

APPROVAL OF LOCAL DEVELOPMENT PLAN  
 This LDP has been adopted by the  
 Shire of Denmark.  
 CED Signature.....Date.....

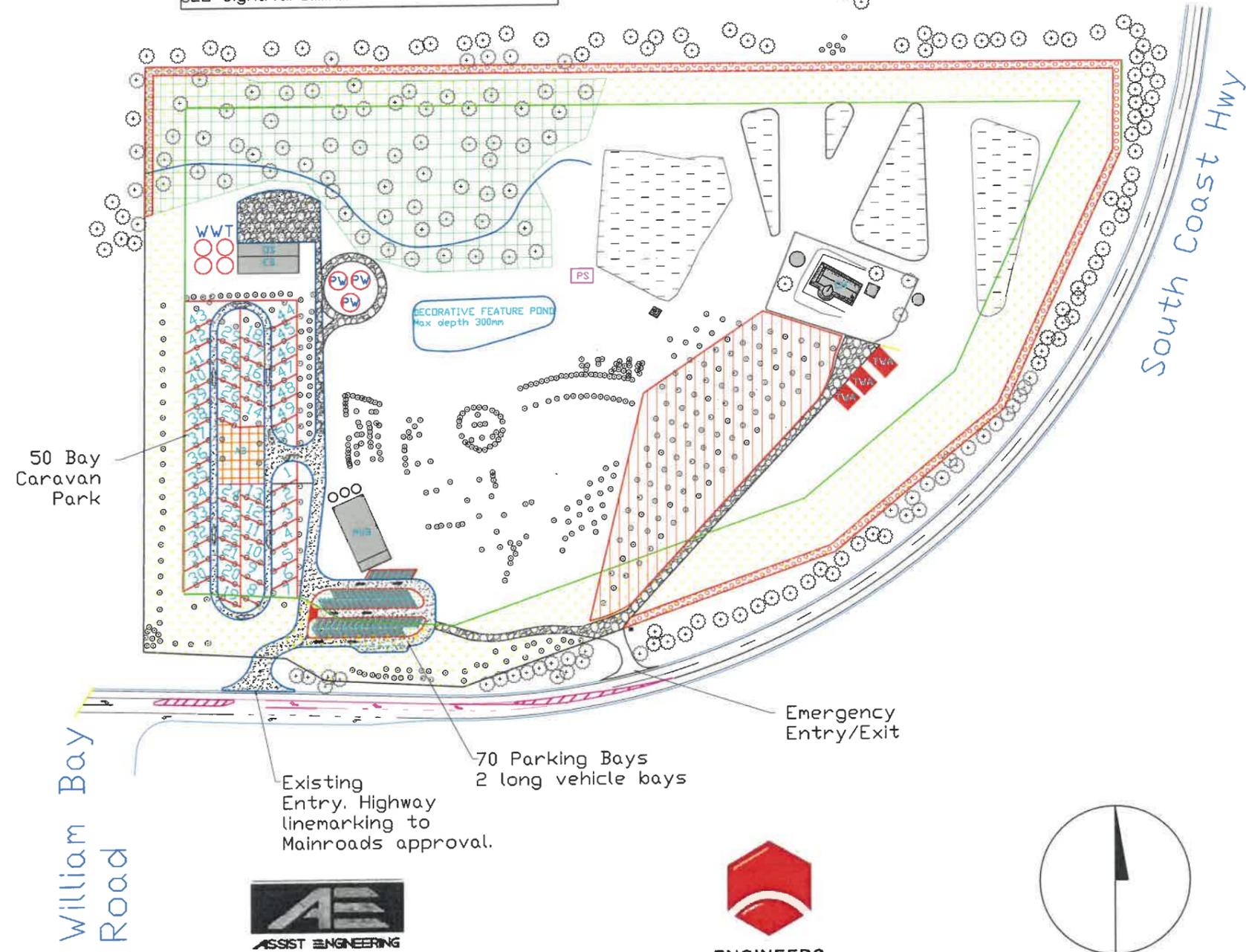
AMMT NO.	SUMMARY OF AMMENDMENT	Date endorsed by LGA

**DEVELOPMENT GUIDELINES**

- All development in accordance with LPS No.3
- All development shall generally be in accordance with this Local Development Plan and/or any minor variations approved by Council.
- All development to be screened from the South Coast Highway utilising existing vegetation and supplemented with additional planting of native vegetation as required by the Shire.
- Potable water to Shire and Dept of Health/Water requirements. All Wastewater to be treated on site. Secondary Treatment Plant to be approved by Department of Health.
- Existing bushland to be preserved and re-vegetation undertaken where required by the Shire.
- Rural style fencing to be used around site to Shire approval.
- All buildings and facilities to be single storey.
- Proposed South Coast Highway adjustment/linemarking to be approved by Mainroads.
- Access road and 70 bay carpark to be sealed to Shire requirements.
- A clear trafficable width of 4m to all tracks and roads to be maintained as per the Bushfire Management Plan.
- 50x Caravan Bays.
- All facilities, buildings, clearances, water supply and access/egress to meet bushfire fighting and compliance requirements.
- Existing and proposed building colour is Jasper.
- Development setbacks (buffer):  
 -20m from side boundary  
 -30m from Sth Cst Hwy.
- Orchard, garden areas and recreation space to be retained.
- Recognition and preservation of black cockatoo habitat to Shire requirements.
- Multi use building to only include permitted uses such as:  
 -Reception  
 -Restaurant  
 -Shop  
 -Brewery (subject to separate approvals, Licence and requirements)

**LEGEND**

- Buffer Zone
- Existing vegetation
- Existing Dams
- Wastewater Dispersal Field
- Sealed Road.
- Existing Trees/ Shrubs
- Existing internal Road
- Existing 4m Gravel Firebreak
- Existing Structure
- Potable Water
- Wastewater Treatment
- Amenity Block
- Temporary Workforce Accomodation
- Multi use Building
- Caretakers House
- Equipment/Operation Shed
- Pump Shed

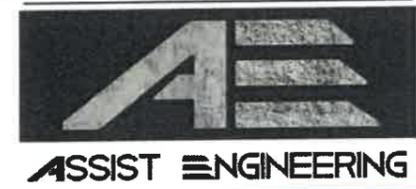


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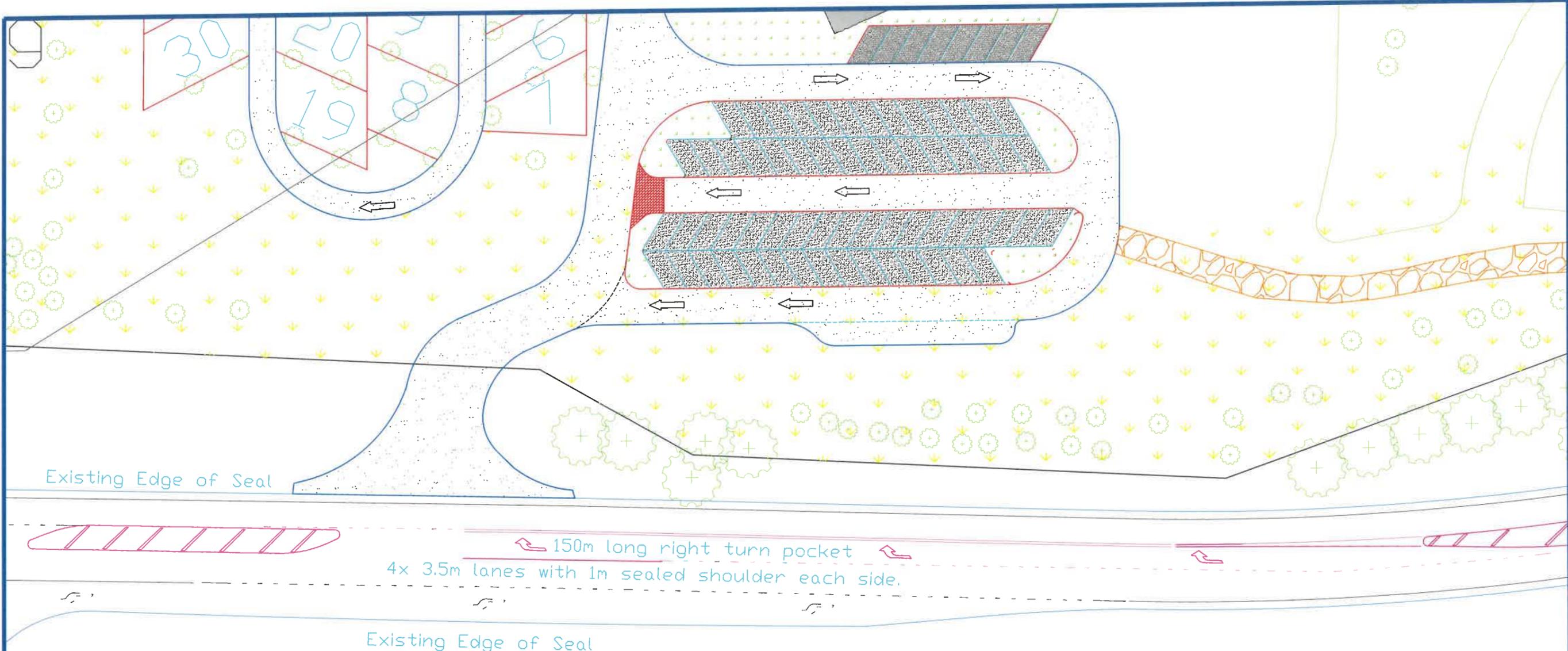
Tax Sheet	
Survey No	
FB	
File No	



DESIGNED	RW	DATUM
DRAWN		SCALE 1:2500
CHECKED		APPROVED RW
RECOMMENDED		

**2446 SOUTH COAST HWY, DENMARK**  
**Local Development Plan**

SHEET 1 OF 2	FILE
DRAWING No.	A
AE 0025-5	3
04/09/2025	



150m long right turn pocket  
4x 3.5m lanes with 1m sealed shoulder each side.



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NOTE: Shire adoption of Right Turn Pocket is not approval to construct.  
Any works on South Coast Highway is subject to separate Mainroads application/requirements.

**APPROVAL OF LOCAL DEVELOPMENT PLAN**

This LDP has been adopted by the Shire of Denmark.

CEO Signature.....Date.....

AMMT NO.	SUMMARY OF AMMENDMENT	Date endorsed by LGA

Tax Sheet	
Survey No	
FB	
File No	



DESIGNED	RW	DATUM
DRAWN		SCALE 1:500
CHECKED		APPROVED RW
RECOMMENDED		

**2446 SOUTH COAST HWY, DENMARK**  
**Local Development Plan**  
**Mainroads Right Turn Pocket**

SHEET 2 OF 2	FILE
DRAWING No.	A3
<b>AE 0025-5</b>	
04/09/2025	

**APPENDIX XIII - SCHEDULE OF TOURIST ZONES (Cont'd)**

PARTICULARS OF THE LAND	TOURIST USE	CONDITIONS OF TOURIST USE
<p>T14</p> <p>No.2446 (Lot 3) South Coast Highway, William Bay.</p> <p><i>AMD 147 GG 1/10/2024</i></p>	<p>Notwithstanding any other provisions of the scheme, the following sets out the permissibility of land uses:</p> <ul style="list-style-type: none"> <li>• Aquaculture (AA)</li> <li>• Caravan Park (SA)</li> <li>• Caretakers Dwelling (AA)</li> <li>• Horticulture (AA)</li> <li>• Brewery (AA)</li> <li>• Private Recreation (AA)</li> <li>• Restaurant (AA)</li> <li>• Rural Pursuit (P)</li> <li>• Shop (max. 150m<sup>2</sup> GLA) (AA)</li> <li>• Workforce accommodation (AA)</li> </ul>	<ol style="list-style-type: none"> <li>I. All development shall be connected to a Secondary Treatment System (STS) approved by the Department of Health. A Secondary Treatment System with nutrient removal may be required.</li> <li>II. All new development shall be setback a minimum:             <ol style="list-style-type: none"> <li>a. 30 metres South Coast Highway.</li> <li>b. 20 metres from all other boundaries.</li> </ol> </li> <li>III. All structures including fencing within the zone shall be constructed to be sympathetic to the existing landscape in terms of colour, finishes, location and height, to the satisfaction of the local government.</li> <li>IV. At the development application stage the proponent shall prepare and submit a Landscape/Revegetation Plan for the protection of existing remnant vegetation, recognition and protection of black cockatoo habitat, and revegetation of water courses.</li> <li>V. Tourist accommodation is limited to a stay of 3 months in a 12 month period other than caretaker's dwelling(s).</li> <li>VI. A local development plan for the site is required prior to approval of any new development.</li> </ol>

**SCHEDULE OF SUBMISSIONS: LOCAL DEVELOPMENT PLAN – LOT 3 SOUTH COAST HIGHWAY, WILLIAM BAY (A541)**

Submission Number	Name & Address	Verbatim Submission	Planning Services Comment
S1	<p>██████████  ██████████  ██████████  ██████████</p>	<p>Please be advised that I am in agreement with the above development as tourism is the main industry in the area of Denmark W.A.</p> <p>We have been coming to Denmark W.A. since 1975 and fortunately we had the good fortune to move here in 2023. Since becoming a resident it has become obvious that without tourism Denmark W.A. would be a less vibrant town, business and residents incomes would be reduced significantly and employment opportunities would also be reduced.</p> <p>Since tourism is growing in this area we really need more facilities as described in the above proposal.</p>	<p>Support noted.</p> <p>Assessed at Scheme Amendment 147 stage: the Tourist zoning and overall land-use mix were considered then.</p> <p>Within LDP scope: single-storey buildings, controlled colours/materials, setbacks and screen planting; 20 m western vegetated buffer; bushfire access notes; parking to be confirmed at development application (DA); and a note that any works within South Coast Highway require separate MRWA approval.</p>
S2	<p>██████████  ██████████  ██████████  ██████████  ██████████</p>	<p>I wish to write in favour of the above development proposal.</p> <p>I believe this new development will benefit Denmark. It will be able to accommodate many of the Green Pool tourists and stop them bringing caravans into Denmark. This will stop the traffic crush in town. This will stop the illegal caravan parking in town.</p> <p>This would be an option for many who are free camping illegally. Currently there is so little legal caravan and car parking close to town. These tourists will be able to shop in town in their car and leave their caravan at William Bay.</p> <p>I see no reason why we shouldn't have a new caravan park at William Bay. It can be seen as positive step in business innovation. A draw card for tourism.</p>	<p>Support citing traffic relief noted.</p> <p>Assessed at Scheme Amendment 147 stage: the Tourist zoning and overall land-use mix were considered then. Highway access is managed by MRWA.</p> <p>The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p>
S3	<p>██████████  ██████████  ██████████  ██████████  ██████████</p>	<p>I am one hundred percent in favour of this development.</p> <p>This will ease the holiday traffic flow through our small township during peak seasons by removing the congestion and parking issues associated with caravans and RVs</p> <p>It will compliment the accommodation on the opposite side of the highway by catering for families with caravans and RV travellers .</p> <p>This may also alleviate the illegal free camping in our shire that proliferates during holiday seasons.</p>	<p>Support citing traffic/illegal camping noted.</p> <p>Assessed at Scheme Amendment 147 stage: the Tourist zoning and overall land-use mix were considered then.</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p>

S4	<p>██████████  ██████████  ██████████  ██████████</p>	<p>My husband and I totally agree for this to go ahead, a great new caravan park which Denmark needs. It's looking very good and has been in the process for quite a while. Needs to be passed.</p>	Noted
S5	<p>██████████  ██████████  ██████████</p>	<p>We completely APPROVE this development, as we have done for the last 5 years.  Why is it taking so long to complete??  Illegal camping is ignored throughout the town, as it becomes an ever increasing problem. Let them open a proper, legal and well managed caravan park!!</p>	Support noted including concern about illegal camping.
S6	<p>██████████  ██████████  ██████████</p>	<p>I would fully support this caravan park to go ahead and be developed for catering for the tourists and locals.  Tourism in Denmark is certainly growing at a rapid rate with caravan usage on the rise.  I look forward to the opening.</p>	Noted
S7	<p>██████████  ██████████  ██████████</p>	<p>I wish to acknowledge my support for this proposed development, after examining the Local Development Plan I believe this will further Denmark's reputation as a premium tourist destination on WA south coast.  My family have been residents and ratepayers in the Denmark Shire for 100 yrs now and have seen the district gradually change from primary industry [dairy farming, horticulture, fishing etc] to become a tourist friendly Shire.  This proposed development is long overdue as Greens Pool is a popular and well protected swimming area in the ocean and at present the accommodation closest is the caravan park at Parry Beach which has restrictions on larger vans, and the various accommodation at Denmark, including the caravan parks.  The facilities at this proposed development at William Bay will allow family friendly holidays close to this swimmer friendly area.  I have discussed this with my many family members living within the Shire and they all agree with my decision to support the LDP for Lot 3</p>	Noted

		South Coast Hwy, William Bay	
S8	██████████ ██████████████████ ██████	We say yes to this development plan.	Noted
S9	██████████ ██████████████████ ██████████████████	I wish to offer my support in the development of Lot 3, South Coast Highway, William Bay. I have enjoyed watching the growth of the development when I come to visit family in Denmark. I can't wait for the opening day of this amazing venue. What a great opportunity to create more jobs for the local community and adding another wonderful venue for travelling tourists, like myself.	Noted
S10	██████████ ██████████ ██████████████████ ██████ ██████████	We wish to offer our support, in relation to the above development, at Lot 3 South Coast Highway, William Bay. We look forward to having another venue to take our family to when they visit from out of town. This is a fantastic opportunity not only for the local community to gain employment, but it will also provide for the travelling tourists, that come to the area.	Noted
S11	██████████ ██████████ ██████████████████ ██████	<b>Do You Support the Proposal?</b> Yes	Noted
S12	██████████ ██████████████████ ██████████	<b>Do You Support the Proposal?</b> No <b>Comments.</b> In my nearly 50 yrs of living here...all of which have been out past the site of this proposal, this is by far the place where I have seen some of the scariest, most dangerous driving, from Cars pulling out in front of traffic , causing everyone to have to slam on their brakes, to even having someone coming up the hwy on the wrong side of the road and more. To think of adding this extra turn off so people have to stop and wait on the hwy to turn is an absolute disaster waiting to happen. Beyond that, Greens Pool is already ridiculously busy. Try doing swimming lessons down there and see how much room there is for additional pressure on our already over-populated area. I strongly oppose this idea.	Objection (road safety; Greens Pool capacity) noted. Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals. Management of parking/capacity within William Bay National Park is a DBCA matter, outside the LDP; however the LDP aims to keep parking on-site and discourage towing into the Park. Visual impact managed through single-storey limit, colour palette, setbacks and perimeter landscaping, tied to an endorsed Landscape Plan.

