

MARCH 2024

PLANNING ASSESSMENT REPORT

Redevelopment of Existing Tourist Development

Coogee Beach Holiday Park, 3 Powell Road, Coogee, 6166
Discovery Holiday Parks



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Located at Coogee Beach Holiday Park, 3 Powell Road, Coogee, 6166
Discovery Holiday Parks



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EXECUTIVE SUMMARY

This Planning Assessment Report has been prepared by MasterPlan in support of a development application made by Discovery Holiday Parks Pty Ltd seeking planning approval for a proposal to redevelop an existing tourist development (Coogee Beach Holiday Park). The application is made to the City of Cockburn for assessment and determination by the Metro Outer Joint Development Assessment Panel on behalf of the Western Australian Planning Commission under the *Planning and Development Act 2005 (WA)*.

The application is made over land located at 3 Powell Road, Coogee.

The Site is reserved for *Parks and Recreation* under the Metropolitan Region Scheme. Clause 18 of the MRS states that the approval of the Western Australian Planning Commission is required for any development on land reserved for *Parks and Recreation* or *Regional Open Space* triggering the need for a development application to be made.

The planning assessment provided within this report and associated supporting documentation demonstrates that the proposed development satisfies the requirements of the relevant planning instruments and represents an appropriate design outcome for the site and its local setting. It is the conclusion of our assessment that there are strong grounds for the application to be approved subject to reasonable and relevant conditions.

SITE AND PROPOSAL DETAILS	
Address of Site	Coogee Beach Holiday Park, 3 Powell Road, Coogee, 6166
Real property description	Lot 173 On Deposited Plan 193079 (173/DP193079)
Site (leased area)	4.4404 hectares
Local Government	City of Cockburn
Planning Scheme	City of Cockburn Town Planning Scheme No. 3
Zone	Regional Reserve
R-Code Classification	No R-code
Special Control Area	No Restricted or Additional Uses
Development (Structure Plan) Area	No Structure Plans found
Region Scheme	Metropolitan Region Scheme
Region Scheme Reservation	Parks and Recreation
Proposal	Redevelopment of existing tourist development
Approval Authority	Outer Joint Development Assessment Panel
Landowner	City of Cockburn (Reserve)
Lessee	Discovery Holiday Parks Pty Ltd (ABN 50 111 783 846)
Proponent	Discovery Holiday Parks Pty Ltd (ABN 50 111 783 846)



ASPECTS OF DEVELOPMENT	
Defined Land Use(s)	Tourist Development
Public Notification	☒ Not required ☐ Required

APPLICANT DETAILS	
Applicant	Discovery Holiday Parks Pty Ltd
Applicant's representative	Peter Stanley, MasterPlan QLD
Applicant's contact details	MasterPlan QLD 14 Sunshine Maroochydore QLD 4558 M 0413 832 601 E peters@masterplan.com.au
MasterPlan Reference	60006



1.0 INTRODUCTION

1.1 Overview

This Planning Assessment Report has been prepared by MasterPlan in support of a development application (DA) made by Discovery Holiday Parks Pty Ltd (DHP) seeking planning approval for a proposal to redevelop an existing tourist development (Coogee Beach Holiday Park (Park)). The application is made to the City of Cockburn (Council) for assessment and determination by the Metro Outer Joint Development Assessment Panel (JDAP) on behalf of the Western Australian Planning Commission (WAPC) under the *Planning and Development Act 2005* (WA) (P&D Act).

The application is made over land located at 3 Powell Road, Coogee (Site).

MasterPlan delivers urban and regional planning services across Australia through offices in South Australia, Northern Territory, and Queensland. MasterPlan provides planning support for Discovery projects across Australia.

DHP is part of the G'day Group which comprises three (3) leading Australian tourism brands Discovery Parks, G'day Parks and loyalty program G'day Rewards. Employing more than 2,200 people Australia-wide, G'day Group has a truly national footprint with over 300 holiday parks, including 85 fully owned and operated Parks and Resorts.

DHP has a clear plan for growth and ongoing improvement including continued development of the existing portfolio to better meet market demand and to further enhance the customer experience in each of the group's strategically selected destinations. In addition, key locations are being targeted to continue to build on the current mix of park accommodation options available.

The Site is a Reserve. The Council is responsible for the care, control, and management of the reserve for the purpose of a caravan park. DHP entered a lease of the Site from the Council on 6 May 2022. The Commencement Date of the lease is 2 August 2023. The term of the lease is 21 years commencing on the Commencement Date.

In accordance with the provisions of the lease, DHP proposes to undertake redevelopment of the accommodation and facilities in the Park. Acting as the lessor, the DA has been endorsed by the Council for lodgement. The planned redevelopment of the Park is a key element of DHP's nationwide expansion strategy, and a sign of confidence in the tourism industry in the region.

DHP proposes to undertake redevelopment of the Park over two (2) stages:

- 1) Stage 1 – Demolitions and Development:
 - a) Demolition of several cabins, the current managers residence and office, the camp kitchen and ablution blocks and the central ablutions block.



- b) Rebuilding of the office and residence.
- c) Relocation of several Park Homes occupied by permanent residents.
- d) Construction of a new pool and recreation area, and camp kitchen and amenities/laundry.
- e) Construction of twenty-nine (29) new tourist cabins.

2) Stage 2 – Removal and Development:

- a) Removal of twenty-four (24) park homes from the Park.
- b) Construction of twenty-eight (28) new tourist cabins:

In relation to the proposed changes to accommodation (tourist and permanent) units:

- The number of permanent accommodation units (Park Homes) in the Park, will be reduced by twenty-four (24).
- The number of tourist accommodation units at the Park, will be increased by forty-eight (48).
- The number of powered sites in the Park, will be reduced by six (6).
- The number of accommodation units in the Park, will be increased by eighteen (18).

The Site is reserved for *Parks and Recreation* under the Metropolitan Region Scheme (MRS). Pursuant to Clause 13/Division 1/Part II of the MRS, the written approval of the WAPC is required for the proposed redevelopment triggering the need for a development application to be made.

The Site is depicted as Regional Reserve in the *City of Cockburn Local Planning Scheme No. 3* (LPS 3). The use and development of the Site is not regulated by LPS3. The approval of the Council is therefore not required under LPS3 for the Proposal.

The redevelopment project has an estimated value of \$13.5 million which exceeds \$10 million. In accordance with regulation 5(b) of the *Planning and Development (Development Assessment Panels) Regulations 2011*, the DA must be considered and determined by a Development Assessment Panel (DAP) as a Mandatory DAP application as if it were the WAPC. The DAP for the City of Cockburn is the Metro Outer Joint Development Assessment Panel (JDAP).

Development applications are required to be assessed in accordance with the statutory requirements of the P&D Act. The purpose of this planning assessment report is to provide an overview of the Site and the proposal and to detail how the project fits with the relevant statutory requirements.



1.2 Specialist Consultants

This planning assessment report should be read in conjunction with plans, drawings, and reports prepared by the following specialist consultants:

1. Green Hill Design (Architectural Designer) www.greenhilldesign.com.au.
2. Stantec (Traffic Engineer) [Stantec in Australia](http://Stantec.in.Australia).
3. Bushfire Prone Planning (Bushfire Consultant) [Welcome to BushFire Prone Planning - Bushfire Prone Planning - BAL Assessments](http://Welcome.to.BushFire.Prone.Planning-.Bushfire.Prone.Planning-.BAL.Assessments).
4. McDowall Affleck (Civil Engineer) <https://www.mcdowallaffleck.com.au/>.
5. Focused Vision Consulting (Ecological Consultant) <https://www.focusedvision.com.au/>.
6. Homewood Consulting (Arborist) <https://homewood.com.au/>.
7. Acoustics Consultants Australia (Acoustic Engineer) <https://acousticsconsultants.com.au/>.
8. MRA Environmental (Waster Management Consultant) <https://www.mraenvironmental.com.au/>.

1.3 Pre-Lodgement Engagement with the Council

Pre-lodgement communications were conducted with the Council prior to lodging the development application. A Pre-Lodgement Report prepared by MasterPlan was submitted to the Council on 30 October 2023.

By email dated 29 November 2023, Chantala Hill (Senior Planning Officer) provided preliminary feedback to MasterPlan on the Pre-lodgement Report. A copy of the Council feedback is provided in **Appendix A**.

DHP's response to the matters raised in the preliminary feedback is outlined in **Table 1**.

Table 1: Council Pre-Lodgement Feedback

MATTER	COUNCIL FEEDBACK	APPLICANT RESPONSE
Transport/Traffic	The proposal results in a slight increase in vehicular trips from the existing situation and therefore, the resulting impact is considered acceptable.	Noted.
	Request further detail on the form of edge treatment to the western side of the site. We need to understand if the path network is public access or will be inhibited by fencing at the park. There are potential security/safety issues with the access through the dunes terminating at fences and the City would also like to see the networks along the beachfront interconnected where viable.	Access to or through the Park will only be facilitated for guests of the Park. The lease of the reserve under which Discovery operates does not require that Discovery provide public access to or through the Park. There is also no obligation under the terms of the lease for Discovery to develop or facilitate and/or develop connections outside the lease



MATTER	COUNCIL FEEDBACK	APPLICANT RESPONSE
		boundaries between the four walkways through the dunes. Notwithstanding the lease arrangements. Discovery appreciates and supports the Council's comments on security/safety aspects associated with the use by members of the public of the dune tracks. A new 1.2-metre-high "Koppers Log" fence constructed of timber is proposed for the western edge of the Park. This type of fence construction will enable members of the public to enter the Park as necessary for security/safety reasons.
	All proposed car parking (including "Peron Peninsula"), internal circulation roadway width, wheel stops and entrance/exit points to be designed and line marked in accordance with AS 1742, AS/NZS 2890.1:2004, AS/NZS 2890.3:2004, AS/NZS 2890.6:2004 as appropriate.	The need for compliance with the stated standards is noted in this report and on the proposed Plans of Development.
Waste Management	As per the City's Local Planning Policy 1.14 Waste Management, a Waste Management Plan should be provided that includes details of collection, waste volume generation data, intermediate and major bin store locations/sizes (m2) and bin store construction.	A waste management plan (WMP) prepared by MRA Environmental addresses the matters raised by the Council and is enclosed with this report.
	The Plan will also need to allow for adequate storage of waste and recyclables for peak periods and bin store capabilities to house 1 week's waste.	The WMP addresses this matter.
Parks and Environment	More detail required on what existing trees are being retained and removed, and the impact that the development would have on tree roots or tree pruning.	An arborist report prepared by Homewood Consulting addresses the matters raised by the Council and is enclosed with this report.
	New trees and new landscaping - it would be interesting to see what is being proposed landscaping wise for the new cabin areas.	Except for the new pool and outdoor recreation area, there are no proposals to upgrade the landscape treatments around the Park.
	In conjunction with the environmental report, it would be really helpful to have the following: A tree overlay with the proposed site plans to clearly identify the number and species of native trees which are to be removed.	An ecological impact assessment report prepared by Focused Vision Consulting addresses the matters raised by the Council and is enclosed with this report.



MATTER	COUNCIL FEEDBACK	APPLICANT RESPONSE
	- An overlay of the plans with the identified potential black cockatoo habitats. - An overlay of the mapped ecological communities of conservation-significance: Tuart Woodlands, Callitris and Moonah communities.	
Coastal Considerations	The City is currently in the process of engaging a consultant to update the Coastal Hazard Risk Management and Adaption Planning (CHRMAP). As part of this the City be doing revised hazard assessments to identify 100-year ARI erosion and 500-year ARI inundation extents for various planning timeframes. This may result in the erosion and inundation hazard lines being in different locations for the 15 year planning timeframe compared to the 2013 Erosion and Inundation hazard assessment report which this application is based upon. It is noted that the proponent is aware of the potential future impact this might have on the Caravan Park.	Plans of Development prepared by Greenhill Design show the location of the proposed redevelopment works relative to the Holiday Park Buffer Plan and the SLR Hazard Line referenced in the lease between the Council and DHP. The location of these lines is consistent with the relevant sections of the CHRMAP and the Council's Foreshore Management Plan. Consistent with the terms of the lease, DHP will not construct any permanent structures on those parts of the Site which are west of the Holiday Park Buffer Line. Development on those parts of the Site west of the Holiday Park Buffer Line will be limited to transportable accommodation which can be relocated, removable infrastructure, and services which are necessary to support the transportable accommodation and removable.
Other General Planning Comments	The development, which is deemed noise sensitive, is adjacent to Cockburn Rd. As per SPP 5.4 and the City's Local Planning Policy 1.12 Noise Attenuation, noise impacts need to be considered via an Acoustic Report.	An acoustic impact report prepared by Acoustics Consultants Australia addresses the matters raised by the Council and is enclosed with this report.
	Concerns surrounding the extent of development located within BAL-40 and FZ, particularly given this is a vulnerable land use. Will need to further consider if it adequately satisfies SPP 3.7.	A copy of the Pre-lodgement Report inclusive of a bushfire management plan (VBMP) prepared by Bushfire Prone Planning was submitted to the Land Use Planning team of the Department of Fire and Emergency Services (DFES) for review. The feedback on the BMP from DFES is discussed in section 1.4 of this report.
	The City is currently determining whether the proposal will be required to be reviewed by our Design Review Panel.	This advice was superseded by advice given by Chantala Hill on 7 December 2023 that due to the City not being the determining authority in this instance, the Council will not be requesting that the proposal go through Design Review Panel process.



