the carpark. <p>There are surely other sites that could be converted to commercial use rather than disturb our existing aged facility.</p> <p>I include in this letter Appendix A showing the controversial site and the adjacent Hamilton Park which gets no use. These two sites could be interchanged.</p> <p>The new Hamilton Park would feature Geriatric Seating Benches and Oldie's Swings and Roundabouts to be used by Amaroo Ancient Population when staggering to the new SIGA.</p>	
S113		<p>I am apposed to the plans for a new supermarket on South Coast Highway, on several grounds.</p> <ol style="list-style-type: none"> 1. The development would have a destructive effect on the adjacent karri reserve. Drainage trenches 	




		<p>on the reserve are already causing problems and a large area of hardtop for parking would cause considerably more run-off. Also, rubbish is an issue.</p> <ol style="list-style-type: none"> 2. Small shops and businesses in the centre of town will lose a great deal of passing trade. Parking is only a problem at the height of the tourist season. Why should local residents and businesses (whom you represent) lose the heart of our town for the convenience of tourists? Re – the extra specialty shops – there are always vacant shops in Denmark – why build more? 3. It's hardly fair to the residents of Amaroo to create a noise and pollution problem adjacent to the place where they moved for a peaceful retirement. Not only dawn to dusk customer traffic – the delivery trucks cause a loud disruption often late at night. <p>Please reject this proposal.</p> <p>PS – Many local residents drive to Albany specifically to shop at Aldi where they get good quality and much fairer process – maybe Aldi could be encouraged into the current supermarket – just a thought.</p> <p>Thank you for your consideration of these issues.</p>	
S114		<p>Do You Support the Proposal? Undecided</p> <p>Comments. Safe traffic access. Lack of undercover parking and or walkways Is this design concept outdated? Enter any similar design in Albany and several of them have multiple empty shops.</p> <p>More information about the specialty stores. Denmark thrives on diverse, small business that aim to compliment each other not to compete against each other. Other larger businesses do not have the same ethics in their business model.</p> <p>I do support a more accessible location, it is a shame the current site of the IGA building was encouraged.</p>	
S115		<p>As a long-time resident, I know it is nice to keep things in town as they have been, now it is high time to alleviate the parking and awkward access to IGA, yes time to move on. There is exceptional population growth and the restrictive size of the CBD cannot cope with general population let alone the influx of visitors.</p> <p>I think it is a great pity there has not been a little lateral thinking,, eg put the supermarket where the primary school is move the dos to the site of the shire offices and the present IGA then becomes the shire offices.</p> <p>The primary school is in need of a total upgrade, supermarket plus plenty of room for housing close to amenities. Now wouldn't that get people talking!!</p>	
S116		<p>I just wanted to acknowledge the proposed retail development DA2025/37 and lend my support for the concept, in general.</p> <p>What is impressive is the additional 130 car parking bays which Denmark is sorely lacking. The current town centre (Strickland Street) is very limited in parking bays to service the business there, and there is a bit of vacancy in the retail spaces. Is this because of difficulty to attract consumers due to the lack of finding parking, or is it because the overall demand is not there?</p> <p>What struck me as I was reading the Net Benefit Test, is that they reference in section 4.2 that the Visitor Market numbers are based on 2021/22 visitor statistics. This was during COVID where WA residents could not travel outside of WA, and hence we saw visitor traffic at rates similar to Dec/Jan school holiday period all year-round. It was like Xmas rush every week for almost 2 years. Accommodation, restaurants, cellar doors were</p>	

		<p>super busy during this period. Thus, I question the validity of this time frame to base future consumer demand based on visitation.</p> <p>The Traffic Management report and plan to widen SC Hwy and add a left turn lane on the Ocean Beach Road intersection to SC Hwy is a real plus and an overall improvement.</p> <p>And finally, it states in the documentation that the current Super IGA will be replaced by the new development and turned into (potentially) non retail use, but no further information than that. I suspect the Shire has an idea of what they would like to see happen, but it is not clearly outlined in the proposed development application. So for me the full picture is not very clear.</p> <p>Thanks for the opportunity to comment.</p>	
S117		<p>Do You Support the Proposal? No</p> <p>Comments. I am opposed to the development.</p> <ul style="list-style-type: none"> • Increased traffic congestion • Larger vehicles could not be accommodated • Decentralisation of centre of town leaving shops vacant and closures as town centre loses its interest to customers that have a one-stop shop • Noise created during the night affect residents of Amaroo • Additional shops/products would mean closure of centre of town shops if similar 	
S118		<p>Do You Support the Proposal? No</p> <p>Comments. * that to have a supermarket with its visual pollution - advertising and commercial activity right at the entrance to this glorious town/village detracts all of us, visitor and tourist from all the beautiful aspects of Denmark</p> <p>* especially is not right at this site for a town that prides itself on developing active eco tourism</p> <p>*the centre of Denmark with the other retail outlets is the place for the supermarket</p> <p>*this is not a pedestrian friendly area. The highway is busy. Hardy St itself is busy beyond its purpose - for the residents commuting *the noise pollution will be excessive day and night, and the nightmare of trucks arriving whenever * this is a residential area> Not commercial. Please rezone that site.</p>	
S119		<p>Do You Support the Proposal? Undecided</p> <p>Comments. Denmark has a choice to be different, and possibly without the issues that other regional areas now face. Is the proposed Denmark Shopping Centre including seven speciality shops really taking our community into consideration?</p> <p>Has consideration and respect been given to the residents at Amaroo? What impact will the 24/7 delivery, offloading, forklift use, pollution and noise have on them.</p> <p>Is there really a need for the seven speciality shops when there's increased vacancies in the hub of town. Has</p>	


		the Shire considered moving to the Super IGA building and Super IGA move to the Shire building?	
S120		<p>Do You Support the Proposal? No</p> <p>Comments. I don't think that location is suitable for shopping centre development, for a number of reasons.</p> <p>Denmark has no need for a larger IGA, the existing store handles the current trade easily. IGA owners have no competition & are no friend of Denmark. The owners only seek to maintain their monopoly.</p> <p>Re the 7 extra small shops, there is no demand, quite a few existing shops in central Denmark remain unleased.</p> <p>The proposed site does not have the capacity for so much extra traffic, the Ocean Beach Rd - South Coast Hwy intersection is very busy already, especially at school & holiday times. Extra traffic there at nearby Hardy st would create an increased traffic danger, in particular to pedestrians & cyclists.</p> <p>The amount of mature trees that would be cleared is totally unacceptable. Central Denmark should maintain the existing trees along the roads & CBD at all cost. These trees are what gives Denmark the character that we all enjoy. The character of Denmark is at stake here, please don't destroy what we & the tourists come to Denmark for.</p>	
S121		<p>I have looked at the proposal for a shopping centre on the corner of Hardy Rd & West Coast Highway. I'm for increased competition within the supermarket structure in town - virtually a monopoly, even though there are two supermarkets.</p> <p>What concerns me is the need for 7 speciality shops when we have shops vacant around town, that have been vacant for some years now!! The trend these days is for people to shop online - having bricks & mortar is an expense that a lot of businesses can not afford any more. What type of businesses are envisaged to take these premises on? As the saying goes are they going to be more white elephants!!</p> <p>Traffic is already a headache during peak times on South Coast Highway, residents quite often use Hardy Road to get onto the highway - left to Ocean Beach & right to out of town or in our case just around the corner to home. There is no guarantee that we won't be affected in some way by the noise from the complex e.g. trucks in the loading bay - noise travels.</p> <p>It's a difficult decision to say whether I'm for or against the proposal. There is a pro & a few more cons as far as I can see.</p>	
S122		<p>Submission Regarding the Proposed Out-of-Town Supermarket Development-DENMARK</p> <p>I am writing to express my deep concern regarding the Shire's impending decision on the development of a new shopping centre outside of the main town centre. I believe this decision is perhaps the most critical the Shire has ever faced, with potentially irreversible and detrimental consequences for the viability and character of our beloved town.</p> <p>As a long-term property owner and permanent resident of Denmark, and as a University-qualified Geographer with a special interest in Urban Geography, I have a deep understanding of the dynamics that underpin successful urban environments. Furthermore, I have witnessed firsthand in France and the UK the devastating effects of relocating the main shopping attraction, specifically the supermarket, away from the town centre. The consequences, tragically, are the death of the main street, leading to a landscape of vacant, dilapidated shopfronts, a significant loss of businesses and employment, and in this case the destruction of what is</p>	



		<p>currently an iconic Australian country town streetscape.</p> <p>The economic success and viability of our main street are intrinsically linked to foot traffic. A supermarket, located within the town centre, acts as a crucial magnet, drawing a consistent and large flow of people. This is because supermarkets offer what are known as 'low-order goods' – items purchased frequently – thereby generating a regular and substantial influx of visitors to the heart of our community.</p> <p>Should the supermarket be relocated out of town, the most immediate and impactful effect will be a drastic reduction in foot traffic to the main street. People will undoubtedly drive to the new supermarket, complete their shopping, and then leave, bypassing the town centre entirely. This fundamental shift in consumer behaviour will have a cascading negative effect on what are termed 'complementary businesses'. Local establishments such as the CO-OP, an iconic and locally owned institution, along with numerous other businesses that rely on the “supermarket anchor”, will suffer immensely. With fewer people walking by, these businesses, which employ local people, will experience a severe drop in sales, leading to closures, increased vacancies, and ultimately, dilapidation of our town centre. As the town centre declines, property values will inevitably follow suit.</p> <p>The plan for the new shopping centre also includes tenancy for at least six additional shops. Considering that the shop space and residential development opposite the present IGA has never been permanently occupied it seems we are poised to add to this existing oversupply. Where will the likely tenants for these new shops come from? Most likely, they will be existing shop owners and tenants from the town centre who, seeing the writing on the wall, will desert our main street. This will only accelerate the rapid decline of the street and the town itself delivering yet another killer blow to our community. Note, this plan is not just about replacing the present IGA but creating an alternate Shopping CENTRE.</p> <p>Denmark is unique, not only for its breathtaking natural landscape but also for its distinctive urban landscape. This unique character is now at grave risk.</p> <p>Will future visitors be drawn to a town where the main street is devoid of activity, featuring endless rows of closed shops? Our town boasts a unique Australian country town charm, with its beloved cafes, bakeries, and small eateries. These are not merely places for transactions; they are vital community hubs where people connect, share news, and foster a sense of belonging. The proposed development jeopardises this crucial social cohesion and the vibrant community spirit that defines Denmark.</p> <p>It may be claimed that a new supermarket will provide employment but most likely junior, part time workers. What is more probable is a net decline in overall business activity and employment across the town as existing businesses struggle and close. Should other retailers close the net result will be a diminished range and type of goods available to the people of Denmark</p> <p>While I acknowledge that an out-of-town supermarket might offer more parking during peak times, this is a colossal price to pay. The cost includes the irreplaceable loss of local businesses, the destruction of the unique urban landscape that makes Denmark so special, and a loss that, once incurred, will be irreversible.</p> <p>I urge the Shire to consider these critical points and to recognise the profound and irreversible negative impacts that an out-of-town supermarket development will have on the economic, social, and cultural fabric of Denmark. We must safeguard our town centre – the heart of our community – for current and future generations.</p>	
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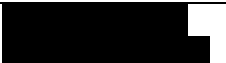
S123		<p>I am writing to voice my concern with the new supermarket proposal.</p> <p>Firstly, I am concerned that a new large supermarket owned by big business nonlocals will put our small local family-owned shops out of business and change the character and soul of our town.</p> <p>Secondly, we already have empty shops near the current Supa IGA so why do we need more?</p> <p>Thirdly as a School Bus Driver who travels through town at least four times a day I am very concerned that the proposal will not adequately address the increase in traffic issues especially the corner of South Coast Highway and Ocean Beach Road.</p> <p>As you know this is already one of the busiest intersections in town. Traffic turning right from Ocean Beach Road into South Coast Highway is a problem now and will only get worse will more traffic.</p> <p>The introduction of a left hand turn lane is long overdue and will help but I believe will be offset by the increase in overall traffic going to the new development.</p>	
S124		<p>I am a resident of Amaroo village living here with my husband and have enjoyed six years in a peaceful environment. Recently there has been more traffic noise in Hardy street due to more and more vehicles using this street as a short cut, school buses, lorries and cars. Hardy street is in a residential area and not built for all this traffic.</p> <p>I am writing to voice my objections to the building of the supermarket and shops to be built on lot 50 South coast highway. (corner of S.C.Highway and Hardy street).</p> <p>I understand that the proposal for the building is a forgone conclusion and I do not object to a larger supermarket and shops in Denmark but not in this location. I do, however, think a great deal of thought must be given to the following objections should this build go ahead.</p> <p>A. NOISE. Hardy Street is in a residential area and with a supermarket and shops on the proposed site there will be a large increase in traffic, both small and large. Articulated vehicles are large and noisy, braking noise, gear changing as they come up the hill from Mt Shadforth road, turning into loading bay and reversing and general engine noise. There will be many more local delivery trucks on the road as well.</p> <p>B. TRAFFIC. There will be a large increase in traffic movements using Hardy street, both local cars from the other side of town and large vehicles (delivery trucks and articulated vehicles.) Are these large vehicles able to turn from Shadforth Road into Hardy street which is a normal residential street? Not very wide. They will take up more than half the road to turn round this corner.</p> <p>C. POLLUTION. Most vehicles have a distinct smell attached to them. Petrol or diesel fumes and strong exhaust fumes and this will only increase with vehicle movements in a concrete environment.</p> <p>These are my main concerns and I hope will be addressed by the Denmark Shire.</p> <p>There are a few issues concerning the car park:</p> <ul style="list-style-type: none"> A. Size and number of parking bays for customers who have a disability . They should be wider than normal parking bays. B. Location of parking bays for caravans and cars with trailers. Should be "drive through 11 to avoid unnecessary turning in a restricted area. 	

		I hope my concerns will be taken seriously as they are also the same concerns as many other local residents .	
S125		<p>I have two main concerns,</p> <p>1: The breaking up of our central business area into two precincts and the effect this will inevitably have on the businesses located in and around Strickland Street.</p> <p>2: (a)The traffic congestion which is already a problem for many drivers on the Highway, Hardy Street and Ocean Beach Road intersections. In fact I have witnessed on several occasions impatient motorists travelling west on the Highway driving up on to the footpath at the Childcare Centre rather than wait until cars have turned right into Hardy Street.</p> <p>Add to this the cars which turn left (often over the curb) out of Ocean Beach Road and from the driveways of the Childcare Centre and the Uniting Church.</p> <p>It makes no sense then to further compound the problem by adding entrances and exits to the supermarket car park on these roads.</p> <p>(b)What extra provision needs to be made for the delivery trucks (often B doubles) to actually enter and exit Hardy Street safely without crossing into oncoming traffic lanes.</p>	
S126		<p>Do You Support the Proposal? No</p> <p>Comments. The traffic in the said area is not conducive to a shopping precinct in this location. There are already major hold ups exiting Ocean Beach Rd onto South Coast Highway in either direction. I believe that trucks would have to back in off Hardy Street which is not ideal in an area that has an over 55's residence next door. I believe the best answer is for the shire to rezone some land approx halfway to Ocean Beach to relieve the pressure that is in the CBD</p>	
S127		<p>Thank you for providing the residents and ratepayers of Denmark with an opportunity to comment on the proposed shopping centre development at the corner of South Coast Highway and Hardy Street.</p> <p>I have several concerns, including:</p> <ul style="list-style-type: none"> • “Keeping our village feel” is part of the Council’s Decision-Making Principles in both the Shire’s Corporate Business Plan 2024-2028 and Our Future 2033, Shire of Denmark Strategic Community Plan. By creating a large shopping centre all the way out at Hardy Street does <u>not</u> assist in keeping Denmark’s village feel. • I am surprised the proponents of the development believe the traffic studies and road widening proposals (included in the Traffic Engineering Assessment dated 19 November 2024 and shown on drawing A001) adequately remove all the problems with increased vehicle movements in the location. Turning right from Ocean Beach Road onto South Coast Highway will become a far greater nightmare than it is already. It wasn’t long ago that there was a fatality near the service station. • The proponent’s Net benefit Test prepared by Taktics4 says the development has the potential to create an additional 62 full time equivalent jobs. As the proposed development has limited parking bays, where are the 62 employees going to park if adequate spaces are to be provided for the customers? 	


S128	<div></div> <div></div>	<p>Thank you for the opportunity to submit comment on this Proposal from Metcash.</p> <p>My comments are based on our Strategic Community Plan, Our Future 2033, as it is this document that directs and underpins how we collectively “manage” our shire. There is sparse mention of “shopping facilities” in the Community Plan except where under “Community Priorities” it states that we want “a more vibrant CBD”. The Vision calls for “living the village lifestyle”, and the Plan espouses the need to “retain the village community atmosphere”. It is these things that sets the Shire of Denmark and the town itself on a pedestal that other towns aspire to, but where regrettably “development’ has thrown the key away.</p> <p>I strongly oppose this Proposal for many reasons; however, I will briefly address only two, which are listed in the Conclusion of LB Planning’s letter dated 24 March 2025, my comments in red :</p> <p>! It will NOT increase economic opportunities to all Denmark Town Centre retailers and spending over Eme as population and visitor numbers increase in the catchment. and</p> <p>2 It will also NOT create a safer pedestrian and traffic environment for the main street and help minimise congestion presently experienced during busy holiday periods.</p> <p>In relation to the first item, it is so very clear that the Proponent Metcash lack any empathy with Denmark and its community. The inclusion of 6 “speciality shops” is simply inviting existing retail businesses to move out of town. No doubt there would be attractive incentives to move, as the bottom line is in making more money for the Metcash. There are empty shops in town, so why invite more? Denmark town has a village atmosphere and all documentation supports the retention of the village atmosphere. The Hardy Street site is on the periphery of the CBD, or indeed beyond it. Development of this site and drawing out existing retail businesses is at odds with Our Future 2033. This Proposal will detract from the CBD being more vibrant, the converse applies.</p> <p>In relation to the second item, which specifically deals with traffic and traffic only, the “main street” is South Coast Highway. I speak as a Chartered Civil engineer, like you David, but for me, with over 45 years in active engineering. I am; however, not a Traffic Engineer, but the overall arrangement shown on the drawings will only add congestion to what is a hot-spot on South Coast Highway. To determine, as this Consultant has done, that South Coast</p>	
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		<p>Highway will be safer from a pedestrian and traffic environment point of view, is simply absurd. I question whether Main Roads has reviewed the overall analysis which uses old data and fails to examine the consequences abutting and outside the proposed development. I refer to each end of Hardy Street. Designing a robust solution for the intersection of the entrance to the proposed shopping centre/South Coast Highway/Ocean Beach Road whilst accommodating additional traffic generated from the proposed shopping centre, the petrol station, Mitre 10 and the Visitors Centre, is clearly difficult. As designed, the arrangement proposed will provide congestion both within and outside busy holiday periods. Main Roads need to re-assess the South Coast Highway arrangement using better data and explore the roundabout option albeit it has land use and topographical complexities.</p>	
S129		<p>Do You Support the Proposal? No</p> <p>Comments. I am opposed to the proposed Shopping Centre proposed on the corner of the South Coast Highway and Hardy Street . I am opposed to proposal on the following grounds</p> <ol style="list-style-type: none"> 1) The new centre contains 7 specialty shops . There are already several vacancies in buildings in the town centre. I understand that some of the current town centre businesses also would like to move up to this area as well . This would diminish the vitality and functionality of our current town centre. Our current town centre has shops within walking distance and I believe this is an important feature and function of our small community town. 2. I believe that Denmark is not big enough to support and extra 7 specialty shops, as well as maintain a vibrant town centre. 3. I believe that as a tourist town Denmark should be able to showcase its outdoor activities /natural environment and not be promoted as a "shopping town " 4 .I do not believe the proposal of shopping centre is suitable for that site . I am concerned about the increase in traffic pressure at the at entrance to the proposal and Ocean Beach Road and the South Coast Highway. There is already growing traffic congestion and dangers on the Ocean Beach rd corner and nearby corners , particularly in holiday periods. I also believe the proposed site is not suitable to right next door to a retirement facility. 5. I am opposed to the locating of a large air-conditioned shopping centre in our town . I think it takes away from the small, intimate and unique and community feel of our town. 6. I understand that community members and visitors may have difficulty with parking in our current town centre and I think this issue should be addressed. Perhaps extra parking areas could be included in the new park area to be developed near the river, the Annie Harrison park or next to the fire station . I feel this is a far bigger issue and priority than our need for a bigger supermarket or more shops . 	