S13	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p><b>Do You Support the Proposal?</b> No</p> <p><b>Comments.</b> We have a chance, unlike Margaret River and Byron Bay, to slow down tourist development. The area zoned for possible development is situated at our most scenic and iconic Greens Pool. Only a fool would not see the absolute sense in maintaining it, not just for now but for future generations. The juncture of the road into Greens from the highway is beautiful. It is stunning from town until the exit to Greens. Having a tourist caravan park at this location is not only visually jarring but also potentially dangerous. It will create even more congestion at Greens itself. We need a long-term strategy to cope with the increasing number of people going to the Greens over the summer. This problem remains unsolved. I think this should be solved first before any question of development at this site.</p>	<p>Objection (visuals; congestion) noted.</p> <p>Visual impact managed through single-storey limit, colour palette, setbacks and perimeter landscaping, tied to an endorsed Landscape Plan.</p> <p>Management of parking/capacity within William Bay National Park is a DBCA matter, outside the LDP; however the LDP aims to keep parking on-site and discourage towing into the Park.</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p>
S14	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>I'm contributing my perspective of the development of the property opposite the entrance to William bay on South Coast Highway.</p> <p>This is a wonderfully positive use of this land. The plans show an aesthetic balance for the location and will give travellers and holiday makers a wonderful facility to experience a world class coastline. My experience of caravan parks is one of quiet and enjoyable locations. Most unlikely to generate noise to adjoining properties.</p> <p>Locating a caravan capacity out of the town area will cater for an increasing travelling community without the impact to developing or expanding facilities within the town precinct.</p> <p>I totally support this balanced and ecologically sound proposal.</p>	<p>Support noting quiet operations expected.</p>
S15	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p><b>Do You Support the Proposal?</b> No</p> <p><b>Comments.</b> I Strongly Oppose the development plan on Lot 3 South Coast Highway -Denmark already can not support the current intake of tourists due to lack of car parks and amenities -Tourists always trash the bush, leaving rubbish, excrement and non disposable wipes every holiday season -Denmark shire can not afford to put bins in car parks or service these car parks for rubbish removal, resulting in litter accumulation -</p>	<p>Objection (waste/litter; servicing) noted.</p> <p>Water supply and on-site wastewater will be addressed at development application with DoH/DWER to ensure compliance with Government Sewerage Policy; trade and human waste streams to be managed separately if required.</p> <p>Within LDP scope: single-storey buildings, controlled colours/materials, setbacks and screen planting; 20 m western vegetated buffer; bushfire access notes; parking to be confirmed at development application; and a note that any works within South Coast Highway require separate MRWA approval.</p>

S16	[REDACTED]	<p>I wish to offer my support in the development of Lot 3, South Coast Highway, William Bay.</p> <p>I look forward to having another venue to take my visitors out to the new Tourist Development at William Bay. What a great opportunity to create more jobs for our local community and travelling tourists to explore this great area.</p>	Noted
S17	[REDACTED]	<p>Letter of Support. I see the development at lot 3 as a positive for Denmark. It is being developed by experienced, local business owners who are forward thinking in planning for the future of our town. It will provide jobs and leisure opportunities for many.</p>	Noted
S18	[REDACTED]	<p>Letter of Support. I feel one of it's strengths is being developed by a local, experienced family connected to our local community who already provide employment for many locals and also one of the most accessible cafe options in our town.</p> <p>It will provide the opportunity to share the stunning space and also a connection with agriculture, hopefully helping bridge the gap between city and country.</p>	Noted
S19	[REDACTED]	<p>Hello, as a long term resident of Denmark i would like to know the reason why a planned park cannot be approved at William Bay. Every summer the 3 van parks in the Denmark area are full and surely the proposed park will ease that pressure. I honestly think it a great idea to have one not too far out of town and still reaping the rewards that the summer tourists bring.</p>	Support citing seasonal demand noted.
S20	[REDACTED]	<p>I am in favour of the new caravan park at lot 3 South Coast Highway.</p> <p>This plan has great ideas for functioning as a family holiday park which involves kids getting out and being active and enjoying themselves in the open air. I fully support this development.</p>	Noted
S21	[REDACTED]	<p><b>Do You Support the Proposal?</b> No</p> <p><b>Comments.</b> There are many aspects that need to be considered with this proposal Concern about the environment -Williams bay already has issue with human impact With caravan park next door the numbers will increase, concern of ease of people visiting late at night &amp; potentially causing negative impact The park will definitely need gating &amp;</p>	<p>Objection (environment; safety; services capacity) noted.</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p> <p>Water supply and on-site wastewater will be addressed at development application with DoH/DWER to ensure</p>

		<p>restrictions It's the jewel in the crown of Denmark &amp; needs strict protection if we don't want to compromise its wellbeing Safety -a precarious position for the site to have large vehicles entering &amp; existing The increase camping capacity will also put strain on the extended environment, infrastructure &amp; service provision We just can't keep having more &amp; more &amp; more visitors if we wish to maintain the precious environment for which people gravitate here for As a nurse at DHS I am well aware of the mismatch of emergency service provision &amp; population when the town's population swells at holiday times</p>	<p>compliance with Government Sewerage Policy; trade and human waste streams to be managed separately if required.</p> <p>External lighting to be low-spill; compliance with Environmental Protection (Noise) Regulations required.</p> <p>Dark-sky principles to be considered via the Landscape/Lighting Plan.</p>
S22	<p>██████████ ██████████ ██████</p>	<p>I would like to comment to the proposed new caravan park. Generally it's questionable to provide more short term accommodation in a town and environment which is already under fare pressure due to large numbers of visitors in the peak seasons. However if at all a caravan park locally owned and operated by seems more attractive than those of not local investment group. Further a caravan park might take the pressure of the housing market. A lesser demand on short term accommodation could potentially increase the availability of long term rentals.</p>	<p>Mixed comments (pressure on town; local ownership).</p> <p>Assessed at Scheme Amendment 147 stage: the Tourist zoning and overall land-use mix were considered then.</p> <p>Within LDP scope: single-storey buildings, controlled colours/materials, setbacks and screen planting; 20 m western vegetated buffer; bushfire access notes; parking to be confirmed at development application; and a note that any works within South Coast Highway require separate MRWA approval.</p>
S23	<p>██████████ ██████████ ██████</p>	<p>I write to you in support of the proposal for the above lot, in the main, a caravan park. I support the proposal because Denmark is growing and will continue to do so, and there are a housing and a rental shortage in Denmark. A new caravan park will assist in alleviating that problem. Tourism is expanding and a new caravan park will accommodate that expanding growth. The proposed site is on the outskirts of town, thereby, will reduce traffic congestion in the town itself whilst still providing business for the local businesses. In addition, it will provide employment to a number of locals of various ages also including the younger generation who might experience their first sojourn into employment. I do not believe it will detract from any other businesses in Denmark because of the local and tourist growth. I empathise with any neighbours who might be frightened of such a business being nearby but having observed several caravan parks in Denmark for around four years now, and I have noted that they actually seem to be quiet and conservative, presumably out of respect for the internal neighbours. I also understand that many trees have been planted to assist in reducing any visible distractions and to increase the sense of nature.</p>	<p>Support citing jobs/economy noted.</p> <p>Assessed at Scheme Amendment 147 stage: the Tourist zoning and overall land-use mix were considered then.</p> <p>Within LDP scope: single-storey buildings, controlled colours/materials, setbacks and screen planting; 20 m western vegetated buffer; bushfire access notes; parking to be confirmed at development application; and a note that any works within South Coast Highway require separate MRWA approval.</p>

S24	<p>██████████  ██████████  ██████</p>	<p>It has been brought to my attention that the proposed tourist facility on Lot no 2446 Southwest highway near the Williams Bay turn off has been met with unnecessary opposition.</p> <p>As a senior citizen who has travelled extensively in Australia and overseas I consider this proposed facility world class and should be supported to the fullest extent .</p> <p>As a country dependent on our tourist income particularly in the southwest I feel that a facility of this standard and in this location is of extreme importance to the area.</p> <p>The shortsightedness of those opposing this beautifully presented facility is something that has me concerned for the future of our country and future generations.</p> <p>I am a frequent visitor to this area and would welcome a beautiful park so close to so many beautiful attractions.</p>	Support citing regional tourism role noted.
S25	<p>██████  ██████████  ████</p>	<p>Great for employment, great spot to take some traffic out of our congested town, this is a good thing to be backing plus whats to come there in the future is a asset for Denmark, I think Nole and Rossie are forward thinking people and very good business people. I'm for it .</p>	Noted
S26	<p>██████████  ██████████  ████  ██████████</p>	<p>I wish to offer my support in the development near William Bay. he development help create more Job opportunities for my Grand children to be able to stay in Denmark.</p> <p>And another place to sit back and relax, to have a cup of tea.</p>	Noted
S27	<p>██████  ██████████  ██████████</p>	<p>It's great to see local Denmark Families investing in our town to create great job opportunities, keeping our town growing, our children employed and offering more facilities for our Tourists and Locals to enjoy.</p> <p>I wish to offer my support of the development plan.</p>	Noted
S28	<p>██████  ██████████  ██████</p>	<p>I would just like to give my feedback that I approve the proposal regarding the above.</p>	Noted

S29	<p>██████████  ██████████  ██████████</p>	<p>I am deeply concerned about the delay in approving the above proposal. This has been exacerbated by a recent serious accident to one of the proponents and put enormous stress on this family. I trust the Shire will give this matter their immediate attention</p> <p>May I point out:</p> <ol style="list-style-type: none"> <li>1. The Phillips family have run a highly successful business in Denmark for 18 years and employ up to eighteen staff. They have been working on this project for the last 5 years.</li> <li>2. The Phillips Family own 37 hectares of land on Williams Bay Road, where tourist attractions, good roading and car parks already exist.</li> <li>3. There are already preparations in place for a family orientated business by personnel who have already proven their ability running a successful business which has enhanced the Touri.sm strategy of the Denmark Shire.</li> <li>4. Further delays in approving this new enterprise need to be negotiated urgently. The Phillips family have proven their value to the community, and I believe this project is for the greater good of the Denmark Shire.</li> <li>5. An explanation of why this is being delayed would be very much appreciated by our family at this difficult and frustrating time.</li> </ol>	<p>Comment (process/delay). Noted. LDP assessment proceeds independently and focuses on site controls and agency requirements</p>
S30	<p>██████████  ██████████  ██████████  ██████████</p>	<p>The article in our local paper this week outlined the new shopping development that the Shire approved ,catering for the certainly growing need by residents and tourists .Well done ,vision and action to cater for the obvious developing need.</p> <p>I was moved to comment on the Eco Caravan Park proposed at the William Bay turnoff on the South West Hwy</p> <p>There is no doubt Denmark has been "discovered" by the tourist community ,tours, greynomads, events, clubs etc etc and the WA Tourists Commission is intent on multiplying the already rapidly growing local cohort with masses of overseas groups</p> <p>What makes Denmark attractive to them ? Why do they arrive on our doorstep? The Natural beauty ,coastal and local ,the feeling of being in harmony with nature ,the peace and serenity and the entertaining support options available to provide a range of convenient low key ,high quality options.</p>	<p>Support (relieve congestion) noted.</p> <p>Assessed at Scheme Amendment 147 stage: the Tourist zoning and overall land-use mix were considered then.</p> <p>Management of parking/capacity within William Bay National Park is a DBCA matter, outside the LDP; however the LDP aims to keep parking on-site and discourage towing into the Park.</p>

		<p>We congratulate the Shire on the support and development of those treasured values and the business operators who have invested and developed a business that profitably serves the tourist and ratepayer, while employing local goods and services and giving local young people a place to experience work as they study or prepare for a career in tourism A new way of living in the Denmark region compounding steadily toward tourism, tourism and tourism</p> <p><b>Retaining the essential spirit of the place while accommodating the numbers is the challenge</b></p> <p>Work done on Greens Pool shows a commitment to dealing effectively with the crowd, without destroying the magic Work done on Prawn Rock Channel complements and extends the value of the natural features</p> <p>I believe the proposed Eco caravan park at the William Bay turnoff would cater for "Passing" tourists relieving congestion in the town but providing a destination for early morning swimmers ,photographers , even free (illegal) campers may be enticed to an option in the trees , if all those trees you can see from the Hwy grow to maturity I think the Phillips families development of Reminisce waterfront cafe and its employment of local young people has demonstrated what we would like to see in an Eco Caravan Park We strongly advocate approval of the operation of the ECO Caravan Park on the South West Coast Hwy at the William Bay turnoff</p>	
S31	<p>██████████ ██████████████████ ██████████ ██████████████████ ██████████</p>	<p>Please find below some feedback on the proposed caravan park from a Denmark resident:-</p> <p>1) Environmental impact - the proposed location of the caravan park is the exact opposite of what people come to Denmark for. They want to get away from the developments that scar other places and visit Denmark for its beauty and low scale development. The caravan park , even with its "promised" vegetation screening will be an eysore for the Shire which, if allowed, will scar it permanently. The development is a negative for Denmark as a whole and is the exact opposite of the <b>first priority</b> contained in the recent published Denmark Shire strategy document <b>Our Future 2035</b> -Environment: Strong Focus</p>	<p>Objection (environmental impact; road safety; cycling).</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p> <p>External lighting to be low-spill; compliance with Environmental Protection (Noise) Regulations required. Dark-sky principles to be considered via the Landscape/Lighting Plan.</p> <p>Visual impact managed through single-storey limit, colour palette, setbacks and perimeter landscaping, tied to an endorsed Landscape Plan.</p>

		<p>on Environmental Conservation.</p> <p>2) Road Safety - proposed entrance to the caravan park.</p> <p>The entrance to the proposed development is at the bottom of a long sweeping bend and nearly opposite the entrance to William Bay.</p> <p>As a regular user of the existing junction to William Bay I cannot think of a more dangerous proposal than having an entrance to a caravan park (slow moving, large vehicles) opposite the existing William Bay junction. It is dangerous enough already without adding to it.</p> <p>3) Road Safety - Increase in foot and cycle traffic on William Bay road -</p> <p>While the number of caravan sites in the proposed caravan park are not large (at present proposal) it could lead to many more people walking and cycling between the caravan park and Williams Bay (Greens Pool/Elephant Rocks). I cycle the road occasionally and it is not a pleasant experience.</p> <p>My concern is that allowing the development will lead to more foot and cycle traffic on the road and negatively impact on all road users' safety. I cannot see any reference to this in the proposal.</p> <p>In summary I cannot see any positives for the Denmark community in this proposal.</p> <p>It has so many negatives for the Denmark community I am surprised it has progressed this far.</p>	
S32	██████████ ██████████ ██████	<p>The development of Lot 3, South Coast Highway, as a tourist caravan park/cafe is many years overdue. This project has encountered constant, unreasonable delays, both from the Shire of Denmark and the residents of 'Wollery,' despite the developer meeting all the requirements to create a user-friendly, ecologically sound, and much-needed tourist venue in the William Bay area.</p> <p>This developer has proven their capability to operate and run a first-class venue at the Shire-owned Rivermouth Caravan Park for close to 25 years now and comes highly recommended.</p> <p>Over the past 73 years, since I first visited Denmark, the William Bay area has never provided any facilities for visitors to either camp or park their caravans, allowing them to stay and enjoy the natural wonders of this vital area. And as tourism has, and always will be, our main source of income in the Denmark area and the surrounding region, it is long</p>	Support (longstanding need) noted

overdue that we provide first-class facilities for tourists and visitors to this area, many of whom are from overseas.

Recently, the Shire of Denmark has permitted a trader to operate a caravan-style outlet serving coffee in the car park at William Bay, which is suitable for children and those who do not require a comfortable, clean, and hygienic place to sit and enjoy a coffee or meal. The developer of Lot 3 has a proven record of delivering reliable, high-standard service to visitors to the Denmark River Mouth, where their Renaissance Café is a favourite among many Denmark residents, as well as visitors to our area. Their proposed café, attached to the proposed Caravan Park on the site of Lot 3, would finally bring Denmark into the current century and in line with other Western Australian and Australian tourist sites. Without it, we do not deserve the time and effort of people travelling to visit our wonderful area of Western Australia.

When the road into Greens Pool and Elephant Rocks was finally upgraded and completed, it did not provide adequate parking for this highly visited area, with long lines of vehicles often found parked along the road leading back to South Coast Highway. This is exacerbated by camper vans, camper trailers and caravans having to be towed into the area. The establishment of a caravan park in the vicinity would encourage these people to park and leave their space-taking vehicles at Lot 3, before proceeding to the actual Greens Pool area. In fact, it should be a stipulation that they be disconnected and parked on a suitable site at Lot 3 or adjacent to Lot 3, before proceeding to the actual tourist attractions at the end of this road, thus freeing up space for visitors by car.

The developer has researched and selected plants and trees for Lot 3 that are low-water-demanding and fire-retardant. They have installed three large dams on the property to conserve water for use on their plantings and for use within the proposed park.

The location of this development will not impact the traffic flow in the area because it can be accessed by a left-hand pull-off from the Nornalup end, and vehicles can exit to the left towards Denmark by joining the existing passing lane, thus allowing for easy flow of continuing and turning traffic. The Main Roads have already passed these exit and entry points.

Resistance and complaints about the development of this site as a caravan park/café appear to be instigated by left-wing leaning residents

		<p>of Denmark, and particularly residents of the 'Wollery' complex, which has always been an alternative living style originating from the years when 'Hippies' were prolific in this area. Today's Denmark has come a long way forward from this style of living, and it is time, as a Shire region, that we move forward with the times, whilst still maintaining the natural beauty of the region.</p> <p>It is my opinion that the development of Lot 3 South Coast Highway as a tourist destination is a forward-thinking, much-needed development that the developer wishes to create as a safe, restful, environmentally conscious retreat for travellers, and once established and open to the public, it will also provide a nice place for local people to go for a coffee or meal.</p> <p>It is beyond my comprehension why there is so much resistance and 'jumping through the loop' being created over this well-designed and needed complex, when there is a long list of other developments that have received approval both on the way towards William Bay or within that area.</p> <p>To mention a few:</p> <p>The Birbeck family has been granted permission to expand their development in the Dam area, to include holiday accommodation, with plans for additional units already approved.</p> <p>The Chocolate tourist attraction has recently completed and opened its on-site units.</p> <p>Karma Chalets and Little River Farm Cottages are both allowed to operate within natural bushland, as is The Honey Mead outlet.</p> <p>While beyond William Bay there is now The Top Shed, Jazzy boots and William Bay Cottages.</p> <p>Each of these developments has impacted the local environment and natural bushland, yet they have been given approval and allowed to open to the public. Please let common sense prevail over this excellent, thoughtful and needed development without any further time-wasting delays.</p>	
S33	<p>██████████  ██████████  ██████████████████  ██████</p>	<p>We have a sense of inevitability about the outcome and are resigned to the changes that will come regarding our lifestyle and amenity that our land has afforded us for the past 24 years. We have enjoyed seclusion, peace and an uncongested (mostly) piece of paradise and love where we live.</p>	<p>Nearby resident (safety; slip lane; extra parking; path).  Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.  Off-site parking and shared path upgrades are outside</p>

Already the cracks are opening with the march towards a tourism driven business model not only on Steve's property but now potentially (and inevitably) immediately across the highway with Noel's entrepreneurial endeavours. At night we now have lights, laughter and vehicle movements in the paddock opposite our eastern boundary, soon to be added to with further cabins being installed and accessed via Privett Road. Light pollution, noise and congestion will go to a whole new level once the caravan park becomes a reality. Again, sad but unavoidable it seems.