1.4 Pre-Lodgement Engagement with State Government

Pre-lodgement communications were conducted with State Government prior to lodging the DA. A Pre-lodgement Report prepared by MasterPlan was submitted to the *Department of Planning, Lands and Heritage* (DPLH) on 30 October 2023.

By email dated 11 December 2023, Jasmine Hancock (Senior Planner | Land Use Planning) provided preliminary feedback to MasterPlan on the Pre-lodgement Report. A copy of the DPLH feedback is provided in **Appendix A**.

DHP's response to the matters raised in the preliminary feedback is outlined in **Table 2**.

Table 2: DPLH pre-lodgement feedback

MATTER	DPLH FEEDBACK	APPLICANT RESPONSE
Approval Pathway/Planning Authority	Proposed changes to the Development Assessment Panel exemptions of the Planning and Development (Development Assessment Panels) Regulations 2011 are currently underway. This would require development applications, located on a Metropolitan Region Scheme Reserve, to be determined by the WAPC rather than JDAP. Until these changes come into effect, the development application (with estimated works exceeding \$10 million) will still be determined by the JDAP. There will also be transitional arrangements that allow the application to be determined by the JDAP if changes to the process occur after the application is submitted. It is not anticipated that the changes will impact the approval pathway of the application if it is lodged, as anticipated, in January 2024.	Noted.
Transport and Traffic	There were no major transport issues identified in the Transport Impact Statement (TIS) prepared by Stantec. As the main access to the site from Powell Road intersects with Cockburn Road, designated as a 'Primary Regional Road' reserve under the Metropolitan Region Scheme, a referral to Main Roads WA will be required. It is recommended that you seek pre-application advice from Main Roads WA on the TIS prior to lodgement.	A copy of the Pre-lodgement Report inclusive of the TIA was submitted to Main Roads WA for review on 15 December 2023. Main Roads WA provided the following feedback on 30 January 2023 (refer Appendix A). With reference to transport noise, the proposal is located within the State Planning Policy 5.4 – Road and Rail Noise trigger distance of a significant freight/traffic route (Cockburn Road). A noise assessment, in accordance with SPP 5.4 will need to be submitted with your development approval application.



MATTER	DPLH FEEDBACK	APPLICANT RESPONSE
		- For your information, a signalised pedestrian Crossing is proposed on Cockburn Road between Powell Road and Beach Road. This will allow for safe pedestrian movements across Cockburn Road. This project is currently awaiting delivery. - The upgrade of Cockburn Road (Fremantle-Rockingham Highway) is not in Main Roads' 4 year forward estimated construction program and all projects not listed are considered long term. Please note project timing is subject to change and Main Roads assumes no liability for any change to the timing information provided. - An extract of the Cockburn Road (Fremantle-Rockingham Highway) land requirement plan is attached for your reference. Based on the feedback from Main Roads WA, DHP commissioned Acoustics Consultants Australia to prepare an acoustic impact report prepared by addresses SPP5.4.
Coastal hazards	The site is located within Coastal Erosion Hotspot Watchlist No. 21 – Coogee Beach of the Assessment of Coastal Erosion Hotspots in Western Australia (2019) report. The site will become increasingly susceptible to coastal erosion by 2040 with significant risk to the western portion of the holiday park by 2070. The hazard line is likely to migrate further landward over time with sea level rise. As outlined in the City of Cockburn Coastal Adaptation Plan (under review) the long term coastal adaptation strategy is managed retreat. The proposal to ensure the accommodation and associated infrastructure/services located west of the hazard line is temporary and easily removable is consistent with the coastal adaptation strategy of managed retreat. The protection of the 40-metre-wide vegetated public foreshore reserve is also supported.	Noted.
Bush Forever	With respect to the Bushfire Management Plan, the exact location and extent of clearing of vegetation proposed to manage	The location and extent of clearing of vegetation proposed to manage bushfire risk is described in the arborist report, ecological



MATTER	DPLH FEEDBACK	APPLICANT RESPONSE
	bushfire risk is required. The ecological assessment prepared by Focused Vision consulting should also be included in the final report.	impact assessment, and the bushfire management report.
Bushfire risk	As the proposal involves an intensification of land use within a Bushfire Prone Area, the requirements of SPP 3.7 Planning in Bushfire Prone Areas applies. It is noted that a Bushfire Attack Level Assessment, Bushfire Management Plan, and Emergency Evacuation Plan, has been prepared in accordance with SPP 3.7. There are some concerns regarding the location of cabins (new and relocated) with a BAL-40 or BAL-FZ rating. Given its designation as a vulnerable tourism land use under SPP 3.7 it is recommended that consultation with the Department of Fire and Emergency Services occur prior to lodging the application.	A copy of the Pre-lodgement Report inclusive of a Bushfire Management Plan (BMP) was submitted to the Land Use Planning team of the Department of Fire and Emergency Services (DFES) for review on 15th December 2023. DFES provided feedback on 24th January 2024 (refer Appendix A) in relation to vegetation classification, bushfire protection criteria assessment and tolerable losses. In response to the feedback from DFES, Bushfire Prone Planning provided advice to DHP on the actions required to update the BMP (refer Appendix M). Based on the analysis of the feedback from DFES, Bushfire Prone Planning updated the BMP based on the recommended actions refer Appendix M).
Transport Noise	The majority of the site is located within the trigger distance of an 'Other/significant freight/traffic route' - Cockburn Road. A noise assessment including a noise level contour map and recommended noise mitigation measures (if required) will need to be submitted with the report in accordance with SPP 5.4 Road and Rail Noise.	The acoustic impact report prepared by Acoustics Consultants Australia addresses the matters raised by DPLH and is enclosed with this report.
Report Content	The report should make reference to the recently released WAPC Planning for Tourism and Short-term Rental Accommodation Guidelines 2023, in particular section 4.3.1 – Caravan Parks and Appendix 2 – Design Assessment for Proposed or Redeveloped Caravan Parks. The ten design principles identified within WAPC State Planning Policy 7.0 - Design of the Built Environment should also be addressed in the report. The overview section of the report would benefit from inclusion of the approval history for the site including a summary of previous development approvals.	Assessment comments in relation to the WAPC Planning for Tourism and Short-term Rental Accommodation Guidelines 2023 are provided in Chapter 6 of this report. Assessment comments in relation to the WAPC State Planning Policy 7.0 - Design of the Built Environment are provided in Chapter 6 of this report. A summary of information provided by the Council on the planning approval history for the Site is provided in section 2.3 of this report.



1.5 Community Engagement

Engagement was not undertaken with the community prior to making the application.

2.0 CONTEXT AND SITE INFORMATION

2.1 Context Information

2.1.1 Location and Land Uses

The Site is in the suburb of Coogee, located 3.8 kilometres from the major regional centre of Spearwood and in the local government area of the City of Cockburn Council (Council). Land use patterns in the locality of the Site are depicted in the Locality Plan provided in **Appendix B**. The immediate surrounding uses to the Site are described in **Table 3**.

Table 3: Surrounding uses

DIRECTION FROM SITE	SURROUNDING USES AND ACTIVITIES
North	Coogee Beach Reserve including the Coogee Beach Tennis Court, playground, and the Coogee Jetty.
South	Coogee Beach Reserve and Coogee Beach Surf Life Saving Club
East	Regional Reserve (Rail) and Cockburn Road
West	Coogee Beach Reserve, Cockburn Road, residential neighbourhoods

2.1.2 Community Facilities

In the neighbourhood of the Site, there are several community facilities.

- The Coogee Community Hall is located 1.0 kilometres to the west of the Site.
- The Coogee Beach Tennis Courts are located 350 metres north of the Site.
- The main public access point to Coogee Beach is located approximately 500 metres south-west from the Site.
- The Woodman Point Playground and Regional Park is located approximately 2.9 kilometres to the south of the Site.
- The John Graham Recreation Reserve is located approximately 2.9 kilometres to the south of the Site.
- The Coogee Primary School is located 2.7 kilometres south-west of the Site.



2.2 Site Information

2.2.1 Title and Survey Details

The Site comprises one allotment and is held as a reserve by the Council. The Site of the application is leased by the Council to Discovery as detailed below:

- Address: 3 Powell Road, Coogee
- Title: LR3107-991
- Land Description: Lot 173 Deposited Plan 193079.
- Site (leased area): 4.4404 hectares.
- Status Order: Reserve under Management Order (O677545).
- Reserve No: 29678.
- Reserve Purpose: Class A Reserve for the Purpose of a Caravan Park.
- Primary Interest Holder: City of Cockburn.
- Lessee: Discovery Holiday Parks Pty Ltd (ACN 111782846).

The Site is not burdened by easements.

A copy of the certificate of title for the Site is provided in **Appendix C**.

The Site Plan provided in **Appendix D** depicts land parcel and road boundaries.

2.2.2 Lease Details

The Council is responsible for the care, control, and management of the reserve for the purpose of a caravan park under management order which confers upon the Council as the lessor, the power to lease for any term not exceeding 42 years subject to the consent of the Minister for Lands. Discovery entered a lease of the Site from the Council on 6 May 2022. The commencement date of the lease was 2 August 2023. The term of the lease is 21 years from the commencement date.

The Council has placed obligations on Discovery through clauses of the lease that relate to redevelopment of the Site including:

1. Within six months of the commencement date, Discovery must submit a development application for the proposed upgrades to the Park.
2. Redevelopment works must proceed by stages in accordance with a schedule to the lease.



3. To maintain adequate foreshore reserve between the shoreline and the Park, a *Holiday Park Buffer Line* must be established and maintained which must be offset at least 20 metres landward of the *Sea Level Rise (SLR) Hazard Line* as varied from time to time to reflect new information and advances in coastal science. The SLR Hazard Line must be adjusted from time to time as required by the Council. If the separation between the western boundary of the Park and the high water mark is at any time greater than 40 metres, the Council may provide written notice to Discovery amending the boundary.
4. Discovery must not construct any permanent structures on those parts of the Park which are west of the Holiday Park Buffer Line. Development on those parts of the Park west of the Holiday Park Buffer Line is limited to transportable accommodation which can be relocated, removable infrastructure, and services which are necessary to support the transportable accommodation and a removable infrastructure.

A copy of the Buffer Plan referenced in the lease that shows the Holiday Park Buffer Line and the SLR Hazard Line is provided in **Appendix E**.

2.2.3 Existing Use

A review of historic aerial imagery indicates that development of a caravan park on the Site began in the 1970s, and the Park was built by 1995.

The Site is currently operated as a caravan park (Discovery Parks Coogee) by DHP. The Discovery "Park Map" depicts existing development on the Site (refer **Appendix F**).

The key features of the Site are illustrated in the photographs taken by DHP in October 2023 provided in **Appendix G**.

A plan showing the location and direction of the site photographs is provided in **Appendix H**.

2.2.4 Site Layout and Built Form

The Park has a linear form with a north-south orientation. The Park is accessed from Cockburn Road through the Council-managed Coogee Beach Reserve.

The Park consists of a reception/office building, four (4) amenities blocks, a common area, three (3) barbeque areas, 113 single-storey permanent sites (Park Homes), 26 single-storey cabins and 39 powered sites. The facilities and built form of the Park are split across the two (2) areas either side of the main internal road (*The Boulevard*).



2.2.5 Gradient/Topography/Site Levels

A contour and feature survey of the Site prepared by Veris (Ref. 637103-00 dated 18 August 2022) (refer **Appendix I**) shows that the Site is generally low lying and flat with site elevations that vary between approximately 5.0 metres Australian Height Datum (AHD) on the western boundary and 4.0 metres AHD toward the centre of the Site and the eastern boundary.

2.2.6 Fencing

The contour and feature survey of the Site prepared by Veris indicates that the site is edged by "Koppers Log", post and rail, and cyclone fences on each boundary as summarised in **Table 4**.

Table 4: Boundary fencing

BOUNDARY	FENCE TYPES AND HEIGHTS
North	2.7-metre cyclone fence
South	1.2-metre post and rail fence
East	0.9-metre cyclone fence
West	0.9-metre Koppers log fence 1.2-metre Koppers log fence 1.2-metre post and rail fence

Existing boundary fences are depicted in the site photographs provided in Figure 1 (cyclone fence) and Figure 5 (Koppers log fence) of **Appendix F**.