S130		<p>My response is that there is insufficient information being provided to make a decision for the following reasons.</p> <p>1 / The analysis by the consultants is unreliable because it is simply a rehash of two previous reports. Since the original report the demographic for the Denmark town & shire have changed dramatically. Covid drove many people to leave the city & a prime choice was to relocate to Denmark. Similarly people chose to "holiday at home" rather than overseas.</p> <p>2/ Traffic flow design pertains only to the IGA site. To make any sensible comment on the traffic it is essential to see how the Shire Council/Main Roads propose to direct non IGA traffic around the dangerous bottlenecks at each end of Hardy Street.</p> <p>3/ The presumption that specialty shops existing in the present shopping precinct will not be threatened or that their business will expand is pipe dreaming. This plan will only divide the town and threaten its uniqueness and appeal.</p> <p>4/ The shopping habits of those Denmark residents going to Albany will increase, not decrease, due to the high prices already being charged here.</p> <p>5/ The proposal, as put, only benefits Met Cash while severely disrupting traffic on South Coast Highway and nearby streets, particularly Ocean Beach Road, Mount Shadforth Road and Hardy Street.</p> <p>We are firmly opposed to the current plan.</p>	
S131		<p>Do You Support the Proposal? No</p> <p>Comments.</p> <p>1. Do we really need a bigger Denmark IGA (who already are a monopoly in town) when the current store ably fulfils local needs for most of the year (not to mention the smaller IGA which is a local business)?</p> <p>2. Do we need more specialty store spaces when the Denmark town centre is currently struggling to fill empty retail/business spaces?</p> <p>3. Will the Ocean Rd/South Coast Hwy intersection be a safe traffic space (for all users) esp. during peak times (daily and over holiday periods?)</p> <p>4. In the event that the proposed shopping centre is passed, is that really the best location for it (not even mentioning the inevitable destruction to the greenery/trees?)</p> <p>5. For many Denmark residents (and no doubt visitors), is this what is best for this community? Does short term convenience (and gain or the owners) "trump" that which makes Denmark unique & special?</p> <p>In conclusion, I don't see any compelling arguments to have a new IGA especially in the new proposed location which to me, is far from ideal. I would've have moved to Albany or stayed in Perth if I needed to be closer to bigger shopping centres. As with most big businesses/conglomerates, the profits ultimately benefit the owners and investors and less goes back to the community. I prefer to support local and small businesses where I can – to me it means more financial and emotional investment flows back into your community, something which is becoming less tangible in this increasingly messed up world of ours. Please make a good decision that puts people and the environment before profits for those that are only interested in profits.</p>	


S132		<p>Having studied the information provided to the residents of Amaroo Retirement Village, situated at 12 Hardie St, Denmark, I wish to indicate my concerns about the proposed new Shopping Centre, planned for the corner of Hardie Street. And the South Coast Highway.</p> <p>Page 1.</p> <p>1.0 4th arrow point “Associated service facilities (toilets, bin storage area etc.)” These are not marked, except the Loading Bay, which is very close to the Amaroo boundary.</p> <p>Concerns 1. Noise at night from deliveries, back sounds, voices, banging down of goods. This is not acceptable.</p> <p>Concerns 2. Bad smells from food waste. Could a daily collection of food waste be made – perhaps for compost, (by Green Skills or other) and/or, slightly imperfect food could be collected daily, (perhaps by the Denmark Food Bank, or made available free to the public.)</p> <p>Page 4</p> <p>4.0 2nd dot point “Landscape buffer to Amaroo”</p> <p>Concerns 1. What will it look like?</p> <p>Concerns 2. Will it subdue noise?</p> <p>Concerns 3. What are the details of the “Revised Acoustic Plan”?</p> <p>5.3 “Pedestrian Access” paragraph 3</p> <p>Where is “Hamilton Reserve?”</p> <p>Concern 1. This will make a more obvious access to Amaroo, after hours, and what about Amaroo’s security in that case.</p> <p>More general concerns:</p> <ol style="list-style-type: none"> 1. It would seem inevitable that there would be more potential for anti-social behavior, from non-Denmark visitors, around the area, after dark. Such behavior is frequently reported occurring in Supermarket area in other places. Perhaps there will be security guards on duty? 2. The traffic around the area of the proposed Shopping Centre would not only be a cause of hazard and frustration to users of the South Coast Highway, but it would, inevitably, cause many drivers to try to bypass that bottleneck and take to using Hardie Street as their way around the area. This again would impact on the Amaroo village, which at present enjoys a quiet area and only light traffic Hardie St. <p>If the Shire can answer all these queries to Amaroo’s satisfaction, I see no valid reason for objecting to the proposed building project, since it has already passed planning approval once, already.</p> <p>I will be interested in hearing of any outcomes from the meeting.</p>	
S133		As a long time resident of Denmark & now living in Amaroo Village. I feel that I am able to offer some	


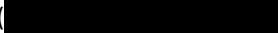
		<p>comments on the proposed shopping centre on the corner of South Coast Hwy/Hardy St.</p> <ol style="list-style-type: none"> 1. Too few Acrod spaces. 2. Shoppers will still go to Albany because of medical appointments & the swimming pool, we will shop whilst there. 3. Speciality shops will not survive because of on-line shopping. 4. Where will the 62 jobs come from & where will they live? 5. Gas storage tank on Amaroo boundary will need to be relocated 6. Will there be a roundabout at the junction of Ocean Beach Rd & South Coast Hwy? Not shown on the plan. Alterations to South Coast Hwy & Hardy St., also Shadforth Rd & Hardy St. will need to be addressed as it is already difficult & trucks will compound the problem. Speed limits on Hardy ST. also "no parking" signs will be needed. 7. Noise from unloading trucks at excessive long hours will be detrimental to village residents. 8. Parking bays for 60+ employees will take up a large number of parking bays shown on the plan. 9. Road congestion on South Coast Hwy cannot to ignored & crossing the highway will need to be addressed – church, child care centre. <p>Hardy St is already used frequently by trucks & school busses as well as traffic trying to avoid the centre of town. It should not be a highway!</p> <p>Already Coles & Woolworths deliver food to Denmark. What makes the developers think this will change? Not a very well thought out plan!</p> <p>Council – show some insight & think carefully about the site of this development.</p>	
S134		<p>Do You Support the Proposal? Yes</p> <p>Comments. Really support the idea is another shop in town as I believe the IGA needs a little competition to lower prices and actually become affordable to the people who live in this beautiful town!</p> <p>The idea of another cafe is also a brilliant idea as with Mrs Jones closed, Ravens is the only cafe in town and gets pummelled every school holidays. To be able to get eggs on toast for under \$20 would be a dream!</p> <p>In terms of shops, something along the lines of a Spudshed or Bunbury Farmers Market style store would be incredible as the support of local farmers would increase, as well as they're fantastic range of in-house pre-made meals would become as close as Denmark gets to "fast food".</p> <p>As for the specialty stores, can I suggest bringing in more services such as florists, hair dressers, brow and lash specialists, nail technicians etc as with only one of each store in town, it can become incredibly hard to book due to high demand and would be far better than having to regularly trek in to Albany.</p> <p>I understand that retail stores are a given, but services would be more beneficial to the quality of our lives here in Denmark. As someone who lives just up the road from the shops I'm excited for the ease of congestion around the IGA and the diversion of traffic from down by the bridge. I'm not particularly looking forward to the traffic during the build, but I think all the panic and complaints about "sound pollution" of "trucks and forklifts" during open hours by other locals is uncalled for as it's barely noticeable around the current IGA</p>	

		<p>anyway, and I'm only two houses up from the current construction of Wilson Rise and that doesn't bother me at all as I'm at work while it's occurring (plus there is more noise from young guys in their old 4x4's!). Apologies for the ramble, I just wanted to cover all the bases of the complaints being made in group forums from a fresher perspective :)</p>	
S135		<p>Do You Support the Proposal? No</p> <p>Comments. We would like to state that we also wrote a submission opposing the proposed development, the last time this proposal was put forward. On that basis, the points we will raise will be similar to our last submission. The main areas of concern for us are as follows.</p> <ol style="list-style-type: none"> 1. Traffic congestion at the intersection of South Coast Hwy and Ocean Beach Rd. 2. Overflow parking, especially for larger vehicles, i.e. caravans and camper vans, into the carpark of the Visitor Centre and along Hardy Street. 3. Insufficient large-vehicle parking allotted within the proposed shopping centre carpark. 4. Increase traffic flow in Hardy Street, at all hours of the day. 5. Noise pollution. 6. Detraction from the village atmosphere. 7. Loss of amenity. Details are as follows. <p>1. Traffic congestion at the intersection of South Coast Hwy and Ocean Beach Rd. The intersection of South Coast Hwy and Ocean Beach Road is now, commonly, very busy, becoming more congested at Christmas and Easter holiday time. It is often reported that Denmark is 'at peak accommodation occupancy rate' at these times. Denmark's popularity is growing, therefore the vehicle numbers are growing, which in turn will make this intersection in particular even more congested for longer periods of the year.</p> <p>The proposed plans show an ingress facility into the shopping centre opposite Ocean Beach Rd. It is not difficult to foresee driver frustration, impatience and potential accidents as cars navigate to traverse South Coast Hwy attempting to use that ingress to get into the proposed shopping centre.</p> <p>2. Overflow parking, especially for larger vehicles, i.e. caravans and camper vans, into the carpark of the Visitor Centre and along Hardy Street. The location of the existing Supa IGA, by default, often promotes issues with how and where larger vehicles park whilst shopping. Mrs Jones carpark and its adjacent verge were often used, simply because there is little allocation of parking for such vehicles nearby (except for outside the Denmark VFRS building).</p> <p>As stated in point 1, popularity will lead to more vehicles, which, out of laziness, lack of actual quantity of allocated large-vehicle parking spaces or frustration of inconvenience, people will start to park in the Visitor Centre carpark and along the Hardy St verge. This action in itself will promote a pedestrian safety issue as people cross both South Coast Hwy and Hardy St to access the shopping centre.</p> <p>3. Insufficient large-vehicle parking allotted within the proposed shopping centre carpark. Added to point 2, above, the proposed drawings show only 2 bays allocated within the shopping centre carpark for larger vehicles and those spaces are located toward the rear of the carpark. This is a tourist town, camper vans and</p>	



		<p>caravans are part of the scenery, permanently. It is easy to foresee congestion and driver frustration/tension after driving into the carpark expecting a park space only to see them full or small vehicles parked in them. This is often witnessed in the Coles/Dome carpark in Albany where such larger vehicle parking bays are allotted near the Dome cafe. It is our opinion that not enough thought/planning has gone into the allocation and accessibility of the large-vehicle issue in the proposal.</p> <p>4. Increase traffic flow in Hardy Street, at all hours of the day. The Traffic Flow plan shows how delivery trucks are to access the shopping centre i.e. along Mt Shadforth Road then into Hardy Street. We feel strongly that this option should not be permitted. It is a residential street and it is simply not wide enough for truck and car traffic flow. Added to the above, early morning and evening (as currently happens at Supa IGA) 7 day a week deliveries will be a constant disturbance to the residents of that street and Mt Shadforth Road.</p> <p>5. Noise pollution. Obvious delivery vehicle noise is the first point in this section. Next is type 24 hour noise from refrigerator/freezer and air-conditioner equipment, which, it is noted, is mounted on the roof toward the rear of the building (in close proximity to Amaroo Village). Due to the nature of how this equipment needs to work, it will be a constant, invasive and annoying background sound, especially noticed on still nights, to the surrounding residents. The next point we raise is general noise generated by shifting of stock and pallets during the day but often at night time as shelves are stocked and new deliveries are made, will also be a constant. Rubbish removal trucks often access commercial premises very early in the morning, so as to have good access to the bins. The bins would probably be emptied several times a week, thus resulting in more noise disturbance to the surrounding residents.</p> <p>6. Detraction from the village atmosphere. Our concern regarding this point is that the proposed design of the new shopping centre does not suit the current amenity of the town's ambience. This town is highly regarded for its calm, slower, village lifestyle. We are concerned that should this type of structure be built, it would detract from that idiom. We also have a concern after noting the layout of the 'specialty shops' on the proposal drawings, does this layout invite any one of the international fast food chains to look to lease a tenancy within the complex, which we would rather not see in our town, due to the image the chains often exhibit and the possible eroding of business and income to existing small operators in town. Another concern is that should the Post Office shift to the new shopping centre, people would be forced to go there, which in turn would have a detrimental effect on existing Strickland Street businesses. The Post Office shifting to that location would also add more delivery traffic to Hardy Street. Of course, we admit that what we state above is, at this point in time, speculation, but some or all of this is possible and we think relevant to our submission.</p> <p>7. Loss of amenity. Our reason for bringing this up is mainly out of concern for the residents of Amaroo Village. Currently their life is as relaxed and quiet as one could expect, living in that location. It would be naive to have moved to such a location and not realised that there is an empty block of land next door zoned 'commercial use', which would be built on one day. However, we consider that this type of facility is the wrong one for this particular site, extra traffic, noise, odour (from in-house waste disposal) and parking issues, to name but a few, have the potential to decrease property values and reduce the general amenity of the surrounding residential area. We do not oppose a new shopping centre in Denmark but we strongly oppose it in the location as proposed. Thank you for the opportunity to air our concerns.</p>	
S136		<p>Do You Support the Proposal? Yes</p> <p>Comments. None</p>	


S137		<p>I am totally against a development of this kind in this location.</p> <ul style="list-style-type: none"> *it will have a negative impact on an already stressed road junction of Ocean beach Rd & South Coast Hwy. *it will have a negative impact on Hardy St with increased noise & vehicle traffic. * it will have a negative impact on the residents of Hardy St including Amaroo independent living village. * It will impact greatly on the “village “ shopping precinct & all the shops near & around the current IGA . IGA is the “ heart” of the shopping hub. This will lead to loss of income. <p>* IGA should look at ways of improving access & parking on its current site. Surely there is space for lift access to the lower car park . Do we need the outside staircase?</p> <p>*If a new IGA supermarket needs to be built look at other possible sites. Land opposite the Mt Barker Rd T junction- which might have to be resumed , the current Visitors Centre which would then relocate to the old IGA site. (the pool could also be built in that building, ready parking .)</p> <p>* Sell the Hardy St land to Amaroo or similar as we need more over 55s accommodation .</p> <p>Do not build a supermarket on the proposed site.</p>	
S138		<p>We are writing to register our objections to the proposed development on the block owned by Metcash, situated on the corner of South Coast Hwy and Hardy St.</p> <p>How can a Shire support the construction of a major shopping centre adjacent to an already established retirement village? I guess that part of the answer lies in the major increase in rates from the site.</p> <p>We are told that Hardy St will be widened by some 2 m. Apart from the increased traffic in both number and size, it will be even more life threatening to walk along the footpath to the Amaroo club house - we insist on a protective barrier for the whole length of the street. How large delivery trucks will enter Hardy St from Mt Shadforth Rd is a mystery. The increase in the volume of traffic in Hardy St will be substantial.</p> <p>There is a real issue in the delivery and unloading of goods. Not only will we have large trucks delivering goods to the site, making Hardy St a major thoroughfare, but also the continual, and even worse, unloading of goods by fork lifts with reversing alarms.</p> <p>We think that 7 am to 10 pm as operating hours is ridiculous - many of us are still in bed at 7 am and returning to bed well before 10 pm. We would insist on an 8 pm to 8 am curfew.</p> <p>We gather that there is to be a raised wall on the north side to 'protect' Amaroo units 1-6. This will cause a shadow to fall on these units at certain times of the day and the year. Also, is there to be a 6 m setback on the same north side - this should be carefully monitored.</p> <p>We got the impression, from reading the planning document, that suddenly shopping at the new Guru Bros will be a panacea in terms of pricing! No longer will people travel to Albany, or shop on line, to access the lower prices of Coles and Woolies. This is delusional thinking!</p> <p>Modern vehicles have very low exhaust emissions, mainly carbon dioxide, water and nitrogen. Older vehicles, such as diesel trucks, are not so friendly, probably including noxious oxides of nitrogen in their emissions.</p>	

S139		<p>Do You Support the Proposal? No</p> <p>Comments. The traffic flow analysis is unconvincing.</p> <ol style="list-style-type: none"> 1 The IGA supermarket in Strickland Street is a key traffic sink for those Denmark residents linked to Ocean Beach Road and the entire population of Ocean Beach. It is currently accessed by a Right turn at the T-junction intersection between Ocean Beach Road and South Coast Highway followed by a Left turn into Strickland Street. 2 Traffic approaching this T-junction from the south faces a challenge for two reasons. Sight-lines to the west are poor because of the curvature of South Coast Highway and, on the east side, the Filling Station exit is too close. More often than not, west-bound traffic seems reluctant to signal because of the proximity of the Filling Station entrance and Ocean Beach Road. At peak hours, and during the tourist season, delays become significant and the resulting frustration increases the risk of accidents. 3 The case argued in the Traffic Assessment Report G35886L-01A is specious. Although the earlier assessment (long since lapsed) based on the '<i>RTA (NSW) Guide to Traffic Generating Development (2002)</i>' has been updated using the '<i>Guide to Transport Impact Assessment TS 00085 v 1.1(2024)</i>' ... this simply means that the parameter values in the engineering formulae used to make the assessment may now be more reliable. It does not mean (as the casual reader might reasonably assume) that the impact on traffic flow will be lessened. The current estimate may be lower than the previous one, but the reader is misled to think prior approval matters, despite it expiring if not enacted within two years. 4 But the real problem with the impact assessment is that it assumes a simple linear relationship between traffic count and the floor area of the proposed development without regard to its location in an existing road network. It would predict that a supermarket surrounded by a moat and accessed by a single drawbridge would have the same pattern of traffic flow as the same supermarket buried in the heart of a heavily built-up inner-city network of roads. 5 This may well be a convention assumption, but that doesn't make it justifiable. To access this relocated 'major traffic sink' Ocean Beach Road users would have to execute a complex set of manoeuvres through the nearby street network having first successfully navigated a right turn at the Ocean Beach Road/South Coast Highway T-junction. The claim that '<i>we are satisfied that there would be no discernible detriment to the surrounding road and intersections as a result of the proposed development</i>' is clearly nonsense more so in the light of Summary 7e which claims this to be true even without AUR treatments at the South Coast Highway intersections with Ocean Beach Road and Hardy Street. 6 On matters such as this, the Shire Council decision-making process is guided by five principles ... the last of which poses the question, "<i>Does it enhance our way of life, and keep our village feel?</i>". Clearly this proposal does neither. It would be a betrayal of trust for residents who have invested in the peaceful quiet of nearby homes, particularly those in Amaroo Village – and, removing the supermarket from Denmark's commercial core will create an activity vacuum that must inevitably affect the village feel. 7 This proposal should not proceed. 	
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S140		<p>Do You Support the Proposal? No</p> <p>Comments. As a permanent resident AND long time small retail business owner () I am STONGLY OPPOSED to the new shopping centre precinct.</p> <p>Taking the main supermarket away from the "town centre" will not only fracture the small town feel which tourists love (and locals alike) but it will severely impact the small businesses in town that currently rely on regular foot traffic to survive.</p> <p>It will not stop people from doing their grocery shopping at Woolworths or Coles nor will it stop the number of times their delivery trucks are coming across from Albany. People who choose to do their shopping with them do so because of a cost saving.</p> <p>It will however cause a number of the small businesses currently located in the town centre to really struggle (and very likely go out of business) especially if 7 "specialty" shops are able to trade at the same site of the proposed supermarket.</p> <p>I think if you were to do a survey of the businesses in town you would find that the majority of them would not survive with less foot traffic than is currently experienced.</p>	
S141		<p>I have read through the information on the Shire's website regarding the proposal for a supermarket and some shops to be built on the corner of South Coast Highway and Hardy Street.</p> <p>I could find no acknowledgement of the fact that the adjoining land on the eastern side of the development is Shire Public Recreation Reserve number R46256, known as Hamilton Reserve.</p> <p>Hamilton Reserve contains a significant stand of Karris, Marris, Jarrahs, Yellow tingles and Sheoaks which are visible from many vantage points around town.</p> <p>It is defined as a Class C reserve under the WA Land Administration Act 1997, and designated by the Shire of Denmark as being of High Conservation Value (HCV).</p> <p>The Shire of Denmark Bushland Reserves Weed Strategy states that a C Class reserve <i>"can still be HCV due to high community value or scenic value and sense of place (entrance scenic value). These reserves contribute to open greenspace in urban centres or form buffer zones between residential and industrial areas."</i></p> <p>The reserve is highly valued by members of the local community who actively contribute volunteer time each week to remove invasive plants.</p> <p>The development could have a major impact on this important natural area.</p> <p>A thorough assessment of the site's capabilities is needed and plans prepared to mitigate the effect of any intrusive activities.</p> <p>Will the additional stormwater shed from the development be directed to the drainage line that runs through this reserve? Areas in the reserve are already suffering from waterlogging due to stormwater from adjacent properties being directed into the bushland.</p> <p>It is not clear from the plans whether the POS noted on the plan is on site or in the adjacent Reserve?</p> <p>It appears from the photo montage that the vegetation in the adjoining bushland reserve is to be removed and replaced with a wall. Again, hard to tell details from the plan.</p>	

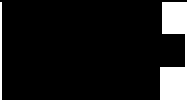
		<p>Mention is made of easy access/links to the “main street” – is that the Highway or Strickland St? Access through Hamilton Reserve will be convenient, but needs to be carefully planned.</p> <p>Two further questions:</p> <p>Is this super market intended to replace the existing IGA in Strickland St?</p> <p>Which goods and services that people are now going to Albany for are planned to be provided?</p> <p>Thank you for the opportunity to raise these issues.</p>	
S142		<p>Do You Support the Proposal? Undecided</p> <p>Comments. Concern over increased traffic numbers using Hardy St as it is already busy with traffic bypassing the town area Has it been considered to make a new entrance off Sth Coast Hwy on the opposite side(to Hardy St) of complex to remove traffic from Hardy St Especially for delivery trucks entering at all hours</p>	
S143		<p>I have no objections to a Supermarket going on this site.</p> <p>However I do object to having specialty stores, as I feel this will impact the town and the shops in town. Making it harder for the small Businesses to survive in town.</p> <p>I am assuming that there is a plan so the traffic flows smoothly from Hardy Street to South Coast highway ect.</p>	
S144		<p>Amaroo are responding to the above proposed Shopping centre and specialty stores on the corner of Hardy Street and South Coast Highway No. 82-90 (lot 50).</p> <p>Amaroo Care Inc and the residents of the Amaroo Village (the residents will submit their individual feedback) are against the development of this lot for the proposed intended use for the following reasons:</p> <ol style="list-style-type: none"> 1. Supermarkets by their nature require multiple daily truck deliveries and often in the early morning. The loading dock for the proposed supermarket is situated close to the Amaroo village boundary the noise and lights from these vehicles will impact our residents. 2. The residents of Amaroo village were attracted to the quiet location the proposed development will increase the traffic volume in the street. 3. General lighting and noise from the building itself and associated carparks will impact our residents. I do note that air conditioning units have acoustic attenuation however this will not completely remove the noise. 4. Having an entry to the carparks from Hardy Street will significantly increase the traffic along hardy street and make an already difficult intersection even harder to traverse. Noting heavy vehicles may also use this entrance and Hardy Street to do so. 5. Given the intended number of parking bays, it can be assumed that excess vehicles will start to park along Hardy Street. 6. The Hardy Street and South Coast Highway intersection is not designed to take the additional traffic this development will bring even if it is redesigned the added volume will create serious traffic issues particularly during holiday periods. 7. The location of this proposed development will also create congestion issues at the intersection of 	