All that aside (progress and change are a fact of life however we may feel about them), I would like to draw attention to three matters that really concern us in terms of the parameters and provisions that we feel should be imposed when Lot 3 is given the green light.

- A separate and additional slip lane for traffic entering and exiting the caravan park be a non-negotiable requirement. This is already a dangerous intersection supported by previous traffic accidents having occurred during peak season. One such incident requiring a Heli-Vac patient transfer from the scene.
- Additional car parking as an absolute priority at William Bay beaches. Recent upgrades have proven inadequate to meet the high demand during peak season and these facilities once ratified and operating will add to the pressure cooker environment we are witnessing and the associated "rage behaviours" from frustrated tourists.
- A bicycle path linking the new caravan park, Rainbow Farm and the William Bay attractions. Steve is on the right track to assist in this as it is incredibly dangerous, having distracted tourists and bicycle traffic interacting, on William Bay Road. Noel will need to get on-board with providing funding to make this happen I believe.

In summary we would like to see the new caravan park proposal fail but that is not realistic Noel has already invested heavily and won't simply roll over and give it up as a failed business strategy, he'll fight council all the way even if it's not supported and eventually he'll get his way. But we implore council to force his hand when it comes to best practice regarding vehicle movements and safety.

As a local to the area we have gone from comfortably and casually

the LDP and are matters for MRWA/DBCA; LDP retains on-site screening and buffers.

Access to the Munda Bididi trail from the development should be explored.

		<p>walking around the block in the afternoons (including South Coast Highway where we never saw a vehicle after 5pm) to modifying our own driving strategies during summer and other holiday periods turning into William Bay Rd when returning from Parry's Beach as opposed to our usual right hand turn from the overtaking lane into Privett Road.</p> <p>The world is catching up with us even out here at our beloved William Bay, please make every effort to ensure it is a safe and stress-free experience for the wave of visitors we now see, keen to have there five minutes of what for us has been an irreplaceable time in a very special place.</p>	
S34	<p>██████████ ██████████ ██████████</p>	<p>I wish to express my total opposition for developing a large tourist precinct, especially the inclusion of a caravan park, with its entrance opposite the William Bay Road intersection. I am sure that Main Roads did not assess the traffic flow situation in the high visitor period of December to May, in particular January and Easter. That intersection is dangerously busy in these periods and to then add long, slow-moving caravans crossing over the highway into the equation will only result in inevitable fatalities. To exacerbate this bottle-neck danger, traffic approaching from the east have no visibility of the proposed caravan park entrance, possibly with a bank-up of stationary cars on South Coast Highway waiting to enter, until the last moment as the steep decent is on a bend and roadside vegetation blocks the view.</p> <p>Anyone can see that this plan is a recipe for disaster. Unfortunately, for this property in question, there is no site that would be suitable to locate an entrance/exit onto South Coast Highway for busy tourist access. The only possibility would be that a right of way was constructed to Bell Road. That option is better for visibility but not ideal.</p> <p>Traffic safety should be the number one priority in your decision-making.</p>	<p>Objection (sight distance; black spot risk).</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals. LDP removes any depiction of right-turn pocket/passing lane and defers highway works to MRWA.</p>
S35	<p>██████████ ██████████ ██████████ ██████████</p>	<p>I oppose the Draft Local Development Plan of No2446 (Lot 3) 4/9/2025 unless the following issues can be addressed.</p> <p><i>Text in italics are quotes from the original application</i>  <i>Request for dog proof fencing on boundary to The Wolery</i>  My family and I have lived here for 47years and never had issues with neighbouring dogs  Over the last 4 years the Philips 2 large Maremma guard dogs have got</p>	<p>Neighbour concerns (dogs/fencing; screening; tree retention; lighting).</p> <p>Dog management and trespass are compliance/civil matters.</p> <p>Rural interface: a 20 m planted buffer along the western boundary is to be established and maintained via the Landscape Plan to manage amenity and spray drift.</p>

		<p>through the existing standard farm fence a number of times, they have</p> <ul style="list-style-type: none"> <li>• pushed through the existing fence and harassed our horses,</li> <li>• breached the existing fence and aggressively chased us within the Wolery when we were walking in our SE paddock 300m from our boundary!!</li> <li>• threatened and growled at us when we walk along our south fire break.</li> <li>• Large dog footprints have been found in our existing fire break indicating that at times the dogs are ranging through our south Karri forest thus threatening the resident wildlife.</li> </ul> <p>We fear for the safety of our small children who have up to now been free to walk along our south boundary. 2 large guard dogs could easily kill a child. (Wikipedia reports at least 100,000 dog attacks in Australia per year, 2000 of those requiring hospitalisation.)</p> <p>For the last 3 years since the Philips have owned these 2 dogs some of our members are now too afraid to walk alone in the bush along our south boundary fire break. Something that they've been doing for 45 years!</p> <p>Those that still do walk the fire break feel obliged to optimistically carry a stick for self defence.</p> <p>We have asked Noel Philips to upgrade his north boundary fence. He has improved part of the 1.1m existing rural fence but refuses to do the whole boundary.</p> <p>Their large guard dogs have scrambled over their farmhouse 1.1m fence in the past. For us to feel safe on our own property we really need a higher wire mesh fence.</p> <p>NOTE: I have met the dogs at the Philips farmhouse, they are friendly and lovely pets on their own home ground. It's hard for the owners to appreciate how dangerous they can be when they are 'protecting their own territory.'</p> <p>We therefore ask that if rezoning to Tourist is approved the Council includes the following condition,</p> <ul style="list-style-type: none"> <li>• The Philips north boundary fence be upgraded to 1.8m deer fencing using fabricated hinge joint mesh for the length of the North boundary. <ul style="list-style-type: none"> <li>◦ This type of fencing <ol style="list-style-type: none"> <li>1) has no barbed wire,</li> <li>2) is visually more acceptable than farm fencing,</li> </ol> </li> </ul> </li> </ul>	<p>Visual impact managed through single-storey limit, colour palette, setbacks and perimeter landscaping, tied to an endorsed Landscape Plan.</p> <p>External lighting to be low-spill; compliance with Environmental Protection (Noise) Regulations required.</p> <p>Dark-sky principles to be considered via the Landscape/Lighting Plan.</p>
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- 3) will not injure dogs and is designed as a rural dog and deer barrier.
- 4) has large mesh size that will not restrict the movement of quendas and reptiles and other small native animals.
- 5) will help prevent future conflicts between The Wolery residents and the Proposed Tourist development.

Example of deer fencing near Albany.



Vegetation screening on the Highway boundary

quote p45,46 from original proposal 'Extract Figures 13 and 14 show vegetation screening of the proposed caravan site from key viewing points located on South Coast Highway adjacent to the site. Screening adjacent to the street boundary will be provided with Peppermint trees, spaced at 10 metre intervals (approx.), to complement other vegetation in this locality. These trees are native to the south west and capable of growing 10-15 metres high.'

We request that boundary screening peppermint and avocado trees be spaced at a minimum of 6m, not the 10m intervals specified.

Development exclusion zone, (p52 para 8, Local Development Plan)

quote 'Existing stand of mature karri trees located on the north-western portion of the site are to be retained and protected via the identification of a development exclusion area/tree retention area The Development Exclusion Zone on the development proposal has been severely damaged by the proponents in contravention of their own development application!

1. This small area has been recently dissected by wide tracks

		<p>2. a stone quarry has begun within the area next to our boundary fence</p> <p>The damage to this Development Exclusion zone also contravenes the Advice given by the EPA in its letter to the council. Snapshot from the EPA letter of advice to council 3 March 2023 states, The EPA supports the Shire’s proposed scheme provisions requiring development to be consistent with the LDP, no development being permitted within the Development Exclusion Area(s) / Tree Retention Area(s) as shown on the LDP (October 2020), and the requirement for a Landscape Management Plan</p> <p>We request that as a condition of approval the proponents repair the damage they’ve done to this small but important development exclusion zone.</p> <p>External lighting (quote p59 Condition of Tourist Use) ‘xv. All external illumination shall be of low level, controlled spill lighting, with any variations requiring Council Approval.’ snapshot from EPA letter of advice to Council 3 March 2023 p3</p> <p>Fauna Values Fauna habitat management should be considered including protection of fauna habitat from edge effects, noise pollution and light spill. Lighting should incorporate dark sky principles as referenced in the WAPC’s Position Statement ‘Dark Sky and Astrotourism’ and the ‘National Light Pollution Guidelines fro Wildlife’ (as amended). A Landscape Management Plan should be prepared with reference to the LDP to. We support this statement and beseech the council to diligently enforce this advice as our dark southern sky is currently free of artificial light pollution.</p>	
S36	<p>██████████ ██████████ ██████</p>	<p>Being a weekly regular to the William Bay National Park. My big concern regarding the proposed caravan park is large vehicles with large caravan’s turning right towards Walpole. The speed with which a good many vehicles coming down that hill from Denmark is nerve racking. I cannot imagine the rig crossing the road from the c/p will be moving with any speed at all!! Accident waiting to happen!!</p>	<p>Objection (right-turn to Walpole; downhill speeds). Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals. Any MRWA-required controls will be addressed outside the LDP.</p>

S37	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>I object to the use of Lot 3 as a caravan park due to increased traffic and overuse of the National Park.</p> <p>If we are to escape a fire from our neighbourhood the road will be filled with caravans.</p> <p>Poor Greens Pool doesn't need the additional foot traffic or graffiti.</p>	<p>Objection (traffic; fire evacuation; park impact).</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p> <p>Bushfire requirements will be finalised at development application via updated BMP/EEP.</p>
S38	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>This is in support the caravan park on South Coast Highway, near William Bay.</p> <p>The property concerned is always kept to a very high standard, with the planting of trees and gardens.</p> <p>The location will take pressure off the other two caravan parks in Denmark, and keep income distributed within the area.</p> <p>Employment of our young people keeping them in Denmark is of major importance.</p> <p>The main Roads will have to ensure safe access to the property.</p> <p>In completion, I fully support the application and wonder why this project has taken so long to implement.</p>	<p>Support (site presentation; youth employment).</p>
S39	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p><b>I wish to express my opposition to the Draft Local Development Plan (LDP) for Lot 3 South Coast Highway, William Bay.</b></p> <p>The Draft LDP document on the shire website has not been updated since 2022, and I can't find any documentation relating to the required changes or conditions imposed by the various government departments, including the Shire of Denmark, when the approval was given for rezoning from Rural to Tourist Zone.</p> <p>My reasons for opposing the rezoning in 2023 in my submission dated 28 August 2023, still stand and I would like them taken into consideration when assessing the Draft LDP.</p> <p>Using the new Draft LDP Map and the Development Guidelines numbered 1 – 18, I would like to comment on a number of them which I find confusing or lacking in information.</p> <p><b><i>All development in accordance with LPS No 3 (number 1)</i></b></p>	<p>Objection (LDP currency; screening responsibilities; wastewater; fencing; lighting; road noise; access to trails; park pressure).</p> <p>LDP scope covers built form, landscaping and buffers on the site; off-site vegetation is not relied upon.</p> <p>Water supply and on-site wastewater will be addressed at development application with DoH/DWER to ensure compliance with Government Sewerage Policy; trade and human waste streams to be managed separately if required.</p> <p>External lighting to be low-spill; compliance with Environmental Protection (Noise) Regulations required. Dark-sky principles to be considered via the Landscape/Lighting Plan.</p> <p>Visual impact managed through single-storey limit, colour</p>

Does this relate to Town Planning Scheme No 3 Amendment No 147 and the LDP provided at the time? The LDP has not been updated since 2022 so what does this statement mean?

***All development shall generally be in accordance with this Local Development Plan and/or any minor variations approved by Council. (number 2)***

How can one submit a LDP for approval knowing the development will only “be generally in accordance with the LDP”? How am I expected to comment on this if there will be changes? This proposal is not ready for comment.

***All development to be screened from the South Coast Highway utilising existing vegetation and supplemented with additional planting of native vegetation as required by the shire. (number 3.)***

According to the Draft LDP Map provided, the existing vegetation screening South Coast Highway is on road reserve and therefore not part of the development. The supplemented additional planting is not shown on the map and the Shire requirements have not been provided. The existing vegetation shown to the north of their boundary is actually on The Wolery, and so cannot be shown as being part of this development. Being a neighbour with a common boundary on the north of this development, I would need to see in writing a requirement/condition by the Shire, and a commitment by the proponent/s, to screen this development from our property before I would consider approving this development.

***All Wastewater to be treated on site. Secondary Treatment Plant to be approved by Department of Health. (number 5)***

Currently there is no approval for a Secondary Treatment Plant.

***Rural style fencing to be used around site to Shire approval. (number 7)***

This type of fencing is a totally inadequate barrier to dogs. I have lived on the Wolery for 47 years. I never encountered dogs on our property until the land in question (Lot 3) changed hands a number of years ago. Since then, I have been traumatised by the dogs on numerous occasions, both on our property and on the highway. I am now too scared to walk in the southern area of our property in case the dogs are out. And I can no longer ride my bike on the highway on the south side of the property

palette, setbacks and perimeter landscaping, tied to an endorsed Landscape Plan.

Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.

Management of parking/capacity within William Bay National Park is a DBCA matter, outside the LDP; however the LDP aims to keep parking on-site and discourage towing into the Park.

in question, (Lot 3), after a very terrifying and dangerous chase by one of the dogs, down the highway at high speed. The fear of encountering the dogs again, and the totally inadequate rural style fencing, has altered my life style to such a degree that both my mental and physical health have suffered. To make matters worse, the contact with the land owner at the time of these traumatising events, was disrespectful and flippant.

Rural style fencing will not stop caravan guests from wandering onto our property, and it will not stop dogs from entering our property. We must know that our children are safe at all times in their own home environment, safe from strangers and dogs. Our farm sheds and other assets will need protection from curious wandering unknown people and our domestic animals will need protection from curious wandering dogs. The northern boundary fence would have to be the rural style fencing used on deer farms to stop people, and dogs, from entering our property.

***Proposed South Coast Highway adjustment/line marking to be approved by Main Roads. (number. 9)***

All access (by potential guests and caravaners) to and from the proposed development is via South Coast Highway, which runs the length of its entire southern boundary, The access point is very close to the very busy intersection and turn off into William Bay Road. The speed limit in both directions is now 80kph. There are two lanes heading east at this point, one being an overtaking lane, and two heading west, one being the turning lane into William Bay National Park. It's a very busy, and often dangerous intersection. From the William Bay Road intersection, the view of traffic to the west is extremely poor. It takes six (6) seconds for a car to reappear out of the "road dip," ie it looks like there is nothing coming! Six seconds doesn't sound like a long time to wait before making a safe entry onto the highway, but being a frequent user of William Bay National Park, I know first hand how impatient other drivers can be, especially tourists, because they don't know about the "hidden dip" in the road to the west.

The proposed alterations to South Coast Highway, will not solve their entry/exit problems. In my opinion it will create an even bigger and more dangerous traffic problem. No wonder the Main Roads Department have not approved it yet.

**Artificial lighting** (not addressed in the Development Guidelines.)

Artificial Lighting will be detrimental for the health and well-being of many of the residents, including myself, living in close proximity to this development. It would also have a detrimental impact on our native nocturnal fauna, such as the Brush Tailed Phascogale, the Western Pygmy Possum, the Quenda and the bush rat (pamphlet from Shire Office) to name just a few.

The neighbouring properties do not have street lights or artificial lighting on all night.

“Night Skies” are a tourist attraction. Tourists come from near and far to enjoy our beautiful, clear, unpolluted starry nights. We should promote them like other towns in WA do, not destroy them. (<https://astrotourismwa.com.au/towns>)

Among other things, the EPA report “calls for dark sky principles to be incorporated in the development proposal in line with dark sky and astrotourism”.

**Road Noise** (not addressed in the Development Guidelines)

This development falls within an area subject to significant road noise as identified by the Department of Planning, Lands and Heritage. South Coast Highway curls around the whole East and South boundaries of this property. This is an incredibly noisy highway, especially in peak tourist seasons like Easter and the summer holiday period. I know this, as I can hear the roar of the traffic from my house approx. 600 metres to the north/north west of the highway, and it is very unpleasant sitting outside because of the noise. Especially when the prevailing summer, often very strong, south easterly wind is blowing! Definitely not conducive to sitting around a camp site!

**Access to tourist tracks and trails** (not addressed in the Development Guidelines)

This proposed development is surrounded by private property, both rural and special rural residential properties. It has poor access to nearby tourist attractions unless you drive a motor vehicle. Access to tourist tracks and trails for people who prefer walking and cycling is difficult. This proposed development is enclosed by private property and unless you are keen, fit and don't mind using the highway or a major road that

has no foot or bike paths, there is nowhere to walk or ride. If you do venture out onto the highway, on foot or bike, you will, more often than not, encounter fuel tankers, wood chip trucks, logging trucks, earth moving trucks, the milk tanker, water carting trucks, caravans, school buses, tourist buses, and, lots more caravans and campervans in the tourist season. I have stopped cycling to Greens Pool in the peak tourist periods as its too dangerous.

**William Bay National Park** (not addressed in the Development Guidelines)

William Bay National Park is a Denmark icon and is in close proximity to this proposed development. The Denmark Shire's Sustainable Tourism Strategy identifies current concern that our iconic attractions – Greens Pool and Elephant Rocks – are over promoted. It finds this is contributing to congestion, poor dispersal and may lead to environmental degradation and visitor dissatisfaction due to over tourism. During peak tourist periods, parking is a problem within the park. Greens Pool and Elephant Rocks car parks are full and overflowing onto the newly planted road verges. Local volunteers lovingly propagated, planted and landscaped these areas. Due to the parking problems caused by over promotion of our popular beaches, local families are having to head to the beach early, or later in the evening when it is cool, just to be able to park, missing out on the long awaited, warm, summer days at the beach. And local families enrolled in VacSwim classes are often late for the lessons because of the parking problem, or have stopped attending. This proposed tourist development which includes a 50 bay caravan park, will only increase the congestion at these beaches during the peak tourist seasons.