2.2.7 Road Access

The Site has frontage at its northern end to Powell Road which connects to Cockburn Road.

Discovery engaged Stantec to prepare a Traffic Impact Assessment (TIA) under the *Western Australian Planning Commission Transport Assessment Guidelines* (refer **Appendix J**). The TIA (19 October 2023):

- Describes the existing transport conditions proximate to the Site.
- Identifies the dimensions of the internal roadways typically being 5.0 metres to 6.0 metres wide through the northern portion of the Site and approximately 4.0 metres in the southern section. There is a posted speed limit of 8.0 kilometres per hour and vehicle slow points are provided through the entirety of the Site to ensure vehicle speeds remain low.
- Describes the car parking layout within the Site and the car parking available external to the Site.
- Describes existing traffic volumes in the neighbourhood of the Site based on intersection surveys.
- Describes existing public transport and active transport available in the neighbourhood of the Site.



2.2.8 Internal Access

Movement around the Park is provided by several internal roads – The Boulevard, Peron Peninsula (exit), Narembeen Avenue, Kondinin Avenue, Zanthos Avenue, Bouganville Avenue, York Place, Pingelly Drive, Coorow Drive, Mindari Drive, Kunmarina Drive, Waroona Drive, Moora Drive, Byro Way, Augusta Way, Nullagine Way, Kununurra Way, Gibson Way, Pinjarra Way, Mandalay Way, and Dampier Row.

The Park has approximately 1.5 kilometres of bitumen sealed internal roads.

2.2.9 Public Transport and Active Transport

There are three (3) public transport (bus) stops along Cockburn Road as follows:

- Three (3) minute walk, 240 metres from the Site.
- Seven (7) minute walk, 600 metres from the Site.
- Four (4) minute walk, 350 metres from the Site.

Section 8 of the TIA describes existing public transport and active transport available in the neighbourhood of the Site.

2.2.10 Utilities and Services

The Site is connected to reticulated urban infrastructure including water, sewerage, stormwater, telecommunications, and electricity as described by McDowell Affleck in a Services Report (4 October 2023) refer **Appendix K**.

Maps extracted from the Councils' mapping service for the Site show a water metre (WCORP-006) located in the centre of the site and a sewer pressure main (WCORP-069) that enters the Site on the south-east corner of the southern boundary, follows the internal road *Moora Drive*, then follows the internal road *The Boulevard* (refer **Appendix L**).

2.2.11 Surface Water Features, Watercourses, and Drainage

The site is not affected by any surface water features, water courses, or drainage.

2.2.12 Flood Hazards

The Site and its immediate locality are not mapped by the Department of Water and Environmental Regulation (DWER) in the Flood Plain Mapping tool as being in a floodplain or being impacted by a floodway or flood fringe.



2.2.13 Bushfire Hazards

The Park and extensive areas of surrounding lands are designated by the Fire and Emergency Services (FES) Commissioner as *Bush Fire Prone Areas* on State mapping tool Locate 5 (refer **Appendix L**).

A Bushfire Hazard Management Plan (BMP) has been prepared by Bushfire Prone Planning (Ref. 220569 - 6 March 2024) to accompany the DA (refer **Appendix M**). The BMP includes a desktop assessment of the environmentally sensitive areas of the Site and its environs, and the identification of vegetation on public land with environmental, biodiversity and conservation values. The BMP was updated to reflect the feedback from the FES.

The BMP is supported by a Bushfire Emergency Plan prepared by Bushfire Prone Planning (Ref. 220569 - 6 September 2022) (refer **Appendix M**).

2.2.14 Acid Sulphate Soils

The Acid Sulphate Soils (ASS) Risk Mapping developed by DWER and published through the State mapping tool Locate 5 indicates that the Site is not at risk from acid sulphate soils.

2.2.15 Ecological Features

The State mapping tool Locate 5 indicates that the Site and adjoining land to the west and north (Coogee Beach Reserve) are within a "Bush Forever Area" (**Appendix L**).

DHP commissioned Focused Vision Consulting to prepare a 'Biological Assessment' (February 2024) refer **Appendix N** to provide an assessment for flora, vegetation, fauna and habitat values, in accordance with relevant Environmental Protection Agency (EPA) guidance, incorporating desktop assessment and field survey; and to prepare and provide a technical report and spatial data that meets EPA and Index of Biodiversity Surveys for Assessment (IBSA) requirements. The assessments undertaken by Focused Vision Consulting comply with the requirements for biological assessments for Environmental Impact Assessments in Western Australia, as detailed in the *Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment (EPA 2016)* and *Technical Guidance – Terrestrial Vertebrate Fauna Surveys for Environmental Impact Assessment (EPA 2020)*.

Flora and vegetation assessments were undertaken by Focused Vision Consulting to a 'Reconnaissance' level of detail which focused on a comprehensive desktop assessment, a field survey utilising relevé sampling to define each vegetation unit (where assemblages of native flora occur), and targeted surveys for Threatened and Priority flora and ecological communities across the site. As part of the targeted assessment, Tuart trees and their canopies were mapped by Focused Vision Consulting, to determine the presence and extent of the Tuart woodlands and forests which are a Threatened Ecological Community (TEC). The Rottneest Island Pine and Tea Tree TEC, known to occur in the area, was also targeted, as well as any other significant ecological communities known to occur in the region, or resulting from the desktop assessment.



Fauna assessments were undertaken by Focused Vision Consulting to a 'Basic' level of detail which focused on a comprehensive desktop assessment, a field survey focused on habitat mapping (also carried out in reference to the vegetation mapping), recording opportunistic observations of fauna from direct and indirect (evidence) sightings, and targeted surveys for fauna species of significance and their habitats. As part of the targeted assessment, foraging, breeding (trees with suitable hollows) and roosting habitat for Threatened Black-Cockatoos were also surveyed and mapped by Focused Vision Consulting.

The report identifies that there are five species of tree or shrub growing in the study area that represent endemic flora and could therefore be representative of remnant vegetation. In all instances, these endemic species are growing in isolation, and none comprise intact vegetation with structure or occur over native understorey. In addition to these five (5) defined vegetation units, the study area supports consisting of planted areas, and areas that are cleared and support no vegetation. Most of the study area (70%) is cleared for buildings and infrastructure. The report concluded that 70% of the Site had been cleared, 11% of the Site was "completely degraded", and 20% of the site was "degraded- completely degraded" (section 5.2.3).

The report notes that one Priority 4 taxa, *Grevillea olivacea* was recorded within the Planted Areas. However, this species is commonly used in rehabilitation and landscaping, and in this location, is part of a planted vegetation unit, and not naturally occurring. The report concludes that this vegetation unit is not considered regionally significant nor are any of the recorded vegetation units of significance due to this factor. The report further notes that no Priority Ecological Communities were recorded during the field assessment and therefore none are considered regionally significant due to this factor.

The key findings and conclusions of the flora, vegetation, fauna and habitat assessment of the study area are:

- *No Threatened flora were recorded.*
- *One Priority 4 flora (Grevillea olivacea) was recorded which is considered to be planted and not naturally occurring within the study area.*
- *One of the recorded introduced species (*Tamarix aphylla) is listed as a Declared Pest plant under the BAM Act and is also as a WoNS, and is assigned the 'C1 – Exclusion' category, which requires that the species be excluded from all parts of Western Australia and therefore, should be eradicated.*
- *Two vegetation units, Eg and Planted Areas were described and mapped within the study area.*
- *None of the mapped vegetation units are representative of any Commonwealth or State listed TECs or PECs.*
- *The condition of the vegetation in the study area ranges from 'Degraded – Completely Degraded' to 'Completely Degraded'.*



- *One fauna species of conservation significance, Quenda (P4), was observed during the field assessment.*
- *Two fauna habitats, Tuart Woodlands and Planted Shrublands, were described and mapped across the study area.*

The report further concludes that several Black-cockatoo habitats are supported by the study area:

Foraging habitat:

- *0.53 ha of 'low' quality foraging habitat for Carnaby's Black-cockatoo and 'low to negligible' quality foraging habitat for Forest Red-tailed Black-cockatoo within the Tuart Woodland habitat.*
- *0.85 ha of 'low to negligible' quality foraging habitat for Carnaby's Black-cockatoo and 'low' quality foraging habitat for Forest Red-tailed Black-cockatoo within the Tuart Woodland habitat.*

Breeding habitat:

- *Eight trees with the potential to provide suitable breeding hollows for Black-cockatoos in the future were recorded.*
- *No trees with suitable nor unsuitable hollows for Black-cockatoo breeding were recorded.*

Roosting habitat:

- *No known or confirmed roosting habitat was recorded although the Tuart Woodland habitat is considered to potentially provide habitat suitable for roosting, however, this is considered unlikely. A follow-up Black-cockatoo roost survey of the site, conducted at dusk during late March or early April would assist in this conclusion.*

2.2.16 Trees

In response to the Council pre-lodgement feedback and as part of an overall program to undertake arborist's assessments of trees in parks across Australia, DHP commissioned Homewood Consulting to prepare an *Arboricultural Impact Assessment* (25 January 2024) of the proposed redevelopment of the Park (refer **Appendix O**).

The Arboricultural Impact Assessment (AIA) advises that 276 trees at Discovery Park – Coogee Beach were assessed in relation to the proposed development of the Site. The AIA advise that the arboricultural retention value of each tree is used to guide decision making regarding tree protection throughout the development process. The AIA assigns retention value for each tree in consideration of the tree's size, health, structure, ULE and a review of the tree photograph. The AIA advises that:



- 34 trees have a 'High' retention value. Trees in this category are generally large trees and the most significant trees on site. These trees are all mature specimens with good or fair health and structure that provide a significant landscape contribution. They are expected to be assets in the landscape for the long term. All efforts should be made to incorporate these trees into any new development/design.
- 127 trees have a 'Medium' retention value. Trees in this category are generally mature trees in good or fair condition with a structural fault that may require arboricultural input, mature trees that are smaller and provide a moderate landscape contribution, or semi-mature trees that are well-established and in good condition. Where practical, design modifications should be considered to retain and protect these trees from arboricultural impact. Replacement planting should be undertaken on-site to compensate for the removal of any Medium retention value trees.
- 75 trees have a 'Low' retention value. Trees in this category may be trees with poor health and/or structure, environmental weed species, young/small trees that can be easily replaced in the landscape, or trees which are otherwise not suitable to be retained with a new development. These trees are not worthy of impeding development and generally do not need to be incorporated into the development design.
- 12 trees have a retention value of 'None'. This includes dead trees on site that have been recommended for removal and tree stumps.
- 28 trees have 'Third party' ownership. Trees assessed as 'Third party' are located just outside the property boundary and are owned by another party. Unless otherwise negotiated with the tree owners and approved by the relevant authority, these trees require retention and protection throughout all stages of development.

2.2.17 Coastal Erosion

The publication *Coastal erosion hotspots in Western Australia* (July 2019) prepared by the DPLH and the Department of Transport (DT) under the *WA Coastal Zone Strategy*, identify 'hotspots', where coastal erosion is expected to impact on public and private physical assets and require management and adaptation action within 25 years.

Land and the coastal margins in the vicinity of the Site is identified as a coastal erosion hotspot in the mapping outputs of the publication (refer **Appendix L**).

2.2.18 Waste Management

In response to the Council pre-lodgement feedback, DHP commissioned MRA Environmental to prepare a waste management plan for the Park to ensure that the waste storage and collection activities for the operational phase of the proposed development are in accordance with the Council's *Local Planning Policy 1.14 Waste Management*.



The Waste Management Plan (March 2024) (WMP) (refer **Appendix P**), under current arrangements, wheelie bins for both general waste and recycling are positioned throughout the Park and are monitored by Park personnel as required. The wheelie bins are positioned kerbside on the internal road network and are serviced on-site once per week. General waste and recycling from Park facilities including the camp kitchen, amenities building, pool & recreation area and the office is collected by Park personnel daily and transferred into the bulk bins stored in the waste storage area at the southern end of the Park. The bulk bins are also serviced on-site at the waste storage area once per week.

2.2.19 Environmentally Sensitive Land

Environmentally sensitive areas (ESAs) are classes or areas of native vegetation where the exemptions for clearing vegetation under the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (Clearing Regulations) do not apply. The Site is identified as being located within an “Environmentally Sensitive Land” on maps sourced from the State mapping tool Locate 5 (refer **Appendix L**).

2.2.20 Airport Noise and Obstacle Limitation Surface

The Site is not identified as being in an Airport Noise Area or subject to an Obstacle Limitation Surface on the Locate 5 mapping service (refer **Appendix L**).