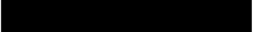
		<p>Ocean Beach Road and South Coast highway impacting other properties.</p> <ol style="list-style-type: none"> 8. The findings from the provided studies indicate a much higher volume of traffic in the area if the figures provided are true and accurate. 9. This area is also a noted traffic black spot the additional development will create even further issues. 10. Given the current IGA has just been upgraded the push to move from the current location to the new location does not appear feasible unless a deal has already been struck with a tenant to take over the old site. <p>Understanding this site has already been approved for a supermarket/shopping centre if it were to go ahead strict conditions for building approval should be put in place to help reduce the expected impact on all residents of Hardy Street and surrounding streets.</p>	
S145		<p>Do You Support the Proposal? No</p> <p>Comments.</p> <ol style="list-style-type: none"> 1. It is difficult to see how traffic can safely access such a development. The residents of Hardy Street and Scotsdale Road would have to contend with vehicles, including large articulated supply trucks, attempting to enter the supermarket from the North end of Hardy Street in addition to the volume off traffic which will be generated by the upgraded and enlarged Mrs Jones facility. People coming in from the South end of Hardy Street would have to cross South Coast Highway on a bend which does not allow good visibility to the West. No provision seems to have been made for people towing caravans. How are they supposed to access the site? 2. It is hard to see how such a development would be good for the town centre. There are already several vacant shops in town. Taking shoppers away to what would in effect be a shopping mall will do nothing for existing businesses. Visitors who simply wish to replenish supplies may well just keep travelling and not bother to check out the town centre. 	
S146		<p>Do You Support the Proposal? No</p> <p>Comments. 5th of June, 2025</p> <p>Dear CEO and Councillors,</p> <p>I wish to formally object to the proposed development of a supermarket and associated retail shops adjacent to the retirement village in Denmark. While I acknowledge the need for retail services in our town, this development is poorly located and risks significant negative impacts on a vulnerable population. I ask that the Council refuse approval for the following reasons:</p> <ol style="list-style-type: none"> 1. Inappropriate Land Use Adjacent to a Retirement Village This proposal places a major commercial operation directly next to a community of elderly residents. The associated increase in noise, disruption, and loss of amenity will undermine the health, comfort, and dignity of people who should be protected from such impacts. 2. Traffic and Safety Risks The development will bring a marked increase in traffic, including delivery trucks, customer vehicles, and service vehicles. This presents a real safety hazard for retirement village residents, many of whom have reduced mobility or rely on walking aids. It also puts pressure on surrounding streets not 	

		<p>designed for commercial traffic volumes.</p> <p>3. Loss of Amenity and Residential Character The development's size, hours of operation, lighting, and noise will dramatically alter the residential and peaceful character of this part of Denmark. The quiet environment is essential to the wellbeing of elderly residents and should be preserved.</p> <p>4. Community and Environmental Considerations Denmark has built a reputation for thoughtful planning that balances growth with liveability and care for its people. Approving a supermarket so close to a retirement village would compromise the town's values and quality of life for some of its most vulnerable citizens. In light of the above, I respectfully urge the Shire to reject the proposed development in its current location.</p>	
S147		<p>Do You Support the Proposal? No</p> <p>Comments. There are a number of areas that are of significant concern, as detailed below:</p> <ol style="list-style-type: none"> 1. No cost benefits to local customers or visitors <ol style="list-style-type: none"> a. Since the local IGA has been recently purchased by an interstate corporation, prices have substantially increased and seem to be continuing to do so. Many products have gone up by over 70% or more (e.g. Community Branded Soy milk, \$1.15 -> \$2.00 per litre) b. The cost of the 'big' IGA to locals is prohibitive and many people cannot afford to do a regular shop there. This same company owns multiple other IGA and appears to follow the same practices where they have a monopoly on services. Re-establishment of the same business further up the road from their current location, will benefit nobody in town except for the business owners. c. If this property was to have an actual competitor business (such as Coles, Woolworths or ALDI), then that would merit further consideration from a benefits perspective. 2. Disruption to the ambience of the Denmark township and loss of the small town that locals and visitors cherish <ol style="list-style-type: none"> a. The majority of people live in and visit Denmark for the peace and quiet of our natural surroundings. b. Having a large scale shopping centre, with 130 parking bays is completely out of place for our town. The impact on the surrounding streets and environment will be excessive, taking into consideration the need to resize roads, remove trees, and integrate roundabouts and the extended build time with trucks, rubble and waste disposal requirements. c. Increased traffic and noise, especially an issue during school holidays with existing traffic jams and poorly maintained roads. d. During busy periods, the main streets of Denmark (South Coast Hwy, Ocean Beach Rd, Strickland St) are already overwhelmed. Adding a new shopping centre at the main entry point to town (from the east) will only make this worse. 3. Removal of bushland (although likely remnant) that is progressively being lost across the state <ol style="list-style-type: none"> a. The small cleared area on the current site is but a tiny portion of what will be lost overall. 	





		<p>Having a gravel/concrete carpark will impact water flow during the wet seasons and increase ambient heat during the warmer months due to light reflection</p> <p>b. Wildlife access to bushland is already limited and removing this in a high traffic area will likely result in more of our native animals being injured or killed</p> <p>4. Distance between the proposed development and the existing central Denmark business area.</p> <p>a. The distance is too great for the average elderly pedestrian and there are poorly constructed paths back towards the main town area.</p> <p>b. People will likely go to either Strickland St or this new location, with Strickland St likely the losing side in this scenario</p> <p>c. No pedestrian crossings currently exist and the South Coast Hwy is very busy with heavy vehicles and regular traffic.</p> <p>d. No undercover or rest areas between the two locations to support the elderly and potential mobility issues.</p> <p>In summary, I do not believe that this is beneficial for the people of Denmark for the above reasons and would like to see a better thought out proposal that actually addresses the shortcomings in the current Denmark business areas. Specifically, lower cost of living and better accessibility for the people of our town.</p>	
S148		<p>I don't think we need another shopping centre. There are to many empty one's and the one's that are still here aren't doing it easy. We need more houses to many people can't find one.</p>	
S149		<p>Thank you for this opportunity to provide my comments on this proposed Shopping Development. I wish to cover the impact of this development on my lifestyle and other residents of Hardy Street, Denmark.</p> <p>Traffic Generation</p> <p>1. There will be a severe and significant impact on the number and size of vehicles on South Coast Highway, Ocean Beach Road intersection(already identified by the RAC in the top ten dangerous intersections) Hardy Street and Mt Shadforth Road. This will mean an increase in cars and large commercial delivery trucks on our residential road. Although there is a stated widening of Hardy Street at the potential shopping centre site this only provides limited access. Hardy Street is already used as a short cut and this additional traffic will have a major safety impact especially for us as older residents of Amaroo Village.</p> <p>2. I have limited mobility and already have difficulty crossing busy roads. Crossing the Highway at Hardy Street to access the footpath is hazardous due to limited visibility of cars coming over the rise into town at 60 kms. Many residents are frightened to start this crossing due to our slow pace of walking with walking sticks or other aids.</p> <p>3. Somewhere a safe location for a pedestrian crossing may assist people with disabilities and the ageing people.</p> <p>4. Pedestrian and Disabled Access to proposed Shopping Centre</p> <p>There is only three Acrod parking places and they seem to be not wide enough. I use my Acrod card and</p>	

		<p>believe that three places are insufficient for the aged population of Denmark.</p> <p>5. At this point in time there is no taxi service in Denmark.</p> <p>Buffer Zone</p> <p>Although this has been increased in this proposal no details are provided of how the noise of deliveries and operations of this proposed shopping centre will be mitigated. Also, there may be an increase in emissions and pollution.</p> <p>Comments</p> <p>Apart from some recent limited information there has been no discussion regarding these amended plans with residents of Hardy Street. We expect to have our quiet residential street transformed into a busy place during building and then operation of the supermarket with six specialty shops with a serious impact on our lifestyle and amenities. While I am not against progress and development in Denmark, however I consider there are many negative impacts on the town from this proposal. Other sites could be considered that are located beside our existing town centre.</p> <p>Therefore, I am writing to lodge my objection to the development of this Proposed Shopping Centre at L7 50 South Coast Highway, Shire Reference DA 2025/37 A457.</p>	
S150		<p>I am writing to register my complaint against the proposed shopping centre development on Lot 50 (No.82-90) South Coast Highway, Denmark.</p> <p>As an Amaroo Village resident located directly behind the proposed shopping centre, I am strongly opposed to the development due to concerns about:</p> <ol style="list-style-type: none"> 1. Visual and noise impact from my house. I live directly behind where the proposed loading bay is on the development application. At the moment, I see trees and open sky from the front of my house (Unit 4). Once the development is there, I would probably have a large ugly wall to stare at and the noise of trucks and people at all hours of the day and night. 2. Personal safety. I also fear the complex will attract undesirable people that may break into my house cause damage locally in the village, or worse. The thought fills me with fear and as I do not see how this can be avoided with such a large centre. 3. Increased traffic on Hardy St. Hardy St is already busy with traffic as an artery to the main highway and is noisy. Oncoming traffic makes it difficult for Amaroo residents, many who are quite elderly, to safely enter and exit the Amaroo village by car. I would expect this to become entirely dangerous if shoppers and supply trucks also start using this road. 4. Danger to elderly pedestrians from Amaroo village walking into town or to the United Church. The speed of traffic going along Hardy St is already too fast with visitors and holiday makers, which makes crossing over the highway from Hardy St very dangerous. Add delivery trucks and food shoppers to Hardy St and also on the highway bunched up trying to access the carpark of the new development and this will only worsen. 	



		<p>5. Impact on the value of my house. Residents of Amaroo Village invested in the locality and Village for a quiet retirement. I feel that the development will be detrimental to my enjoyment of a quite living place of residence and negatively impact on the value of my property when my family want to sell it. I am 90 years old and cannot move away.</p> <p>6. Most residents at Amaroo receive their shopping by delivery and do not need to be close to the shopping centre. The assumption that people will no longer shop in Albany is wrong as we shop there for more variety and cheaper prices. The new shopping centre will not make prices cheaper. It will just compete with other shops in the main street that do not have access to large scale business discounts with wholesalers. Prices are more likely to go up and I expect there will be public resentment to the development. Why not relocate it further out where parking and traffic are easier? So, there is no benefit for any of us living close by, only negatives.</p> <p>As elderly residents that do not have the option of moving, we deserve more consideration in our later years for our comfort, safety and mental health. I have been very concerned about the proposed development and that is why at the age of 90, I am taking the trouble to write to you with the help of family. I don't know anyone else at the Amaroo Village that want this shopping centre to go ahead, and it is causing us all a great deal of concern.</p>	
S151		<p>Do You Support the Proposal? No</p> <p>Comments. The traffic through the intersection of Ocean Beach Rd and Sth Coast Hwy, the additional traffic East bound from Hardy St and the Slip exit will increase the delays turning out of Ocean Beach Rd which is already bad enough.</p> <p>Whilst traffic from Ocean Beach will turn left to get to the site there will still be significant volume of traffic that needs to turn right, this will face additional West bound traffic plus the additional East bound, which will also increase the number turning Right into Ocean Beach rd. The position of the Slip exit from the Carpark onto South Coast Hwy East bound needs to be relocated as at that location it will cause further issues for vehicles turning Right out of Ocean Beach Rd, this slip road needs to come out on East side of the carpark, through the current pulling bay and join Sth Coast Hwy to the East of the Ocean Beach Rd intersection which will then be safer for all.</p> <p>The numbers in the Figure 1: Conservative Long-Term Ultimate Post Development Peak Hour Turning Movements of the Updated Traffic Assessment which appear to be from the original submission do not add up correctly so there are errors in this. The increases will have significant impact on that intersection which is already heavily congested and will be an issue and result in increased accidents especially with the mix of vehicles including towing and trucks that traverse this intersection. If this proceeds it needs at minimum the change on the point where vehicles exit the carpark to be from the East end onto Sth Coast Hwy.</p> <p>Realistically if in the location then a roundabout needs to be built to handle the traffic volumes and changes with the carpark exit coming into the roundabout. Ocean Beach Road at the intersection needs to be widened to allow for queue of traffic turning left and a queue turning right. Consideration to re-opening Buckley St or to getting another connection via Kemsley or further down Ocean Beach Rd will likely be needed. Be great to get this new build, though the site isn't the greatest position and if it is to go there then the roads need to be addressed as it is already a known issue with the volume of traffic and for that intersection the increase in the right turning traffic into Ocean Beach Rd cannot do anything else but increase the delays at that interesting and the lengthy queues that happen already.</p>	

S152		<p>Do You Support the Proposal? Undecided</p> <p>Comments. I do believe that a larger supermarket will be beneficial but living in Ocean Beach I am worried how the development will make it harder to turn right at the intersection of Ocean Beach Road and the highway. Even though less people will be turning right, there will be more people turning into Ocean Beach Road from the highway coming from the new shops. I'm not too confident of how accurate the traffic assessment is, when some of the figures in the turning movements diagram just don't add up.</p> <p>I am concerned that the shopping centre will take business away from the shops in the town centre. Visiting Manjimup, it is clear that the shopping centre there is busy while there is hardly anyone and a lot of empty shops in the town centre. We don't want this to happen to Denmark. I can't see this shopping centre stopping people from going to Albany, unless the new supermarket offers more competitive prices.</p>	
S153		<p>Do You Support the Proposal? No</p> <p>Comments. I wish to lodge an objection to DA2025/37 (DA) for a Shopping Centre Development on Lot 50 South Coast Highway.</p> <p>I live in  in the Amaroo Village, an Independent Living facility. In the whole village there are thirty-six units and approximately seventy residents. At no time we were advised by the proponents of the DA of their intention, once more, to lodge a further DA not was there any prior consultation. Apart from a ridiculously small sign placed at the corner of Hardy Street and South Coast Highway (during the objection period) there was no attempt to contact the residents of the Village directly. Notification of such matters solely through the internet, completely ignores the "digital divide." It is the case that more than one third of the current Village residents have neither an email address nor access to the internet.</p> <p>In my row of six residences, all of which directly face Lot 50, the average age of the twelve residents is well in excess of 80 years, in addition two are undergoing palliative care. Many of the residents have been in the home since the early 2000's, well before the two DA's and the rezoning of Lot 50. The only current barrier between us and the development is an exceptionally low dividing fence and a proposed 3 m setback. As the only other significant housing on Hardy Street, the presence of the Village, itself dating back to the early 2000's, has been all but completely ignored in the application.</p> <p>My main objection to the development is that the location of Lot 50 is singularly inappropriate for this degree of high intensity development. While it may well have a commercial zoning this does not imply that any form of development is appropriate. The fact that the developers have included significant road widening of the three roads bordering the site is itself a clear acknowledgement of these issues, though the widening of Hardy Street is restricted to the area in front of Lot 50.</p> <p>Nevertheless, it is extremely unlikely that the road widening of itself will be able to mitigate The development of significant traffic hazards at all of the intersections adjacent to the development. It is the case that the only access to the site from South and east require cars to undertake two right turns into the shopping centre car park. Since the only access from South Coast Highway on the southern boundary is two left slip lanes, for entry and exit to the northern lane of South Coast Highway. On the Southern side of South Coast Highway, all in close proximity there is intersection with Ocean Beach Rd; the entrance to the Information Centre; the entrance to the childcare centre and a separate entrance to the Uniting Church. It is almost certain, that these three entrances and exits, will at times become choked with traffic, with the efforts to access sole entry the</p>	

	<p>shopping centre from Hardy St. At peak times during the day, many School buses transit the T intersection, in order to access the primary school. On their return many of these buses need to do a right hand turn at the Ocean Beach T intersection to go to the High school. None of these specific local issues are adequately dealt with in the submission. Indeed, all that is offered is a series of assurances from a generic traffic modelling exercise at a macro level.</p> <p>It is certainly the case that the provision of 170 car parking spaces in the new development will prove to be inappropriate and ineffective. The fact that the new supermarket will be some 50% larger than the existing one, the inclusion of seven hundred square metres of specialty shops and the consequent increase in the staffing profile of the whole centre. Given that the proposal itself claims sixty-two additional jobs will be created it is conceivable that over a third of the parking bays will be taken up by the existing staff. In addition, three disabled parking bays and only two long vehicle trailer parking bays, are also grossly insignificant. All of this reinforces my earlier point that Lot 50 in location and size is inappropriate for both the nature and intensity of this development.</p> <p>The other main objection relates to the effect on the Denmark Town Centre precinct and its continued viability. It is claimed that the Net Benefit Test report does not support or require any analysis of shifting spending patterns within the Town Centre. It completely ignores the fact the new supermarket will be 1 km (by car / foot) from the existing supermarket. In addition, the majority of destination shops / services will remain in the vicinity of Strickland Street, e.g. pharmacy, banks, newsagent, bakeries, medical services, Post Office. Almost certainly this will mean a significant split in spending patterns across the whole township. It doubtful that the eleven coffee shops in the town Centre will remain viable. Indeed it already the case that currently there is some vacant retail space across the Centre and on South Coast Hwy adjacent to Lot 50.</p> <p>The other major factor not addressed in the proposal is that the IGA network of supermarkets is the most expensive in WA. Choice magazine late in 2024 did a survey for a comparable basket of goods and the following are the results:</p> <table><tr><td>Western Australia:</td><td>Aldi:</td><td>\$53.52</td></tr><tr><td></td><td>Woolworths:</td><td>\$69.20</td></tr><tr><td></td><td>Coles:</td><td>\$68.53</td></tr><tr><td></td><td>IGA:</td><td>\$72.19</td></tr></table> <p>https://www.choice.com.au/shopping/everyday-shopping/supermarkets/articles/cheapest-groceries-australia</p> <p>In other words, IGA is dearer by a factor of nearly 5%. It is also the case that the IGA product range is significantly less than both Coles and Woolworths. It's for reasons such as these seven delivery trucks now serve Denmark and the hinterland with daily door to door refrigerated goods ordered online. For it is the case that online shopping has increased due to convenience, price, and accessibility. Coles deliver seven days of the week from only \$2. The attempt in the proposal to claim that the new shopping centre will reduce shopping trips by residents to Albany is fallacious, based as it is on a model that remains hidden in its assumptions.</p> <p>I could well be the case that a new shopping centre could unwittingly become a stranded asset while in the meantime decimating the existing Strickland Street precinct.</p> <p>There are any other aspects of the development that I find unacceptable however when considered alongside the two major ones I have raised, I will not go into great detail. They are the potential for the shopping centre to become a heat sink and a source of considerable emissions, mostly car and truck fumes.</p>	Western Australia:	Aldi:	\$53.52		Woolworths:	\$69.20		Coles:	\$68.53		IGA:	\$72.19	
Western Australia:	Aldi:	\$53.52												
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	Coles:	\$68.53												
	IGA:	\$72.19												

S154		<p>, I am a third generation Business Owner in Denmark, a resident rate payer, and reside at 72 Inlet Drive Denmark.</p> <p>In regards to the proposed Shopping Centre at Hardy Street, I oppose the development on a few grounds.</p> <ol style="list-style-type: none"> 1. A similar development was done in Esperance years ago, with a Woolworths & shops built away from the main shopping precinct, and it had a disastrous effect on shopping in Esperance due to breaking the town into two shopping area's. Overtime it drained the main shopping precinct in Dempster Street to a shadow of it's former self. I know this as I was active in Esperance with work in this period. 2. Many years ago the Denmark Co-op mooted a similar move to Hardy Street, and a public /shareholders meeting was held & a motion was moved that the submission be put forward as Supermarket be proposed for that area, not a shopping Centre. This idea was heavily opposed, and did not go ahead. 3. The Shire should talk to the current business houses in town , and how they have been tracking for the past 5-7 years, as building more shops, when not all are currently utilized does not make common sense. At present the town is not in demand I would have thought for another Butcher, Liquor Store, Newsagency or whatever the proposed Shops may be. I for one owning our building like many others in the town shopping district, would have no desire to move. 	
S155		<p>Do You Support the Proposal? No</p> <p>Comments. None</p>	
S156		<p>Do You Support the Proposal? No</p> <p>Comments.</p> <ol style="list-style-type: none"> 1. The noise issues will impact residents of Amaroo, despite the measures outlined in the Acoustic report. None of those measures disappear the reality of a large supermarket and retail space with carpark butting up against their fences. 2. IGA is not competitive. Current owners are poorly viewed in the community for their prices. I will continue to have my groceries delivered from Albany, as will many others. I question the number of retained car trips to Albany that the report suggests. 3. Retail spaces- unless these spaces are the larger chains that people travel to Albany for eg Spotlight, Officeworks etc, travel to Albany will still be required. People choose Denmark for a smaller village feel and are happy to travel to Albany for these things, rather than see our village become a congested retail city. Again, projected retained car trips to Albany is questionable. 4 Loss of village community. I can currently park once in town and do my grocery shopping, walk across to the chemist, the post office and the newsagents. Splitting the main grocery store away from town village requires driving and parking twice, while navigating difficult highway intersections . This is both inconvenient and loses the village appeal of the town. Will the retail spaces draw away business from the Main Street, again, contributing to the decline of the village? 5 Entrance statement. Ugly, commercial, loss of Denmark's identity. Final statement. This development has the potential to fundamentally change the character of Denmark town. 	