In conclusion, **I oppose the Draft Local Development Plan in its current form.** There are too many unknowns, and until all the relevant government departments give approvals and/or conditions, and these are made available for public comment along with the Draft LDP, this proposal should not be out for comment.

S40	[REDACTED]	<p>As we know there doesn't seem to have much thought or consideration for the residents who live in close proximity of the proposed caravan park out at Lot 3 South Coast Highway, William Bay. Previous proposals throughout the years have been rejected, Caravan parks, sandalwood facilities, Eco blocks, all types of over tourism.</p> <p>I had my house plans declined because my window frames clashed with the surrounding environment, but now we have a caravan park not more than 50 metres away that can do what they like. This doesn't seem to be of concern anymore.</p> <p>The area concerned will impact not only the residents in the immediate area but the whole area including Biodiversity, Wildlife. Water ways, Noise, Traffic congestion, all which will likely be impacted. As with the dam near by the Highway, surely it would have the potential to cause softening of the road surface.</p> <p>What with the Entrance right near the T Junction (William Bay Road and South coast Highway) the most visited National Park in WA. Would that not be of concern? I am amazed there hasn't been a major accident to date since the Entrance was placed there. It seems to be a catastrophe waiting to happen. The misleading information with the development claims of the Karri strand to the south which happens to be Blue Gums are on the decline with termites throughout and classed as invasive. Also I would like to mention we already have vehicles exiting with headlights shining down to our residence. We don't have many Blue gums on the south side of the proposed caravan park. Has anyone taken that intrusion into consideration?</p> <p style="text-align: right;">From my understanding the caravan park is to have 50 non powered sites which means generators? The noise pollution with the projected 50 caravans and onsite accommodation, possibly 300+ people + Cafe + Aquaculture that they are proposing to have there on the property would be concerning.</p> <p>Denmark has a considerable number of caravan parks in the area, Big4 Ocean Beach, River mouth Caravan Park, River bend Caravan Park, Karri Aura, Duckets Mill, Rickety Gate, Boat Harbour, Parry's Beach, New Farm Denmark Camping, Peaceful Bay to name a few. Not sure we require another. The residents did not move here years ago to build their lives and future in order to have a caravan park on their doorstep.</p> <p>The Proposed Caravan park would not only be contributing to the devastation of the William Bay National Park and surrounds. The National Park is struggling to cope with the impact of tourists over the Christmas</p>	<p>Objection (amenity; biodiversity; noise; traffic; local streets).</p> <p>Visual impact managed through single-storey limit, colour palette, setbacks and perimeter landscaping, tied to an endorsed Landscape Plan.</p> <p>External lighting to be low-spill; compliance with Environmental Protection (Noise) Regulations required. Dark-sky principles to be considered via the Landscape/Lighting Plan.</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p> <p>Local street management is outside LDP scope.</p>
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		<p>holidays, Easter etc, it's only going to get worse.</p> <p>For us, with the increase of traffic already obvious on Byleveld Close and Privett Road (which both are <b>no through roads</b>) and because they connect and we have already experienced tourists cut through to William Bay and or to town via Byleveld and up Privett to South Coast Hwy as to people coming out of Hayscape. With that comes Cars, Caravans etc, speed limit means nothing, so it is a concern for residents out here, we have young children, vision impaired, disabled to mention a few.</p> <p>With the Proposed Caravan park AND Steve's we will likely have even more traffic using these roads mentioned above therefore we think there should be bollards and or a gate for emergency services and residents only, Both roads mentioned above have only a tiny sign underneath the road signs with no through road.. These signs are not enough.</p>	
S41	<p>██████████  ██████  ██████████  ██████</p>	<p>We would like to comment and show our support for the proposed development plan for Lot 3 South Coast Highway Denmark WA:</p> <p>We feel the proposed site is situated in an ideal position, along a major tourist route and in close proximity to National Parks, Greens Pool, Elephant Rock, William Bay, as well as all the tourist attractions wineries/cideries/ breweries that the Great Southern area has to offer and is well known for. It's also in close enough proximity to the towns of Denmark and Albany to encourage tourist to visit and explore.</p> <p>Being close to Greens Pool (around 4kms) also might encourage some of the more able bodied tourist to use a push bike instead of their car when going for a swim in the beautiful pools (this certainly could help with the congested parking) and also encourage them to explore the bike / walk trails around the area.</p> <p>Tourist are always on the lookout for ways to explore different experiences and enhance their journey and they don't always want to stay in town caravan parks. We travel ourselves in a caravan for 2 – 3 months a year and if possible look to stay at farm or station stays along the way.</p> <p>The Denmark and Great Southern areas are very popular over the summer months, really for most of the year there are local and Eastern States tourist on the road and it seems the biggest complaint when talking to them is the lack of available sites so they can take time looking around the area. Therefore having an extra caravan park in the area</p>	Support (location near attractions; cycling).

		<p>should be seen as a bonus.</p> <p>We are Albany residents but will be looking to book in and holiday in the Denmark area when this park is open.</p>	
S42	<p>Jack Richardson 2474 South Coast Highway WILLIAM BAY <a href="mailto:jack-richardson88@hotmail.com">jack-richardson88@hotmail.com</a></p>	<p>I am writing as the owner of the adjoining 42-acre rural property located at 2474 South Coast Highway, William Bay, to express my strong concerns regarding the Draft Local Development Plan (LDP) for the proposed 50-bay caravan park at Lot 3 (No. 2446) South Coast Highway. This development follows the recent rezoning under Town Planning Scheme No. 3 Amendment No. 147, which was gazetted in October 2024. I understand the LDP, which was advertised for public comment on 17 September 2025, is currently open for submissions, and I urge the Shire to carefully consider the potential conflicts with existing rural land uses on neighbouring properties before granting approval.</p> <p>My family recently acquired and moved to our property on 4 July 2025, having placed an offer on 15 March 2025 without knowledge of the specific caravan park proposal, including the detailed layout presented in the LDP. At the time of our offer, while the rezoning had occurred, the Draft LDP outlining the 50 caravan sites directly along our shared boundary was not brought to our attention and we were not aware about the proposal. We are actively using the property as a rural farm, with activities including operating loud motorbikes for recreational and practical purposes, responsible use of firearms for pest control and other farm-related needs and plans to introduce cattle within the next few months. These are typical rural pursuits that align with the property's zoning and our intended enjoyment of the land. However, the proposed caravan park, with 50 sites positioned directly along our shared boundary fence as shown in the LDP site plan, poses significant risks of land use conflict.</p> <p><b>Concerns Regarding Amenity and Land Use Compatibility</b></p> <p>The introduction of a tourist accommodation facility in close proximity to our active farm could lead to frequent complaints from caravan park visitors about noise, smells, and other disturbances inherent to rural operations. For instance:</p> <ul style="list-style-type: none"> <li>Noise from motorbikes and firearms could be perceived as</li> </ul>	<p>Objection (rural interface; noise; odour; buffers; traffic; wastewater).</p> <p>Rural interface: a 20 m planted buffer along the western boundary is to be established and maintained via the Landscape Plan to manage amenity and spray drift.</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p> <p>Water supply and on-site wastewater will be addressed at development application with DoH/DWER to ensure compliance with Government Sewerage Policy; trade and human waste streams to be managed separately if required.</p> <p>Detailed acoustic/agronomic assessments can be required at development application stage if relevant.</p>

disruptive by short-term guests seeking a quiet holiday experience.

- Odours and sounds from cattle, once introduced, may similarly attract objections, particularly given the lack of any proposed buffer zones or mitigation measures in the LDP or supporting documents.

I am concerned that such complaints could result in restrictions imposed on our property use, effectively limiting our ability to freely enjoy and operate our farm. This would undermine the rural character of the area and our rights as recent purchasers who invested in the property expecting to maintain these rural activities. Notably, the Scheme Amendment No. 147 Full Report and its appendices, including the Traffic Statement, do not appear to address potential noise or amenity impacts on adjoining properties, focusing primarily on traffic without considering broader compatibility issues. This oversight could lead to ongoing disputes and reduced quality of life for my family.

To mitigate these risks, I recommend the Shire require amendments to the LDP, such as:

- Establishing a more substantial vegetated buffer zone along the shared boundary to reduce visual and acoustic impacts.
- Incorporating acoustic assessments and barriers to minimize noise transmission between the sites.
- Limiting the number or placement of caravan sites near the boundary to avoid direct adjacency.

**Concerns Regarding Traffic and Access Safety**

Additionally, the proposed highway upgrades and site access arrangements raise serious safety issues for my family. The LDP includes a right-turn pocket and emergency entry/exit on South Coast Highway, which is a high-speed road with vehicles often towing caravans descending a hill. According to the Traffic Statement in the Amendment Report, the development is expected to generate up to 288 daily vehicle trips, predominantly private cars and caravans, with peaks during weekends. This increased traffic volume, combined with the new slip road approximately 60 meters east of William Bay Road, could complicate safe entry and exit from our property driveway, especially

		<p>during peak tourist seasons.</p> <p>Vehicles towing caravans may slow significantly when turning, creating hazards for following traffic and potentially causing congestion or accidents near our entrance. The Traffic Statement asserts no material traffic impact, but it does not specifically evaluate risks to adjoining driveways or the downhill gradient's effect on heavy vehicles. I request that the Shire commission an independent traffic impact assessment focusing on these localised safety concerns before proceeding.</p> <p>In summary, while I recognise the potential economic benefits of tourism development in the region, this proposal must not come at the expense of existing rural residents' rights and safety. I strongly urge the Shire to reject the current Draft LDP or require significant modifications to address these issues. Please confirm receipt of this submission and keep me informed of the decision-making process. I am available to discuss my concerns further if needed.</p> <p>Thank you for your attention to this matter.</p>	
S43	<p>██████████  ██████████  ██████████  ██████████</p>	<p>We wish to object to the proposed caravan park at William Bay due to the congestion that already exists at Greens Pool. There is a grave risk of killing a place with overuse which is what is happening at Margaret River. The fact that the development has been going on for several years suggests that the approval was a forgone conclusion. One landowner has requested this development to the detriment of the whole town. Parking at Green's Pool is already inadequate. As local residents we avoid the area in the summer holidays for this reason. A caravan park at William Bay would exacerbate the problem.</p> <p>We strongly object to the proposal of a caravan park at Lot 3 Sth Coast Hwy.</p>	<p>Objection (overuse of Greens Pool; precedent).</p> <p>Management of parking/capacity within William Bay National Park is a DBCA matter, outside the LDP; however the LDP aims to keep parking on-site and discourage towing into the Park.</p> <p>Visual impact managed through single-storey limit, colour palette, setbacks and perimeter landscaping, tied to an endorsed Landscape Plan.</p> <p>Within LDP scope: single-storey buildings, controlled colours/materials, setbacks and screen planting; 20 m western vegetated buffer; bushfire access notes; parking to be confirmed at development application; and a note that any works within South Coast Highway require separate MRWA approval.</p>
S44	<p>██████████  ██████████  ██████████  ██████████  ██████████</p>	<p>I am writing to formally object to the Draft Local Development Plan (LDP) for Lot 3 South Coast Highway, William Bay, which proposes a caravan park, multi use building and temporary workforce accommodation.</p> <p>My property at 2547 South Coast Highway lies only a few hundred meters south west of the proposed site. I am directly affected by the</p>	<p>Objection (traffic; bushfire; groundwater; scale; lighting/noise).</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p>

likely environmental, traffic and amenity impacts of this development.

**1. Traffic safety and highway design**

This section of South Coast Highway already carries a high volume of heavy vehicle traffic, including freight and agricultural trucks that travel at considerable speed. The road in this location includes a steep downhill section, and large trucks often gather significant momentum as they descend.

We have personally experienced instances where it was unsafe to turn into our driveway due to heavy vehicles travelling close behind us and being unable to brake in time on the downhill slope. On several occasions, we have had to continue driving past our property entrance to avoid the risk of being rear ended by fast moving trucks.

Introducing slow moving and slow accelerating caravans, motorhomes and long vehicles turning across or entering this stretch of highway would greatly increase the danger to existing road users. The combination of heavy vehicle speed, limited sight distances and slow tourist traffic represents a serious traffic safety hazard.

**2. Bushfire risk and evacuation feasibility**

The site is within a bushfire prone area. Given the proposed land use involves tourists unfamiliar with local conditions and caravans that are difficult to manoeuvre, the bushfire evacuation risk is significant. Access routes, static water supplies and closure protocols for high fire danger days need to be addressed. As land owners who have lived through the recent William Bay fire, we have very significant concerns as to the understanding people have of the local environment and fire risk.

**3. Environmental and wetland impacts**

Onsite wastewater treatment and stormwater dispersal from the proposed development pose a serious risk to the local groundwater and nearby wetland systems that ultimately feed into William Bay National Park.

The site has a very high water table, which is evident each winter, and I am concerned that the land will not be able to safely support the scale of infrastructure and population proposed without significant impacts on groundwater quality and the surrounding environment. Nutrient and contaminant seepage from wastewater disposal areas could easily migrate through shallow soils into nearby wetlands and waterways, degrading the ecological integrity of this sensitive area.

Water supply and on-site wastewater will be addressed at development application with DoH/DWER to ensure compliance with Government Sewerage Policy; trade and human waste streams to be managed separately if required.

External lighting to be low-spill; compliance with Environmental Protection (Noise) Regulations required. Dark-sky principles to be considered via the Landscape/Lighting Plan. Bushfire details at development application.

#### **4. Scale, location and tourism pressure on Greens Pool**

This proposed caravan park sits at the entrance to the Greens Pool access road, the gateway to one of Denmark's most popular tourist attractions. Greens Pool and William Bay National Park already experience congestion, long queues and full carparks during summer. This caravan park will only encourage more people and cars to add to an already overrun beach. Travelling by car is the only way to get to the beach from here as there is no safe bike path or footpath to the beach. It is also unrealistic for a family to walk 5kms in the summer heat to the beach with kids and associated beach equipment. The Shire should encourage tourist development closer to town infrastructure, not in a rural, environmentally sensitive area.

#### **5. Noise, lighting and rural amenity**

The proposed multi use building, which may apparently include a restaurant or brewery, together with the accommodation of up to 50 caravans and their occupants, will fundamentally change the quiet rural character of this whole area.

At present, the soundscape is defined by natural rural quiet. The call of owls, the wind in the trees and the occasional passing car. The introduction of a caravan park of this scale will bring constant activity, voices, vehicles and service noise throughout the day and into the night. The cumulative noise generated by guests, machinery, service trucks and hospitality operations would be entirely incompatible with the existing environment.

Equally concerning is the significant light spill that will result from the development. Even with mitigation measures, it is unavoidable that a caravan park, restaurant and brewery complex will emit extensive artificial light. This will disrupt local wildlife such as possums, nocturnal birds, and other native species, which rely on natural darkness for feeding and movement. It will also diminish the amenity for nearby residents, who currently enjoy a dark, peaceful night environment.

No matter what mitigating measures are taken, it is difficult to see how a development of this nature can operate without significant adverse impacts on both local residents and wildlife.

**This site is simply not suitable for a high intensity tourism and hospitality use of this kind.**

#### **6. Visual impact and landscape buffer**

Setbacks of 20 m (side) and 30 m (front) are inadequate. A Landscape and Visual Impact Assessment should be required, with dense native

		<p>screening and mature planting to reduce visual intrusion.</p> <p><b>7. Overall planning context</b></p> <p>This proposal represents a large scale, high intensity commercial use that is completely inconsistent with the rural, environmental and landscape character of William Bay.</p> <p>Future tourism development of this scale should be directed to areas with existing infrastructure, services and emergency access, not to rural locations with fragile environments and limited capacity. Denmark's infrastructure is already under significant pressure during peak tourist periods, with roads, car parks and essential services struggling to cope with existing visitor numbers.</p> <p>Encouraging additional tourists into areas of environmental fragility and sensitivity places further strain on already stretched local resources while degrading the very natural qualities that make Denmark unique. Development of this nature in such a location is neither sustainable nor responsible and undermines the long term protection of the William Bay and Greens Pool precinct.</p> <p>In summary, I respectfully urge the Shire to refuse the LDP in its current form.</p>	
S45	<p>██████████  ██████████████████  ██████████  ██████████████████  ██████████████████  ██████████</p>	<p>I write to register my disapproval for the proposal for the caravan park at William Bay.</p> <p>Firstly, let me say that I am very pro the creation of facilities that help the town grow and evolve successfully as it requires.</p> <p>I disrespect the concept of anyone being anti or negative towards worthwhile projects, just for the sake of it.</p> <p>I do however hold the opinion that it is a bad idea to approve a caravan park in that William Bay location based on a number of considerations. I've tried to outline each below.</p> <p>TRAFFIC</p> <p>I would like to offer my first hand experience of that intersection.</p> <p>My wife and I own 2547 and 2549 Sth Coast Highway William Bay.</p>	<p>Objection (traffic; planning strategy alignment).</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p> <p>Strategic fit was determined at Scheme Amendment stage; the LDP focuses on site development controls</p>

The driveway to our property is the first left after the William Bay turn off heading out of town.

On a recent boundary re-alignment of our properties, (by the previous owner ) it was deemed that the traffic was too dangerous to have normal driveway access to each lot, with the directive being given to create long lead up battle-axe entries to 2549. That was the position of the powers that be as to the safety of this specific precinct only a few short years ago.

The Denmark population and tourist traffic appears to have mushroomed significantly in those few short years since, so the problem is now surely worse rather than better.

The road on that bend, between the 8 Mile Hill Lookout and our house, often has traffic of large trucks laden with water, logs or other produce travelling at speed and with great momentum, navigating the bend.

The process of slowing down to turn into my driveway has at times been a scary experience with drivers of such trucks on my tail not wishing to slow down and reacting aggressively.

In the summertime, during swimming lessons and peak tourist periods, the bend combines with ingress and egress of traffic in and out of William Bay Road to Green's Pool and Elephant Rocks etc. These area's patronage is at absolute capacity during peak period periods.

The idea of cars laden with caravans and trailers trying to get in and out of the caravan park at exactly the same spot is daunting and sounds ill-conceived and dangerous.

The further idea that the caravan park has capacity for cafes serving alcohol and even a brewery, sounds like adding fuel to a really dangerous fire.

#### PLANNING

My understanding was that the "big picture" planning for the Shire of Denmark was to "spread out" tourist activity to avoid both seasonal and geographic congestion.