2.2.21 Heritage, Cultural and Archaeological Values

Aboriginal Heritage

A search of the Aboriginal Sites Heritage System published by the Department of Planning, Lands and Heritage (WA) ¹ indicates that there are no ‘Registered Aboriginal Sites’ and no ‘Other Heritage Places’ in the locality of the subject site.

The State mapping tool *PlanWA* indicates that no aboriginal cultural heritage places or cultural landscapes are found on the Site.

European heritage

The *iNHerit* database indicates that the Site is not within an area of heritage significance.

The State mapping tool *PlanWA* indicates that

- No Historic Heritage Places (Heritage Council) found.
- No Historic Heritage Places (LGA) found.

¹ <https://www.daa.wa.gov.au/heritage/place-search/>



2.2.22 Site Contamination

A search of the Contaminated Sites Database and the Reported Sites Register indicates that the subject site does not contain known or suspected contaminated sites under the *Contaminated Sites Act 2003* (WA).

2.3 Planning Approval History

By email dated 19 December 2023, Chantala Hill (Senior Planning Officer) advised that Council records indicated several recent development approvals for the Site (refer **Table 5**).

Table 5: Planning Approval History

REFERENCE NUMBER	ADDRESS	DESCRIPTION
DA09/1006	3 Powell Rd	Carport
DA10/0141	Site 81/3 Powell Rd	Back veranda
DA13/0697	Site 191/3 Powell Rd	Carport and Front Porch Addition
DA14/0626	Site 108/3 Powell Rd	Retrospective Deck
DA14/1009	3 Powell Rd	Upgrade to Caravan Park (3 Long-Stay Sites)
DA15/0859	Site 182/3 Powell Rd	Carport
DA15/0863	Site 123/3 Powell Rd	Cabin Relocation
DA22/0704	Site 162/3 Powell Rd	Retrospective Carport and Store
DA22/0940	Site 122/3 Powell Rd	Patio Addition

3.0 MANAGEMENT PLANS

3.1 Woodman Point Regional Park Management Plan

The Park is located within the Woodman Point Regional Park (refer **Figure 1**).



Figure 1: Woodman Point Regional Park Management Plan – Land Tenure

The Woodman Point Regional Park Management Plan 2010 (Woodman Point Management Plan) notes that there are two (2) caravan parks and camping grounds offering accommodation within the Park – Woodman Point Holiday Park and Coogee Beach Holiday Park.

The primary strategy of the Woodman Point Management Plan is to:

Manage the park for conservation and allow recreation and other uses to occur to the extent that they do not adversely impact on other park values.

In relation to the Park, the Woodman Point Management Plan states (Section 35):

Coogee Beach Holiday Park is located off Powell Road and is operated by Aspen Parks. The land is leased from the City of Cockburn until 31 May 2011, and the lessee may exercise options to extend the lease until 31 May 2016 or 31 May 2021. The caravan park accommodates both short term and long term residents and is considered an appropriate land use within the Park.

The Woodman Point Management Plan sets out strategies for managing the park in accordance with management zones. The Park is zoned as Recreation – Area 3 (refer **Figure 2**). The adjoining land to the north (Coogee Beach Reserve) is zoned as Recreation – Area 1. The adjoining land to the west (Coogee Beach Reserve) is zoned as Natural Environment Area – Area 1.

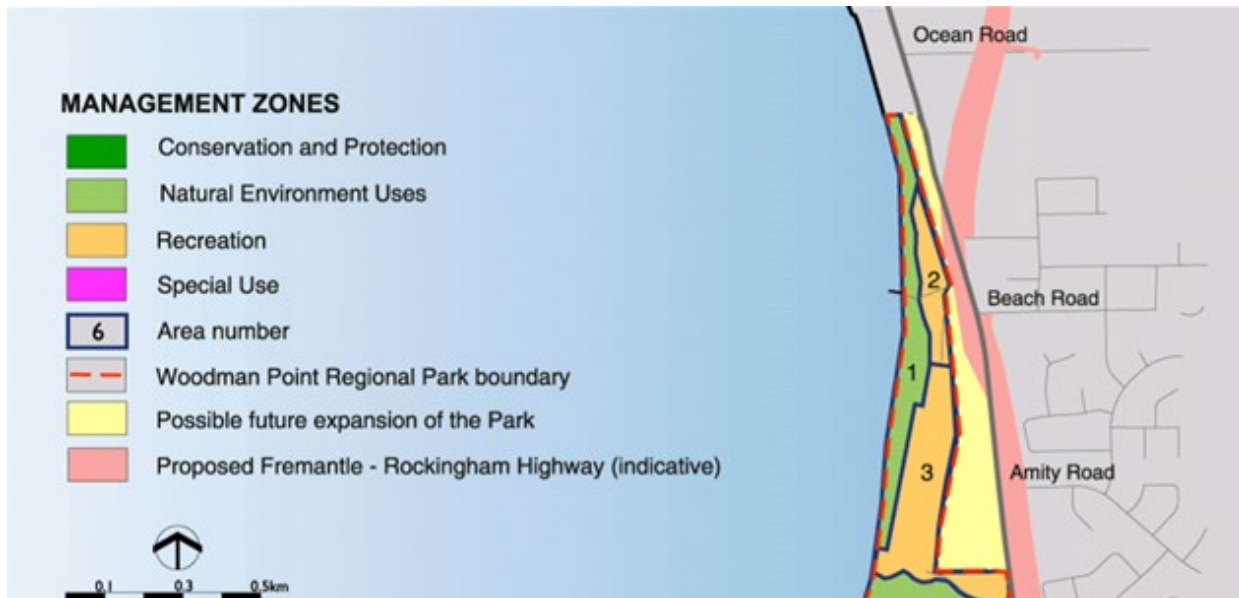


Figure 2: Woodman Point Regional Park Management Plan – Management Zones

The management emphasis of the Recreation Management Zone is:

The prime emphasis of management will be to provide a variety of recreation opportunities. The type and scale of facilities provided will depend on the values of any given area, community demand for recreation and the appropriate management of the Park. Management involves minimising the impact of visitor activities through the sensitive placement and provision of access and facilities as well as through the provision of information and interpretive material. Visible evidence of management may be high.

The acceptable uses and facilities for the Recreation Management Zone are:

Public use may be high in these areas. Predominantly passive recreation pursuits, allowing for Park service and picnic facility development. Commercial concessions are considered appropriate within this management zone. Rehabilitation, landscaping and reticulation of areas may be necessary.

The stated reserve purpose for Recreation – Area 3 is “Caravan Park and Recreation.”

3.2 Coastal Adaptation Plan

The *City of Cockburn Coastal Adaptation Plan (2018)* was developed in collaboration with the Cockburn Sound Coastal Alliance using information from the earlier Coastal Vulnerability Study and Values and Risk Assessment processes. The adaptation plan was prepared to adapt to the changing coast in the City of Cockburn and provides recommended timeframes and trigger points for decision-making and planning. The adaptation plan was prepared by the Council as the first iteration of an evolving, long-term planning and decision-making process for the City of Cockburn, the community, and key stakeholders to adapt settlements and infrastructure to coastal processes – including risks of coastal erosion and inundation.



The adaptation plan includes an implementation stage that recommends specific coastal adaptation activities to be delivered in the immediate (15-year) planning horizon.

The adaptation plan sets out several implementation measures including a recommendation to prepare a foreshore management plan for Coogee Beach to provide an implementation framework for adaptation and long-term retreat, and for immediate-term adaptation measures.

To plan for Cockburn's changing coast, the adaptation plan breaks the coastal strip into a series of coastal management units. The Park is in *Management Unit 5 – Coogee Beach* which is described as consisting of sandy stretches of beach and includes the Coogee Beach Holiday Park, Coogee Beach Surf Life Saving Club and Surfing Lizard Café. Coogee Beach is a frequently visited beach in Cockburn.

For *Management Unit 5*, the adaptation plan concluded that there are areas in this management unit which are currently vulnerable to inundation and erosion. However, an intolerable risk level (representing a trigger point 3 or 4) is not expected to be reached in the immediate planning horizon (15 years). The area has been identified as currently and becoming increasingly vulnerable to erosion and a loss of beach area from coastal actions and sea level rise. Coastal vulnerability and risk assessment mapping shows that the risk associated with erosion will likely become intolerable before 2040 for some assets requiring a decision between retreat and appropriate interim protection options in planning horizon leading up to 2040, or as risk becomes intolerable.

The adaptation pathway adopted in the Coastal Adaption Plan for Coogee Beach (designated as *Coastal Management Unit 5*) is one of retreat from the most vulnerable coastal land in the long term. This pathway also supports responsible interim adaptation measures that continue land uses where these measures are justified and viable in the short to medium term.

The recommended adaptation measures for Management Unit 5 are outlined in the map (refer **Figure 3**).



Figure 3: Coastal Adaptation Plan Management Unit 5 Adaptation Measures

3.3 Coogee Beach Foreshore Management Plan

The *Coogee Beach Foreshore Management Plan (2020 to 2070)* (Foreshore Management Plan) was adopted by the Council in October 2020.



The Park is identified in the Foreshore Management Plan as a beachfront location that could be subject to coastal erosion in the future. The Park forms part of the Coogee Beach Foreshore area. The Foreshore is an area of high community use that has significant and sometimes competing social, environmental, and economic values. The foreshore is predicted to experience coastal inundation and erosion in the longer term, based on current projected sea level rise estimates, placing further pressure on some assets and the natural environment.

The Foreshore Management Plan was developed by the Council in accordance with *State Planning Policy 2.6* to manage the continued recreational, tourism and commercial use of the Coogee Beach foreshore. The Foreshore Management Plan aims to:

Guide management of the coastal reserve over the coming 50 years to 2070, in a manner that ensures the preservation of ecological, cultural, and social values of the area, whilst enabling use of the Foreshore in a sustainable manner in the short to medium term.

The Foreshore Management Plan notes that several existing management plans cover aspects the foreshore. The Foreshore Management Plan aims to be consistent with and build upon these other management plans:

- Woodman Point Regional Park Management Plan (Department of Biodiversity, Conservation and Attractions, 2010).
- Coogee Beach (Environmental) Management Plan (City of Cockburn, 2009).
- Coastal Adaptation Plan (City of Cockburn, 2016).

The Foreshore Management Plan focuses on the sea level rise (SLR) and erosion scenarios that are likely to impact the foreshore and development planning within it, over the 50-year horizon to 2070 (Section 4.4.3):

- Present day scenario (no SLR) considers the 2013 shoreline and the areas at risk from acute coastal erosion events (Hazard Line) even without any increase in sea level.
- 0.5-metre SLR scenario (assumed to occur by around 2070) and likely to directly impact some areas and assets of the Foreshore within the 50-year timescale of this Foreshore Management Plan. Both the Steady Shoreline and Hazard Line are relevant.
- 0.9-metre SLR scenario, assumed to occur by around 2110 and therefore relevant to the planning and design of major new developments occurring in the Foreshore within the timescale of this Foreshore Management Plan (as developments may have a design life well beyond the 50-year timescale of the Foreshore Management Plan). The Hazard Line for this scenario is relevant.

The Foreshore Management Plan contains a map that shows applicable scenarios and hazards, and erosion hazards to 2070 (Figure 14) (refer **Appendix Q**). The Park is impacted by the 0.5-metre SLR scenario (acute) and the 0.9-metre SLR scenario (acute).



The Foreshore Management Plan identifies key assets and areas within the foreshore that are at risk of direct impact by erosion within the timescale of the plan (Section 4.4.3). The potential impacts on Park infrastructure are described as:

Erosion impacts from the 0.5 m SLR Hazard Line (2070) could extend to the boundary of the existing holiday park resulting in potential impacts to structures along this boundary and the encroaching shoreline could see loss of adequate public foreshore reserve buffer. Areas further into the Holiday Park are at risk with greater SLR (likely beyond 2070), which is a consideration for new developments occurring in this area within the life of the Foreshore Management Plan. This asset has reached Trigger 2 - Current risks can be accommodated, but planning should consider longer term risks.

The Foreshore Management Plan makes several observations and recommendations for the Park (Section 6.5.3):

- Westernmost areas of the Holiday Park are at risk of erosion impacts under a 0.5-metre SLR acute scenario, and the receding shoreline may also reduce the remaining foreshore reserve width in front of the site to an unacceptable width.
- A minimum 40-metre-width vegetated public foreshore reserve should be always maintained in front of the Holiday Park, and infrastructure (cabins, services, etc.) should be progressively removed and dunes revegetated if or when required to maintain this minimum reserve width.
- A Holiday Park Buffer Line offset 20 metres inland from the 0.5-metre SLR Hazard Line should be established, in front of which only transportable structures or minor infrastructure should be permitted. This is a sufficient setback to ensure adequate dune width over the life of the Foreshore Management Plan; refer Section 6.8.1 for further details regarding the recommended management of the Holiday Park site and lease.