S157	[REDACTED]	<p>Do You Support the Proposal? No</p> <p>Comments. I believe we have something unique about the character and soul of our town which is why people love coming here and living here. Let's keep it that way! If we construct large urban shopping centres we will lose this unique feel. Let's try to not make Denmark like other places! As Joni Mitchell famously wrote about sixty years ago: "Don't it always seem to go that you don't know what you've got til it's gone. You pave Paradise and put up a parking lot " Let's keep Denmark's character so people will still love it in another 60 years!</p>	
S158	[REDACTED]	<p>Do You Support the Proposal? No</p> <p>Comments. Loss of foot traffic in central business precinct. Congestion at the end of Ocean Beach Road .Interference with tranquillity for the aged people in Amaroo Village at the time of their life when this is just another burden.. An unnecessary addition of extra shops when the existing ones in Strickland Street often find it hard to attract tenants.</p>	
S159	[REDACTED]	<p>Do You Support the Proposal? No</p> <p>Comments. I have tried to be very open to this... but every time I think of an enclosed shopping 'centre' I find myself thinking that it means a permanent shift in the nature of our town. The 'centre' of town is already on Strickland St - with many empty shops. The river is nearby - surely one of the most beautiful parts of town. It's hard to put in words, but we don't live here to be like any other town with enclosed shopping centres - do we? I don't!</p> <p>I love that Denmark is an outdoor-access shopping town, and DOESN'T have a 'shopping centre'. Without wishing to be against the notion of diversity and progress, I do believe it will mark one of the most significant shifts in the atmosphere of Denmark. It may seem a small change, but I think it will have a powerful influence.</p>	
S160	[REDACTED]	<p>Do You Support the Proposal? No</p> <p>Comments. I sat near the RSL on Strickland St on the Sunday of the long weekend and was amazed at the obvious lack of people. At what point would we want to remove even more people from the HEART of town and reduce community interaction even further.</p> <p>There is also nothing to stop these Specialty shops being occupied by already existing businesses in town which in turn would further empty our town centre. Bringing people closer together, not spreading them out, is what will make Denmark a tighter community moving forward into these increasingly harder times.</p>	
S161	[REDACTED]	<p>Do You Support the Proposal? No</p> <p>Comments. I am concerned that Denmark will lose its small-town charm and turn into one of the many other coastal towns that have gone down this path. Albany is so close that it offers enough competition, and I don't think Denmark can support more small business. We already see so many small businesses closing as it's just not viable. The tourists come to Denmark because we are unique in many ways including our lack of big name stores and fast food chains. Please keep Denmark small, cosy and peaceful.</p>	

S162		<p>As a pensioner living in Denmark I will give my considerations for this proposal.</p> <ul style="list-style-type: none"> Noise from building and ongoing operations. Even after reading the noise reduction strategies, I am not convinced they are enough. I hear machinery noise and reverse beeping even with all windows and doors closed firmly. location is a poor choice for access and closeness to Ocean Beach Rd even with possible roundabout. School Hours very busy. I read: left in and left out on proposal, so this increases Millar St and Mt Shadforth Road traffic hugely. Economy has not recovered and there are at least four empty shops already. Albany is worse and still not filled shopping centres shops and others in town. Another bakery? We have two already plus other options. Car parking bays not big enough. <p>I was horrified to read a specialty shop may include a betting shop. What? Awful idea for Denmark. Have you walked down York St past the TAB? A lot of men and perhaps women outside, smoking, drinking, looking down and out. No thanks. Safety aspect too, for all ages. I think the bottle shop has been refused. Good.</p> <p>Yes, cheaper prices would be good. Not guaranteed though. local is best.</p> <p>We live in a beautiful part of WA. let's keep the friendly, village feel and have quiet enjoyment of natural environs.</p> <p>An option would possibly be by Shire Offices, or next door! Ideal to catch business from other end of town.</p>	
S163		<p>As a long-time Denmark resident, now residing at Amaroo Retirement Village. I have listed below, point which I think will highlight how situating the the new shopping complex in its proposed site</p> <ol style="list-style-type: none"> Will not only be detrimental to local residents but also threatening the viability of our main street. ie – Strickland St, and the shops already established there. Consequently, it will, by increasing the amount of retail floor space in Denmark, only add to the risk of more business closures, adding to those shops already vacant in the CBD. It will split the shopping precinct in half despite the proposed pedestrian path through Hamilton Reserve, which, is all uphill!! And the proposed number of car parks, some of which will be needed for staff, the provision in total maybe inadequate necessitating overflow Onto Hardy St, which is already narrow and busy. There would appear to be too few Acrod spaces in the plan with no close option for those unable to acquire the necessary parking. With Reference to Traffic Generation 5.2 on the Plan. I find it difficult to accept that the impact on traffic congestion in the area of the South Coast Highway, Hardy St, Ocean Beach Rd intersections and the adjoining businesses ie – garage, visitors Centre, church and daycare centre, will be no more that previously estimated, when taking into account the phenomenal increase in the number of 	

		<p>tourists in town in our busy periods.</p> <ol style="list-style-type: none"> 7. As a consequence of the traffic congestion, pedestrian crossing at the South Coast Highway to the church and day, on the opposite side of the highway will be even more hazardous than it is at present. 8. The noise pollution will impact all in the area. ie – trucks backing as well as all the impact from such a busy, active development, in what is at present a relatively peaceful part of town. 9. Loss of trees and other vegetation will be a sad loss. 10. The Extra Impact on Hardy St cannot be anything other than impactful for residents. <p>Hoping all of the area will be considered.</p>	
S164		<p>As a long-term landowner and resident of Denmark (40 +years), I would like to object to the proposal of a supermarket and speciality stores on the Hardy Street site. I believe this proposal will cause traffic mayhem, noise and loss of business to Denmark town centre.</p> <p>* Traffic mayhem will be experienced during the building and servicing of the proposed supermarket with South Coast Highway and Hardy St. already suffering heavy traffic flow even when it is not tourist time. The Ocean Beach Road intersection is also very busy and would be further impacted by having a supermarket on that sight. * The noise of building, operating and on-going servicing of the proposed supermarket will impact the residents of Amaroo Village, far outweighing any benefits to them.</p> <p>* Moving the major supermarket out of the town centre will impact the local businesses as people may choose to purchase all they want from the one shopping centre and not use the Bakeries, Cafes and Speciality Stores in Denmark town. Already, many people choose to shop in Albany and others, order online and have deliveries from Coles/Woolworths. I think this proposal will further alienate the local shopper who wants to support the Denmark community.</p>	
S165		<p>Do You Support the Proposal? No</p> <p>Comments. I find it hard to believe you our Council are willing to put a new IGA on that particular spot. I believe they haven't considered the fact that there is a retirement Village right behind this development. Can you imagine the amount of noise that will no doubt come from the traffic all day with trucks in and out and cars continually coming in and out. Let alone the amount of traffic that will come up and down Hardy Road which if this goes ahead, they should close Hardy Road altogether.</p> <p>Why not build it down the end of Strickland St on the reserve there opposite the council house { Anne Park on Holley Road which now is used by tourism to park caravans. This would keep all businesses together so everyone would benefit as it's only a short walk amongst all. This would also have a benefit for tourism.</p>	
S166		<p>Do You Support the Proposal? Yes</p> <p>Comments. None</p>	
S167		<p>Do You Support the Proposal? No</p>	

		<p>Comments. The proposal is still too big for the site, with major negative impacts on the neighbours (especially Amaroo), on the local traffic and on local businesses in the centre of town. Amendments should be sought to decrease the size of the building, with less small tenancies, allowing greater setback from Amaroo, safer road access from the highway, and less disruption to local traffic on Hardy St.</p>	
S168		<p>In my capacity at Green Skills Inc and in particular through the community-driven initiative, Totally Renewable Denmark (TReD), I would like to outline the opportunities we see for the proposed shopping centre development to align strongly with the values, vision, and sustainability goals of the Shire of Denmark.</p> <p>The proposed shopping centre represents a landmark development—a rare and significant opportunity to lead by example how we can build for the future. There is an important chance to embody the principles and aspirations set out in the Shire’s <i>Our Future 2033</i> Strategic Community Plan’s vision for “<i>a vibrant coastal community, connected to the environment, living the village lifestyle</i>” and that:</p> <p><i>“Our community wants us to keep our natural environment, beaches, trails, wetlands, parks accessible and attractive. This is the reason so many of us choose to live here.”</i></p> <p>At the Strategic Community Plan clearly articulates sustainability is not just a goal - it is a core part of who we are as a community. The proposed supermarket development, if and when it goes ahead, is a potential lighthouse project to model how we can implement a state of the art sustainable building in Denmark that matches the Community vision with action to build attentively for generations to come. By doing so the development will reflect the strategic objectives to:</p> <ul style="list-style-type: none"> • <i>Operate as environmental custodians for the future</i> • <i>Support local jobs, industry, and small business and facilitate sustainable development</i> • <i>Enhance community connection and well-being</i> <p>We know that the Council has invested considerable effort in the updating of the Town Planning Scheme to set the groundwork to meet high sustainability standards. The work the Shire is doing to meet key actions from the Sustainability Strategy and Action Plan in the Shire’s buildings, energy and water and fleet are to be applauded.</p> <p>The Totally Renewable Energy Denmark working group, which includes representatives from a range of other community groups and individuals keen to support the Shire’s ambitions in this regard, is keen to know more detail about the conditions the Shire would consider in the building approval to ensure alignment with its stated sustainability principles and community values.</p>	

		<p>Key conditions on approval that we feel should be included, but not be limited to, are:</p> <ul style="list-style-type: none"> • Energy-efficient building design passive solar access, quality insulation, double glazing, rooftop solar, battery storage, and passive solar heating/cooling systems, heat pump water heating • Use of low-carbon and locally sourced materials • Electric vehicle (EV) charging infrastructure and ample secure bike parking • A focus on safe and accessible walking to and within the development including goffers • Provision for current (community bus) and future local bus transport drop off and pick up locations • Rainwater harvesting and greywater reuse systems • On-site waste separation and composting infrastructure (there are innovative options such as the Biobin that are suited to such a development https://biobin.net/about-biobin/) • Landscaping that incorporates native, water efficient and climate-resilient vegetation • Water efficient design eg permeable paving, rain gardens, and bioswales, which allow rainwater to infiltrate and recharge groundwater and reduce local flooding in hard surfaces • Design that integrates with the local village character, and prioritises local businesses, complementarity, local growers, community connection spaces and rewards back to community. <p>These measures align directly with the objectives of the <i>Totally Renewable Denmark</i> initiative, which seeks to transition our region to 100% renewable energy by 2033, while fostering a resilient, equitable and locally empowered energy future. Key TRed objectives include:</p> <ul style="list-style-type: none"> • Electrifying everything using renewable energy • Achieving near-zero emissions from households and infrastructure • Supporting local jobs and skills development in the clean energy transition • Ensuring energy systems are community-owned, inclusive, and affordable <p>We believe that the Shire, by supporting strong sustainability conditions for this development, will be upholding its own Decision-Making Principles as set out in <i>Our Future 2033</i>:</p> <ul style="list-style-type: none"> • <i>Does it protect our environment, or align with our sustainability objectives?</i> • <i>Does it support local jobs, or provide much-needed local services?</i> • <i>Does it enhance our way of life, and keep our village feel?</i> <p>This is not just another commercial development—it is a defining opportunity. We support the Shire in embedding sustainability into the DNA of this project. This will meet the community expectations and</p>	
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		<p>Shire's goals.</p> <p>We look forward to working together to ensure that Denmark continues to lead by example in protecting our environment while planning wisely for the future and to discussing a greater level of detail about the potential sustainability considerations for the proposed development.</p>	
S169		<p>Do You Support the Proposal?</p> <p>Comments.</p>	
S170		<p>Do You Support the Proposal?</p> <p>Comments.</p>	
G1	<p>Main Roads Brad Lenton – Network Manager Great Southern Region gsreg@mainroads.wa.gov.au</p>	<p>Thank you for referring the above to Main Roads GSR for review.</p> <p>Main Roads GSR has reviewed the proposed development and would like to comment on the following.</p> <p>Suggest the minimum design vehicle 19m semi (as of right vehicle) be adopted. South Coast Highway (SCH) is currently RAV 4 rated which allows a vehicle up to 27.5m long. The design vehicle used in the Traffic Assessment is a 14m long articulated vehicle.</p> <p>The Traffic Assessment also makes reference to this section of SCH being 60km/h. This suggests a lack of attention to detail and understanding of the function of the adjacent road network (e.g. SCH is 40km/h not 60km/h).</p> <p>The proposed access from SCH is not supported. The proposed access and associated isolated widening (slip lane and left out) on SCH opposite the Denmark Visitor Centre access will most likely encourage higher speeds, create greater conflicts and undesirable vehicle movements (weaving) and therefore a greater crash risk. While the proposed access is consistent with the 2017 proposal, it is suggested that the proposed widening is no longer in keeping with the overall strategy to create a low speed environment on SCH and Denmark Townsite.</p> <p>As you are aware, previous in principle agreement has been given for creating a new four-way roundabout at Ocean Beach Road intersection (refer attached). It is considered that this treatment would provide excellent access to the development, better control vehicle speeds, improve pedestrian access and enhance the streetscape. The Shire is encouraged to pursue this option with the developer as a condition of approval.</p> <p>The proposed widening of SCH at Hardy Street is not supported. Widening at this location may simply increase speed on this section of SCH. Creating the main access via the roundabout would most likely negate the need to widen the intersection. However, note the adoption of the correct design vehicle may dictate if widening of Hardy Street is required.</p> <p>In general, the proposal appears to simply be a rehash of the 2017 proposal and seemingly lacks any thought as to how community expectations have evolved over time. It is suggested that for the most part any previous conditions as they related to SCH or surrounds are no longer considered entirely relevant.</p> <p>It is hoped the comments above may help better shape a development which is more in tune with both the function of South Coast Highway and broader community expectations for access and amenity in Denmark</p>	

Townsite.



S86

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 are the largest industry sectors within the Shire by value and they generate 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. 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 products.
- 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.

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

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 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.

Trade Leakage

Trade leakage occurs when residents leave their local area to purchase goods and services. Trade leakage can be seen as one measure for 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 the assessment of population growth as well as trends in tourism and other commercial industries. Figure 35 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 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, 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 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.

This Strategy recommends consideration of an appropriate limitation of specialty tenancies within a future supermarket development at Lot 50, as outlined in Action (e)(iv) below, to ensure the proposal does not significantly impact the commercial primacy of the Town Centre main street environment. For the same reasons, this Strategy also opposes any other 'shop' land uses on other commercial lots situated west of Millar and Short Streets. This Strategy proposes the introduction of a Restricted Use designation over commercial 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 & Consolidation

1. 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. Include the land designated as Commercial to be included in the Regional Town zone within LPS4, and:
 - i. Include Lot 97 on P222379 (#1) Short Street and Lot 257 (#2) Hollings Road within the Regional Town zone.
 - ii. Include a portion of Lot 228 on P217468 (#2) Strickland Street within the Regional Town zone, as identified in the maps accompanying this Strategy.
 - b. Review the range of permitted and discretionary uses within draft LPS4 for the Regional Town 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. Designate the area west of Millar and Short Streets as Regional Town zone with additional planning controls within LPS4, noting this area provides a transition between the Town Centre and adjoining residential areas, including:
 - i. Introduce planning controls within LPS4 to prohibit 'shop' land uses to maintain the commercial primacy of the Town Centre main street environment;
 - ii. Support the development of pedestrian linkages and connectivity to the existing Town Centre.
 - e. Notwithstanding provision (d)(i), support a retail complex on Lot 50 D098777 (#82-90) South Coast Highway, and introduce planning controls within LPS4 to ensure future development considers the following matters:
 - i. The development of pedestrian linkages and connectivity to the surrounding area and the existing Town Centre,

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- and provide for development that activates the public realm and fosters a pleasant pedestrian environment;
- 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 through a Needs Assessment and Net Benefit Test 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 the commercial primacy of the Town Centre main street environment.
 - v. Built form considerations including appropriate scale, function and context of the area in consideration of:
 - topography and important views
 - the local urban morphology (pattern of streets and blocks)
 - building proportions, scale and heights
 - intended future precinct character
 - scale and design of the public realm
 - 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.

Our Reference: G35886L-02A

4th September 2025

c/o LB Planning
via email

Attention: Stan Lawrence-Brown

Dear Stan,

82-90 South Coast Highway, Denmark – Proposed Shopping Centre and Shops Traffic Engineering Assessment

Further to our previous involvement with the above, please find following a response to traffic engineering concerns raised in associated submissions.

Background

In 2013 Traffix Group initially undertook assessments and prepared a report for a similar development proposal on the subject site that subsequently approved and Planning Permit A457.A 2013/153A, dated 20th October, 2017 was issued.

In 2024 Traffix Group undertook assessments and prepared a letter of comparison with the previously approved development scheme. In particular, the 2024 scheme had 175m² less floor area when compared with the previously approved scheme and was predicted to generate less traffic than the previously approved scheme.

Key factors as adopted with the initial assessment as stated in the 2024 letter which demonstrate that a great level of conservatism was previously assumed are as follows:

- *The RTA Guide allows for a discount of up to 25% in traffic generation estimates for developments of this size to account for 'multi-purpose' trips. However, this discount was not applied in the previous assessments.*
- *The assessment conservatively assumed that all site traffic would be new and generated solely by the development. In practice, much of this traffic is likely to consist of vehicles already on the road network, redirected to the site as part of passing or 'linked' trips.*
- *The assessment assumed a more concentrated distribution of peak-hour traffic, while in reality, traffic is likely to be more evenly distributed throughout the day and week due to the site's location and its association with nearby recreational activities. This approach likely overestimated peak-hour traffic volumes.*
- *With regards to traffic distribution, the number of movements was increased to meet Main Roads WA's requirement of 65% of trips to and from the east, ensuring westbound movements were not underestimated. This adjustment resulted in the total site-generated traffic, in all*

directions, being conservatively adopted at 120% of the already conservatively predicted traffic volumes.

Furthermore, when undertaking the initial assessment the following approximate percentage increase to existing volumes on roads in the vicinity of the site were assumed as part of the associated analysis, noting that this is prior to including the conservative development traffic discussed previously:

- South Coast Highway (to the west of the site) 428%
- South Coast Highway (adjacent to the site) 250%
- South Coast Highway (to the east of the site) 50%
- Ocean Beach Road 208%
- Hardy Street 200%

Current Proposal

Whilst the traffic volumes used as part of our initial assessment are well outdated, it is understood that site access is now predominately¹ proposed via a new roundabout that would be constructed as part of the development at the corner of South Coast Highway and Ocean Beach Road. In particular, a new fourth (northern) leg of this future roundabout would provide access to and from the on-site parking that would be provided as part of the development.

Please refer to Appendix A of this letter for a concept design of the roundabout which is based on the desirable requirements of the relevant AustRoads Guide. It is also noted that the fourth leg is partly identified on the abutting land to the east which we understand has been accepted by the Shire of Denmark, and that the main part of the roundabout is identified to the southwest of the existing intersection on land that we understand is also under the control of the Shire in order to ensure that a more equitable land take outcome is achieved and to ensure that a large part of the subject site is not instead effectively “lost”.

In addition, a secondary restricted access connection is proposed via Hardy Street which would facilitate left-in movements only. Importantly, this connection would provide a largely local access only in association with motorists arriving from Mt Shadforth Road to the north.

The roundabout would also provide pedestrian refuges across the three existing intersection legs such that pedestrians could safely cross each road/access in a staged fashion, thereby being required to only negotiate one direction (and lane) of traffic at a time and providing for a significantly improved outcome compared with existing conditions. The new (fourth) leg would also include a pedestrian refuge to also maximise safety for crossing pedestrians, confirming that the attached design is a concept only and exact details can be determined through consultation with the Shire and Main Roads WA as required.

¹ Larger delivery vehicle accessing ids still proposed vis Hardy Street via a separate connection consistent with good practice to minimise the potential for conflict between these vehicles and other vehicles and pedestrians.



The now proposed arrangement for motorists accessing the on-site carpark compares with the previously approved outcome where the carpark would have been accessed via a left-in/left-out connection directly with South Coast Highway and an all movements connection with Hardy Street which would have also resulted in a significant increase of motorists needing to turn left and right at its intersection with South Coast Highway.

The previously approved access connections also included no enhancement to the arrangements for pedestrians to cross South Coast Highway (or Ocean Beach Road). Furthermore, at the time of our initial assessment the posted speed limit along South Coast Highway in the vicinity of the site was 60km/h. However, Main Roads WA has advised that it is now 40km/h.

Summary of Submissions and Associated Response

It is understood that 171 submissions have been received in relation to the proposal, including one from Main Roads WA. A summary of the traffic engineering items presented in the submissions, in addition to a response to each, is provided in the following table.