Creating a caravan park in the William Bay area which is already suffering from desperate congestion seems to go against these principles.

Being that the site is not a walkable or bike rideable distance to these tourist attractions, it is just creating more car traffic, to a place that is already existing beyond capacity.

Ad-hoc planning outside the framework of the Shire's desired outcomes and plans for The Shire should be kept to an absolute minimum in my opinion, as it threatens to derail the big picture and intent for the town's future.

Additionally it creates problems for all other rate payers and business owners who have been making plans for their own lives based on the reasonable assumption that the Shire would follow its planning intentions.

Would it not be a better idea to encourage these type of businesses at the planned future activity nodes within the Shire planning framework such as Bow Bridge, Peaceful Bay, and Nornalup?

My understanding is that William Bay was not ever planned to become one of these future activity nodes.

The creation of a caravan park, staff accommodation, tourism attractions such as lake fishing, cafes and a potential brewery, are surely the first step to William Bay becoming something beyond (and diversely different to) The Shire's intentions and planning for the precinct.

#### AESTHETICS OF OUR BEAUTIFUL TOWN

Aesthetically, as you come out of town over the 8 Mile Hill, past the lookout just beyond The Wolery, there's a vantage point where the views open up of the ocean towards Point Hillier. It's the first time you see the ocean heading out of town. The foreground is forest and agricultural greenery. It is one of the lovely aspects and outlooks from within our town.

Why we would want to cheapen and mess up that aspect, with signage and commercial buildings and car parks in the foreground is beyond me.

		<p>Conversely the small chalet development on the Birkbecks property the opposite side of the road is much more appropriate, in my opinion, and less visually intrusive and aesthetically polluting to the area.</p> <p>If it was really deemed that we needed a caravan park in the William Bay location, would it not be better to have a beautiful tree lined access way up over the pastured hill beyond the Birkbecks chalets on the opposite side of the road so that the caravan park and associated mess and visual pollution could be concealed from public view?</p> <p>Would such considerations not be better planning?</p> <p>With well considered planning these are the types of outcomes that we can create for our town. Much more beautiful. Much more appropriate.</p> <p>Good planning should surely be designed from the ground up, based on the Shire's intentions for the betterment of all. This particular proposal seems more reactive and based on one land owners request, and any such approval would appear to be against the needs and best outcomes of the Shire and general rate payers.</p> <p>Why should we have "just okay" or "sub-par" when good planning should and could make our town's future the best it could possibly be?</p> <p>SPEED LIMITS</p> <p>Main roads have recently reduced the speed limit between William Bay and Denmark Town to 80 km an hour. This has made the process of getting in to town for essentials for residence West of Denmark just that little bit more time-consuming. My understanding is that the approval of this caravan park may result in these speed limits being reduced further, as a requirement by main roads to which the Shire may agree. This is inconvenient for West of Denmark residents who wish to interact with the village centre.</p>	
S46	<p>██████████  ██████████  ██████████  ██████████  ██████████</p>	<p>Thanks for the opportunity to have an input regarding the LDP, Lot 3 Sth Coast Hwy. I am attaching my previous submission for the LPS Amendment and making a few extra observations here.</p> <p>I don't think the proponent of the LDP has taken on board the comments that were received from Govt Agencies and the Minister for Planning.</p>	<p>Objection (intersection safety).</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p>

When I read those comments on the original Amendment application it was evident that there were various areas that required more considered planning.

Rather than take these comments and adapting the plan accordingly the proponent appears to be progressing without revision and without resolving the major issues like traffic issues at the entrance/egress and health issues with the wastewater, and the size of the project creates issues of conflicting outcomes. ie, sewage and creeks and dams and the creation of an accident black spot at the intersection of Greens Pool Road/Sth Coast Hwy and the proposed park entrance. The set backs to the neighbours on the West appear to not be 20mtr when the laid out design/planting is studied in conjunction with the LPD. The supplementary landscaping along the road doesn't exist from the old driveway to the NE corner of the development. The proponent is relying on the roadside vegetation for screening but this may be impacted by the changing of the overtaking lane and provision of a turn right lane. The EPA requirements regarding the remnant bush, Black Cockatoos and creeks has likewise been ignored at this point in time.

It seems to me that the proponent is trying to progress the plan to a point that puts pressure on Agencies and Local Govt to agree to a sub standard plan (Sub optimal was the Main Roads terminology). The new road plan is actually worse than previously and it seems that the proponent wants to get a green light on the LDP before coming up with an agreed or safe road intersection plan. I note that on the Main Roads and National sites there are no accidents recorded for Greens Pool/Hwy intersection. I have talked to local St John's ambulance drivers and they have indicated that there has already been multiple accidents and hospitalisation from crashes at the intersection, and on the road just east of the overtaking lane up the hill past Lot 3. The overtaking lane is planned be reduced in length. I am happy to follow that up and get some written information from St John's if the Denmark Shire Officers would like that information for decision making.

I would like the Denmark Shire to ask for the missing planning information prior to granting an LDP for Lot 3. As the nearest neighbour to the north of the development we have discussed with the owners

LDP confines itself to on-site layout and screening.

issues with their dogs and shooting of guns from Lot 3 towards our property. We have photographic evidence of the shooting and the dog incursions onto our property but the owners have not shown any regret. It is our fear that this same difficult entrenched attitude will prevail on any issues with the planned development if resolution of planning issues and permissions are left to enforcement, or a later stage of the planning process.

**2<sup>nd</sup> Submission**

**Thank you for the opportunity to express my opposition to TPS3/SA147 The process remains a mystery after I have spent days of research, talked to people in the Denmark Shire Planning Department and other people who have an interest in this application.**

**We have a 190 page document which was produced on 28 Oct 2020. The document is full of mistakes and omissions, and hasn't addressed the concerns of the EPA regarding specific aspects. It is supposedly not what we are writing a submission about because the specific details of what is going to be developed for tourists is not the subject of the Amendment.**

**I can't help presuming that this application is the easy way for the proponent to achieve an easier path to doing what he wants with the least oversight possible.**

**It is impossible to submit comments on the Amendment without also commenting on the 190pg plan.**

**In overall terms we have a mishmash of land uses and tourist "attractions" squashed onto a 12Ha property that is overseen by a noisy major tourist route. It is hard to screen from the road and adjoining properties and has a death trap of an entry/exit from Highway 1. The proponent has made it obvious from the work he has completed on the site that the planning waffle in the document will be ignored where possible and policing of commitments like those regarding lighting, noise, wastewater, tree protection zones, setbacks from waterways will be ignored once this staged planning process has been snuck through Council.**

**Keeping in mind that this amendment 147 will make future applications for aspects of the overall plan easier (eg the Caravan Park) I will address**

a few of the problems with the plan below.

The EPA letter of 28<sup>th</sup> Feb 2023 has not been addressed by the proponent. The EPA, guided by the mistake of the Environmental Consultant in the report, continues the confusion of Lake William with Lake Byleveld. This basic geographical mistake raises questions for me regarding the detail in the proponents report. The next four paragraphs of the EPA report show its concern that the area for sewage treatment is inadequate given the various aspects of the proposal and finishes by saying that *“Consideration should be given to limiting the scale of future aquaculture, agritourism and horticulture development.”*

The EPA thinks that the plan is flawed in the above aspect.

The EPA suggests that:- *Flora and Vegetation; Terrestrial Fauna The amendment area contains approximately 2.5 ha of native vegetation mapped as consisting of mainly jarrah and marri. The vegetation is potential habitat for threatened species of black cockatoo. Implementation of the scheme amendment may result in the clearing of native vegetation and fauna habitat and potential noise, dust and light impacts on fauna. The EPA supports that the LDP (October 2022) proposes to retain the consolidated area of native vegetation. Retention and management of vegetation and fauna habitat should be considered as part of the future planning process. Any clearing of conservation significant fauna habitat, in particular black cockatoo habitat, may require referral under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).*

The proponent killed three cockatoo habitat trees(200 year old Karri) when building his marron dam. More recently he has taken an excavator into the LPD to dig up the rocks for the driveway. The sincerity of the proponent regarding the planning document is again bought into question.

The EPA also suggest:-*A Landscape Management Plan should be prepared with reference to the LDP to address identification and protection of vegetation and trees to be retained, the protection of fauna habitat, a preference for use of locally indigenous native species in the proposed gardens, and fertilizer/ nutrient input particularly in*

***areas where agritourism or horticulture land uses are proposed.***

I haven't observed a single endemic plant in the landscape planting to date. Roses, Conifer, Palms yes. Whilst the EPA suggests that environmental concerns can be managed through the scheme provisions it takes work by Council Officers to police these provisions and the proponent shows no sign of being compliant in managing the above issues that the EPA have raised.

I am sure that many residents that live in close proximity to No 2446 (Lot 3) have mentioned the social issues that the EPA mentions - the lighting, noise and loss of rural amenity. What I will concentrate on is the danger that will be created by the access road/crossover.

In section 8. VEHICLE ACCESS the proponent states "*Visibility greater than 500 metres is achieved to the west and about 240 metres to the east (within the road reservation) Austroads advises a minimum visibility of 201 metres, with a desirable distance of 226 metres for roads operating at 90kph. Appropriate visibility is achieved.*"

**In fact neither direction has an unobstructed sight line longer than 200mtrs – see pictures below.**



*Above the first view glimpse as approaching proposed entrance from the East – less than 200 mtrs – picture taken from left hand lane travelling west*



*Above the first glimpse as approaching proposed entrance from the West – less than 200 mtrs*

Steve Picking from Main Roads stated that an on site visit was attended by the Main Roads Network Operations Manager Chris Grant. Steve said that the entrance is “sub-optimal” when judged by Main Roads preferred sight lines guidelines. The access was however still assessed as just adequate for a road that has a 90Km an hour speed limit.

In our communication with Main Roads it was suggested that Shire Officers should initiate further discussion with Main Roads. Steve Picking also indicated that the full range of detail for the project on Loc. 2446(Lot 3) was not divulged at the meeting with Main Roads.

The Greens Pool turn off and new access driveway combine to create a dangerous intersection. The road down the hill to the east of this site has limited visibility, cars are dividing into two lanes in order to access the Greens Pool turn off, or continue West to Walpole.

South Coast Hwy to the East of the proposed entrance also divides into two lanes, one for cars continuing East and the other for cars turning to Greens Pool. The road then changes into a two lane easterly flow with one lane for overtaking. Any car exiting the site has the confusion of cars choosing the different directions with limited sight lines.

The chance of caravans safely exiting the site in a westerly direction, crossing three lanes, including an overtaking lane – all with limited sight lines and a slow moving car towing a van, is poor especially at peak traffic times. To enter the proposed tourist site when approaching from the East, cars and caravans will have to cross an overtaking lane at slow speed to access the site.

		<p>Main Roads data from Traffic Map shows that in 2022/23 an average of 2,776 vehicles, travelling in both directions used that part of the Sth Coast Highway on a daily basis and that from 4.00am to 11.00pm 25% of those vehicles were speeding. Visitation to the National Park via the Greens Pool Rd is continuing to grow with 99,318 vehicles in 2021/22 and 118, 026 vehicles in 2022/23. All these vehicles will be negotiating the new intersection if this project is allowed.</p> <p><b>The cost of improving the site lines (if possible) would be huge, not borne by the proponent but by the Western Australian tax payer. A crash of some severity is virtually inevitable within the first season of operation. This is an outcome that nobody wants to happen, or to witness. I wonder who will accept responsibility for death and injury at this black spot? The Main Roads have hand balled to the Shire and yet the Shire told me it is Hwy 1 – Main Roads responsibility.</b></p> <p><b>I finish my submission with the sobering prospect of a death that “nobody sees coming except Blind Freddy” and hope that this accident black spot is one of the main reasons for Council refusing this Amendment.</b></p>	
S47	<p>██████████  ██████████  ██████████  ██████████</p>	<p>Traffic safety at the entry/exit from Lot 3, William Bay onto South Coast Highway(SCHWY) and it's proximity to the entry/exit from William Bay Road (WBR) onto SCHWY is our main concern and priority.</p> <p>These entry/exist points are approximately 60m apart, the WBR exit turning right onto SCHWY is at this time a difficult one, especially during peak tourism periods. The site line to the West is impacted considerably due to a dip in the road which blocks views of cars and motorbikes driving East along SCHWY.</p> <p>The proposal states that the Main Roads Department (MRD) have apparently done a site check of the road and line site distances stated at 500m to the West and 240m to the East when entering/exiting Lot 3. We don't believe these measurements to be accurate and would suggest that the MRD has in fact not visited the site.</p> <p>The Traffic Report in section 16.1 suggests repurposing the current overtaking lane for traffic driving West on SCHWY as a right hand turn</p>	<p>Objection (safety; visuals; EPA advice).</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p> <p>Visual impact managed through single-storey limit, colour palette, setbacks and perimeter landscaping, tied to an endorsed Landscape Plan.</p> <p>EPA advice has been incorporated via LDP controls (landscape/lighting/buffers).</p>

lane for traffic driving East on SCHWY to enter Lot 3. The overtaking lane to our mind is currently a safety net for traffic turning right onto SCHWY from WBR due to the dip mentioned above. Taking this away is in our opinion of great concern for traffic safety for drivers exiting and turning right from WBR onto SCHWY.

Another concern is that we anticipate visitors using the facilities at Lot 3 will be going to and from William Bay National Park (WBNP), not only by car, RV, towed caravans etc but also bicycles, hence crossing from WBR to the entry of Lot 3 and visa versa. We envisage this as yet another traffic hazard to be considered and yet not mentioned in the Traffic Report or in the Proposal.

Currently when you have traffic turning right and left off SCHWY into WBR along with traffic trying to exit WBR onto SCHWY it is a hazardous scenario. Once you then add in the additional traffic flow from the Lot 3 entry/exit onto SCHWY and WBR there would then be in our opinion greater risk for traffic accidents. There have been several accidents on the WBR/SCHWY intersection, which seem to be increasing along with the traffic flow to WBNP. We can only envisage accident numbers increasing with the entry/exit point for Lot 3 if it were to go ahead. Our neighbours have attended several accidents in recent years, as their property is closest to the WBR/SCHWY intersection and I really feel for them having to attend such incidents and would be concerned for them if these incidents were to increase.

Considering tourist numbers to WBNP currently have been recorded at 650,000+ per year and increasing, it's hard to believe a report on traffic impact around the WBR, SCHWY and Lot 3 entry/exit location would state as per section 4.3.1 " There are no reasons to suspect that the proposed access would create a road safety issue for uses or passing traffic". We find this statement biased and partial to the developers interest only.

As the Traffic Report supplied is dated 2021, done during quiet Covid times and appears most likely the MRD has not visited the site our strong thoughts are the Council along with the MRD conduct a full independent traffic review.

We have had a house at William Bay for over 25 years and have seen first hand over the years how the traffic conditions have changed with the increasing popularity of WBNP. There are more trucks, caravans and RV's

		<p>using SCHWY. Changing the speed limit to 80km has been a good initiative with increasing traffic as more people discover our lovely Shire of Denmark and what it has to offer. We are not against another caravan park in Denmark, we are concerned however at the location at Lot 3 and the impact of traffic safety. We ourselves have tried to think of ways the development of Lot 3 could advance and the traffic conditions be changed to make it safe but we have been unable to come up with any. We hope a comprehensive and independent traffic review will be undertaken by the Denmark Council and MRD. There maybe ways to mitigate the concerns we foresee but other wise we are of the opinion the intersection at WBR/SCHWY/Lot 3 potentially becoming one of the states blackspots.</p> <p>This would obviously not be beneficial for anyone, infrastructure is already struggling within WBNP and tourism will continue to impact this stretch of Hwy due to the considerable growth including the RAC and Heyscape developments at neighbouring Raintree Estate.</p> <p>We don't mind change or growth in our community but careful planning going forward is critical and we should not accept any chance of unnecessary accident's or fatalities impacting Denmark Hospital, let alone the first responders that live next door to this proposal.</p> <p>We hope you take our comments above in good faith for our concern of the safety of all road uses at this stretch of SCHWY. We use this route daily and have first hand experience over many years, not just from reports and statistics. These are a great tools for planning but not the same as the practical use.</p>	
S48	<p>██████████  ██████████  ██████████  ██████████  ██████████  ██████████  ██████████  ██████████</p>	<p>The ██████████ would like our previous comments regarding the Town Planning Scheme No. 3 Amendment No. 147 (TPS3/SA147) to be taken into consideration regarding the move from Scheme amendment to Local Development Plan (LDP). Many of the issues we raised with the Denmark Shire regarding the Scheme amendment have not been resolved at this stage of the development planning.</p> <p>In particular we would like to restate in this objection our concern that the safety of the road isn't addressed by the sketch added to the LDP application in fact it raises many issues as explained below.</p> <p>With regard to the other new drawing that has been presented by the proponent we will indicate how the truth of on ground activity belies the</p>	<p>Objection (safety; visuals; EPA advice).</p> <p>Strategic fit was determined at Scheme Amendment stage; the LDP focuses on site development controls</p> <p>Road safety &amp; MRWA: LDP does not authorise any highway works; a standard MRWA note will be included. Detailed access treatments remain with MRWA/works approval.</p> <p>Visual/amenity: Single-storey buildings, muted colours, setbacks and screen planting will be tied to an enforceable Landscape Plan (including restoration of any affected tree-retention areas).</p>

reality of these new sketches. We wonder where the required Landscape/Revegetation and black cockatoo habitat Plan is? We understood it was a condition of Tourist Use as per the Amendment No 147.

It appears that inconvenient aspects of the LPD drawings may have been altered or misrepresented to make the application appear to comply with the Shire conditions.

The Main Road entry to Lot 3 and drafted alterations to the existing road. It has been our considered opinion that the addition of the new entry will create a black spot for road safety. The drafted suggestion of how that entry may work has added to our concerns. The overtaking lane will be shortened (There have already been three serious crashes where the overtaking lane ends). The altering of the existing overtaking lane start at the Greens Pool turn-off to becoming a right hand turn into Lot 3 will exacerbate a very confusing intersection. Cars already use this overtaking lane to avoid slow turning traffic from the Greens Pool Rd. due to the poor site lines to the West, cars approaching have minimal time to assess what is happening at Greens Pool. With the new road layout suggestion these cars would have nowhere to go except head-on into a right turning vehicle. The large volume of traffic turning out of Greens Pool Road will now have to assess right turning traffic into Lot 3, left turning traffic into Greens Pool and through traffic heading to Walpole whilst also assessing the impact to their manoeuvre of traffic entering and leaving Lot 3.

We are concerned that an adopted LDP will influence Main Roads in their assessment of this problematic issue. We would have liked to see at least an initial design and assessment prior to a LDP being adopted.