The Foreshore Management Plan identifies immediate and long-term actions for the Park (Section 6.5.3):

- Immediate Term
 - Progressive redevelopment of Holiday Park with permanent development (ablutions, offices, major services, etc.) behind the Holiday Park Buffer Line as assets reach the end of useful life.
 - Only transportable accommodation, removable infrastructure, and minor services to be established on the ocean side of the Holiday Park Buffer Line.
 - Ensure leasing arrangement reflects risks and hazards present for the property and controls in place.
 - Monitor shoreline movements and the width of the vegetated foreshore reserve in front of the Holiday Park as part of the City's annual coastal monitoring program.



- Longer Term
 - Implement managed retreat of Holiday Park infrastructure to maintain a 40 m public foreshore reserve width and rehabilitate dunes as necessary to respond to future erosion and shoreline recession Potential timeframe: 2040 – 2060.

The Foreshore Management Plan makes findings and recommendations for the Park and lease of the Site by the Council for a holiday park (Section 6.8.1):

The western boundary of the Holiday Park could be impacted directly by erosion by 2070 under a 0.5 m SLR scenario, and the Steady Shoreline will move closer reducing foreshore reserve width in front of the site to a potentially intolerable width. Increasing usage of the reserve may also put pressure on the dune system, and there may be a requirement to modify access track(s) nearby the Holiday Park in future to assist dune management.

The holiday park should generally remain within its current footprint, and should not expand westward at the expense of natural areas.

The Foreshore Management Plan contains a plan (Figure 17) that shows the Holiday Park Buffer (**Figure 4**).

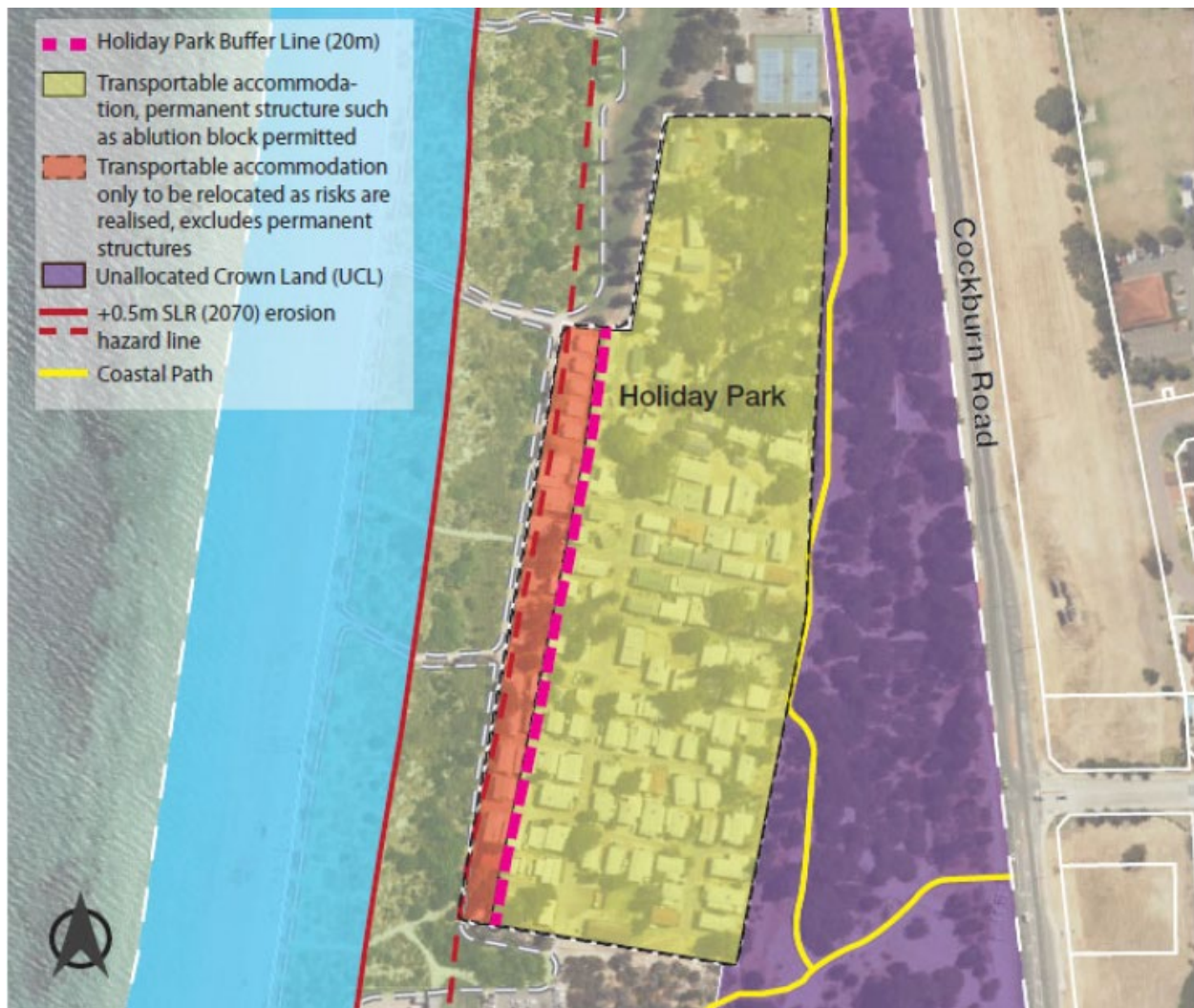


Figure 4: Holiday Park Buffer.

The Foreshore Management Plan recommends measures to be incorporated into any lease agreements that have a tenure extending beyond 20 years:

1. *Flag the potential future realignment, closure or revegetation of some access tracks adjacent to the Holiday Park, should it become necessary for dune management.*
2. *Secure agreement to upgrade the existing informal track running along (and within) the Holiday Park's western boundary to facilitate easier Holiday Park user access to designated beach paths and better management access to dunes. Agreement for this should be obtained, even if the works are undertaken by the City.*
3. *Establishment of a Holiday Park Buffer Line, offset 20 m landward of the 0.5 m SLR Hazard Line (refer to Figure 17). This Buffer Line aims to allow for adequate foreshore reserve width between the shoreline and the Holiday Park over the life of the lease. This line may be updated and refined in future to reflect new information and advances in coastal science.*



4. *Prohibit the construction of new permanent development (ablutions, buildings, major services, etc.) west of the Holiday Park Buffer Line. This minimises the scale of assets that may need to be removed in future to maintain adequate foreshore reserve.*
 5. *Limit development west of the Holiday Park Buffer Line to that of transportable accommodation and removable infrastructure, to facilitate easier removal/relocation of assets in this area should retreat due to erosion be required during the life of the lease.*
 6. *Only such services (power, water, sewer and communications) may be installed beyond the Holiday Park Buffer Line as necessary to support transportable accommodation and removable infrastructure within this area. These services shall not include any main or trunk lines, and shall be designed and installed in a way that they can be progressively removed as necessary from west to east, without interrupting supply to other areas or assets.*
 7. *Maintain a separation of at least 40 m between the high water mark (Highest Astronomical Tide level contour) and the western boundary of the Holiday Park site at all times, (considered adequate foreshore reserve width). This can be monitored annually via the City's coastal monitoring surveys and program.*
 8. *Secure agreement from the lessee to adjust the site's western boundary as necessary, and to remove all structures and services outside of the adjusted boundary, if requested by the City to maintain the required 40 m minimum separation.*
 9. *The lease shall include the relevant roles and responsibilities for key stakeholders including the lessee, CoC and DPLH.*
- *Immediate Term actions recommended to be undertaken by the City:*
 - *Incorporate clauses in any future Holiday Park lease agreement to adequately address the above requirements.*
 - *Upgrade the access track along the western boundary of the site and undertake revegetation and dune stabilisation activities to increase resilience of the dune to withstand impacts of storm events and reduce likelihood of significant erosion.*
 - *Monitor the beach profile to ensure a 40 m foreshore reserve is retained and to allow for timely response to risks as, or if, they are realised, via the coastal monitoring program.*

The lease between the Council and Discovery over the site is consistent with the relevant parts of the Foreshore Management Plan.



4.0 THE PROPOSAL

4.1 Proposal Overview

The proposed use of the Site is for the redevelopment of an existing tourist development. In overall terms:

- 1) The existing facilities of the Park will be reduced by:
 - a) Twenty-four (24) park homes
 - b) Six (6) powered sites
 - c) One (1) amenities block
- 2) The existing facilities of the Park will be increased by:
 - a) Forty eight (48) additional cabins.
 - b) One (1) new pool/recreation area.

4.2 Development Stages

The Proposal comprises the development of the following key elements over two (2) stages. The timing of the development staging over the 21-year term of the lease will occur in compliance with the terms of the lease of the Park held by Discovery.

4.2.1 Stage 1 – Demolition and Development

- 1) Demolition of the current managers residence and office located on the northern side of the Site in between *Narembeen Avenue* and *Kondinin Avenue*.
- 2) Demolition of the camp kitchen and ablution blocks on park eastern side, located between *York Place* and *Pingelly Drive*.
- 3) Demolition of the central ablutions block, located between *Mindari Drive* and *Kunmarina Drive*.
- 4) Rebuilding of the office and residence on the eastern side of the Park entrance along the northern boundary.
- 5) Relocation of Park Homes:
 - a) Three (3) park homes to the area between *Bouganville Avenue* and *Pingelly Drive* along the eastern boundary of the Site.
 - b) Four (4) park homes to the eastern side of *The Boulevard* between *Mindari Drive* and *Kunmarina Drive*.



- c) Three (3) park homes to the south-east corner of the Park.
- 6) Demolition of cabins (Units 201-205)
- 7) Construction of new pool and recreation area on the western side of the Site between the proposed tourist cabins the western side of the Site along Peron Peninsula.
- 8) Construction of new camp kitchen and amenities/laundry along the entry driveway between *York Place* and *Pingelly Drive*.
- 9) Construction of new tourist cabins:
 - a) Eight (8) standard cabins between *Gibson Way* and *Kunnunurra Way*.
 - b) Eight (8) two storey deluxe cabins on the western side of *Peron Peninsula*.
 - c) Three (3) deluxe cabins between *Gibson Way* and *Pinjarra Way*.
 - d) One (1) DDA cabin between *Gibson Way* and *Pinjarra Way*.
 - e) Eight (8) superior cabins between *Peron Peninsula* and *The Boulevard*.
 - f) One (1) DDA cabin between *Peron Peninsula* and *The Boulevard*.

4.2.2 Stage 2 – Removal and Development

- 1) Removal of twenty-four (24) park homes from the Site.
- 2) Construction of twenty-eight (28) new tourist cabins:
 - a) Seven (7) superior cabins between *Kununurra Way* and *Nullagine Way*.
 - b) One (1) DDA cabin between *Kununurra Way* and *Nullagine Way*.
 - c) Four (4) standard cabins between *Nullagine Way* and *Augusta Way*.
 - d) Four (4) standard cabins between *Augusta Way* and *Byro Way*.
 - e) Four (4) superior cabins between *Augusta Way* and *Byro Way*.
 - f) Four (4) superior cabins between *Nullagine Way* and *Augusta Way*.
 - g) Four (4) superior cabins located between *Byron Way* and the southern boundary of the Site.



4.3 Proposed Changes to Park Facilities

A summary of the proposed demolition, removals relocations, and new development incorporated within the Proposal by stage is provided in **Table 6**.

Table 6: Summary of Proposed Changes to the Park

SECTION	EXISTING DEVELOPMENT	STAGE 1 REMOVAL	STAGE 1 RELOCATION	STAGE 1 NEW DEVELOPMENT	STAGE 2 REMOVAL	STAGE 2 NEW DEVELOPMENT	COMPLETED DEVELOPMENT	NETT CHANGE
Park Homes	113	0	10	0	24	0	89	-24
Standard Cabins	5	0	0	8	0	8	21	16
Deluxe Cabins	20	9	0	8	0	0	14	-6
Two Storey Deluxe Cabins	0	0	0	8	0	0	8	8
Superior Cabins	1	0	0	8	0	19	28	27
DDA Cabins	0	0	0	2	0	1	3	3
Powered Sites	39	5	0	0	1	0	33	-6
Amenities Blocks	4	2	0	1	0	0	3	-1
Camp Kitchen	1	1	0	1	0	0	1	0
Managers Residence	1	1	0	1	0	0	1	0
Office	1	1	0	1	0	0	1	0
Recreation Area/Pool	0	0	0	1	0	0	1	1

The proposed changes to accommodation units (cabins, powered sites, and permanent) by stage are summarised in **Table 7**. For the purposes of this analysis:

- Tourist accommodation units are assumed to comprise standard cabins, deluxe cabins, two storey deluxe cabins, superior cabins, and DDA cabins.
- Permanent accommodation units are assumed to comprise Park Homes.