Traffic Engineering Related Submission and Associated Response

Submission Item	Submission Response
The Hardy Street/South Coast Highway intersection is dangerous and will become more congested.	Under the current access proposal Hardy Street access to and from the on-site carpark is proposed via restricted left-in movements on Hardy Street only. This is to serve as a largely local site connection for traffic that is anticipated to largely already be on Hardy Street and will not result in substantial additional turning movements at this intersection.
The South Coast Highway/Ocean Beach Road intersection is a well-known traffic build up area and already requires an upgrade.	Main access associated with the on-site parking is now proposed via the creation of a fourth (northern) leg of a roundabout that is proposed at the South coast Highway/Ocean Beach Road intersection which would significantly improve the poor existing safety and operational conditions at the intersection.
The additional cars will cause major delays.	The majority of traffic accessing the site is anticipated to be traffic that would already be on the surrounding road network, particularly during existing peak operating periods, and the proposed roundabout discussed above will improve capacity, queueing, delays and the ability for pedestrians to cross associated roads at that intersection.
The 40km/h speed limit is ignored and the proposal would result in additional traffic and speeding.	Not only is speeding and other illegal driving activity an enforcement matter, but the provision of the above discussed roundabout will physically assist to reduce vehicle speed.
The Hardy Road ^{sic} /Mt Shadforth Road intersection would become congested.	The now restricted Hardy Street carpark access connection, in combination with the proposed roundabout discussed above, means that the majority of traffic using this intersection to access the site would likely be traffic that would otherwise use it in any event. Furthermore, it is envisaged that a relatively small percentage of traffic accessing the site would be to and/or from the north.
Ensure enough car parking is provided.	On-site parking will be provided to the satisfaction of the Shire based on the type(s) of use(s) and associated floor area.
Ensure that the proposal allows for the increase in traffic volumes.	The above discussed roundabout at the South Coast Highway/Ocean Beach Road intersection will improve existing operating and safety conditions and will be sufficient to accommodate traffic accessing the proposed on-site carpark.
Concern in relation to pedestrians attempting to cross roads to access the site.	The above discussed roundabout will provide for a significantly improved outcome for pedestrians crossing South Coast Highway and Ocean Beach Road and an appropriate outcome for those crossing the new northern leg that will provide access for the on-site carpark.
Concern in relation to trucks and deliveries, both at night and using Mt Shadforth Road, in association with noise and lights.	Lighting and noise is outside our area of expertise. However, experience suggests that there would be a requirement as part of any development to provide appropriate baffling/screening of light and acoustic treatment for noise. Experience also suggests that trucks will be restricted at certain times/days

	consistent with the EPA requirements and any other restrictions considered necessary by the Shire which is consistent with a number of Conditions implemented on the previous Development Approval.
Two trailer parking bays is insufficient.	On-site parking for trailers, boats and caravans will be provided to the satisfaction of the Shire.
Will the proposal include a footpath link between the existing footpath Hardy Street and the one South Coast Highway near Millar Street.	There is an expectation that a 2.5m wide path would be constructed on Hardy Street and South Coast Highway abutting the site as a minimum. This would include a connection between the existing Hardy Street footpath and the proposed crossing points at the previously discussed roundabout that is proposed at the South Coast Highway/Ocean Beach Road intersection.
Roundabouts should be provided at the South Coast Highway intersections with both Hardy Street and Ocean Beach Road to assist with access to and from the site.	Earlier commentary in relation to a roundabout now being proposed as part of the development at the South Coast Highway/Ocean Beach Road intersection is reiterated. Similarly, we confirm that restricted on-site carpark access only is now proposed via Hardy Street and traffic using Hardy Street to access the site will largely be traffic that would already be using Hardy Street.
Hardy Street should be widened to facilitate the additional traffic.	The previous approval included a requirement to widen the Hardy Street carriageway to 7m and it is expected that this would still be the case, partly as a result of the restricted Hardy Street carpark access and partly to assist with access for larger delivery trucks. It is also noted that there is likely to be a requirement to undertake minor kerb modifications of the inside radius at its intersection with South Coast Highway in order to ensure that existing motorist can turn into Hardy Street when an exiting delivery truck is propped to turn out of it onto South Coast Highway. Similar kerb modifications may also be required at its intersection with Mt Shadforth Road to also assist with larger delivery truck access.
The additional traffic will hinder access for Amaroo Village and other properties on Hardy Street.	We confirm previous commentary that restricted carpark access only is now proposed via Hardy Street and that traffic using Hardy Street to access the site is expected to largely be traffic that would otherwise be using it.
Articulated truck access via Mt Shadforth Road would be dangerous and damage infrastructure.	Earlier commentary is reiterated including the likely requirement to widen the existing Hardy Street carriageway and potentially undertake kerb modifications at its intersection with Mt Shadforth Road, both of which would improve accessibility for the larger delivery vehicles that are anticipated.
The 14m long articulated design vehicle that has been adopted in the traffic report is incorrect.	The 14m long articulated vehicle adopted as part of previous assessments in longer than the longest truck (13.5m) that is expected to access the proposed loading and delivery area and has not been used to design intersection upgrades along South Coast Highway. It is our expectation that a Condition of Permit would limit the size of trucks that are allowed to access the loading and delivery area to 14m.
This section of South Coast Highway has a speed limit of 40km/h, not 60km/h as referenced in the traffic report.	The reduction in the speed limit since our initial involvement with the project assists in a traffic engineering sense.

We are of the opinion that all traffic engineering related items raised in the submissions have been adequately responded to, noting that specifics will need to be established as part of any redesign of the internal configuration that is expected as a result of the now proposed carpark access via the future roundabout at the South Coast Highway/Ocean Beach Road intersection that has been discussed throughout this letter.

Please contact Nathan Woolcock at Traffix Group if you require any further information.

Yours faithfully,

TRAFFIX GROUP PTY LTD



NATHAN WOOLCOCK

Director

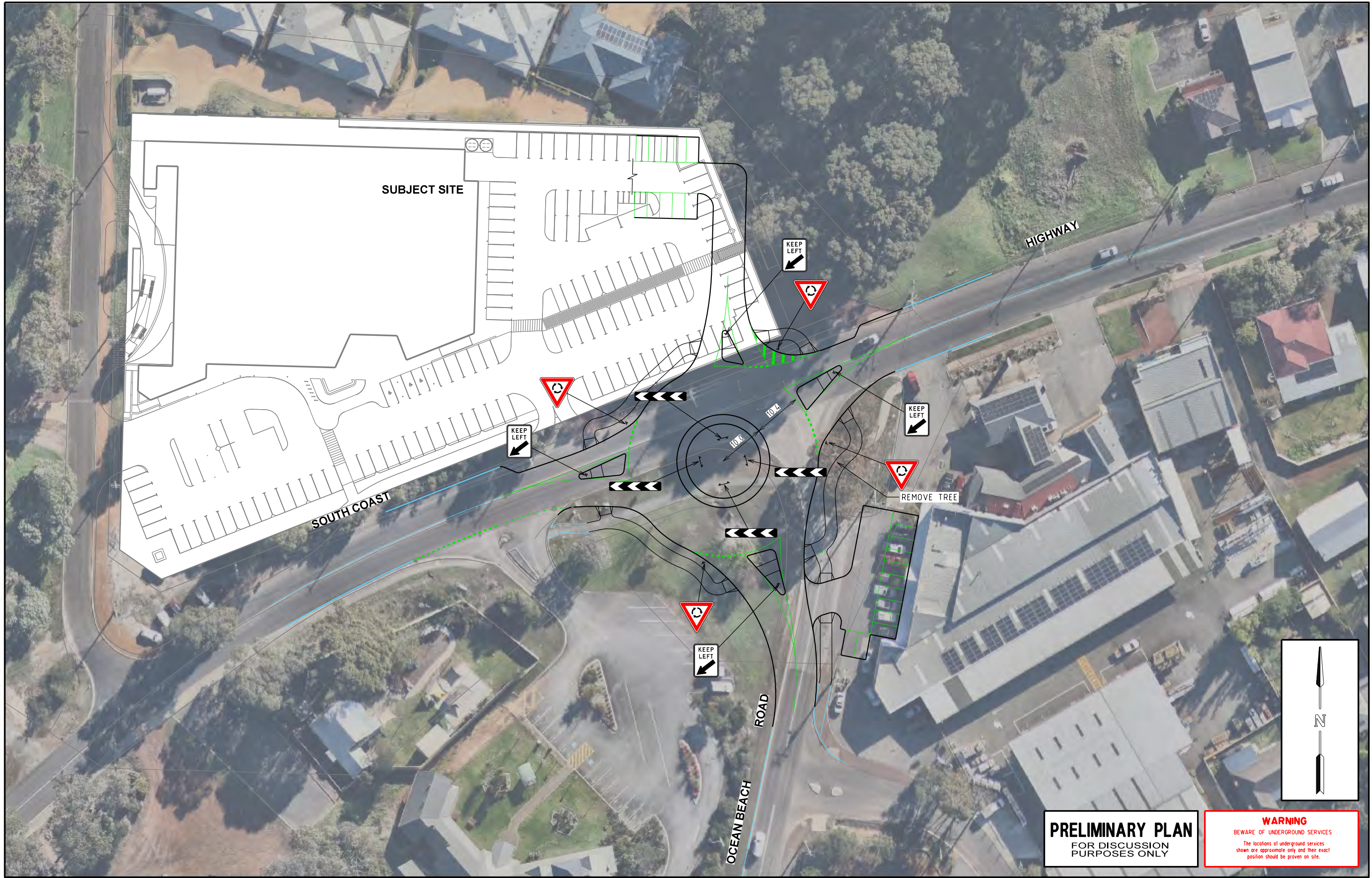




Appendix A

Concept Roundabout Design

DATE: 4/09/2025
MODEL: G35886-01-01
FILE: \\ussrv02\group\Synergy\Projects\GRP\GRP35886\03-Drawings\G35886-01-00.dgn



PRELIMINARY PLAN
FOR DISCUSSION
PURPOSES ONLY

WARNING
BEWARE OF UNDERGROUND SERVICES
The locations of underground services shown are approximate only and their exact position should be proven on site.

ISSUE	ISSUE DESCRIPTION	DESIGNER	CHECKED/APPROVED	ISSUE DATE
A	INITIAL ISSUE	SOK	NW	25 AUG 2025
B	NORTH LEG MOVED AS AGREED WITH DENMARK SHIRE	SOK	NW	04 SEP 2025

GENERAL NOTES
1. BASE INFORMATION FROM PHOTOGRAPH (SOURCE: NEARMAP JUNE 2024)
2. ALL DIMENSIONS ARE TO FACE OF KERB & CHANNEL
3. MAIN ROAD - SOUTH COAST HWYWAY (SPEED ZONE 40km/h)
4. ALL PROPOSED FOOTPATHS AND PRAM CROSSINGS ARE TO BE CONSTRUCTED WITH TACTILE GROUND SURFACE INDICATORS TO DDA COMPLIANCE GUIDELINES REFER TO AS 1428.4-2009

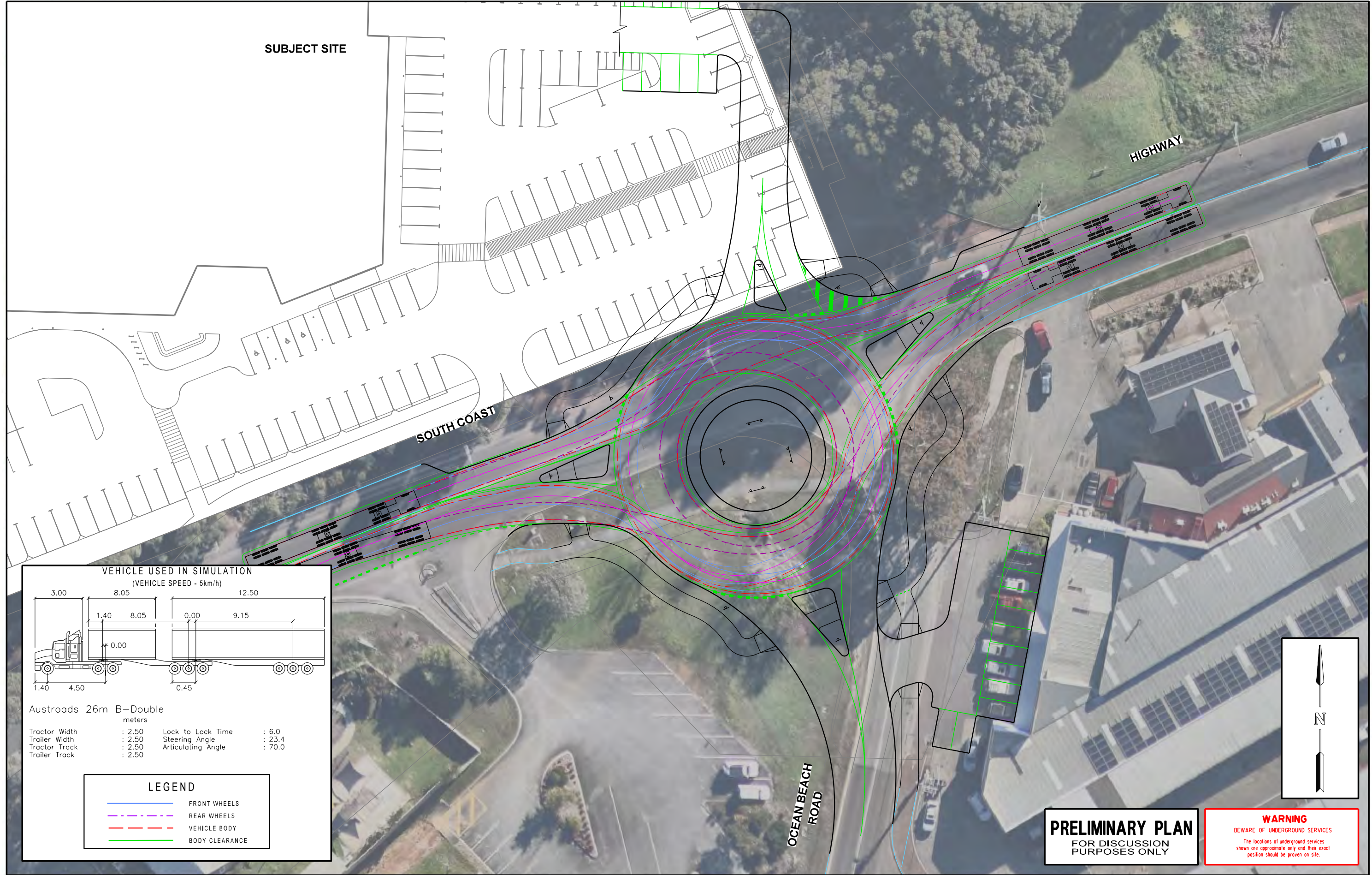
DESIGNED S. O'KEEFE
CHECKED/APPROVED N. WOOLCOCK
FILE NAME G35886-01-00.dgn

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**82-90 SOUTH COAST HIGHWAY
AT OCEAN BEACH ROAD
SHIRE OF DENMARK
CONCEPT PLAN**

SCALE 1:500 (A3) 0 2.5 5 7.5 10
SHEET No. 1 of 5 DWG No. G35886-01-01

DATE: 4/09/2025
MODEL: G35886-01-02
FILE: \Users\traffix\Documents\Projects\GPRP\GPRP35886\03-Drawings\G35886-01-00.dgn



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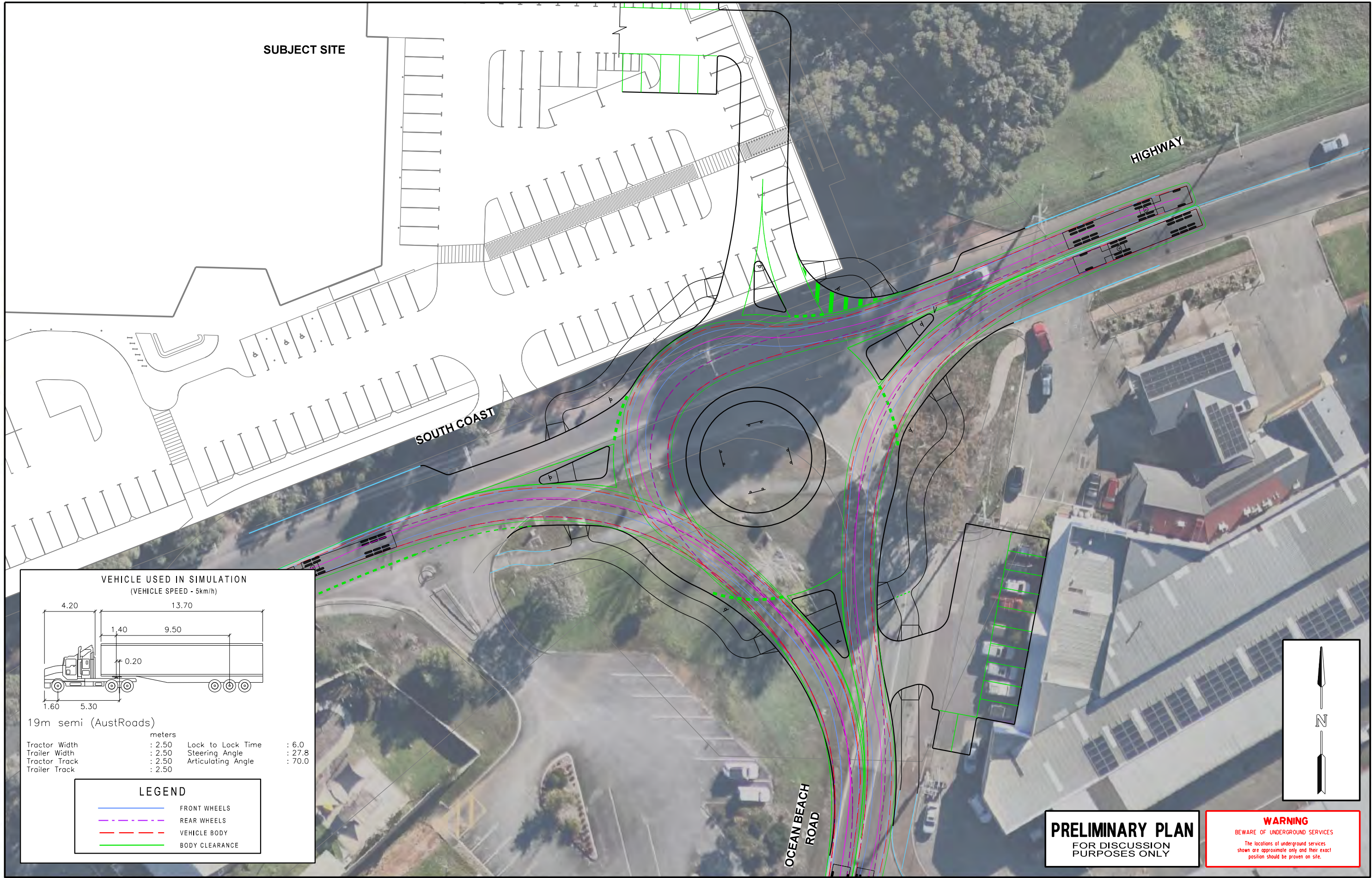
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82-90 SOUTH COAST HIGHWAY
AT OCEAN BEACH ROAD
SHIRE OF DENMARK
SWEPT PATHS - 26m B-DOUBLE

SCALE 1:500 (A3)
0 2.5 5 7.5 10

SHEET No. 2 of 5
DWG No. G35886-01-02



VEHICLE USED IN SIMULATION
(VEHICLE SPEED - 5km/h)

19m semi (AustRoads)

Tractor Width	: 2.50	Lock to Lock Time	: 6.0
Trailer Width	: 2.50	Steering Angle	: 27.8
Tractor Track	: 2.50	Articulating Angle	: 70.0
Trailer Track	: 2.50		

LEGEND

- FRONT WHEELS
- REAR WHEELS
- VEHICLE BODY
- BODY CLEARANCE

PRELIMINARY PLAN

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DESIGNED S. O'KEEFE
CHECKED/APPROVED N. WOOLCOCK
FILE NAME G35886-01-00.dgn

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82-90 SOUTH COAST HIGHWAY
AT OCEAN BEACH ROAD
SHIRE OF DENMARK
SWEEP PATHS - 19m SEMI

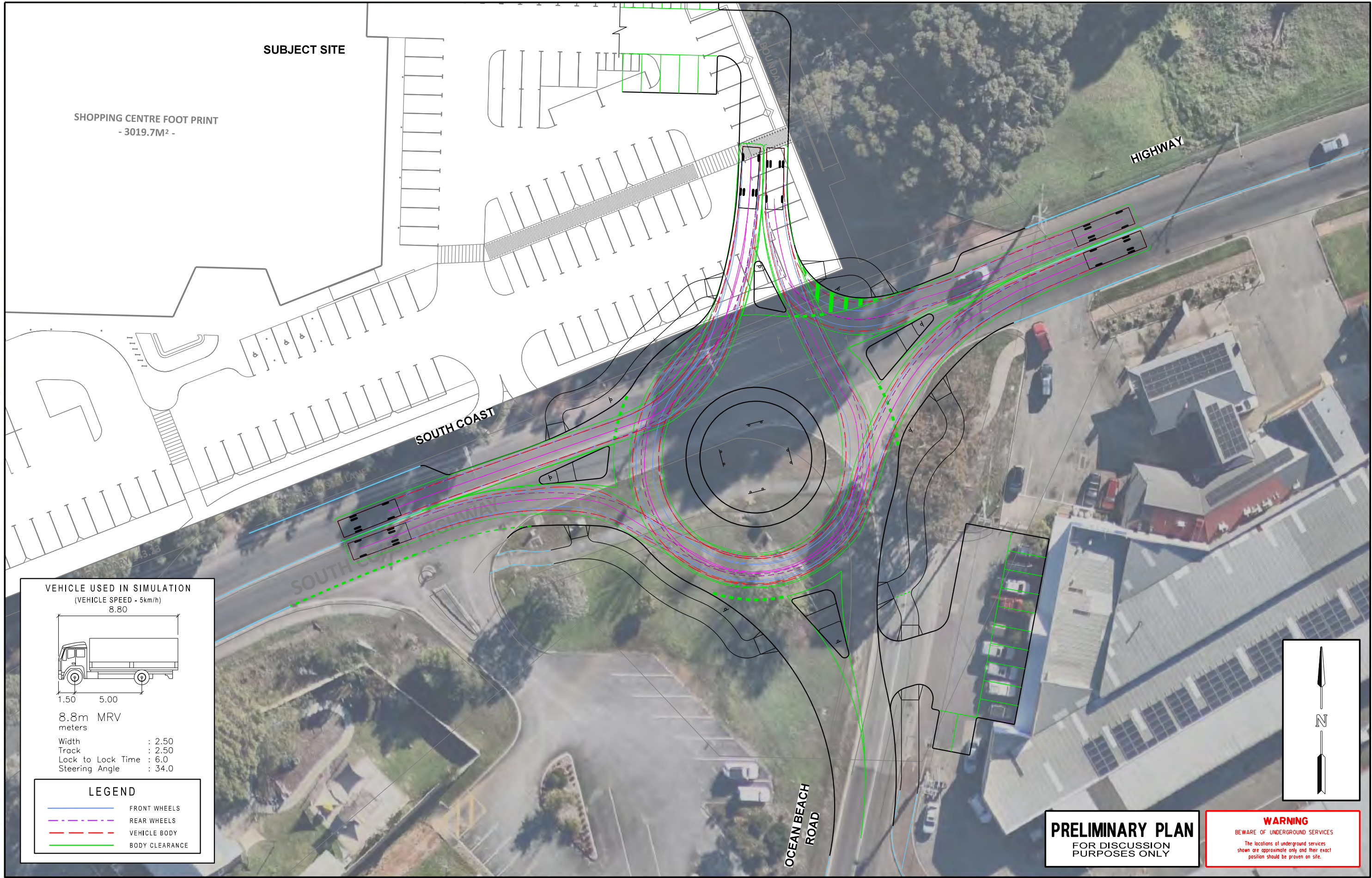
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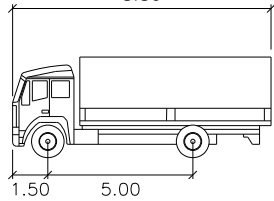
SHEET No. 3 of 5