Existing Dams

This description of the dams as existing is a little misleading. They are integral to the development of the project and were dug two years ago after the LPS Amendment. See attached drone photo for their actual size and shape and their impingement on the 20 mtr buffer for development.

Sewage Treatment Plant

Again it would have made it easier to comment on this LPD if a detailed sewage plan and DWER assessment was included in the new material from the proponent.

The sewage treatment discharging within mtrs of these dams doesn't auger well for Marron production.

Sewage treatment plants do occasionally fail/malfunction and the area for absorption of the treated water is minimal.

The EPA made the following comments in their assessment of the

Western interface: 20 m planted buffer secured through the Landscape Plan to manage amenity/spray drift.

Servicing: DoH/DWER to approve final water/wastewater design at DA stage (wet-season SSE, separation of trade/human waste, nutrient management), with layout changes made if needed to comply.

Compliance: Any past disturbance or fencing/dog issues are compliance/civil matters and do not bind the LDP; future development must meet LDP/setbacks on surveyed plans.

Amendment :-  
The Site and Soil Evaluation (SSE) report (Aurora Environmental 2020) suggests that onsite effluent disposal can be accommodated, with wastewater generated from the proposal site to be treated and disposed over a minimum 7979m<sup>2</sup> area. It is considered any area where wastewater is applied would require vegetation/plants with a high uptake of water to prevent pollutants entering the waterway through groundwater. Any proposed disposal area would need to also consider the water use requirements of the land use and the downstream environment (in this case the proposed caravan park). Appropriate methods of application of wastewater, such as subsurface irrigation, should also be considered, particularly where proposed for application on crops for human consumption.

It is recommended the Shire consider modifying the proposed scheme provisions with reference to recommendations below to further protect and manage Flora and Vegetation and Terrestrial Fauna values:

- Fauna habitat management should be considered including protection of fauna habitat from edge effects, noise pollution and light spill. Lighting should incorporate dark sky principles as referenced in the WAPC's Position Statement 'Dark Sky and Astrotourism' and the 'National Light Pollution Guidelines for Wildlife' (as amended).
- A Landscape Management Plan should be prepared with reference to the LDP to address identification and protection of vegetation and trees to be retained, the protection of fauna habitat, a preference for use of locally indigenous native species in the proposed gardens, and fertilizer/nutrient input particularly in areas where agritourism or horticulture land uses are proposed.

Mapping of the caravan park section  
In contrast to the original caravan park area that was much closer to the Western boundary, the new map shows it fitting neatly 20 mtrs from the Western boundary and 30mtrs from the Main Road boundary.  
The drone picture appended below seems to indicate that the proposed caravan bays are only 15mtrs from the Western boundary and less than 30mtrs from the Main Roads boundary. Our drawing of caravan sites based on the on-ground markings as seen from above may give a more truthful picture.

General Comments/Conclusion  
We have observed the proponent enacting an unapproved plan with

significant ground works.

Whilst that is the proponents right, until the land use is changed, it puts pressure on Council, Main Roads and the Health Department to approve aspects of the development which may not otherwise merit approval. Most worrying of these is the safety aspect of the entrance/exit from the property. We would like the Main Roads changes to be fully investigated prior to the LDP being approved. We would like to see the detailed landscape and bush retention plan. We would like to see more detail of the Sewage disposal system and we are concerned with the present pushing of the boundaries of the development because the area was always too small to contain the proponent's ambition. We hope to have a chance in future to continue to have a say with the Denmark Shire, as a neighbour with a 500mtr boundary with the development, particularly on aspects such as lighting, noise, and appropriate fencing.

For your information, one member of our community does not support this letter.

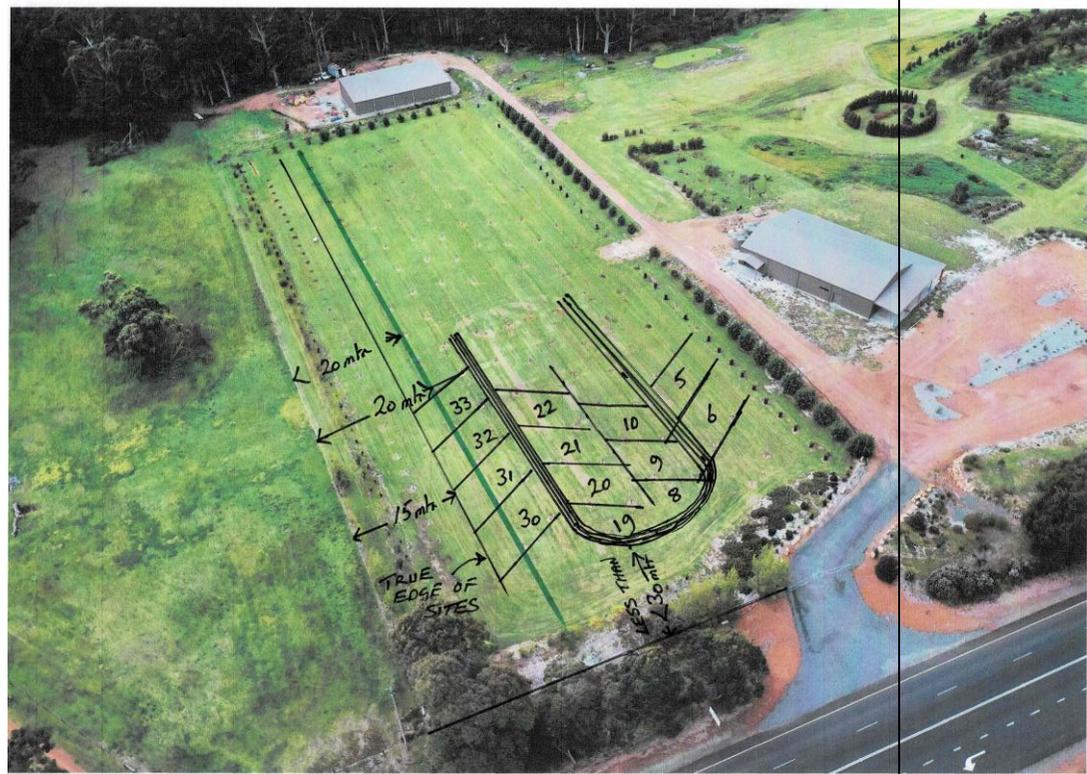
██████████ also attached a full copy of their original objection to Scheme Amendment 147 which can be summarised as follows:

- Inconsistent with the Shire's Sustainable Tourism Strategy; poorly planned tourism risks environmental and community impacts.
- Process confusion: rezoning bundled with a detailed concept, limiting clear public input; staged approach perceived to avoid scrutiny.
- Road safety: access near William Bay Rd is 'sub-optimal'; sight distances contested (<200 m each way), complex multi-lane geometry and downhill approach increase risk, especially for towing vehicles.
- Traffic volumes and behaviour: ~2,776 vehicles/day on Sth Coast Hwy at the site with ~25% speeding; 99k-118k annual vehicles on William Bay Rd indicate high exposure at the junction.
- National Park interface: proximity to Greens Pool adds peak-season pressure and compounds turning/crossing conflicts.
- Environmental water management: greywater/effluent area located upslope of marron dams/horticulture/tourist uses; potential nutrient migration via groundwater pathways not fully tested.
- Vegetation and fauna: alleged disturbance within the Tree Retention/Development Exclusion Area; removal of mature karri

trees for dam works.

- Visual/landscape values: site is highly visible from South Coast Hwy; effective screening considered difficult; risk to valued vistas.
- Amenity and noise: location identified as subject to significant road noise; concerns about overall visitor experience and neighbours' amenity (including dog incursions).
- Active transport access: poor pedestrian/cyclist access—requires crossing multiple highway lanes and using busy roads to reach trails.





S49

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

I am aware that [REDACTED] has previously made comments regarding Town Planning Scheme No. 3 Amendment No. 147 (TPS3/SA147), and I ask that these be taken into account as the process moves from Scheme amendment to the Local Development Plan (LDP) stage. Many of the concerns raised with the Shire of Denmark in relation to the Scheme Amendment remain unresolved at this point in the development planning process.

Road Safety Concerns

I wish to restate objections, particularly with respect to road safety, which I believe have not been adequately addressed by the sketch included in the LDP application. In fact, the new material raises further issues, as outlined below.

Regarding the additional drawing presented by the proponent, I would highlight that actual on-ground activity does not match the representations in these new plans. Furthermore, I would like to know the whereabouts of the required Landscape/Revegetation and black

Objection (tourism model; site works to date).  
 Strategic/need arguments were addressed at Scheme Amendment stage.

The LDP regulates future development through clear controls and agency approvals.

cockatoo habitat plan, which I understood was a condition for Tourist Use under Amendment No. 147.

It appears that certain inconvenient aspects of the LDP drawings may have been altered or misrepresented, potentially to make the application seem compliant with Shire conditions.

With respect to the main road entry to Lot 3 and the proposed alterations to the existing road, I think that adding a new entry will create a dangerous black spot for road safety. The proposed entry arrangement increases my concerns. Altering the existing overtaking lane—beginning at the Greens Pool turn-off—to serve as a right-hand turn into Lot 3 will further complicate an already confusing intersection, in an area where there have already been three serious crashes.

Currently, cars use this overtaking lane to circumvent slow-turning traffic from Greens Pool Rd. Due to poor sight lines to the west, approaching vehicles have minimal time to assess activity at the Greens Pool rd intersection. With the new road layout, these vehicles will have nowhere to go except directly into a right-turning vehicle.

The large volume of traffic turning out of Greens Pool Road will now be required to assess right-turning traffic into Lot 3, left-turning traffic into Greens Pool, and through-traffic heading towards Walpole, all while also considering the impact of vehicles entering and leaving Lot 3. I am concerned that adoption of the LDP may influence Main Roads in their assessment of this problematic situation. There should be an initial design and assessment of these road changes before the LDP is adopted.

[Existing Dams](#)

The map suggests that two of the dams were “existing”, however this is not accurate. The drone photograph below shows clearly that three of the dams are new constructions, after the Local Planning Scheme amendment.

[Sewage Treatment Plant](#)

It would have been helpful if a detailed sewage plan and a Department of Water and Environmental Regulation (DWER) assessment had been included in the new material from the proponent, as this would have facilitated more informed comment on the LDP.

I am concerned that the proposed sewage treatment facility would discharge close to these dams. Given that sewage treatment plants can sometimes fail or malfunction, and the area available for absorption of treated water is minimal, this situation presents significant risks. Should the system fail, there is potential for waste discharge to the stream at the base of the property (north boundary).

The Environmental Protection Authority (EPA) made a number of comments in their assessment of the Amendment – I have highlighted a number of these where I do not believe sufficient information has been provided:

- The Site and Soil Evaluation (SSE) report (Aurora Environmental 2020) suggests that onsite effluent disposal can be accommodated, with wastewater to be treated and disposed over a minimum 7,979 m<sup>2</sup> area. Any area where wastewater is applied would require vegetation with a high uptake of water to prevent pollutants entering the waterway through groundwater.

- The disposal area should consider water use requirements for the land use and the downstream environment (including the proposed caravan park).

- Appropriate methods, such as subsurface irrigation, should be considered, especially for application on crops for human consumption.

- The Shire should consider modifying proposed scheme provisions to better protect and manage flora, vegetation, and terrestrial fauna values, including: Fauna habitat management, protection from edge effects, noise pollution, and light spill.

- Lighting should adopt dark sky principles, as referenced in the WAPC's Position Statement 'Dark Sky and Astrotourism' and the 'National Light Pollution Guidelines for Wildlife'.

- A Landscape Management Plan should be prepared to address identification and protection of vegetation and trees to be retained, protection of fauna habitat, preference for locally indigenous native species, and management of fertiliser/nutrient input, particularly where agritourism or horticulture is proposed.

#### Mapping of the Caravan Park Section

Compared to the original proposal, which placed the caravan park area much closer to the western boundary, the new map shows it positioned 20 metres from the western boundary and 30 metres from the Main Road boundary. Yet no change has been made to the plantings which outline proposed sites. I trust that the Shire will investigate these distances before approval.

#### General Comments and Conclusion

I believe that the necessary access changes must be fully investigated before the LDP is approved. I also believe these should be a detailed landscape and bush retention plan, as well as further details of the

		<p>sewage disposal system. I remain concerned that the current extent of development exceeds what the area can reasonably contain.</p> <p>As a neighbour with a 500-metre boundary adjoining the development, I think it is important that we continue to have input on matters such as lighting, noise, and appropriate fencing, and trust that the Denmark Shire will consider these concerns moving forward</p>	
S50	<p>██████████  ██████████  ██████████  ██████████████████  ██████████</p>	<p>I am submitting my opposition to the adoption of Town Planning Scheme No3 Amendment No.147.</p> <p>The proposed Amendment by Council will result in many aspects of the full plan not being subjected to rigorous scrutiny when presented in future.</p> <p>The Amendment sits uncomfortably within the Shires Tourism Strategy and many aspects of the proposed development including dangerous vehicle access, waste water issues and poor visual screening are not resolved by this application. It appears that the proponent may be taking a staged approach to planning permissions in order to avoid a high level of scrutiny of individual aspects of the proposed development.</p> <p>It has been confusing for people commenting on this scheme amendment. Are we commenting on a simple change of zoning or a complex 190 page document. How can we discuss one without the other.</p> <p><b>My concerns with the Town Planning Scheme No3 Amendment No.147:-</b></p> <ul style="list-style-type: none"> <li>• Road Safety. This is a major intersection on Highway 1 opposite a popular national park and a dual carriage way. It is not a location to add to with a caravan park, café and other proposed commercial activities. A full assessment now by Main Roads on full information about proposed activities is needed not waiting for a ‘trigger’ to refer the proposal to Main Roads. On this basis alone this proposal should not proceed.</li> </ul>	<p>Objection (lack of strategy; unsafe access; noise).</p> <p>Strategic/need arguments were addressed at Scheme Amendment stage.</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p> <p>Noise managed under EP (Noise) Regulations; visual/landscape controls via Landscape Plan.</p>

- This is a major tourism development not in keeping with the Shire Tourism Strategy. It is not supported by the local tourism industry as it adds further pressure to the peak tourism period, it not the location for such activities and does not meet the need for nature based camping experiences in this shire.
- The assessment to date undertaken through the change to zoning from rural to tourism raised major issues in the environmental section regarding waste water management, protection of remnant vegetation (it has been parkland cleared and is under stress), did not deal with noise, visual impacts and had inadequate buffers. The proposal before council now has not addressed these issues.

**Road Safety Issues**

I feel that this proposal increased the risk of future road accidents at this intersection. A potential 'black spot' in the making. On this basis alone this proposal should be rejected.

In section 8. Of the proposal the proponent states *"Visibility greater than 500 metres is achieved to the west and about 240 metres to the east (within the road reservation) Austroads advises a minimum visibility of 201 metres, with a desirable distance of 226 metres for roads operating at 90kph. Appropriate visibility is achieved."*

These unobstructed sight line longer than 200mtrs do not exist in either direction as indicated below



*Above the first view glimpse as approaching proposed entrance from the East – less than 200 mtrs – picture taken from left hand lane travelling west*



*Above the first glimpse as approaching proposed entrance from the West – less than 200 mtrs*

██████████ from Main Roads stated that an on site visit was attended by the Main Roads Network Operations Manager Chris Grant. Steve said that the entrance is “sub-optimal” when judged by Main Roads preferred sight lines guidelines. The access was however still assessed as just adequate for a road that has a 90Km an hour speed limit.

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suggested that Shire Officers should initiate further discussion with Main Roads. Steve Picking also indicated that the full range of detail for the project on Loc. 2446(Lot 3) was not divulged at the meeting with Main Roads.

The Greens Pool turn off and new access driveway combine to create a dangerous intersection. The road down the hill to the east of this site has limited visibility, cars are dividing into two lanes in order to access the Greens Pool turn off, or continue West to Walpole.

South Coast Hwy to the East of the proposed entrance also divides into two lanes, one for cars continuing East and the other for cars turning to Greens Pool. The road then changes into a two lane easterly flow with one lane for overtaking. Any car exiting the site has the confusion of cars choosing the different directions with limited sight lines.

The chance of caravans safely exiting the site in a westerly direction, crossing three lanes, including an overtaking lane – all with limited sight lines and a slow moving car towing a van, is poor especially at peak traffic times. To enter the proposed tourist site when approaching from the East, cars and caravans will have to cross an overtaking lane at slow speed to access the site.

Main Roads data from Traffic Map shows that in 2022/23 an average of 2,776 vehicles, travelling in both directions used that part of the South Coast Highway on a daily basis and that from 4.00am to 11.00pm 25% of those vehicles were speeding. Visitation to the National Park via the Greens Pool Rd is continuing to grow with 99,318 vehicles in 2021/22 and 118, 026 vehicles in 2022/23. All these vehicles will be negotiating the new intersection if this project goes ahead.

The cost of improving the site lines (if possible) would be huge, not borne by the proponent but by the Western Australian tax payer.

In the introduction of the Amendment there are many statements about

the suitability of the site (No. 2446 (Lot 3) South Coast Highway, William Bay) for Tourism. The truth of these statements is not informed by assessment of the site's suitability when judged against the Shires Sustainable Tourism Strategy.

**Inconsistent with Sustainable Tourism Strategy**

Amendment 147 to TPS3, is not consistent with the findings and requirements of the Shire of Denmark's Sustainable Tourism Strategy 2021-2025 (STS). As the STS informs the new LPS' preferred direction for tourism, it is not surprising that A147 is not consistent with the LPS' either. For example:

- The LPS identifies criteria for assessing tourism related land uses and development proposals. The A147 development proposal fails to meet nine of the ten assessment criteria, the exception perhaps being a co-location test.
- The definition of sustainable tourism adopted in the Sustainable Tourism Strategy 2021-25 (STS) and reiterated in the new LPS is *Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry and host communities.*(3)
- Amendment 147 and its proposed tourism development which is located at the gateway to William Bay National Park, does not satisfy the tests contained in the definition -
  - ✘ there has been no impact assessment undertaken
  - ✘ the needs of visitors have been ignored: the STS, re-affirmed by the LPS, finds that William Bay National Park is under pressure and Greens Pool and Elephant Rocks, within the Park, are over-promoted, over-visited, congested and degraded, causing visitors to be dissatisfied with their experience
  - ✘ the needs of the host community of William Bay have been ignored: William Bay is a very small community, of the 30 submissions received by Council with regard to A147, 29 opposed the amendment; adverse consequences from site development to date have still not been addressed by the application of the proponent.