Table 7: Summary of Proposed Changes to Accommodation Units within the Park

SECTION	EXISTING DEVELOPMENT	STAGE 1 REMOVAL	STAGE 1 RELOCATION	STAGE 1 PROPOSED DEVELOPMENT	STAGE 2 REMOVAL	STAGE 2 PROPOSED DEVELOPMENT	TOTAL DEVELOPMENT POST WORKS	NETT CHANGE
Permanent Accommodation Units	113	0	10	0	24	0	89	-24
Tourist Accommodation Units	26	9	0	29	0	28	74	48
Powered Sites	39	5	0	0	1	0	33	-6
Nett Accommodation Units	178	14	10	29	25	28	196	18

In relation to the proposed changes to accommodation (tourist and permanent) units.

- The number of permanent accommodation units (park homes) in the Park will be reduced by twenty-four (24).
- The number of tourist accommodation units at the Park will be increased by forty-eight (48).
- The number of powered sites in the Park will be reduced by six (6).
- The number of accommodation units in the Park (park homes, cabins and powered site) will be increased by eighteen (18).

In overall terms:

- 1) The existing facilities of the Park will be reduced by:
 - a. Twenty-four (24) park homes
 - b. Six (6) powered sites
 - c. One (1) amenities block
- 2) The existing facilities of the Park will be increased by:
 - a. Forty-eight (48) additional cabins.
- 3) One (1) new pool/recreation area.



4.4 Development Layout

The Site is proposed to be redeveloped around the existing internal road layout. The existing park homes and cabins will be either repositioned within the Site or removed from the Site. New tourist accommodation units – cabins of varying typology – are proposed to be located on the western side of *The Boulevard* and Peron Peninsula. All park homes are proposed to be located on the eastern side of *The Boulevard*. A new pool/recreation area is proposed to be located on the western side of *The Boulevard*.

4.5 Plans of Development

Plans of Development for the proposed redevelopment of the Park are provided in **Appendix R**.

The drawings that comprise the Plans of Development are listed in **Table 8**.

Table 8: Plans of Development

DRAWING NO.	SHEET NUMBER	PREPARED BY	REVISION	DRAWING TITLE	DATE OF ISSUE
181002	1	Green Hill Design	PD6	Existing Site Plan	8 March 2024
181002	2	Green Hill Design	PD6	Proposed Site Plan	8 March 2024
181002	3	Green Hill Design	PD6	Proposed Site Plan (Bushfire Overlay)	8 March 2024
181002	4	Green Hill Design	PD6	Building Materials/Finishes Selections	8 March 2024
181002	5	Green Hill Design	PD6	Proposed Site Plan (south)	8 March 2024
181002	6	Green Hill Design	PD6	Proposed Site Plan (north)	8 March 2024
181002	7	Green Hill Design	PD6	Proposed Site Plan (Dimensioned)	8 March 2024
181002	8	Green Hill Design	PD6	2 Bedroom Superior Cabins (Floor Plan)	8 March 2024
181002	9	Green Hill Design	PD6	2 Bedroom Superior Cabins (Elevations)	8 March 2024
181002	10	Green Hill Design	PD6	2 Bedroom Standard Cabins (Floor Plan)	8 March 2024
181002	11	Green Hill Design	PD6	2 Bedroom Standard Cabins (Elevations)	8 March 2024
181002	12	Green Hill Design	PD6	Proposed Site Plan (Dimensioned)	8 March 2024
181002	13	Green Hill Design	PD6	2 Store Deluxe 2 Bedroom Cabins	8 March 2024



DRAWING NO.	SHEET NUMBER	PREPARED BY	REVISION	DRAWING TITLE	DATE OF ISSUE
181002	14	Green Hill Design	PD6	2 Store Deluxe 2 Bedroom Cabins (Floor Plan)	8 March 2024
181002	15	Green Hill Design	PD6	2 Store Deluxe 2 Bedroom Cabins (Elevations)	8 March 2024
181002	16	Green Hill Design	PD6	Recreation Room Building (Floor Plan)	8 March 2024
181002	17	Green Hill Design	PD6	Recreation Room Building (Elevations)	8 March 2024
181002	18	Green Hill Design	PD6	Camp Kitchen Building (Floor Plan)	8 March 2024
181002	19	Green Hill Design	PD6	Camp Kitchen Building (Elevations)	8 March 2024
181002	20	Green Hill Design	PD6	Amenities Building (Ground Floor and perspectives)	8 March 2024
181002	21	Green Hill Design	PD6	Amenities Building (Elevations)	8 March 2024
181002	22	Green Hill Design	PD6	Office/Reception Building (Floor Plan and perspectives)	8 March 2024
181002	23	Green Hill Design	PD6	Office/Reception Building (Elevations)	8 March 2024
181002	24	Green Hill Design	PD6	Manager's Residence Building (Floor Plan and perspectives)	8 March 2024
181002	25	Green Hill Design	PD6	Manager's Residence Building (Elevations)	8 March 2024
181002	26	Green Hill Design	PD6	2 bedroom DDA Cabin (Floor Plan and perspectives)	8 March 2024
181002	27	Green Hill Design	PD6	2 bedroom DDA Cabin (Elevations)	8 March 2024
181002	28	Green Hill Design	PD6	Waste management facilities	8 March 2024



4.6 Coastal Setback

Drawing sheet 2 (Proposed Site Plan) of the Plans of Development shows the location of the proposed redevelopment works relative to the Holiday Park Buffer Plan and the SLR Hazard Line referenced in the lease between the Council and Discovery. The location of these lines is consistent with the relevant sections of the Foreshore Management Plan.

Consistent with terms of the lease, DHP acknowledges and confirms that:

- 1) The Holiday Park Buffer Line must be adjusted from time to time.
- 2) The Holiday Park Buffer Line must be offset at least 20 metres landward of the SLR Hazard Line which may be varied from time to time to reflect new information and advances in coastal science.
- 3) The Council may undertake annual coastal monitoring and surveys to monitor the risk of sea level rise and coastal erosion and to monitor the location of the Holiday Park Buffer Line.
- 4) The Council may, acting reasonably, if it considers that the Holiday Park Buffer Line requires amendment, give written notice to Discovery:
 - a) Specifying why the buffer line is required to be changed.
 - b) Identifying the location of the new Holiday Park buffer line.
 - c) Specifying the date from which the amended Holiday Park Buffer Line is to apply.
- 5) If the separation between the western boundary of the site and the high-water mark (Highest Astronomical Tide Contour) is at any time no longer greater than 40 metres, the Council may provide written notice to Discovery:
 - a) Adjusting the western boundary of the Site to the point where it is 40 metres from the high-water mark:
 - b) Specifying whether the Council requires Discovery to remove any structures, infrastructure or services which are outside of the adjusted boundary.
 - c) Specifying the date from which the adjusted boundary is to apply.

DHP will not construct any permanent structures on those parts of the Site which are west of the Holiday Park Buffer Line. Development on those parts of the Site west of the Holiday Park Buffer Line will be limited to transportable accommodation which can be relocated, removable infrastructure, and services which are necessary to support the transportable accommodation and removable.



4.7 Use Aspects

4.7.1 Land Use

The proposed use of the land will continue to be for the purposes of a tourist development.

4.7.2 Road Access

The Site has frontage at its northern end to Powell Road which provides access to the Site from Cockburn Road. The existing entry road (The Boulevard) and exit road (Peron Peninsula) will continue to be used to service the additional development. The TIA concludes that there is no material change in traffic generated by the subject site because of the redevelopment, therefore no additional impact will occur on the surrounding intersections and road network.

4.7.3 Traffic Generation

The TIA finds that (Section 5.1.1):

The proposed upgrade of the site will increase the number of on-site cabins/sites from a total of 178 to 196 i.e., approximately 10% increase from the current available number of units. This will result in a slight increase in traffic being generated by the subject site as a whole, with the expected trips equating to 49vph in the AM peak, and 61vph in the PM peak (inbound and outbound).

According to WAPC Transport Impact Assessment Guidelines, developments generating between 10 and 100 trips during the peak hour falls under the 'moderate impact' category and is not considered to have any substantial impact on the surrounding road network. Therefore, the traffic volumes generated during any peak after the proposed upgrade would still be considerably low and falls under the 'moderate impact' category without having any substantial impact on the surrounding road network.

The TIA concludes that (Chapter 11):

- *The proposed development will see a slight increase in vehicular trips from the existing situation, due to an overall increase in the number of accommodation units proposed within the park.*
- *The site is expected to generate 49vph in the AM peak, and 61vph in the PM peak (inbound and outbound) with the proposed redevelopment.*
- *The impacts of the traffic volumes associated with the development on the road network are considered acceptable.*

4.7.4 Internal Traffic Circulation

The Proposal includes minor changes to the existing internal road layout. Stage One includes the removal of the existing *Pinjarra Way*, *Mandalay Way* and *Dampier Row* for the construction of the new pool and recreation area and new road connection bordering the area.



The TIA concludes that the majority of the internal road network upgrades are suitable for the use and comply with the relevant standards.

4.7.5 Traffic Management on Fronting Streets

The TIA notes that the site is an existing Discovery Park site, with access to the site gained via Powell Road, which intersects with Cockburn Road via a Give Way controlled T-intersection (Chapter 6).

The TIA concludes that with the proposed redevelopment, there will be an overall increase in the on-site accommodation units by 10% thereby adding a slight increase to the existing trips of approximately six vehicular trips in both the AM and PM peak hour periods. Hence it is anticipated that the proposed redevelopment will have minimal impact on the surrounding intersections and road networks.

4.7.6 Parking and Loading

Each of the proposed cabins including the DDA cabins will be provided with a car park. No changes are proposed to the car parking on Taylor Street that services the main Park building. A common parking area adjacent to the pool area will provide six (6) parking spaces. The new car parks vary in shape but will have a minimum dimension of three (3) metres by six (6) metres (refer sheet 4 and 12 of the Plans of Development).

All areas to be used for vehicle parking, accessways, loading bays and for turning or manoeuvring of vehicles will be sealed, drained, curbed, marked, and signposted (refer sheet 4 of the Plans of Development).

An external parking area for vehicle towing trailers located near the entry point to the Site. The length of the parking area will approximately be 55m and be able to accommodate up to 3 vehicles towing trailers.

External to the site entrance, there is a public parking area with 91 car parking spaces available, of which 6 are located alongside the courts directly north of the site entry. Another public parking area is located approximately 200m north of the subject site providing more than 110 car parking spaces provided.

The TIA concludes that (Section 5.3,2) the overall increase in the number of units will create a parking demand over and above the existing situation, with all parking demand contained within the site, The TIA further concludes that the parking spaces will comply with the relevant standards.

4.7.7 Accessibility

The development will provide three (3) DDA compliant cabins. The DDA cabins will provide access ramps with a DDA compliant slope of 1:14. The DDA cabins will provide wide living areas for manoeuvring. The recreation room building, camp kitchen building, amenities building and office/reception building all provide DDA compliant ramps at a slope of 1:14. The amenities building provides one (1) accessible bathroom and each DDA compliant cabin provides DDA compliant bathrooms.



4.7.8 Operating Hours

The redeveloped Park once completed will be operated by Discovery Parks as part of the Park's normal operations. The operating hours of the Park are 7 days per week 8:30 am to 6:00 pm.

4.7.9 Staffing Levels

The operation of the redeveloped Park may require the employment of additional staff.

4.7.10 Waste Management

The WMP notes that the development will provide an enclosed bin store that is 77m², with a roofed waste storage area of 40m², which is adequate to contain one (1) weeks' worth of waste and recycling generated by the development.

The WMP concludes that:

- In summary, the accommodation component requires 32.83m² of waste storage and the park facility component of the Park requires 1.75m² of waste storage, being a combined total of 34.58m².
- The development will provide an enclosed bin store area that is 77m², with a roofed waste storage area of 40m² which is therefore sufficient for the development and allows for additional space for bulky items if required. This is adequate to contain one (1) week worth of waste and recycling generated by the development.
- Existing waste collection frequencies are anticipated to continue with general waste and recycling to be collected once per week.
- As per existing arrangements, wheelie bins for both general waste & recycling will be positioned kerbside on the internal road network and are serviced on-site once per week.
- General waste and recycling from Park facilities including the camp kitchen, amenities building, pool & recreation area and the office is collected by Park personnel daily and transferred into the bulk bins stored at the southern end of the Park. The bulk bins are also serviced on-site at the waste storage area once per week.

4.7.11 Air Emissions

The proposed use of the Site is not anticipated to generate air emissions.

4.7.12 Noise Generation

The operation of the redeveloped Park is not anticipated to generate any significant additional noise above existing levels.