DWG No. G35886-01-03

DATE: 4/09/2025
MODEL: G35886-01-03
FILE: \\ussrv02\group\Synergy\Projects\GRP\GRP35886\03-Drawings\G35886-01-00.dgn



VEHICLE USED IN SIMULATION
(VEHICLE SPEED - 5km/h)
8.80



8.8m MRV
meters
Width : 2.50
Track : 2.50
Lock to Lock Time : 6.0
Steering Angle : 34.0

LEGEND

- FRONT WHEELS
- REAR WHEELS
- VEHICLE BODY
- BODY CLEARANCE

PRELIMINARY PLAN
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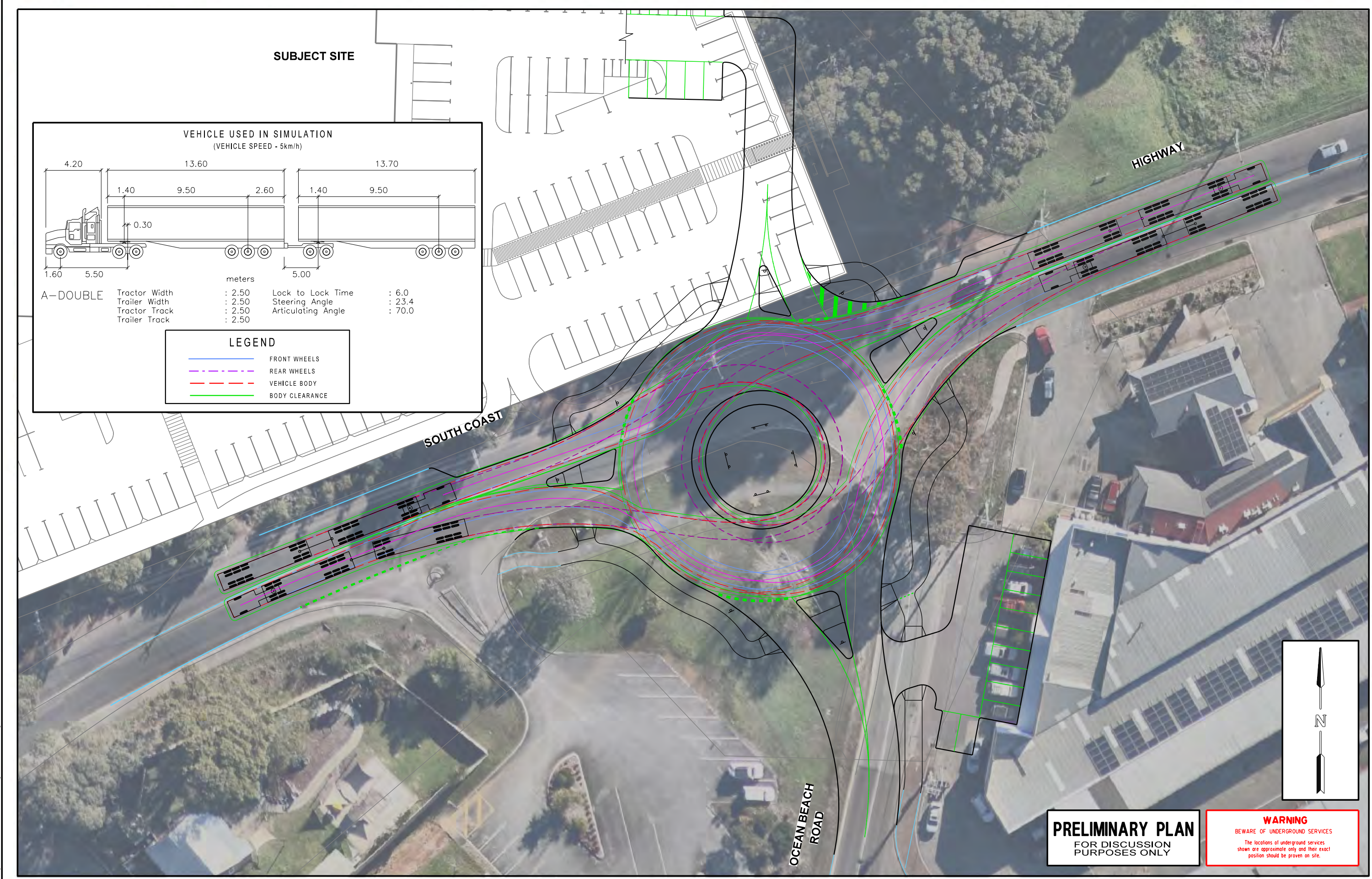
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DESIGNED
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FILE NAME
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82-90 SOUTH COAST HIGHWAY
AT OCEAN BEACH ROAD
SHIRE OF DENMARK
SWEEP PATHS - 8.8m SEMI
SCALE 0 2.5 5 7.5 10
1:500 (A3)
SHEET No. 4 of 5
DWG No. G35886-01-04

DATE: 4/09/2025
MODEL: G35886-01-05
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SWEEP PATHS - A-DOUBLE

SCALE 1:500 (A3) 0 2.5 5 7.5 10

SHEET No. 5 of 5 DWG No. G35886-01-05



SOLVE PROPERTY

Retail development peer review

Proposed Denmark
Out-of-Centre Retail
Development]

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PREPARED FOR SHIRE OF
DENMARK
August 2025

20 August 2025

V 2.0

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EXECUTIVE SUMMARY

- This report provides a peer review of the Taktics4, Proposed Development Denmark Town Centre: Net Benefit Test ('NBT') report and associated reports supporting the proposed development of a retail centre comprising 2,750 sqm net lettable area (NLA) on the corner of Hardy Street and South Coast Highway, about 300 metres west of the Denmark Town Centre, which is in the Shire of Denmark. The proposed centre includes a 2,050 sqm NLA supermarket (to accommodate a relocation of the existing Denmark SupalGA) and seven retail tenancies totalling 700 sqm NLA.
- State Planning Policy 4.2 Activity Centres (SPP4.2) sets out the requirements for assessing new or expanded retail and activity centre developments. SPP4.2 requires two types of assessment: a retail needs assessment to establish there is sufficient demand to justify the development and a 'net benefit test' to weigh the 'pros' and 'cons' of the proposed development on existing and planned activity centres. Under SPP4.2 the proposed development is classified as an 'out-of-centre' development.
- The Taktics4 NBT report uses a well-established gravity model developed and calibrated over many years to estimate retail turnover impacts and retail 'sustainability (viability)'. This peer review accepts that the outputs from that model accurately reflect the current and likely retail characteristics in the Denmark catchment relevant to the proposed development.
- Even though a full retail needs assessment is not required in this case, the Taktics4 report does an adequate job of establishing the need for the development by demonstrating the threshold population size and growth, catchment size and expenditure levels to justify the proposed development.
- The Taktics4 NBT analysis estimates that the Denmark Town Centre currently captures around \$29.9 million in annual supermarket expenditure, comprising \$22.4 million in spend by residents and \$7.5 million by visitors. This estimate relies primarily on the assumption that the current supermarket offering captures 90 per cent of the total supermarket purchases of residents in the town of Denmark and 51 per cent of the supermarket expenditure for residents in the balance of the Shire of Denmark. These assumptions of expenditure capture are unusually high by industry standards, and are not supported by discussions with local Denmark residents.
- If we were to assume that the Taktics4 NBT assumptions are correct, then Denmark could support a total supermarket floorspace of around 2,600 to 3,200 square metres net lettable area (NLA), which represents a borderline demand to attract a full-line (Coles or Woolworths) supermarket. However, this does not account for the existing SupalGA which absorbs some of this existing demand. The proposed development and expansion of the SupalGA from 1,200 sqm to 2,050 sqm NLA will therefore reduce any potential interest from any full-line supermarket from developing for years, if not decades.
- A much more likely scenario is that considerably more than 10 per cent of the supermarket expenditure by households in the Denmark town is spent either in Albany or other centres outside of Denmark. Similarly, the 'escape' expenditure by households in the balance of Denmark is likely to be greater than the 49 per cent assumed in the Taktics4 NBT.

- The net benefit test prepared by Taktics4 does not meet the requirements of SPP4.2, because it:
 - uses incorrect employment assumptions which over-estimates the employment benefits by more than 100 per cent;
 - does not include the 'cons' of the impacts on the existing centre hierarchy and over-emphasises the 'pros' of the proposed out-of-centre development;
 - incorrectly assigns the floor space and benefits to the 'Denmark Town Centre' numerous times in the report, whereas the proposal is an out-of-centre development that has direct negative impacts on the Denmark Town Centre;
 - does not estimate the annual sales turnover the of the existing and proposed centres pre- and post- the development; and
 - does not measure the percentage impacts on the existing Denmark Town Centre to ensure they are with acceptable 'risk levels'.
- The biggest weakness of the Taktics4 NBT is that it does not include any calculation of retail turnover impacts on existing centres as required under SPP4.2. Without this analysis, the NBT does not provide any quantitative measure on which to gauge the negative impacts (or 'cons') on the existing centre network.
- This assessment concludes the proposed centre will have a "high" impact on the Denmark Town Centre as defined under SPP4.2 which will likely undermine the long-term role of the Denmark Town Centre.

1. CONTEXT

1.1 Overview

This report provides a peer review of the Taktics4, Proposed Development Denmark Town Centre: Net Benefit Test ('NBT') report and associated reports supporting the proposed development of a 2,750 sqm net lettable area (NLA) on the corner of Hardy Street and South Coast Highway, some 300 metres west of the Denmark Town Centre, which is in the Shire of Denmark, 420 km south of Perth and 55 km west of Albany, in the Great Southern Region of Western Australia.

The proposed centre includes a 2,050 sqm NLA supermarket and seven retail tenancies totalling 700 sqm NLA. The proposed development is located on the corner of Hardy Street and South Coast Highway immediately west of the Denmark Town Centre.

The proposal also includes the closure and relocation of the existing 1,200sqm NLA SupalGA currently located on Strickland Street in the Denmark Town Centre, to the expanded premises at the new site. Importantly, the SupalGA is the principal retail anchor in the Denmark Town Centre.

The proposal has been advertised for public comment.

The proposed retail centre represents an 'out-of-centre' development under State Planning Policy 4.2 Activity Centres (SPP4.2).

1.2 Purpose

This report determines whether the proposal and its supporting documentation justifies the proposed development. The principle test in this assessment is whether the proposed development meets the requirements of the Western Australian Planning Commission's State Planning Policy 4.2 Activity Centres and its supporting policies.

1.3 Site context

The proposed centre is about 300 metres west of the Denmark Town Centre, and about 400 metres away from Strickland Street which functions as Denmark's main street.

Map 1.1 Denmark Town Centre and subject site



1.4 Planning and policy context

State Planning Policy 4.2 Activity Centres (SPP4.2)

The primary policy instrument for retail and activity centre development and expansion is the Western Australian Planning Commission's State Planning Policy 4.2 Activity Centres.

Net benefit test

The net benefit test prepared under State Planning Policy 4.2 Activity Centres (SPP4.2) is an evolution of the former 'retail sustainability assessment'. The term 'sustainability' in that context applied to the ongoing viability of the existing activity centres.

The current SPP4.2 is itself an evolution of State Planning Policy 4.2 Activity Centres for Perth and Peel, which itself was an evolution of the former Metropolitan Centres Policy. The implication of this is that the application of the 'net benefit test' sometimes fails to appreciate the specific economic and planning factors in regional Western Australia.

SPP4.2 notes that retail and, in particular supermarket, developments are critical anchors in activity centres, because they service the 'daily and weekly' needs of the community to buy food and household consumables on regular basis.

- Supermarkets anchor retail centres
- Retail centres anchor activity centres (see SPP4.2 7.4.3(b))
 "Shops are important anchors of activity centres and should be located in activity centres wherever possible, particularly where those shops provide for the daily and weekly needs of their community."
- Other uses in activity centres benefit from the presence of retailers because the shopping needs of the community generate 'foot traffic' that benefits other (non-retail) businesses.

The proposed development will effectively remove the existing 1,200sqm SupalGA from the Denmark Town Centre, which is the single largest retail anchor in the Denmark Town Centre.

The requirements for net benefit test include considering a range of quantifiable benefits and disbenefits, or 'pros' and 'cons' of the proposed development being developed. SPP4.2 and SPP4.2 Guidelines include a range of questions and a template to follow to fully test the net benefits of a proposal. **Appendix A** of this report lists these requirements in detail.

Given the scale of the proposed development, not every part of the net benefit checklist will apply (such as infrastructure and Government investment). However, a mandatory element of the net benefit test is that the estimated turnover be calculated pre- and post- development (ie. the case now and the case if the new development were to be approved). Then the retail trading impacts need to be calculated to determine the effect on those centres.

Figure 1.1 Turnover and impact assessment requirements of a net benefit test

<p>Estimate the average annual sales turnover (aggregate and per m²) for the proposed development and/or activity centre pre-and post-development proposal.</p> <p>The following impact percentage and risk level for retail turnover is provided as a general guide and should not be used as the only indicator of acceptability of a proposal:</p>		
Impact Percentage	Risk Level	Description
0-5%	Low	Any impacts are likely to be temporary and have no long-term effects on the viability of individual activity centres.
5-10%	Medium	Impacts are likely to be more significant for individual centres but overall network sustainability is unlikely to be undermined in the long-term.
10% +	High	Impacts are likely to be very significant for individual centres and will undermine the long-term network sustainability.
<p>Where the short-term impact is initially high before falling to a medium or low level in the long term, consideration should be given to how the development can be staged or if there needs to be any additional short-term benefits to ensure that level of service is always maintained.</p>		

Source: SPP4.2 Activity Centres Implementation Guidelines 2023, Appendix G2, A2.2.2, p.15

A checklist for the net benefit test prepared under section 5 of the SPP4.2 Guidelines is provide in **Appendix A** of this report to show which requirements have been met by the Taktics4 NBT report and which ones have not been addressed. In some cases, the NBT report addresses the requirements only by making qualitative comments, rather than including any quantitative analysis to support its conclusions

1.5 Population growth context

Population growth is the fundamental demand factor for retail and activity centre growth. Therefore, it underpins the retail/activity centre needs assessment and the required retail floorspace to support the shopping needs of the community.

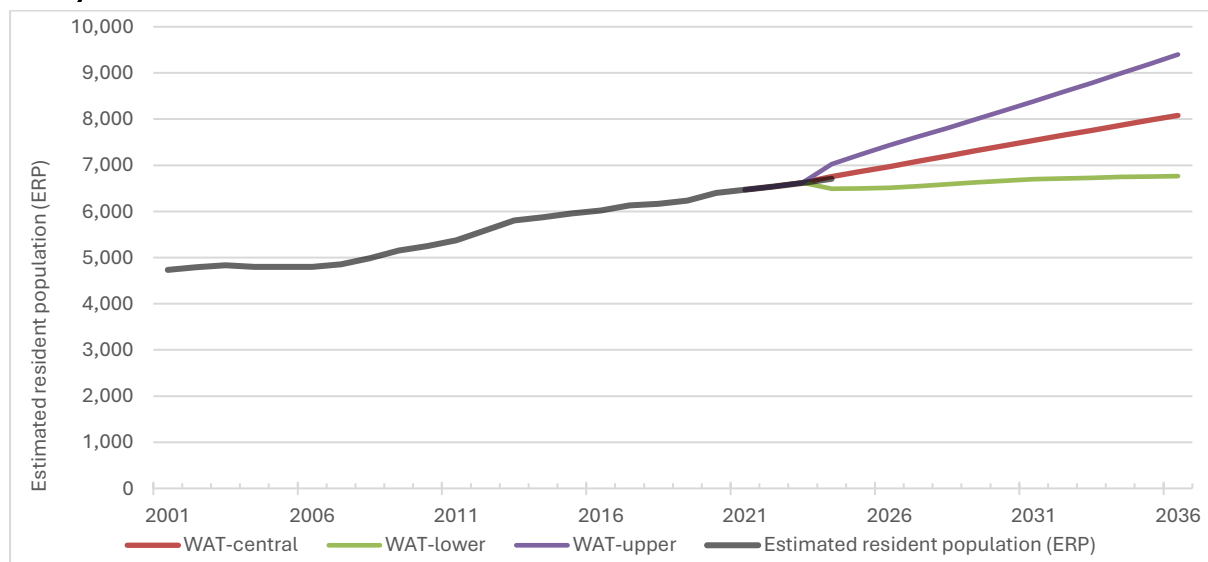
The Western Australian Planning Commission has the role of official demographer for the State and prepares population projections, which are published as WA Tomorrow. The latest publication is Series 11 which was released in early 2025 and provides forecasts for small areas across WA to 2036.

Denmark's population has grown faster than previously forecast and the estimated resident population (the most accurate and timely population statistic available) published by the Australian Bureau of Statistics (ABS) showed that the population of 6,707 residents as of 30 June 2024 was about two years ahead of the previous growth projections (ie Denmark achieved its 2026 population projection by 2024).

The direct implication of this higher-than-projected growth is that retail demand is increasing at a higher-than-expected rate and Denmark will need additional retail floorspace to meet that demand.

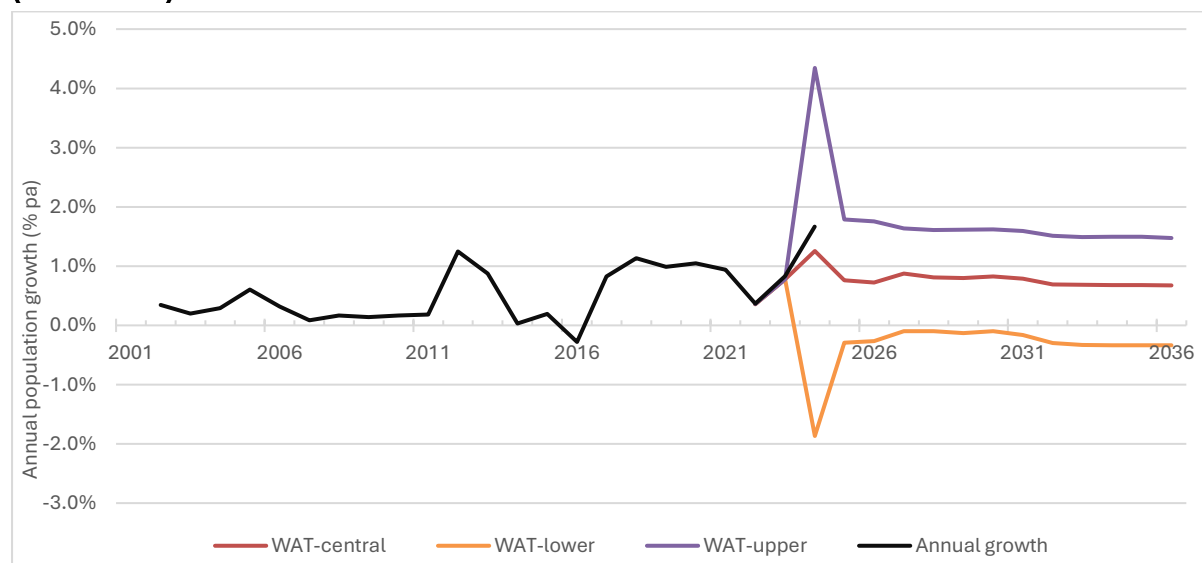
The latest projections indicate that that his new higher growth is expected to continue through to at least 2036.

Figure 1.2 Denmark (SA2) population growth trend and WA Tomorrow projections (2025-2036)



Source: ABS estimated resident population (ERP); WAPC WA Tomorrow Series 11 (2025-2036)

Figure 1.3 Denmark (SA2) population growth rates and WA Tomorrow projected rates (2025-2036)



Source: ABS estimated resident population (ERP); WAPC WA Tomorrow Series 11 (2025-2036)

Denmark's population growth is supported primarily by net internal migration – people moving from other locations within Western Australia to live in Denmark.