- The LPS, echoing the STS, states:  
*Given the Shire's unique natural environment and biodiversity, tourism can lead to potential overuse of sensitive landscapes and environments. For this reason, It is essential that tourism provides net benefits that are reflective of the values and needs of our community.* (4). A147 if approved, will directly contribute to ongoing overuse of sensitive ecosystems, further endangering biodiversity within William Bay National Park. It does not satisfy the 'essential net benefits' test. It does not reflect community values and needs.
  
- Environmental concerns and requirements consistent with the STS are expanded under the LPS Environmental Stewardship section (5)
  - ✘ William Bay National Park *has experienced seasonal congestion beyond the capacity of existing infrastructure leading to impacts on visitor experience and environmental values*
  - ✘ Paragraph 2 states  
*The future of tourism within the Shire depends heavily on the management of natural attractions and their associated cultural values. Visual and environmental degradation has the potential to undermine the value of the Shire of Denmark as a tourism destination, as well as compromising key drivers of community well being and inter-generational equity.*
  - ✘ It calls for, as previously mentioned *Sensitively designed genuine ecotourism experience which [can] engage and educate visitors through our rich local environment, culture and history that go beyond the traditional paradigm of sustainable development... or embrace a regenerative approach that not only sustains existing resources, but also increases the health, function and capacity of our biodiversity, natural systems and local community (paragraph 4)*

A147 fails on every count re environmental stewardship. It will materially add to seasonal congestion, visual and environmental degradation etc. It is an outdated high season tourism offering – in an unsuitable, dangerous location, on an environmentally, socially and visually unsuitable site, non-compliant with Landscape Values) (6) and is without social license.

- The STS finds that the Shire has sufficient accommodation apart from a need for some additional four star plus accommodation and nature based camping. The LPS updates this, finding that the Shire is well serviced with formalised options for caravan parks, with eight existing facilities across the district.(7) The caravan park proposed for Lot 3 via Amendment 147 is surplus to requirements.
- Amendment 147 with its tourism rezoning and proposed development is also incapable of meeting the inherent carrying capacity referred to in the modified LPS –
  - ✗ physically
  - ✗ ecologically and
  - ✗ in social terms, in so far as it *relates to the capacity of the host and wider community to maintain and enhance its well being and harmony, and avoid growing widespread dissatisfaction and negative impacts caused and exacerbated by seasonal overcrowding and increases in peak season visitor numbers.*

Amendment 147 should be rejected because of road safety issues and because the location and site are inherently unsuitable for tourism rezoning and development. Importantly, it also lacks social license. This view is justified on grounds provided by the STS and by the extent of community concerns. The EPA, DWER, Health, DFES, Main Roads and DPIRD reinforce those community concerns with regard to environmental, public health and safety, including road safety, issues. In some instances, DFES, DWER and DoH withhold support for A147.

Amendment 147 and its proposed tourism development is not consistent with the preferred direction for tourism adopted by the modified LPS. The amendment also fails specific LPS criteria and requirements with regard to both Tourism and Landscape Values. This gives rise to further concern that if approved, A147 establishes a precedent for future tourism developments that

- can ignore and avoid key environmental, social (including inter-generational) and tourism issues and
- are non-compliant with the LPS and its foundation documents.

It would be more than regrettable if the positive change in our Shire's relationship with tourism development were to be so frustrated.

The LPS is founded on the current STS. It's consistent with other current, key Shire strategic documents including the Community Strategic Plan and the Sustainability Strategy. These predate and inform the modified LPS. The modifications gain additional authority from further consultation and widespread feedback from the community, including those engaged in the tourism industry. Such consultation did not produce new and startling insights. The modified LPS simply recognises and embraces what the community has been saying for years. It's balanced, sound and will effectively address current and emerging local and global circumstances.

#### **Specific Site Management Concerns**

This proposal should be rejected on the basis of road safety and its inconsistency with the Sustainable Tourism Strategy. If these are insufficient there are also major concerns with the site itself and the ability to manage waste, noise, light, dogs and setbacks.

The proposal diagram is not accurate to the on ground footprint of developments to date. Setbacks in the diagram are not consistent with the reality, the indicative size of dams does not represent the size of the actual water bodies. The diagram suggests a significant remnant vegetation buffer, in fact the area of trees has been parkland cleared, has almost no understorey and appears to be under stress with some large

tree deaths due to other developments undertaken. This does not strike confidence in the environmental management credentials of the proponent to meet obligations.



Actual dam sizes and locations (note inadequate buffers)



Actual caravan park bays already laid out (note inadequate buffers and space for allotted park bays)

The Planning document from the proponent argues that the site fits all the criteria necessary for rezoning, including accessibility of the site (including egress), accessibility on foot and by bicycle to areas of interest, ability to screen the development from major Highway, and the potential comfort of the site for tourists.

The site has very poor accessibility bounded by private properties on three sides and a dual carriage highway and intersection to the south. Access for walking and bicycles is fraught. Pedestrians and cyclists would have to cross four lanes of turning and fast traffic to access Greens Pool Road before coming to the Bibbulmun or coastal trails.

The site is on the Highway 1 with significant road noise including trucks (heavy haulage, woodchip trucks etc) in both directions grinding down the hill and changing gears to climb the hill toward Denmark. Living at the Wolery I am very aware of traffic noise which goes from earliest light and into the evening and is very elevated during the tourism season. This is not an ideal tourism experience suggested by the proponent.

As a neighbouring landholder I am concerned about noise, light spill, dogs and people entering the Wolery. We have already had the proponents guard dogs on the Wolery on a number of occasions, bailing up a Wolery member on the road, and on our property in a threatening way. This is very upsetting.

The rural vistas across the Shire are highly valued by locals and visitors. For example the retention of the tree lined single lane on Lights Beach Road was an excellent outcome where the Shire heeded community sentiment. Adequately screening the proposed development will be very difficult particularly given the proponents intention to pack multiple activities on the one limited block that will require significant hard parking areas, caravan bays and infrastructure. As mentioned their management of onsite remnant vegetation has been poor and I am unconvinced of their intention or ability to adequately screen the human made structures in this proposal.



*Visual dominance from the road will be very difficult to adequately screen*

The environmental context section of the proposal continues to reference Lake William they were probably talking about surface water flow into the adjacent Lake Byleveld which we agree would not occur. Lake Williams is 6km from the site. The consultants didn't consider that ground water moves separate from surface flow and since the ground water is driven by the elevation of the nearby hills (Mount Shadforth and Mount Mcleod), it could conceivably flow into Lake Byleveld. This was not tested.

The area for grey water dispersal is above the Marron Dams, Horticulture and Planned Tourist areas. The EPA raised concerns regarding the ability of the proponent to manage this landuse conflict within the current plan.

The concerns raised during the change of zoning process have not been addressed in this LPS proposal. This deeply concerns me. I ask that the Denmark Shire reject **TPS3/SA147** and call for a full road safety study prior to any development occurring on the site as the highest priority risk.

S51	[REDACTED]	<p>In response to the shire's request for feedback regarding the proposed developments opposite the William Bay turnoff, I will aim to offer some perspective from an immediate neighbour (500m shared boundary) and involved local community member.</p> <p>The Phillips family's proposed caravan park and retail outlet next door has already been the subject of much discussion, so I won't rehash all of the arguments for and against the concept. In my last submission (at the change of zoning stage), I went into the road risks, the inappropriateness of the site and the real time impact that the new owners of the block have already had on a quiet rural community that shares a love it's local coast and country, and tends to look after and support each other. There has been a clear impression that the new owners are bringing change.</p> <p>So now my input to the process is about seeking compromise and moving forward... My hope is that we can still salvage a positive outcome and foster healthy neighbourly relations in generations ahead. To this end, my feedback is that the neighbourhood could incorporate another tourism focussed retail outlet on the site, and that is very likely to proceed even with the current level of approvals established. That is, if Main Roads can satisfy the safety issues around getting traffic in and out of the site, and the proponents are required to contribute to the cost of the works.</p> <p>However I wish to state very clearly, that a caravan park development at the site is a downright foolish idea, and is likely to cause long term negativity on environmental, social and political levels. Not only would it make a poor spot for caravaners to stay, a campsite in that location would impact neighbouring properties profoundly. My concern is less for myself to the north of the development with some rural buffer ( I have already let Noel and Paul know that we would require fencing capable of keeping their visitors from entering our south paddock). My concerns are more around the residents of the Byleveld Road subdivision and the new owners of the Matthew's property west of the proposal. Their homes and lifestyles would be altered and devalued forever.</p> <p>Thank you for making the time to read consider the issues, and I wish you insight and wisdom.</p>	<p>Objection (inappropriate/dangerous; environment; visibility).</p> <p>Highway access is managed by MRWA. The LDP does not approve highway works; any changes are subject to separate MRWA approvals.</p> <p>Visual impact managed through single-storey limit, colour palette, setbacks and perimeter landscaping, tied to an endorsed Landscape Plan.</p> <p>Water supply and on-site wastewater will be addressed at development application with DoH/DWER to ensure compliance with Government Sewerage Policy; trade and human waste streams to be managed separately if required.</p>
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S52	<p>██████████  ██████████  ██████████  ██████████</p>	<p>We wish to support the proposal to approve the rezoning of the land opposite the entry to William Bay National Park for a caravan park by the Phillips Family (of Rivermouth Caravan Park).</p> <p>We believe this to be an excellent idea and will be of great benefit to the area. We remember the Denmark River Caravan Park of 60 years plus ago – and look at it now. It certainly is a credit to them and those who have assisted over that time.</p> <p>They (the Phillips Family) will without doubt will certainly develop this area that we can all be proud of in the future.</p> <p>We trust that Council will give them the required support to continue with the project.</p>	Support (history/track record)
S53	<p>██████████  ██████████  ██████████</p>	<p>This proposed development would provide extra camping area for caravans outside of the town area, taking pressure off already congested parking in town as well as providing much extra sites during busy tourist times.</p> <p>A café in this popular area would be welcome by the many tourists at William Bay and also by those drive through towards Walpole.</p>	Support (extra sites; café).
<b>Government Agency Submissions</b>			
G1	<p>██████████  Main Roads Great Southern  <a href="mailto:gsreg@mainroads.wa.gov.au">gsreg@mainroads.wa.gov.au</a></p>	<p>Original Advice  Main Roads does not support the Draft LDP - 2446 South Coast Highway, Denmark Local Development Plan AE 0025-5 Sheets 1 and 2.</p> <p>Updated advice, offering further explanation:</p> <p>The previous response indicates Main Roads lack of support of the Draft LDP - 2446 South Coast Highway, Denmark Local Development Plan AE 0025-5 Sheets 1 and 2 to utilise the existing Eastbound overtaking/acceleration lane on South Western Highway and convert a section of it into a right turn pocket to service this development. Main Roads considers the predominant traffic need in this vicinity is for the existing over taking opportunity/acceleration lane Eastbound from the William Bay Rd Intersection to remain fully functional. Plans to locate it to further to the East to accommodate access into this development is not supported as it would negatively impact the Eastbound traffic movements on the steep grade of the South Western Highway immediately East of the William Bay Rd intersection. The relocation of</p>	<ul style="list-style-type: none"> <li>• Main Roads' advice is noted. MRWA has assessed the proponent's Traffic Impact Statement and also applied its own network and safety criteria for this high-speed, uphill eastbound section—hence its position to retain the current eastbound overtaking/acceleration lane and not convert/relocate it to form a right-turn pocket.</li> <li>• To avoid implying or pre-judging any highway works, the LDP will delete any figure/note that depicts, relies upon, or commits to changes to South Coast Highway (including a right-turn pocket or relocation of the overtaking lane). The LDP will instead include the following neutral note: "Any works within South Coast Highway are subject to separate MRWA approval; this LDP does not approve or imply any highway works."</li> <li>• MRWA's support for the relocated crossover is acknowledged as per the TIS. Any legacy reference to the original access will be removed from current mapping/documents so only the current crossover</li> </ul>

		<p>the newly constructed crossover is supported in the provided Traffic Impact Statement, and it is my understanding that Main Roads previous support for the development was conditional upon the removal of the original access which I note remains on the current amendment plans.</p>	<p>remains.</p> <ul style="list-style-type: none"> <li>If MRWA determines that any access treatments/road safety works are necessary (now or in future), these will be addressed via MRWA design review, road-safety audit and works approvals and are not approved or implied by the LDP.</li> </ul>
G2	<p>██████████          DBCA Parks &amp; Wildlife Services  <a href="mailto:nikki.rouse@dbca.wa.gov.au">nikki.rouse@dbca.wa.gov.au</a></p>	<p>The Department of Biodiversity, Conservation and Attractions share the following data and comments for consideration in the assessment of the proposal.</p> <p><b>Visitor Numbers</b></p> <p>615,717 visitors were recorded visiting William Bay last year.</p> <ul style="list-style-type: none"> <li>54% of these visits occurred during the peak period from December 1 to March 31, equating to approximately 120,000 vehicle movements an average of 1,025 vehicles per day, or 2,050 vehicle movements (entering and existing) along William Bay Road from/to the South Coast Highway.</li> <li>In January activity intensifies further, with an average of 1,326 vehicles per day, resulting in 2,652 daily vehicle movements entering and exiting William Bay Road from the highway.</li> </ul> <p><b>-Cycle and Pedestrian Use</b></p> <ul style="list-style-type: none"> <li>Section 14.1 notes that the subject site is considered remote and is not expected to generate significant pedestrian or cyclist movement off-site. However, it's important to highlight that Greens Pool, a major attraction, is located at the end of William Bay Road approximately 4.6 km from the proposed caravan park. Given this distance, it is reasonable to expect that some caravan park patrons may choose to walk or cycle to Greens Pool, which would require them to cross the South Coast Highway adjacent to the proposed development.</li> <li>This potential for increased pedestrian and cyclist activity at the highway crossing point should be considered in the planning and safety assessments for the site.</li> </ul>	<p>Visitor numbers to William Bay are noted.</p> <p>Off-site pedestrian/cycle infrastructure and park capacity are outside the LDP with the exception of investigating links to the Munda Biddi cycle track at development application stage.</p> <p>The LDP requires on-site parking and screening and discourages towing into the Park; any crossing safety considerations will be addressed with MRWA at later stages as required.</p>

<p>G3</p>	<p>Department of Health            PO Box 8172          Perth Business Centre WA 6849  <a href="mailto:eh.eSubmissions@health.wa.gov.au">eh.eSubmissions@health.wa.gov.au</a></p>	<p><b>DoH position</b></p> <p>Do not support – reasons provided below, i.e. additional reports, studies, plans or other information that should be provided to determine public health risk / legislative compliance.</p> <p><b>DoH advice</b></p> <p>The DoH notes that the proponent has indicated consideration of application for a Caravan Park License or a Caravan Park (Nature Based) License at the development application stage. There are significant differences between the infrastructure and requirements of these licenses. This should be clarified at the earliest possible stage of the development to inform other land use decisions such as the size of the wastewater system required. A nature-based facility may not be supported due to the proximity to the major freight and traffic route, and the resulting noise and light impacts on the facility without further information being provided. The proponent will also need to consider the following:</p> <p><b>1. Water supply and wastewater disposal</b></p> <p>Disposal of wastewater generated on site is required to comply with the <i>Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974</i>. The subject site is located within a sewerage sensitive area. In accordance with the Government Sewerage Policy 2019, a site-specific Site and Soil Evaluation (SSE) will be required to be undertaken by a qualified consultant during the wettest seasonal time of the year (<b>mid-July/August</b>) as per AS/NZS 1547:2012 to ensure the land application area is located and sized appropriately. The existing SSE was undertaken outside of this period (mid October 2020). A secondary wastewater treatment system is required for onsite treatment of wastewater within a sewerage sensitive area. Wastewater generated by a secondary treatment system is not to be used on recreational areas without approval from the Chief Health Officer and is unsuitable for irrigation onto vegetable gardens or food crops.</p> <p>Conditional approval cannot be provided. An <a href="#">Application to Construct or Install an Apparatus for the Treatment of Sewage (PDF 687KB)</a> must be submitted before the proposal can be supported by DoH.</p> <p>All drinking water provided on site must meet the health-related</p>	<p>Planning Services Comment (LDP vs DA/Approvals):</p> <ul style="list-style-type: none"> <li>Overall position / fatal flaws: DoH’s advice identifies technical requirements to be addressed before development approval (e.g., wet-season SSE, Government Sewerage Policy compliance, separation of trade/human waste, buffers), rather than a barrier to progressing the LDP. These matters were anticipated at Scheme stage and are normally resolved via DA conditions with DoH/DWER; no fatal flaws are raised.</li> <li>Licence pathway (Caravan Park vs Nature-based): DoH seeks early clarity; nature-based may be unsuitable adjacent a major freight/traffic route (noise/light).  LDP: does not fix licence; retain built-form/landscape/lighting controls.  DA: proponent to nominate licence type and demonstrate compliance with relevant standards for the highway setting.</li> <li>Potable water &amp; wastewater (Government Sewerage Policy, wet-season SSE, trade vs human waste): DoH requires wet-season Site &amp; Soil Evaluation, secondary treatment, correct groundwater separation, separate trade/human waste streams, and appropriate application/irrigation limits; potable water must meet ADWG; non-potable to be labelled with backflow prevention where required.  LDP: include servicing note deferring system selection to DA to DoH/DWER satisfaction.  DA: submit wet-season SSE, full design/calcs, and (where relevant) Nutrient &amp; Irrigation Management Plan.</li> <li>Interface with agriculture/aquaculture – buffers: DoH notes a 20 m setback may be inadequate; a</li> </ul>
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requirements of the Australian Drinking Water Guidelines 2011. Any non-drinking water that is supplied at the site (i.e., water that is not intended or suitable for drinking) must be managed to ensure it cannot be confused with or contaminate the drinking water supply. This requires satisfactory labelling of non-drinking water taps and, depending on system configuration suitable backflow prevention arrangements in accordance with Australian/New Zealand Standards AS3500 – Plumbing and Drainage.

**2. Industrial / agricultural interface**

To manage the risk to public health, appropriate separation distances are required to control spray drift, dust, smoke and ash in accordance with the [Guidance for the Assessment of Environmental Factors: Separation Distances between Industrial and Sensitive Land Uses](#). This includes a 100-300m buffer for aquaculture, 300-500m for market gardens and 500m for orchards or vineyards. As it is unclear what agricultural activities are being undertaken at surrounding properties, and the land generally appears to be zoned for rural use, it is reasonable to assume that agricultural chemicals, dust, odour and noise from surrounding agricultural activities will impact the proposed caravan park and food business, unless these separation distances have been met.

Alternatively a 40m separation distance can be used where a vegetative buffer has been adequately designed, implemented and maintained in accordance with these guidelines: [Separation of agricultural and residential land uses](#). These separation distances may be applied to other proposed sensitive land uses, including the proposed caravan park.