4.7.13 Noise Impacts from Cockburn Road

In response to pre-lodgement feedback from the Council, DPLH and Main Roads WA, DHP commissioned Acoustics Consultants Australia to undertake a road traffic noise assessment of the proposed development in the context of:

- State Planning Policy 5.4 (SPP5.4, September 2019) with regards to noise intrusion due to the nearby road (Cockburn Road).
- Australian Standard 2107:2016 Acoustics – Recommended design sound levels and reverberation times for building interiors (AS2107).

The Road Traffic Noise Assessment report (18 January 2024) (refer **Appendix S**) notes that the main source of external noise to the proposed site, confirmed from the site visit, is Cockburn Road at approximately 52 metres away from the nearest boundary. Measurements of road traffic noise were conducted to calibrate predictions in accordance with SPP5.4, to design façade elements appropriately. The report documents a detailed assessment of the “dwellings” in the proposed development in accordance with the methodology described in the SPP5.4 Guideline to predict road traffic noise levels at the proposed residential dwelling, including:

- A screening assessment to investigate the likelihood of exceeding the noise target.
- A noise survey was conducted in order to quantify existing levels of road traffic noise from Cockburn Road.
- Based on the results of the noise survey, noise levels at the proposed dwellings and the relevant sound insulation package recommended.

The assessment concluded that no measures (acoustic insulation package) were required for the cabins, camp kitchen, and recreation room within the redeveloped Park. Measures were however recommended for the manager’s residence and the office.

DHP adopts the recommendations of the Road Traffic Noise Assessment report and is prepared to accept a condition to ensure compliance.

4.7.14 Bush Fire Management

The BMP (refer **Appendix M**) sets out the required package of bushfire protection measures to lessen the risks associated with a bushfire event and establishes the responsibilities to implement and maintain these measures. The BMP also identifies the potential for any negative impact on any environmental, biodiversity and conservation values that may result from the application of bushfire protection measures or that may limit their implementation.



In accordance with the requirements of *State Planning Policy 3.7 Planning in Bushfire Prone Areas*, the BMP:

- Incorporates a bushfire attack level assessment which is diagrammatically represented in the form of a post-development BAL contour map.
- Identifies indicative and determined BAL(s) for existing and/or proposed building works.
- Includes an assessment of the Proposal against the bushfire protection criteria set out in the *Guidelines for Planning in Bushfire Prone Areas* (v1.4, December 2021) published by the Department of Planning, Lands and Heritage (DPLH) and the WAPC.
- Identifies a range of bushfire protection measures to be applied to the proposed development including the need for minor removal of native vegetation within the development area to reduce the threat of bushfire risks and to improve bushfire resilience (refer Figures 3.1b and 3.2a of the BMP).
- Identifies responsibilities for implementation and management of the bushfire protection measures.

A drawing that shows the BAL contour over the proposed layout of the development is provided in Sheet 3 Proposed Site Plan (Bushfire Overlay) of Plans of Development (refer **Appendix R**).

Sheet 3 (Proposed Site Plan (Bushfire Overlay) drawing depicts an area in the southwestern corner of the Park, where a site management approach is opposed to bring the rating down to BAL-40.

Sheet 4 (Building Materials/Finishes Selections) of the Plans of Development depicts the treatments for different BAL ratings proposed for windows and doors, external walls, roofs, and decks based on the BMP and the post-development BAL contour map.

The BMP provides assessment statements on relevant acceptance solutions and confirms that the development is compliant with relevant acceptance solutions (Section 5.3).

The BMP identifies additional bushfire protection measures to be implemented (Section 5.4).

The BMP identifies responsibilities for implementation and management of the bushfire protection measures including developer/landowner responsibilities, landowner/occupier responsibilities, and local government responsibilities (Sections 6.1 to 6.3).

DHP adopts the recommendations of the BMP and is prepared to accept a condition(s) to ensure compliance.



4.8 Development Aspects

4.8.1 Construction of Buildings

The proposed development incorporates the construction of buildings. The location, scale and form of the proposed buildings are summarised in **Table 9** (Note: dimensions are rounded up to 1 decimal place).

Table 9: Built Form Details

BUILDING	DIMENSIONS OF INDOOR AREA	FLOOR AREA OF CABIN	DIMENSIONS OF DECK	AREA OF DECK	HEIGHT	NEAREST BOUNDARY SETBACKS
Superior Cabins	Length: 10.9m Width 4.9m	53.4m ²	Length: 2.8m Width: 4.9m	13.7m ²	4.2m	Western boundary: 7.0m Southern boundary: 4.3m
Standard Cabins	Length: 7.6m Width: 4.7m	12.3m ²	Length: NA Width: 1.1m	NA	3.9m	Western boundary: 5.5m
Two (2) Storey Deluxe Cabins	Length: 19.0m Width: 7.8m	148.6m ²	East deck: Length: 19.0m Width: 2.0m West deck Length: 19.0m Width: 2.5m	East deck: 38.0m ² West deck: 47.5m ²	NA	Western Boundary: 7.0m Northern boundary: 6.3m
Recreation Room Building	Length: 9.5m Width: 7.0m	66.7m ²	Ramp/entrance Length: 17.5m Width: 1.3m Deck: Length: 4.5m Width: 8.5m Inside/outside Area: Length: 8.0m Width: 7.0m	Ramp/entrance 22.8m ² Deck: 38.3m ² Inside/outside Area: 56.2m ²	4.5m	NA
Camp Kitchen Building	Length: 8.0m Width: 5.1m	40.8m ²	Length: 8.0m Width: 3.5m	28.0m ²	4.4m	NA
Amenities Building	Male Facilities and Laundry Length: 13.0m Width: 5.0m Female Facilities, entry	Male Facilities and Laundry: 65.7m ² Female Facilities, entry deck, store and DDA	NA	NA	4.7m	NA



BUILDING	DIMENSIONS OF INDOOR AREA	FLOOR AREA OF CABIN	DIMENSIONS OF DECK	AREA OF DECK	HEIGHT	NEAREST BOUNDARY SETBACKS
	deck, store and DDA Bathroom Length: 16.1m Width: 5.0m	Bathroom: 80.2m ²				
Office/Reception Building	Length: 6.7m Width: 6.5m	43.7m ²	Length: 6.7m Width: 1.5m	10.1m ²	4.0m	NA
Managers Building	Length: 12.0m Width: 6.6m	79.2m ²	NA	NA	4.4m	Northern boundary: 1.0m
DDA Cabins	Living Area Length: 11.5m Width: 5.5m	Living Area: 63.3m ²	Deck Area Length: 3.0m Width: 6.8m Ramp area Length: 11.5m Width: 1.3m	Deck Area: 20.4m ² Ramp area: 15.0m ²	4.2m	NA

4.8.2 Construction Materials and Colour Schemes

The construction materials and colour schemes proposed for the new buildings are detailed in **Table 10** and shown on Sheet 4 of the Plans of Development.

Table 10: Proposed materials and colour schemes

ELEMENT	MATERIAL	COLOUR
Windows and Doors	All windows and sliding doors to be metal framed. Glazing:- (all windows are greater than 400mm above a deck/roof or ground). Screening:- All operable parts of windows shall be screened with a mesh or perforated sheet with a maximum aperture of 2 mm, made of corrosion resistant steel/bronze/aluminium.	Black windows/door frames
External Walls	Cladding fixed to timber frame wall - and either fibre cement sheet (Stria 14mm) or steel sheeting, any gaps less than 3mm to be meshed. Walls to continue down to ground - thus enclosing subfloors all round (subfloor vents to be screened).	Primary Cladding – Surfmist or Dover White Stria. Secondary Cladding (3 variations) – - Wallaby Colorbond Finish - DecoWood Vertical Shadowline Profile - Deep Ocean Colorbond Finish - Skirting: - Monument Panel Rib Skirting



ELEMENT	MATERIAL	COLOUR
Roof	Roof / Gutters/ Fascia's/ Eaves Sarked with non-combustible low flammability material. Fascia's to be metal	Shale Grey Spandek Roof Fascia's/Gutters.
Decks and DDA Ramp	All decks to be enclosed with non-combustible exterior porcelain tile finish and enclosed subfloors. (Alternate timber decks) Can be spaced, bushfire resistant timber, with 2mm corrosion resistant screening mesh underneath, and with enclosed subfloor. Balustrades have no relevant requirements; they shall be Monument finished aluminium or steel upright balusters. DDA Ramp shall be enclosed timber deck as per alternate deck approach above	Exterior Porcelain Terrazzo Tiles (P5) Smoked Ash DecoWood Finish

4.8.3 Impacts on Trees

The proposed development will result in impacts on trees in the Park that may necessitate either the removal, destruction or lopping of trees and the removal of vegetation, or the redesign of the development to avoid damage to valuable trees.

The AIA (**Appendix O**) identifies trees that are inside or surround the proposed construction area and records relevant information including an image of the tree, genus and species, canopy size, diameter at breast height, diameter above basal root flare, health, structure, useful life expectancy, contribution to the landscape, retention value, and tree protection zone/structural root zone dimensions.

For each tree in the construction area, the AIA provides:

- A summary of tree condition and value.
- Dimensions for Tree Protection Zones (TPZ) and Structural Root Zones (SRZ).
- Calculation of tree (TPZ / SRZ) impacts associated with the proposed construction design (in accordance with AS4970-2009).
- Appropriate Tree Protective Measures (in accordance with AS4970-2009).

The AIA advises that the arboricultural impact of a proposed design is determined based on the level of encroachment into the TPZ of a tree as specified in Australian Standard AS4970-2009. Table 3 of the AIA identifies the arboricultural impact categories and descriptors (refer **Table 11**).



Table 11: Arboricultural Impact Categories and Descriptors

CATEGORY	DESCRIPTION
Impact - Removal	The tree is within the footprint of the proposed design and will require removal to facilitate the design. In order to successfully retain the tree, a design modification would be required.
Impact – Major, not viable	The proposed design has a Tree Protection Zone area encroachment greater than 10%, or it impacts the Structural Root Zone. While the tree does not require outright removal under the design, the proposed works are expected to have a significant impact on the tree such that it is expected to die or fail in the future because of the works. In order to successfully retain the tree, a design modification would be required which reduces the impact to an acceptable level, unless a non-destructive root exploration has demonstrated that root distribution is limited in the proposed area of works.
Impact – Major, viable	The proposed design has a Tree Protection Zone area encroachment greater than 10% or impacts the Structural Root Zone. The tree is expected to remain viable because of one, or a combination of the following: • Alternative construction methods are proposed which reduce the impact on the tree. • Site conditions have limited root development within the proposed area of works. • The species is known to be particularly tolerant to root disturbance. • A non-destructive root exploration was undertaken and demonstrated that root distribution was limited in the proposed area of works. The tree will require the establishment of a Tree Protection Zone prior to the commencement of works, which may require compensation for the area lost to encroachment.
Impact - Minor	The proposed design has a Tree Protection Zone area encroachment of less than 10% and does not impact the structural root zone. The tree is expected to remain a viable landscape component with the establishment of a Tree Protection Zone prior to the commencement of works, which may require compensation for the area lost to encroachment.
No impact	The proposed design does not enter the Tree Protection Zone. The tree is expected to remain a viable landscape component with the establishment of a Tree Protection Zone prior to the commencement of works
Remove tree (poor condition)	The tree is in such poor condition that it is recommended for removal, regardless of the proposed design. The tree does not warrant retention and protection throughout the proposed works.



An analysis of the trees identified in the AIA by their retention value (refer Table 1.11, Appendix 1 of the Arboricultural Impact Assessment) and their arboricultural impact categories prepared by MasterPlan is provided in **Appendix Y**. The analysis in **Appendix Y** groups trees identified in the AIA by retention values, arboricultural impact category, and comments made in the Executive Summary of the AIA on the extent to which design modifications may be required to retain trees. For each tree in the analysis table, a clip from the arboricultural impact assessment plans included in Chapter 5 of the AIA is provided.

A summary of the analysis contained in **Appendix Y** is provided in **Table 12**.

Table 12: Arboricultural Impact Categories and Descriptors

RETENTION VALUE	ARBORICULTURAL IMPACT	NUMBER OF TREES	TREES
High	Impact removal	1 tree	14265 – Stone Pine
High	Major – not viable	10 trees	6 Tuart trees (15384, 16079, 21647, 21648, 16073 and 20957). 3 Grey She-oak trees (22765, 24266 and 18949). 1 WA Peppermint tree (14383).
High	Major – viable	3 trees	2 Tuart tree (15382 and 21646). 1 Norfolk Island Pine tree (18823).
Medium	Impact removal	34 trees	8 Grey She-oak trees (14994, 15579, 18951, 20870, 22696, 22028, 24265 and 24350). 5 Queen Palm trees (19453, 25386, 25387, 18325 and 18332). 4 WA Peppermint trees (16769, 24597, 24930 and 21603). 2 Norfolk Island Hibiscus trees (23964 and 19042). 2 NZ Christmas Trees (17944 and 25222). 1 Black Tea-tree (20564). 1 Bush Cherry tree (20416). 1 Columnar Araucaria tree (15308). 1 Mexican Fan Palm tree (13531). 1 Moonah tree (23517). 1 Petticoat Palm tree (13711). 1 River She-oak tree (15441). 1 Sea Hibiscus tree (13710). 1 Small-leaved Fig tree (18529). 1 Tuart tree (22360). 1 Umbrella Tree (15108). 1 Weeping Bottle Brush tree (18664). 1 Weeping Fig tree (24618).