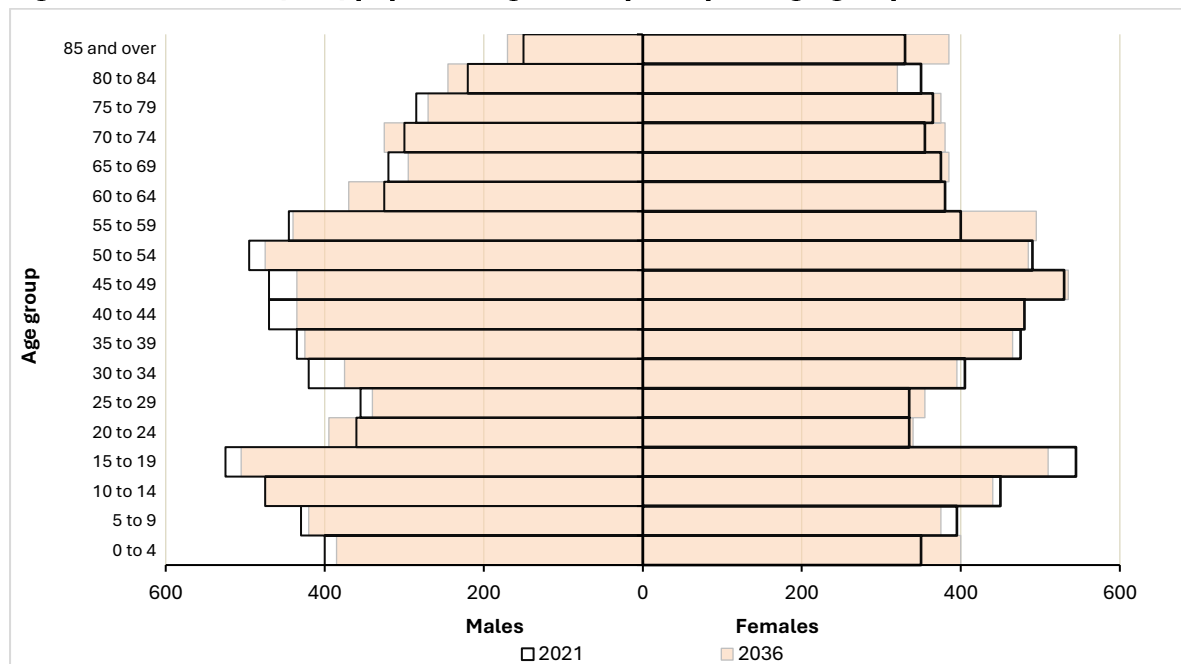
Table 1.1 Denmark (SA2) population growth components and WA Tomorrow projections (2025-2036)

Year (to 30 June)	Births	Deaths	Internal arrivals	Internal departures	Net internal migration	Net overseas migration	NET TOTAL MIGRATION	NET POP'N CHANGE
2022	35	39	600	533	67	8	75	71
2023	44	43	402	346	56	23	79	80
2024	36	61	455	362	93	20	113	88
2025	45	65	na	na	na	na	125	105
2026	45	65	na	na	na	na	130	110
2027	50	60	na	na	na	na	125	115
2028	50	65	na	na	na	na	130	115
2029	50	65	na	na	na	na	130	115
2030	50	70	na	na	na	na	135	115
2031	50	70	na	na	na	na	135	115
2032	50	70	na	na	na	na	130	110
2033	50	75	na	na	na	na	130	105
2034	50	75	na	na	na	na	135	110
2035	55	80	na	na	na	na	135	110
2036	55	80	na	na	na	na	135	110

Source: ABS estimated resident population (ERP); WAPC WA Tomorrow Series 11 (2025-2036)

The age structure of the population is also an important factor in retail demand because it relates to the number of shoppers that are of driving age and also influences the number of people that are not likely to be working (either still student or retired). The WA Tomorrow projections show that while the number of residents in Denmark is projected to exceed 8,000 by 2036, the age structure of the population is not projected to change substantially from what it was in 2021.

Figure 1.4 Denmark (SA2) population growth by five-year age group



Source: ABS estimated resident population (ERP); WAPC WA Tomorrow Series 11 (2025-2036)

Note that Albany's population has also grown at a higher than previously projected rate and is continuing to have strong growth.

The typical retail 'rule of thumb' benchmark across Australia is that each person generates the need for around d1.2 sqm of retail floorspace. On this basis, a population of around 100 persons per annum (as per the WA Tomorrow projections for the Shire of Denmark) will generate demand for an additional 120 sqm of floorspace each year to service Denmark's residents. Added to this estimate is the demand generated by tourists and visitors to Denmark.

1.6 Tourism

The number and visitors or tourists in an area is another factor that influences retail demand. The best source of visitor data is Tourism Research Australia (TRA), which is a division of the Australian Government's Austrade organisation. The Taktics4 report uses information from TRAs visitor surveys to estimate the total demand and impact on retail floorspace demand.

From this reliable data source, the Taktics4 report estimates that visitors are estimated to generate around \$25.8 million on convenience retail goods and services.

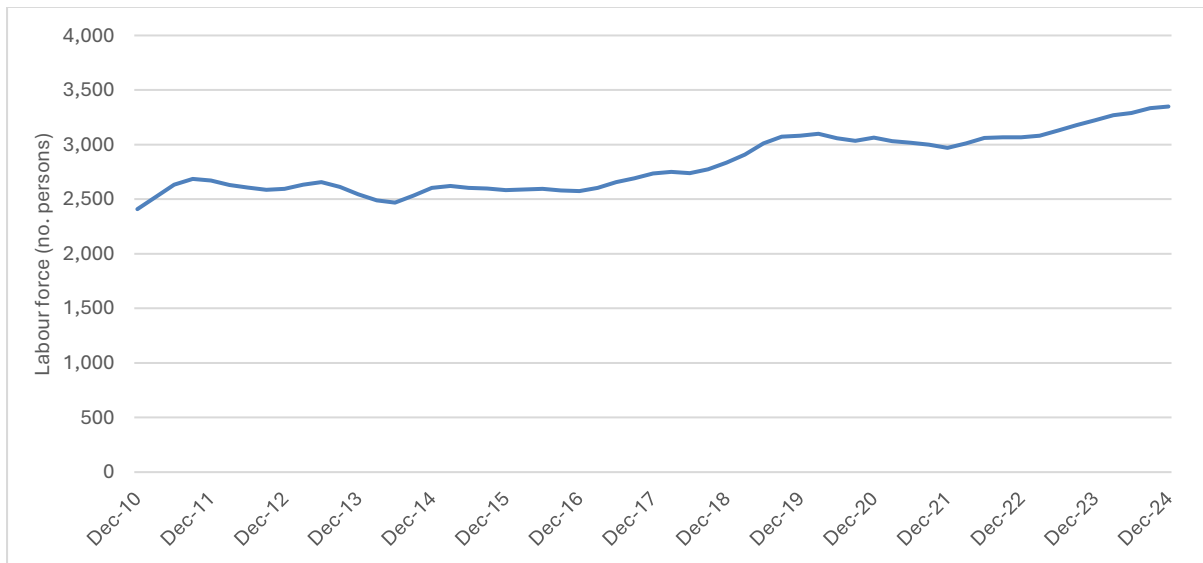
The Taktics4 report estimates that visitors currently make up about 22 per cent of the total retail expenditure in the catchment. The NBT references future growth of the visitor market, but does not quantify the expected growth rate in either visitor numbers or expenditure.

1.7 Employment

Labour force growth is another important demand factor, and it relates to both population growth and to tourism activity. The following chart shows the total estimated labour force in the Shire of Denmark. This represents people in the labour force (employed persons plus unemployed persons looking for work) that live in the Shire.

Therefore, the labour force measure does not directly necessarily reflect the number of jobs that are based in Denmark. In the post-COVID19 work environment, more workers have been able to separate their place of residence from their place of work and enabled them to work from home.

Figure 1.5 Denmark (LGA) labour force trend growth



Source: Jobs and Skills Australia, Small Area Labour Market data

The 2021 Census shows that there were 2,018 jobs located in the Shire of Denmark and 2,351 workers living in the Shire.

An assessment of the place of work for residents living in Denmark shows that 24.6% of all workers living in the Shire of Denmark worked in jobs located elsewhere in the State. Most of these workers travelled to Albany, while an appreciable number worked in the Pilbara (Ashburton, East Pilbara, Port Hedland or Karratha), or in the Perth Metropolitan Region. Table 1.2 provides a list of the top 20 local government areas by place of employment for residents that live in Denmark.

The relevance of this is that work patterns affect shopping patterns. As some 315 Denmark residents (13.4% of the working population) work in the City of Albany, they are also likely to do some or most of their regular shopping in Albany to take advantage of the greater retail competition and selection available.

Table 1.2 Place of work (LGA) for Denmark residents

Local government area	Total	Proportion
Denmark	1,772	75.4%
Albany	315	13.4%
Manjimup	39	1.7%
Perth	29	1.2%
Ashburton	25	1.1%
Plantagenet	20	0.9%
East Pilbara	17	0.7%
Boddington	12	0.5%
Ravensthorpe	9	0.4%
Port Hedland	9	0.4%
Belmont	9	0.4%
Victoria Park	7	0.3%
South Perth	6	0.3%
Perenjori	6	0.3%
Karratha	6	0.3%
Leonora	6	0.3%
Kalgoorlie-Boulder	5	0.2%
Cockburn	5	0.2%
Swan	4	0.2%
Migratory - Offshore - Shipping (WA)	4	0.2%
Other LGAs	46	2.0%
Total	2,351	100.0%

Source: ABS 2021 Census of Population and Housing, place of work; Solve Property

Note also that this separation of place of residence and place of work also means that not all of the jobs based in the Shire of Denmark are filled by Denmark residents. In 2021, 1,772 jobs in Denmark were filled by Denmark residents with the other 246 jobs filled by residents from Albany, Plantagenet, Manjimup and other local government areas.

Other characteristics of Denmark's employment include:

- The Denmark Town Centre has about 20 per cent of the total jobs in the Shire of Denmark.
- About 25 per cent of the workers living in Denmark, have jobs that are located in other local government areas. Approximately half of those workers have jobs in Albany.

2. PEER REVIEW OF NET BENEFIT ASSESSMENT

2.1 Overview

The NBT report sets out to achieve two aims, which although not stated in the report are implicit from its approach and content:

1. Demonstrate that there is sufficient retail demand for the proposed development without undertaking a separate retail needs assessment as required under section 7.2 of SPP4.2 and in the form set out in SPP4.2 Guidelines Appendix G1; and
2. Establish whether the proposed development will provide a positive net benefit for the community, which forms the 'net benefit test' as required by section 7.8 of SPP4.2 and in the form set out in SPP4.2 Guidelines Appendix G2.

2.2 Definitions

The starting point for assessing centres under the WAPC policy framework is to clearly establish the classification of the proposed centre. The NBT report correctly acknowledges that the proposed centre is classified as an out-of-centre development:

"State Planning Policy 4.2 – Activity Centres was adopted in July 2023. SPP4.2 adopts the position that activity proposed **outside of existing or planned activity centres** [bold added] has the potential to undermine the planning and delivery of the activity centre hierarchy. SPP4.2 subsequently establishes a requirement to undertake a Net Benefit Test to assess activity proposed in **out-of-centre developments** [bold added] and/or major developments which exceed a prescribed floor space allocation. A net benefit occurs when the benefits (pros) to the community arising from a proposal outweigh any identified impacts (cons) to the community arising from a proposal." (NBT p. 5)

The conclusion of the report reinforces that the proposal is for an out-of-centre development:

"In the context of the existing distances associated with commercial consumer travel times – **the distance of 500 metres from the town centre** [bold added] seems to be outweighed by the greater opportunities presented to all Denmark Town Centre retailers." (p. 17)

"The findings from this Net Benefit Test indicate that the proposed development satisfies the objectives and outcomes established by SPP4.2 to deal with the assessment for **out of centre developments** [bold added]." (p. 18)

However, within the report, it then states that the new development and its benefits will be provided *within* the Denmark Town Centre and not in a separate out-of-centre development. As stated in the report:

“The proposed development is intended to:

- replace the existing supermarket which may subsequently revert to non-retail uses.
- Subsequently represent an 850 sqm NLA increase in the supermarket floor space available to consumers in the Denmark Town Centre.
- add an additional 500 sqm NLA of convenience retail **to the Denmark Town Centre** [bold added].
- add an additional 200 sqm NLA of non-retail/non convenience retail **to the Denmark Town Centre** [bold added].” (p. 8)

The NBT report subsequently uses this contradiction in the classification to dismiss the impacts of developing the proposed out-of-centre development on the existing Denmark Town Centre, without providing any quantitative analysis to support its conclusions:

“This issue is largely redundant once the issue of the proposed development is expected to have a **positive effect on the Denmark Town Centre rather than a negative one.**” (p. 17)

To clarify the classification of the proposed centre, section 8 of SPP4.2 provides a definition:

“Out-of-centre development

As outlined in section 7.9 Out-of-Centre Development, out-of-centre development is:

- any development application that proposes floorspace greater than 500m² NLA for Category A activity centre uses located outside the boundary of an activity centre, unless exempt” (SPP4.2 p12)

Under SPP4.2 a ‘Category A’ centre is one that is shop/retail uses (Planning Land Use Code – PLUC 5).

The result of this contradiction in the classification of the proposed centre and whether it is a separate out-of-centre development or part of the Denmark Town Centre leads to several significant weaknesses in the NBT report:

- incorrectly attributes several of the benefits or ‘pros’ of the proposed development as directly benefitting the Denmark Town Centre. However, these benefits to the new development (additional convenience retail and non-retail floorspace are arguably disbenefits to the Denmark Town Centre;
- blurs the distinction between the two centres; and
- avoids calculating the retail turnover and impacts of the new development on the Denmark Town Centre (which is a mandatory requirement of the net benefit test under SPP4.2).

2.3 Methodology

The Taktics4 report employs a gravity modelling approach that takes into account the location, type and amount of retail floorspace. This methodology is very appropriate for standardised commodities (such as many food and grocery lines) and uses a probability function based on consumer behaviour which is based on a reasonable shopper weighing up convenience, price and selection.

The gravity modelling approach does not directly take into account pricing differences or the quality of non-standard items (ie. fresh fruit and vegetables), but to some degree it does differentiate between brands (such as Woolworths, Coles, IGA, and ALDI), which serves a rough proxy for general pricing.

The Taktics4 model has been developed and tested over many years and is considered by the industry to provide reliable outcomes with sufficient accuracy to assess retail turnover impacts and 'sustainability' (viability).

A substantial downside of the gravity model is that it lacks transparency. Rather than progressively step through all the assumptions and results of the model, it is generally presented in a report as results from a 'black box'.

2.4 Catchment and expenditure share

The report includes an assessment of the catchment population and expenditure share covering Denmark (town and Shire), the area immediately east of the Hay River, Walpole, Mount Barker, Denbarker. The amount of expenditure varies according to distance from the centre being assessed.

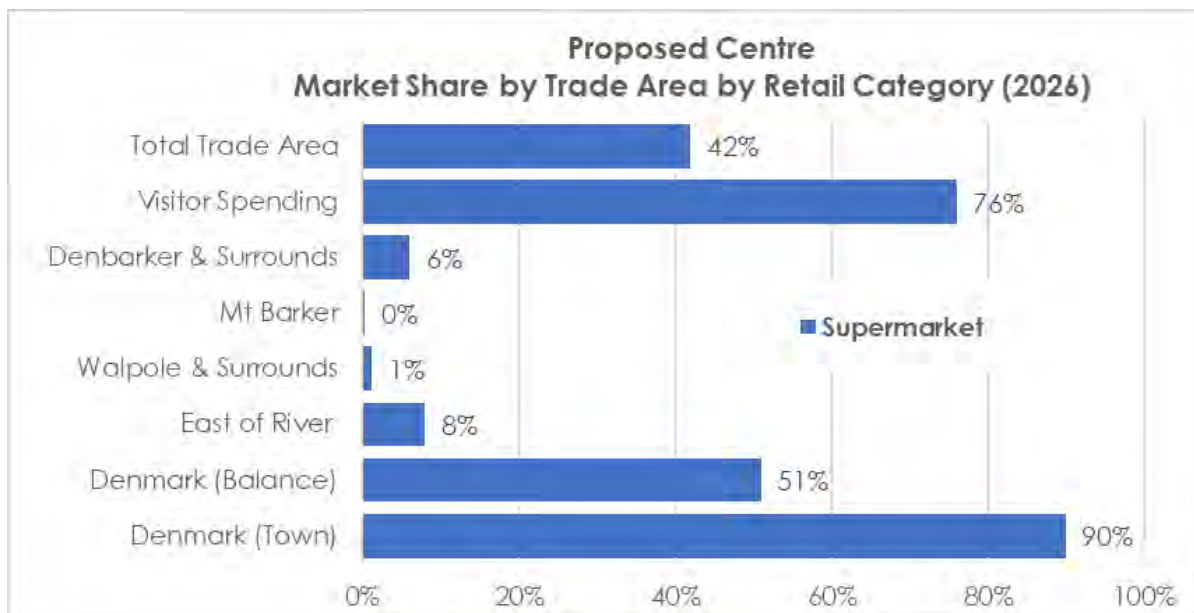
The Taktics4 NBT assumes that the current supermarket offering captures 90 per cent of the total supermarket purchases of residents in the town of Denmark and 51 per cent of the supermarket expenditure for residents in the balance of the Shire of Denmark (see Figure 5). These assumptions of expenditure capture are unusually high by industry standards, and are not supported by discussions with local Denmark residents.

Based on these expenditure retention percentages, the NBT analysis then estimates that the Denmark Town Centre currently captures around \$29.9 million in annual supermarket expenditure, comprising \$22.4 million in spend by residents and \$7.5 million by visitors.

A much more likely scenario is that considerably more than 10 per cent of the supermarket expenditure by households in the Denmark town is spent either in Albany or other centres outside of Denmark. Similarly, the 'escape' expenditure by households in the balance of Denmark is likely to be greater than the 49 per cent assumed in the Taktics4 NBT.

Appendix C provides additional detail on these figures and how they have been calculated.

Figure 5 from the NBT report



Source: Taktics4

2.5 Proximity of the proposed out-of-centre development to the Denmark Town Centre

In addition to the confusion regarding the delineation and classification of the proposed centre from the Denmark Town Centre, the NBT report indicates the two centres are 500 metres apart. Map 1 in this report shows the distance is around 300 metres from the western boundary of the Denmark Town Centre to the proposed centre.

Using either measure, this represents a small separation distance between the existing Denmark Town Centre and the proposed out-of-centre development.

As stated in SPP4.2 section 7.9(g):

“Out-of-centre development may only be appropriate where it is:

- sufficiently separated from nearby activity centres to minimise negative impacts to those activity centres (as demonstrated through the NB Test);”

This policy statement indicates that proximity is in itself a negative factor that increase the trading impacts on existing centres.

This factor is directly comparable to the fundamental principle behind gravity models, such as the one used by Taktics4 – the closer two centres are to each other geographically, the greater competition between those centres.

The Taktics4 report fails to address the separation requirement of SPP4.2 section 7.9(g). This is made worse by the fact the Taktics4 report also fails to quantify the trading turnover impacts which are a mandatory requirement of NB Tests under SPP4.2.

2.6 Activity centre impacts

The activity centre impact analysis effectively measures whether there is sufficient demand to accommodate the proposed development without having a net negative impact on the existing and planned activity centre network. In this case, that means what will the trading impact of the proposed centre on the Denmark Town Centre.

If we were to assume that the Taktics4 NBT assumptions regarding retained expenditure by Denmark households are correct, then Denmark could support a total supermarket floorspace of around 2,600 to 3,200 square metres net lettable area (NLA), which represents a borderline demand to attract a full-line (Coles or Woolworths) supermarket. However, this does not account for the existing SupalGA which absorbs some of this existing demand. The proposed development and expansion of the SupalGA from 1,200 sqm to 2,050 sqm NLA will therefore reduce any potential interest from any full-line supermarket from developing for years, if not decades.

The NBT report prepared by Taktics4 does not assess turnover or impacts by centre. This is a mandatory requirement of SPP4.2 which was discussed in detail in section 1.4 of this report.

The potential impacts can be calculated simply on the floorspace changes that will be caused (actual and potential) by the new out-of-centre development.

For example, the floorspace impacts on the Denmark Town Centre include:

- Certain loss of 1,200 sqm of supermarket floorspace, which is the major retail anchor in the Denmark Town Centre;
- Potential loss of up to 700 sqm of specialty stores that also relocate to the proposed new centre; and
- Potential loss of other non-retail facilities such as the Denmark Post Office, that could relocate to the new centre.

If we assume that the Denmark Town Centre has around 10,180 sqm of shop/retail (PLUC5) floorspace (from the 2019 LUES), then the loss of floorspace will represent a minimum impact (loss) of 11.8 per cent of floorspace (and its equivalent turnover), and potentially up to 18.7 per cent of the total shop/retail floorspace.

As stated in SPP4.2 Guidelines A2.2.2, any impact over 10 per cent represents a “High” risk to the Denmark Town Centre and:

“Impacts are likely to be very significant for individual centres and will undermine the long-term network sustainability.”

That does impact analysis does not account for the additional 850 sqm of supermarket floorspace that will be built in the new centre over the current size of the SupalGA in the Denmark Town Centre. That additional floorspace would have the likely effect of drawing even more expenditure away from the Denmark Town Centre and further increasing the impacts.

As noted in Section 1.5 of this report, trend population growth is increasing demand for shop/retail floorspace in Denmark by around 120 sqm per annum ($1,200\text{sqm} \div 10\text{years}$). This means the impacts on the Denmark Town Centre would take at least ten years and up to nearly 16 years ($1,900\text{sqm} \div 120\text{sqm}$) to be ameliorated.

This demonstrates that the proposed centre fails the impact test if assessed purely on the shop/retail floorspace as defined under SPP4.2, as it would have too risky an impact on the existing shop/retail floorspace in the Denmark Town Centre.

Note that shop/retail (PLUC5) is just category of floorspace that constituted around 38 per cent of all the employment floorspace and 51 per cent of the total employment in the Denmark Town Centre as of the last LUES in 2019 (see Appendix B). Therefore, these impacts over the whole centre and all land uses will be factored down accordingly.

3. CONCLUSION

Key points:

- The Taktics4 report uses a well-established gravity model developed and calibrated over many years to estimate retail turnover impacts and retail 'sustainability' (viability). This peer review accepts that the outputs from that model accurately reflect the current and likely retail characteristics in the Denmark catchment relevant the proposed development.
- Even though a full retail needs assessment is not required in this case, the Taktics4 report does an adequate job of establishing the need for the development by demonstrating the threshold population size and growth, catchment size and expenditure levels to justify the proposed development.
- There is sufficient demand for the proposed development, but the current Denmark market would not justify either a full-line supermarket (instead of the existing SupalGA) or an additional supermarket.
- The proposed new centre is an out-of-centre development under SPP4.2. Therefore, this triggers the requirement for a 'net benefit test' under SPP4.2 section 7.2(f) which states: "Out-of-centre developments are to be assessed in line with this policy, including the requirement for a NB Test (refer section 7.8)."
- The net benefit test prepared by Taktics4 does not meet the requirements of SPP4.2, because it:
 - does not quantify the supply of 'shop/retail' or 'other retail' for the current situation and a minimum of five years into the future for the relevant activity centres;
 - uses incorrect employment assumptions which over-estimates the employment benefits by more than 100 per cent;
 - does not include the 'cons' of the impacts on the existing centre hierarchy and over-emphasises the 'pros' of the proposed out-of-centre development;
 - incorrectly assigns the floor space and benefits to the 'Denmark Town Centre' numerous times in the report, whereas the proposal is an out-of-centre development that has direct negative impacts on the Denmark Town Centre;
 - does not estimate the annual sales turnover the of the existing and proposed centres pre- and post- the development; and
 - does not measure the percentage impacts on the existing Denmark Town Centre to ensure they are with acceptable 'risk levels'.
- The biggest single weakness of the Taktics4 net benefit test is that it does not include any calculation of retail turnover impacts on existing centres as required under SPP4.2 Guidelines A2.2.2. Without this information, the net benefits cannot be determined as it only includes the 'pros' and not the 'cons'.
- The impact test in this report shows proposed centre will have a "high" impact on the Denmark Town Centre as defined under SPP4.2 which will likely undermine the long-term role of the Denmark Town Centre as the principle shopping precinct in the Shire.