It should be noted that caravan park users may be particularly susceptible to emissions from agricultural use given the nature of outdoor recreational activities and the types of shelter associated with caravanning and camping. Based on this assessment, the proposed 20m buffer is insufficient to protect occupiers of the caravan park and the food business from potential spray drift, dust, smoke and ash from surrounding agricultural uses.

**3. Public health impacts - Noise**

DoH notes that there may be significant noise impacts from the proposal which have not been considered in the acoustic report. This may result in significant health and amenity impacts to the surrounding properties, from noise generated by the caravan park and from the multi-purpose building (which may include a reception centre, restaurant and/or brewery). The proponent should consult with the Department of Water

≥40 m vegetated buffer can be used where separation distances cannot be met.

LDP: retain minimum 20 m western planted buffer and tie species/density to the Landscape Plan to manage spray drift/odour/trespass.

DA: adjust layout and/or increase effective vegetated depth where testing warrants.

- Noise / amenity: DoH indicates operational noise (caravan park/multi-use building) needs more detailed modelling.

LDP: regulate setbacks, single-storey form and screening; low-spill lighting.

DA: provide updated acoustic assessment demonstrating compliance with EP (Noise) Regulations and address SPP 5.4 road-noise outcomes through siting, enclosures and/or operational limits.

- Food safety (registration/notification): Standard compliance under the Food Act 2008, Food Regulations 2009 and ANZ Food Standards Code.

LDP: advice only.

DA/Operations: register/notify with the Shire prior to opening.

- Workforce accommodation (lodging-house): If more than six persons for hire/reward, lodging-house registration and compliance with Health Local Laws may be required.

LDP: enabling only.

DA/Operations: declare occupancy and obtain the necessary registrations/approvals.

- Mosquito management (medical entomology): Avoid creating breeding habitats (ponding, unsealed tanks, poorly designed water bodies).

LDP: require design principles in Landscape/Water

and Environmental Regulation and the Shire of Denmark’s Environmental Health Services to better understand how they need to model these noise impacts, as the current modelling does not adequately address the public health and amenity impacts on surrounding properties from noise generated by the proposed development.

**4. Food safety**

Any handling of food intended for sale, or sale of food at this facility will need to comply with the *Food Act 2008*, Food Regulations 2009 and any relevant standards of the Australia New Zealand Food Standards Code. This includes the requirement to notify or register the food business under the *Food Act 2008* with the appropriate enforcement agency (Shire of Denmark) prior to commencing operating.

More information on starting a food business can be found at [https://www.health.wa.gov.au/Articles/S\\_T/Starting-a-food-business-in-WA](https://www.health.wa.gov.au/Articles/S_T/Starting-a-food-business-in-WA)

**5. Lodging house**

It is unclear from the proposal if the temporary workers accommodation will accommodate more than six persons, for hire or reward. The premises may need to be registered as a lodging-house in accordance with the *Health (Miscellaneous Provisions) Act 1911*, Part V, Division 2 and maintained in accordance with relevant Health Local Laws.

**6. Amenity – medical entomology**

The subject land is in a region that occasionally experiences problems with nuisance and disease carrying mosquitoes. These mosquitoes are known carriers of Ross River (RRV) and Barmah Forest (BFV) viruses. Human cases of RRV and BFV diseases have been reported in this region. Any future development needs to avoid the creation of additional mosquito breeding habitats.

The DoH recommends that the proponent ensures proposed site works do not create additional mosquito breeding habitat as follows:

- Changes to topography resulting from earthworks must prevent run-off from creating surface ponding as it may become mosquito breeding habitat
- Mosquito-proof design should be incorporated into building design for accommodation and recreational facilities (such as mosquito mesh on doors and windows and the inclusion of an enclosed outdoor recreation area) in order to minimise resident and visitor exposure to mosquito bites

Management documentation.

DA: include a mosquito-management component (design + maintenance).

Recommended LDP wording:

1. Servicing note: “Potable water and wastewater treatment/disposal are to be provided on-site to the satisfaction of DoH/DWER at development application stage, in accordance with the Government Sewerage Policy. A wet-season Site & Soil Evaluation, separation of trade and human wastewater streams, appropriate disposal methods (e.g., subsurface irrigation where appropriate), groundwater separation and setback compliance must be demonstrated prior to approval.”
2. Western interface: “A minimum 20 m western buffer is to be fully vegetated and established/maintained via the Landscape Plan to mitigate amenity and spray drift impacts.” (Wider or augmented buffers may be required by DA testing.)
3. Lighting & amenity: “External lighting to be low-spill and designed consistent with dark-sky principles; detailed lighting and landscaping to be confirmed at DA stage and carried into the Landscape Plan.”
4. Advice notes (DA/operations): “Any food business must comply with the Food Act/Regulations and be registered/notified with the Shire; any Workforce Accommodation exceeding lodging-house thresholds must be registered and comply with Health Local Laws.”
5. Mosquito management: “Water bodies, tanks and storage to be designed and maintained to prevent mosquito breeding; include a mosquito-management component in Landscape/Water Management documentation

		<ul style="list-style-type: none"> <li>• Water tanks and other water-holding containers must be sealed or screened to prevent mosquito access and breeding</li> <li>• Waste items should be filled with sand/soil, kept undercover or punctured to reduce the chances of these items holding water and becoming mosquito breeding habitat</li> <li>• Constructed water bodies must be located, designed and maintained so they do not create or contribute to mosquito breeding.</li> </ul>	<p>at DA stage.”</p> <p>Conclusion: DoH’s points are standard DA-stage requirements (not LDP refusals). With the LDP wording above and DA conditions to DoH/DWER satisfaction, no DoH issue prevents the LDP from proceeding.</p>
G4	<p>DWER              PO Box 525            ALBANY WA 6331  <a href="mailto:southcoast@dwer.wa.gov.au">southcoast@dwer.wa.gov.au</a></p>	<p>DWER acknowledges that the DRAFT Local Development Plan (DLP) reflects some of the recommendations made during the 2023 Scheme Amendment no. 147 phase. Outstanding issues and recommendations are provided below, and these concerns should be addressed.</p> <p><b>Wastewater</b></p> <p>The location of the proposed wastewater disposal area is up gradient and approximately 30m from the largest dam, and approximately 100m from the ephemeral creek’s foreshore vegetation. DWER’s advice on Scheme Amendment 147, relating to wastewater disposal and the site soils, identified issues with the soil’s nutrient retention capability. This advice is still relevant and is offered here again for ease of reference.</p> <p>Generally, the site has low land capability for tourism development based on the very low nutrient retention capability of the soils (254WhIKYs), sandy/clay loams with moderate permeability and high groundwater levels (JB001 – 1.1 m BGL, JB 002 – 0.66 m BGL and JB 003 1.1 m BGL).</p> <p>With the combination of non-intensive agricultural land use (orchards, aquaculture), tourism (caravan park), café and microbrewery these land use activities could potentially be non-compatible.</p> <p>The hydraulic loading on the saturated soils could be problematic and the different types of wastewater need to be separated (human and trade). As the soils are saturated from surface to depth there will be very low capacity for microbial purification or nutrient assimilation as these processes require non-saturated soil.</p> <p>The Department recommends that assessment of specific sites for where on-site trade waste disposal is proposed be undertaken by a suitably qualified soil scientist, with proven experience in wastewater</p>	<p>DWER’s advice on low land capability, groundwater separation, nutrient management and dams is noted.</p> <p>A Local Water Management Strategy, NIMP and updated SSE will be required at development application stage; layout may be adjusted to ensure compliance. DWER will be consulted on all relevant approvals.</p>

management to support any proposed Scheme amendment. This assessment should consider:

- Spatial, physical, environmental, and policy constraints that may limit areas suitable for waste disposal
- Outline assumptions made and what more detailed studies would be required at subsequent stages
- Provide an indication of the maximum volume of wastewater the site is likely to be able to be managed, including winter storage needs if required.

Further to this, advice provided by the EPA to the Shire regarding Scheme Amendment 147, should be carefully considered in relation to the proposed LDP, as it relates to Inland Waters and the compatibility of land uses and management of wastewater disposal. The advice is repeated here for your ease of reference.

Extract - EPA - Determination Published 3 March 2023

#### **Inland Waters**

An ephemeral creek runs east to west along the northern portion of the amendment area. The amendment area is part of the Parry Inlet-Kordabup River sub catchment but is a reasonable distance from the tributary to the west that drains into Parry Inlet.

The amendment area is mapped as being within a sewage sensitive area as it is within 1 kilometre of the wetland Lake William. However, Lot 3 is in a different catchment and does not drain into Lake William. Given the buffer of vegetation around Lake William and distance (600 metres) from the site, future development is likely to be a low risk to the wetland.

Future development associated with the amendment has the potential to impact groundwater and surface water hydrology, quantity and quality of the local area, local creek and Parry Inlet. In particular there may be impact from nutrient runoff from aquaculture, agritourism and horticulture land uses, and from onsite effluent disposal systems associated with microbrewery, caravan park, and other tourism related land uses set out in the scheme text.

The Site and Soil Evaluation (SSE) report (Aurora Environmental 2020) suggests that onsite effluent disposal can be accommodated, with

wastewater generated from the proposal site to be treated and disposed over a minimum 7979m<sup>2</sup> area. It is considered any area where wastewater is applied would require vegetation/plants with a high uptake of water to prevent pollutants entering the waterway through groundwater. Any proposed disposal area would need to also consider the water use requirements of the land use and the downstream environment (in this case the proposed caravan park). Appropriate methods of application of wastewater, such as subsurface irrigation, should also be considered, particularly where proposed for application on crops for human consumption.

Consideration should be given to the compatibility of the proposed land uses in the context of management of the disposal of wastewater in relation to the capacity of the receiving environment and the ability of future development to comply with Government Sewerage Policy 2019, Draft State Planning Policy 2.9 Planning for Water, and Guidance Statement No. 3 Separation Distances between Industrial and Sensitive Land Uses.

The EPA supports the Shire's proposed scheme text provisions associated with the Inland Waters factor including preparation of a Local Water Management Strategy (LWMS). The LWMS should demonstrate mitigation and management of impacts on the receiving hydrological environment. Water management planning should maintain or improve groundwater and surface water quality. Maintenance of pre-development hydrology should be considered at various stages as part of water management planning. Future development should also consider best practice management of stormwater, management of fertiliser use, and retention of native vegetation. Department of Water and Environmental Regulation (DWER) should be consulted regarding any future water management planning documents.

It is recommended the Shire consider modifying the proposed scheme provisions with reference to recommendations below to further protect and manage Inland Waters values:

- On site effluent disposal should be consistent with the Government Sewage Policy 2019 including the use of secondary treatment systems with nutrient removal where required. In

addition to the Shire and the Department of Health, on site effluent disposal systems should be to the satisfaction of DWER.

- An addendum to the SSE (December 2020), should be prepared to inform the capability of the proposed land application area to manage on site effluent disposal. The SSE should be used to inform any modifications to the local development plan, development applications, proposed method of on-site effluent disposal, building envelopes, remediation works (where applicable). Advice should be sought on the adequacy of the revised SSE from DWER and Department of Health.
- Appropriate setbacks to waterways should be considered.
- Foreshore management should be considered including protection of vegetation and erosion control.
- Consideration should be given to limiting the scale of future aquaculture, agritourism and horticulture development.

The proposed location of the wastewater treatment system is low in the properties landscape and groundwater seepage was observed in this location during a site visit on 27<sup>th</sup> November 2023. Depending on the proposed infrastructure, there could be a risk of both groundwater and surface water contamination from the treatment infrastructure. Significant fill may be required to protect infrastructure, and this itself, has the potential to impact the sites hydrology. The following advice was provided for Scheme Amendment 147 and is still applicable.

The proposed site for construction of a new shed is within close proximity to the waterway. Considerable groundwater seepage flow was observed entering the proposed site for the shed during the site visit. Spoil material excavated from the site has been pushed up and at one point is within metres of the waterway channel. There is a risk of the spoil which has not been stabilised, being washed into the waterway. Significant fill for the site will be required to provide groundwater separation. From the proposed dams layout plan it appears the fill encroaches into the waterway. Given the proposed shed site's proximity to the channel, and location in a low-lying area subject to groundwater inundation, the site is not considered suitable for a shed.

**Dams**

During the site visit 27<sup>th</sup> November 2023, groundwater seepage was observed in the area between the two dams that were existing at that time. The seepage had created a wetland habitat with dependent vegetation. It is noted that the LDP depicts an additional two existing dams within this area. At the time the following recommendation was made:

As a way of achieving flow connectivity through the site as well as environmental protection and natural biofiltration, DWER recommends that the smallest of the proposed dams be refused, and the remnant vegetation in its proposed footprint, is retained.

The LDP also shows another proposed 'decorative feature pond'. This could potentially impact groundwater hydrology and surface runoff. It has the potential to intercept runoff from the wastewater disposal area and has the potential to intercept groundwater that would normally be available to the downstream environment including the ephemeral stream. Cumulative impacts of this pond in addition to existing dams will need careful consideration prior to any development approvals.

**Conclusion**

While DWER does not object to the DRAFT Local Development Plan, it should be noted that concerns exist relating to the potential impact to the groundwater and surface water hydrology of the site.

To mitigate potential environmental impacts, including nutrient runoff from aquaculture, agritourism, and horticulture, and effluent disposal from tourism-related land uses (e.g., microbrewery, caravan park), future Development Applications must be accompanied by a detailed Site Soil Evaluation report. This report should assess the suitability of proposed activities in relation to site-specific soil and landform characteristics. Proponents must provide a detailed assessment of wastewater chemistry and maximum volumes, ensure clear separation of waste streams, and evaluate site-specific soil and landform characteristics to support proposed future developments.

A Nutrient and Irrigation Management Plan (NIMP) will be required for

		<p>future development to demonstrate the site's ability to achieve maximum uptake of nutrients with minimal contaminants leaching into the surrounding environment. The NIMP should be prepared to the satisfaction of both DWER and DPIRD. <a href="#">WQPN-33-Nutrient-and irrigation-management-plans.pdf</a></p> <p>Future development will be required to consider best practice management of stormwater.</p> <p>Where the Department has a statutory role, planning applications should be considered prior to the Department issuing any relevant permits, licenses and/or approvals.</p> <p>In the event that the applicant determines that a works approval or licence application is required under Part V of the Environmental Protection Act 1986 (EP Act), the advice provided in this communication does not prejudice and must not be considered to infer the outcome of the EP Act licence and works approval process.</p> <p>In the event there are modifications to the proposal that may have implications on aspects of environment and/or water management, the Department should be notified to enable the implications to be assessed.</p>	
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## Schedule of Modifications – Local Development Plan Lot 3 (No. 2446) South Coast Highway, William Bay

Purpose: To finalise the LDP by addressing agency advice and submissions, and to align the LDP with the Scheme provisions and the Local Planning Strategy 2024. These modifications relate to the LDP only and do not authorise any works within South Coast Highway (MRWA jurisdiction).

Ref.	LDP Element	Modification (to be shown on LDP plan/text)	Reason / Source
M1	Highway interface / notes	Delete all figures/notes that depict or commit to highway works (e.g. right-turn pocket, repurposed/relocated overtaking lane). Insert a single standard note: "Any works within South Coast Highway are subject to separate MRWA approval; this LDP does not approve or imply any highway works."	Consistency with MRWA advice and LDP scope; on-site outcomes only.
M2	Access mapping	Remove any legacy reference to the original crossover. Show only the current, MRWA-supported crossover location.	Housekeeping per MRWA updated advice.
M3	Parking	Replace the fixed number of parking bays with a performance-based control: "Car parking (including long-vehicle bays) to be confirmed to the Shire's satisfaction at Development Application stage, having regard to final land-use mix and staging."	Flexibility to size parking to the final use mix.
M4	Western rural interface	Require a minimum 20m planted buffer along the western boundary. The buffer is to be designed, established and maintained through the LDP Landscape Plan (species/densities; screening function). Include advice that the effective vegetated depth may be increased at DA if testing warrants.	Manage amenity and spray drift at the rural interface.
M5	Built form & screening	Retain single-storey height, recessive/non-reflective materials and setbacks. Tie these controls to a binding Landscape Plan that delivers perimeter screening (including the highway frontage) on-site (i.e., not relying on road reserve vegetation).	Visual landscape outcomes; clarity that screening occurs on-site.
M6	Tree Retention / Development Exclusion Area	Add a specific requirement in the Landscape Plan to preserve and enhance identified Tree Retention / Development Exclusion Areas and to rehabilitate any disturbed sections.	Respond to submissions and prior EPA advice; maintain internal vegetation values.
M7	Lighting	Insert: "External lighting is to be low-spill and designed consistent with dark-sky principles. Details to be provided at DA and carried into the Landscape/Lighting Plan."	Reduce light spill to adjoining land and fauna;

			respond to submissions.
M8	Servicing – water & wastewater	Insert a servicing note: "Potable water and wastewater treatment/disposal are to be provided on-site to the satisfaction of DoH/DWER at DA stage, in accordance with the Government Sewerage Policy. A late winter Site & Soil Evaluation, separation of trade and human waste streams, appropriate disposal methods (e.g. subsurface irrigation where appropriate), groundwater separation and setback compliance must be demonstrated prior to approval."	Address DoH/DWER requirements and SSE timing; manage nutrient risk.
M9	Water management	Require submission at DA of a Local Water Management Strategy and a Nutrient & Irrigation Management Plan (NIMP), prepared to DWER/DPIRD satisfaction.	Mitigate nutrient export and manage hydrology onsite.
M10	Bushfire	Confirm that updated Bushfire Management Plan and Emergency Evacuation Plan will be provided and implemented at DA to demonstrate compliance with SPP 3.7 (including APZ, water and access standards – e.g., 4 m trafficable width).	Vulnerable land use in bushfire prone area – detailed compliance at DA.
M11	Acoustics / road-noise	At DA, provide an updated acoustic assessment demonstrating compliance with the Environmental Protection (Noise) Regulations and addressing SPP 5.4 road-noise outcomes (building siting, treatments and/or operational limits as required).	Respond to DoH advice and road-noise environment.
M12	Mosquito management (design principle)	Include a design principle that water bodies, tanks and storage are to be located, designed and maintained to avoid mosquito breeding; incorporate a mosquito-management component in Landscape/Water documentation at DA.	Respond to DoH medical entomology advice.
M13	Active transport advisory	Insert an advisory that any off-site pedestrian/cyclist treatments or crossings are outside the LDP; opportunities to link to the Munda Bididi trail can be explored with MRWA/DBCA at DA if appropriate.	Clarify LDP scope; note potential investigation only.

Notes:

- All modifications apply to the LDP plan/text and associated notes. They do not authorise any works within South Coast Highway.
- Detailed technical designs and agency approvals are to be addressed at Development Application stage as set out above.