APPENDICES

Appendix A – SPP4.2 Net Benefit Test

SPP4.2 and its associated guidelines set out the requirements of needs assessments and net benefit tests. The following table provides a summary of the requirements for a net benefit test and notes includes an assessment of whether the Tactics4 report has addresses each of the requirements.

State Planning Policy 4.2 Activity Centres – Analysis Requirements for Net Benefit Test

SPP 4.2 requirement	Policy wording from SPP4.2 and SPP 4.2 Guidelines	Tactics4 report
Trigger for net benefit assessment - proposed development is either 'major development' or 'out-of-centre' development	SPP4.2 (section 7.8 page 8) "a) Major development proposals within activity centres and out-of-centre developments can have an adverse effect on the extent and adequacy of facilities and services available to a local community, and the ability to access them in an efficient and equitable manner by walking, cycling and public transport."	Done: Tactics4 reports identifies the proposal is an 'out-of-centre' development.
Establish need for proposed floorspace	SPP4.2 (section 7.8 page 8) "b) It is therefore important to ensure that development of activity centre uses within an area generally complies with the floorspace need identified for specific activity centres in local planning strategies or structure plans (a Needs Assessment, refer section 7.2) and where a proposal exceeds that floorspace need, the proposal is to demonstrate a net benefit to the community of any impacted centres.	Partially done: the Tactics4 report notes the catchment market (residents and visitors) and quantifies the size of the catchment. However, the report does not quantify the square metres of floorspace needed to service the catchment.
Assesses as an out-of-centre development	SPP4.2 (section 7.9 page 9) "Out-of-centre developments are to be assessed in line with this policy, including the requirement for a NB Test (refer section 7.8). g) Out-of-centre development may only be appropriate where it is: <ul style="list-style-type: none">• sufficiently separated from nearby activity centres to minimise negative impacts to those activity centres (as demonstrated through the NB Test);• in proximity to existing housing at an average dwelling density of at least 25 dwellings per gross Urban Zone (Region Schemes) hectare within a 400m walkable catchment of the development; and	Partially done: the Tactics4 report notes that the proposed centre is "500 metres" from the Denmark Town Centre, but does not provide any commentary on (1) whether this constitutes 'sufficiently separated', nor (2) calculate the negative impacts on the Denmark Town Centre.

SPP 4.2 requirement	Policy wording from SPP4.2 and SPP 4.2 Guidelines	Tactics4 report
	<ul style="list-style-type: none"> • accessible to its catchment community by walking and cycling, minimising the need for additional private vehicle trips." 	
Identify existing and proposed centre hierarchy	<p>"7.9 Out-of-centre development</p> <p>a) There is a general presumption against the approval of activity centre uses outside of activity centres as they are likely to impact nearby activity centres and the overall activity centre hierarchy."</p>	Done: the Tactics4 report notes there is only one existing centre – the Denmark Town Centre – in the catchment of the proposed development.
Provide floorspace for each relevant centre (current and minimum five-year projection)	<p>SPP4.2 Guidelines (Appendix G2 2.2.2 page 14)</p> <p>"For retail proposals, the NB Test should include the supply of shop/retail (PLUC:5-SHP) and/or Other Retail (PLUC:6-RET) floorspace (present period and over a defined future time period – minimum five years) within relevant activity centres and the retail turnover estimates for each activity centre for the base year and NB test year/s."</p>	Not assessed
Estimate annual sales turnover pre- and post-the proposed development for each relevant centre	<p>SPP4.2 Guidelines (Appendix G2 2.2.2 page 14)</p> <p>"An estimate of the retail turnover for each relevant activity centre should be identified for the following scenarios:</p> <ul style="list-style-type: none"> • base case - without the planning proposal/ development and • with the new planning proposal/ development. <p>The differences between the scenarios is the turnover impact for each activity centre."</p>	Not assessed
	<p>SPP4.2 Guidelines (Appendix G2 2.2.2 page 15)</p> <p>"Estimate the average annual sales turnover (aggregate and per m²) for the proposed development and/or activity centre pre-and post-development proposal."</p>	Not assessed

SPP 4.2 requirement	Policy wording from SPP4.2 and SPP 4.2 Guidelines	Tactics4 report												
Profile each affected centre	<p>SPP4.2 Guidelines (Appendix G2 2.2.2 page 14)</p> <p>"When estimating impacts, the assessment should include the following detail:"</p> <hr/> <p>Location of proposed development</p> <p>Provide a contextual description of the proposal and location with supporting maps, identifying if out-of-centre, within-centre or new activity centre</p> <hr/> <p>Size of the proposal</p> <p>Detail the change in net lettable area (NLA) of the shop/retail (PLUC:5-SHP) and/or other retail (PLUC:6:RET) floor space</p> <hr/> <p>Describe the following for the existing situation</p> <ul style="list-style-type: none"> - Definition of trade area (including primary trade area and any secondary and tertiary trade areas) - Estimated current and historical population of the trade area - Overview of trade area resident attributes and implications for floorspace need and spending estimates - Estimated historical expenditure of the trade area using latest ABS Household Expenditure Survey or other reliable source <hr/> <p>Detail the following for the proposed situation</p> <ul style="list-style-type: none"> - Definition of trade area (same as existing situation) - Estimated forecast population of the trade area - Estimated forecast expenditure of the trade area 	Not assessed												
Determine if trading (turnover) impacts are 'significant' or 'acceptable'	<p>SPP4.2 Guidelines (Appendix G2 2.2.2 page 15)</p> <p>"The following impact percentage and risk level for retail turnover is provided as a general guide and should not be used as the only indicator of acceptability of a proposal:"</p> <table border="1"> <thead> <tr> <th>Impact Percentage</th><th>Risk Level</th><th>Description</th></tr> </thead> <tbody> <tr> <td>0-5%</td><td>Low</td><td>Any impacts are likely to be temporary and have no long-term effects on the viability of individual activity centres.</td></tr> <tr> <td>5-10%</td><td>Medium</td><td>Impacts are likely to be more significant for individual centres but overall network sustainability is unlikely to be undermined in the long-term.</td></tr> <tr> <td>10% +</td><td>High</td><td>Impacts are likely to be very significant for individual centres and will undermine the long-term network sustainability.</td></tr> </tbody> </table>	Impact Percentage	Risk Level	Description	0-5%	Low	Any impacts are likely to be temporary and have no long-term effects on the viability of individual activity centres.	5-10%	Medium	Impacts are likely to be more significant for individual centres but overall network sustainability is unlikely to be undermined in the long-term.	10% +	High	Impacts are likely to be very significant for individual centres and will undermine the long-term network sustainability.	Not assessed
Impact Percentage	Risk Level	Description												
0-5%	Low	Any impacts are likely to be temporary and have no long-term effects on the viability of individual activity centres.												
5-10%	Medium	Impacts are likely to be more significant for individual centres but overall network sustainability is unlikely to be undermined in the long-term.												
10% +	High	Impacts are likely to be very significant for individual centres and will undermine the long-term network sustainability.												

SPP 4.2 requirement	Policy wording from SPP4.2 and SPP 4.2 Guidelines	Tactics4 report
Determine amelioration of retail turnover impacts	<p>SPP4.2 Guidelines (Appendix G2 2.2.2 page 15)</p> <p>"Where the short-term impact is initially high before falling to a medium or low level in the long term, consideration should be given to how the development can be staged or if there needs to be any additional short-term benefits to ensure that level of service is always maintained."</p>	<p>Not assessed: the Tactics4 report does not include any quantitative impact assessment. However, section 6.4 Impact Reduction Test does have a qualitative statement regarding population and visitor growth reducing impacts.</p>
Estimate benefits	<p>SPP4.2 Guidelines (Appendix G2 A2.3 page 15)</p> <p>"When estimating benefits to the community, the assessment should consider:"</p> <hr/> <p>What benefit will occur and how important the benefit will be?</p> <ul style="list-style-type: none"> - Detail what benefit will occur due to the proposed development - Wherever possible use existing data and standards to measure the size of the benefit and how important it will be to the community. <hr/> <p>Who in the community are expected to experience the benefit?</p> <ul style="list-style-type: none"> - Identify those in the community who will be likely to experience the benefit – customers and employees, the local community, different socio-economic groups - Define the geographic boundary where the benefit is experienced – the site, the surrounding area, the local government. <hr/> <p>How much benefit is expected?</p> <ul style="list-style-type: none"> - Estimate how many individuals are expected to experience the benefit - Describe the degree of change expected due to the benefit - Determine the expected duration for which stakeholders are expected to experience the benefit. <hr/>	<p>Addressed: Section 6 of the Tactics4 report addresses several related questions, including:</p> <ul style="list-style-type: none"> • Demand for additional floorspace? / Does Proposal meet this demand? • How will Proposal impact the activity centre? • Are any potential impacts reduced over the longer term? • What is the anticipated loss and/or gain of services to the community? • Will the proposal contribute to a net increase in employment? • Does the proposal align with the objectives and outcomes of SPP4.2 policy and the planning framework?
Net benefit assessment template	<p>SPP4.2 Guidelines (Appendix G2 A2.3/A2.4 pages 15-19)</p> <p>"The following assessment template should be used to evaluate the net benefit to the community of a proposal. The criteria should be examined when assessing the merits of the planning/development proposal against the base case or current situation."</p>	

SPP 4.2 requirement	Policy wording from SPP4.2 and SPP 4.2 Guidelines	Tactics4 report
	<p>STRATEGIC ALIGNMENT</p> <p>Is the proposal consistent with the strategic planning for the area?</p> <p>Is it aligned with the relevant regional strategy and approved local planning strategy?</p> <p>Is the proposal consistent with the objectives and outcomes of SPP 4.2?</p> <p>What are the potential impacts on the activity centre hierarchy?</p> <p>Is the size and scale of the proposal consistent with the level of the hierarchy?</p>	Not addressed
	<p>PRODUCTIVITY</p> <p>Does the proposal provide new jobs in addition to any that may be lost elsewhere – net additional jobs?</p> <p>Does the proposal contribute to diversifying local jobs – creating more strategic employment versus population-driven employment?</p> <p>For retail proposals, how is the proposal expected to impact upon the current and expected turnover and role of relevant activity centres?</p> <p>Will the proposal increase the choice and availability of goods and services in the area?</p>	Partially done: Tactics4 report estimates net additional jobs created, and comments on increased choice / availability of goods and services. However, retail turnover is not assessed at all.
	<p>QUALITY OF LIFE</p> <p>Is the proposal compatible with surrounding land uses? Will there be an improvement in the level of amenity and vibrancy that benefits the wider community?</p> <p>Does the proposal include land uses such as healthcare, education and community facilities?</p>	Partially addressed: brief comment that the proposal will have a positive impact (qualitative, without evidence).

SPP 4.2 requirement	Policy wording from SPP4.2 and SPP 4.2 Guidelines	Tactics4 report
	<p>ENVIRONMENTAL SUSTAINABILITY</p> <p>Would the proposal have an impact on overall vehicle trips? Would car-based net trips (by distance) increase or reduce as a result of the proposal?</p> <p>Does the proposal contribute to improved air and water quality – such as incorporating water sensitive urban design (WSUD), or walking and cycling infrastructure that reduces emissions from vehicles?</p> <p>Does the proposal protect or enhance remnant vegetation or contribute to improving the urban tree canopy?</p> <p>Does the proposal help reduce energy consumption and emissions – for example through sustainable construction methods and/or incorporating renewable energy systems?</p>	<p>Partially done: Tactics4 report calculates estimated vehicle trip reduction as a result of the proposed development.</p>
	<p>INFRASTRUCTURE AND SERVICES</p> <p>Is there significant government investment in services, infrastructure or development in the area or nearby centres that may be affected by the proposal? Will the proposal impact patronage/viability of the investment and what is the expected impact?</p> <p>Does the proposal include enhancements to utilities that benefit the local area?</p>	<p>Not addressed</p>
	<p>EQUITY AND SOCIAL INCLUSION</p> <p>Does the proposal have the potential to improve access to economic opportunity for minority and vulnerable groups?</p>	<p>Done: Tactics4 report notes additional employment opportunities for these groups.</p>

Appendix B – Denmark Land Use and Employment Survey 2019

The WAPC conducts a Land Use and Employment Survey (LUES) to help plan activity centres, implement planning policies, and inform development assessments. These surveys are conducted as required across the State. The latest LUES collection for Denmark was collected in 2019 as part of the Great Southern LUES.

Denmark Town Centre – Land Use and Employment Survey 2019

PLUC name	PLUC code	Floorspace		Employees				Floorspace per worker
		sqm	%	Full-time	Part-time	FTE	%	sqm/FTE
Entertainment / Recreation / Culture	ENT	3,550	12.1%	7	20	15.0	5.0%	236.7
Health / Welfare / Community Services	HEL	1,350	4.6%	2	15	8.0	2.6%	168.8
Manufacturing / Processing / Fabrication	MAN	325	1.1%	2	9	5.6	1.9%	58.0
Office / Business	OFF	4,060	13.8%	49	57	71.8	23.8%	56.5
Primary / Rural	PRI	0	0.0%	0	0	0.0	0.0%	na
Residential	RES	2,600	8.9%	5	6	7.4	2.4%	351.4
Other Retail	RET	3,700	12.6%	20	28	31.2	10.3%	118.6
Service Industry	SER	1,650	5.6%	4	0	4.0	1.3%	412.5
Shop / Retail	SHP	10,180	34.7%	89	162	153.8	50.9%	66.2
Storage / Distribution	STO	1,600	5.4%	0	0	0.0	0.0%	na
Utilities / Communications	UTE	350	1.2%	3	6	5.4	1.8%	64.8
TOTAL OCCUPIED		29,365	100.0%	181	303	302.2	100.0%	97.2
Vacant Floor Area	VFA	0	0.0%	0	0	0	0	0
TOTAL		29,365	100.0%	181	303	302.2	100.0%	97.2

Source: WAPC Great Southern Land Use and Employment Survey 2019(complex number 9494)

Appendix C - Retail analysis from Taktics4 Net Benefit Test

ESTIMATED ANNUAL RESIDENT RETAIL SPENDING CAPACITY (\$M p.a.)

By Trade Area by Year

Total Convenience Retail

Retail market	Popu- lation	Total retail spend					Current capture - supermarket		Current capture - other retail		Potential capture - supermarket		Potential capture - other retail	
		Retail spend \$M p.a.	% of total market	% of resident market	Super- market spend \$M p.a.	Other spend \$M p.a.	%	\$M	%	\$M	%	\$M	%	\$M
Denmark (Town)	2,700	\$17.12	15%	19%	\$11.79	\$5.32	90%	\$10.61	na	na	95%	\$11.20	na	na
Denmark (Balance)	3,600	\$30.63	26%	34%	\$21.10	\$9.53	51%	\$10.80	na	na	69%	\$14.56	na	na
East of River	1,100	\$10.29	9%	11%	\$7.09	\$3.20	8%	\$0.57	na	na	15%	\$1.06	na	na
Walpole & Surrounds	550	\$3.23	3%	4%	\$2.23	\$1.00	1%	\$0.02	na	na	2%	\$0.04	na	na
Mt Barker	2,900	\$21.62	19%	24%	\$14.89	\$6.73	0%	\$0.06	na	na	0%	\$0.06	na	na
Denbarker & Surrounds	900	\$7.36	6%	8%	\$5.07	\$2.29	6%	\$0.30	na	na	12%	\$0.61	na	na
Resident spending	11,750	\$90.24	78%	100%	\$62.00	\$28.00	25%	\$22.37	64%	\$13.38	44%	\$27.53	64%	\$15.81
Visitor spending		\$25.82	22%		\$9.91	\$15.93	76%	\$7.49	36%	\$7.62	87%	\$8.66	36%	\$8.99
Total trade area		\$116.1	100%		\$71.91	\$43.93	42%	\$29.86	48%	\$21.00	50%	\$36.20	56%	\$24.80

Source: Solve Property interpretation of Taktics4 Denmark Net Benefit Test pages 11-15, including Figure 4.

Notes: 'Potential capture' assumes the proposed new centre is approved and it estimates the retail expenditure that would be spent either within the Denmark Town Centre or the new centre.

Response and Additional Information.

SPP4.2 guides and measures are unsuitable for regional rural areas

SPP 4.2 guides urban retail planning in Perth, Peel, and Bunbury, excluding regional and rural areas. The NBT proposal aims to support, not harm, the town centre's value. Consumer submissions favour more diverse retail options. The town centre will remain a focal point for social and shopping activities.

State Planning Policy 4.2 (SPP 4.2) sets out the strategic framework for commercial and retail development in urban areas within the regions of Perth, Peel, and Bunbury, intentionally omitting guidelines for regional or rural settings where market conditions and community dynamics differ. Within this policy environment, the proposed NBT development asserts its intention to complement rather than undermine the established economic and social role of the existing town centre.

The potential relocation of supermarket operations from the core town centre to a peripheral site raises concerns about adverse impacts on incumbent businesses, which may experience reduced foot traffic and diminished revenues. On the other hand, not permitting the proposed development also significantly risks stalling the evolution and adaptability of the town centre, potentially leaving it ill-equipped to respond to changing population needs, consumer preferences, and market trends. Balancing the evolution of retail infrastructure with the vitality of traditional centres is thus a nuanced challenge that requires careful consideration of long-term outcomes for the community.

Submissions from local consumers appear to reflect a demand for increased retail diversity, suggesting that residents seek greater choice and convenience in their shopping experiences. The commitment to maintaining the town centre as a central hub underscores its importance not only as a commercial district but also as a place for community interaction, cultural events, and civic engagement. The proposed development does not change this.

The proposed centre remains part of the Town Centre and Township

The proposed development is next to the current town centre and is closer to it than some businesses to the southern end are to the supermarket at the northern end. This proximity means that residents of the new development will have convenient access to amenities and services located within or adjacent to the town centre, potentially encouraging greater foot traffic and boosting local commerce. Additionally, since the official boundaries do not encompass certain nearby businesses along South Coast Highway, the visual and practical distance between the proposed site and the main commercial hubs is reduced, providing a sense of integration with the heart of town.

The town does not lose a supermarket from the existing town centre. The town gains a more extensive and wider choice of goods and services on the fringe of the town centre.

The potential relocation of specialty shops will not significantly impact the existing town centre

There are approximately 120 businesses operating in the town centre, including 45 retailers. The proposed development would add six specialty stores and most of these would directly compete with similar existing businesses in the existing town centre.

These tenants in the existing town centre are not closely linked to the supermarket in the existing town centre and are spread out, supporting car travel over walkability. As a result, customers typically drive between stores for their shopping needs, indicating that proximity to the supermarket is not essential for these retailers' success.

The introduction of new specialty shops could intensify competition among local businesses, potentially impacting the profitability and survival of established stores in the area. For instance, an additional bakery or newsagent might draw customers away from long-standing establishments, leading to shifts in consumer loyalty and spending patterns. This does not represent a planning issue. The competition between businesses is not recognised as a major planning consideration.

The potential impacts on the town centre

Any perceived impacts of the proposed development on the existing town centre are outweighed by the rare opportunity for the township to attract major redevelopment and secure a major change to the retail landscape. Commercial redevelopment opportunities require significant uniform and level parcels of land.

To maintain the existing town centre fabric a proposed redevelopment must promote direct synergies to the existing town centre. The compilation of land parcels to facilitate redevelopment opportunities in the existing town centre are often difficult to achieve due to historically individual land ownership of small land parcels.

The compilation of small parcels of land into a redevelopment site will almost always require compromise in relation to the relationship and synergies between the proposed development and the existing town centre fabric.

The alternative is to identify parcels which accommodate this redevelopment either on the fringe/adjacent to the existing town centre or as close as practical to the town centre. The alternative is to not encourage change at all.

This may work for the time being. The customers and visitors will be drawn by the amenity or the notion of the amenity of the existing town centre. But over time the inability for the town centre to grow and attract major businesses will contribute to a gradual but continual decline of the existing town centre.

Culminating in the loss of a valued hub and forcing communities to travel further for their goods and services.

The loss of escape expenditure to the Albany

The claim that the town centre and in particular the supermarket is failing so badly that shoppers prefer Albany or deliveries from Denmark lacks evidence.

First, if this were true, allowing the proposed development would increase size, choice, and competition, likely reducing prices. Second, there is no solid data supporting the claim; only a few individuals have expressed this view. In fact, the local supermarket has one of the highest turnovers per square metre in the state, indicating most locals shop in Denmark.

Not permitting the proposed development would either perpetuate spending outside Denmark or protect the current operator, with neither outcome meeting the community's present or future needs.

Furthermore, the potential benefits of the proposed development go beyond mere price reductions. Increased competition might lead businesses to improve their services, diversify their product offerings, and invest in facility upgrades to attract and retain customers. For residents, this means greater convenience, better quality goods, and possibly enhanced amenities—all contributing to an improved quality of life.

Conversely, maintaining the status quo by not permitting the proposed development may stifle economic growth and innovation within the community. It risks encouraging more

residents to spend money in regional centres, which could lead to lost revenue and fewer employment opportunities locally. Additionally, insulating the current operators from competition may result in complacency, reduced incentives for improvement, and ultimately, diminished value for consumers. Thus, considering the long-term interests of the community, endorsing thoughtful development aligns more closely with sustainable progress and the evolving preferences of residents.