RETENTION VALUE	ARBORICULTURAL IMPACT	NUMBER OF TREES	TREES
Medium	Major – not viable	16	5 WA Peppermint trees (14281, 15558, 20055, 24596 and 24929). 4 Grey She-oak trees (18950, 20869, 22027 and 22029). 2 Athel Trees (21035 and 22782). 1 Mallee tree (20083). 1 River She-oak tree (20044). 1 Rottnest Island Pine (19000). 1 Swamp Gum (15019). 1 Weeping Bottle Brush (23542).
Medium	Major – viable	12	4 WA Peppermint trees (16036, 20056, 21604 and 24932). 2 Tuart trees (16229 and 22061). 2 Athel Trees (20091 and 25258). 1 Grey She-oak (22697). 1 Horsetail Casuarina (24106). 1 Mexican Fan Palm (25391). 1 Rottnest Island Pine (22787).
Medium	Impact minor.	8	2 WA Peppermint trees (22533 and 24931). 1 Athel Tree (22783). 1 Brazilian Pepper tree (23241). 1 Moort tree (21208). 1 NZ Christmas Tree (17942). 1 Rottnest Island Pin tree (15872). 1 Tuart tree (16074).

In the context of the assessed retention value and arboricultural impact categories, the Executive Summary of AIA identifies the trees that would require design modification for the trees to be retained. Based on the AIA, the plan prepared by MasterPlan provided in **Appendix T** provides an illustration of the location of trees that require “design modification” or “significant design modification” to ensure their retention and protection as identified in the AIA.

4.8.4 Impacts on Flora, Vegetation, Fauna and Habitat

The scope of work for the Biological Assessment prepared by Focused Vision Consulting (refer **Appendix N**) included a task to undertake and report on a general environmental impact assessment that identifies ecological features that could require further assessment, should be avoided in the new development, or would trigger the need for environmental approvals, should impacts be unavoidable.



The report advises that the key ecological values of the study area that should be avoided in the new development if possible, or require further consideration if impacts are unavoidable, are:

1. *Endemic, native vegetation represented within vegetation units, 'Af', 'Cp', 'Eg', 'Go' and 'Ml', which although all likely planted, could represent remnant (original) vegetation.*
2. *Eight mature Tuart trees that are Black-Cockatoo potential future breeding trees (Rank 7; trees with adequate DBH to form suitable breeding hollows for Black-Cockatoos in the future, but with no suitable or potentially suitable hollows at present).*

The report advises that in accordance with the Mitigation Hierarchy (1. Avoid, 2. Mitigate Impacts, 3. Offset), in the first instance, clearing or impacting any of the native vegetation represented within the five vegetation units that support isolated endemic trees (including the eight mature Tuart trees that are Black-Cockatoo potential future breeding trees) or shrubs should be avoided in the new development. Avoidance includes avoiding direct impacts from clearing individual trees or shrubs, or indirect impacts from damaging root systems or compromising tree integrity by any disturbance within the tree protection zone (TPZ). The report notes that TPZs are detailed in arborist report prepared by Homewood (2023). Any change to current conditions within TPZs, such as excavation, construction of a building, or laying of pavement, could result in indirect impacts on the relevant tree.

The report advises that all the identified endemic trees and shrubs currently occur in the existing holiday park development and that the proposed redevelopment footprint is understood to not differ significantly from the existing footprint. The report advises that, therefore, unless locations where the ultimate footprint differs from the current intersect with a TPZ, all impacts should be avoidable. Detailed survey data could be consulted (or gathered and assessed, if not already available) to ascertain if there are any locations where a new footprint outside the existing footprint intersects with TPZs of endemic trees.

The report advises that where there may be unavoidable impacts within TPZs, it is recommended that an arborist be consulted regarding methods to avoid adverse effects on relevant trees (mitigate impacts). If impacts on endemic trees cannot be avoided, further assessment of the original remnant status of the relevant trees could be carried out using historical imagery from relevant dates, that may indicate historic clearing.

The report advises that if trees are confirmed as remnant (original), or if the endemism of potentially affected trees is not able to be ascertained, and impacts are not able to be avoided, unless a relevant exemption applies under the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (Regulations), an application to the Department of Water and Environmental Regulation (DWER) for a Native Vegetation Clearing Permit (NVCP) may be required under Part IV of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The report further advises that if unavoidable impacts may result for any of the eight potential future Black-Cockatoo breeding trees, it would be necessary to consider the requirement for a Commonwealth referral to Department of Climate Change, Energy, the Environment and Water (DCCEEW) supported by a more detailed environmental impact assessment.



The report advises that the extent of possible Tuart Woodlands within the study area was determined to be all areas of Tuart tree canopy. These areas of Tuart tree canopy, plus the 30-metre buffer are presented in Figure 14 of the Biological Assessment provide an indication of the distribution and extent of the Tuart Woodland within the Site (refer **Appendix U**).

Analysis of the AIA indicates that the location of the eight Tuart trees identified as having retention values of High or Medium is consistent with the eight Tuart trees identified in the Biological Assessment, although the AIA does not fully cover the extent of the Tuart tree canopy of the Biological Assessment. Based on the AIA, the plan prepared by MasterPlan provided in **Appendix U** illustrates the location and TPZ of the Tuart trees identified in the AIA.

In consideration of the AIA and the Biological Assessment, DHP acknowledges that further arborist and ecological investigations and design reviews will be required to fully address the implications of these two critical technical investigations. This work will require Focused Vision Consulting (ecological) and Homewood Consulting (arborist) working with the designer to identify options for mitigation including:

- Repositioning of buildings, roads and parking areas.
- Specialist building footings.
- Retention of existing pavements.
- Permeable paving products for roads and parking areas.
- Sensitive surface preparation.
- Non-destructive root exploration.
- Arborist supervision of works.
- Additional tree planting.

DHP acknowledge that the work necessary to progress the details of the park redevelopment in the context of these investigations and review will require the provision of further information to support the DA.

4.8.5 Methods of Construction and Site Management

Construction of the proposed redevelopment will be a combination of buildings constructed off-site and placed on stumps (e.g. cabins) and buildings constructed on-site.

The construction site will be managed to ensure the protection of the health, safety and welfare of workers and other people in accordance with Western Australia's work health and safety legal framework as set out under the *Work Health and Safety Act 2020*.



A Construction Management Plan (CMP) will be prepared before the development commences. The CMP will provide detail on the following:

- Delivery of materials and equipment to the Site.
- Storage of materials and equipment on the Site.
- Parking arrangement for contractors and subcontractors.
- Impact on traffic movements.
- Operation times including delivery of materials.
- Other matters likely to impact on the surrounding residents/businesses.

4.8.6 Fencing

The proposed development will retain most of the existing fencing. Fencing on the coastal boundary of the Park will be changed to 1.2-metre-high "Koppers Log" fencing. The fencing proposed to be constructed is depicted on the Plans of Development provided in **Appendix R**.

4.8.7 Lighting

Similar to the existing development in the Park, each new cabin will incorporate the use of bunker lights on the exterior of the cabins. The bunker lights have a 10-metre throw distance. The second style of lighting is pathway lighting which are 1.0-metre-high bollard lights which have a 10-metre throw distance.

4.8.8 Advertising Signs

The proposed development will not involve the construction or putting up advertising signs on the Site.

4.9 Works Aspects

4.9.1 Services and Infrastructure

The Engineering Services Report prepared by McDowall Affleck (Ref. 17277 dated 4 October 2023) states that the redevelopment will connect to existing services for sanitary drainage, water plumbing, and internal power and telecommunications cabling and conducting with slight modifications to suit (refer **Appendix K**).

4.9.2 Road Access Works

No additional works are proposed for road access to the Site.



4.9.3 Internal Rooding Works

All areas to be used for accessways will be sealed, drained, curbed, marked and signposted (refer sheet 12 of the Plans of Development in **Appendix R**).

4.9.4 Parking and Loading Works

All areas to be used for vehicle parking, accessways, loading bays and for turning or manoeuvring of vehicles will be sealed, drained, curbed, marked and signposted (refer sheet 12 of the Plans of Development).

All proposed car parking (including "Peron Peninsula"), internal circulation roadway width, wheel stops and entrance/exit points will be designed and line marked in accordance with AS 1742, AS/NZS 2890.1:2004, AS/NZS 2890.3:2004, AS/NZS 2890.6:2004 as appropriate (refer sheet 12 of the Plans of Development).

4.9.5 Excavating and Filling

The proposed development will not involve excavating or filling for, or incidental to the proposed building works.

4.9.6 Landscaping

Except for the new pool and outdoor recreation area, there are no proposals to upgrade the landscape treatment around the Park.

5.0 PLANNING APPROVAL TRIGGERS

The provisions of the local planning framework that trigger the requirement for the Proposal to obtain planning approval are outlined as follows.

5.1 Region Planning Scheme

The relevant region planning scheme is the *Metropolitan Region Scheme 2014* (MRS). The MRS defines the future use of land and provides the legal basis for planning in the Perth metropolitan region, dividing it into broad zones and reservations. Parks and recreation: Land of regional significance for ecological, recreation or landscape purposes and are not subject to any Special Area Provisions, Region Scheme Policies, or Region Scheme Applications.

The Site is depicted in the MRS as being reserved land for "Parks and Recreation" being defined under the MRS as "*Land of regional significance for ecological, recreation or landscape purposes.*" (refer **Appendix V**). The adjoining land to the west (Coogee Beach Reserve) is also reserved for Parks and Recreation. The adjoining land to the east is identified as *Regional Reserve – Rail and Regional Reserve – Road*.



Part II of the MRS deals with reserved land. Under Clause 13/Division 1/Part II of the MRS provides that:

Except as provided in Division 2 of this Part no person shall commence or carry out any development on reserved land, other than the erection of a boundary fence, without first applying for and obtaining the written approval of the Commission to do so.

Subclause 16(1a)/Division 2/Part II of the MRS provides that development on reserved land owned by or vested in a public authority may be used without the written approval of the WAPC if the development is permitted development that does not involve the clearing of regionally significant bushland in a Bush Forever area. In respect of these matters:

1. The Site is reserved land vested in the Council. The proposed "Tourist Development" does not fall within one of the provisions for permitted development under Subclause 16(3)/Division 2/Part II.
2. The Park and adjoining land to the west and north (Coogee Beach Reserve) are identified as being within a "Bush Forever Area" on maps produced through the SLIP mapping service (**Appendix L**). The Biological Assessment report (**Appendix N**) however notes that no vegetation unit are considered regionally significant. The proposed development will therefore not involve the clearing of regionally significant bushland in a Bush Forever Area.

Under Instrument of *Delegation 2022/03 Powers of Local Governments Metropolitan Region Scheme*, the WAPC resolved to delegate to local governments, and to members and officers of those local governments, its functions in respect of the determination, in accordance with Part IV of the MRS of applications for approval to commence and carry out certain development. These delegations do not apply to the DA because:

- Development on zoned land – the Site is not on zoned land.
- Development on regional road reservations – the site does not abut a regional road.

Pursuant to Clause 13/Division 1/Part II of the MRS, the written approval of the WAPC is therefore required for the proposed development.

5.2 Local Planning Scheme

The relevant local planning scheme is the *City of Cockburn Local Planning Scheme No. 3* (LPS3).

Schedule 1 of LPS3 sets out the land use definitions of relevance to the proposed development:

'Caravan park' means premises that are a caravan park as defined in the Caravan Parks and Camping Grounds Act 1995 section 5(1).

'Chalet' means a dwelling forming part of a tourist development or caravan park that is —



- (a) *a self-contained unit that includes cooking facilities, bathroom facilities and separate living and sleeping areas; and*
- (b) *designed to provide short-term accommodation for guests.*

'Tourist development' means a building, or a group of buildings forming a complex, other than a bed and breakfast, a caravan park or holiday accommodation, used to provide –

- (a) *short-term accommodation for guests; and*
- (b) *onsite facilities for the use of guests; and*
- (c) *facilities for the management of the development.*

The proposed cabins are considered to fall within the definition of a *Chalet*. The proposed chalets will be part of a complex providing short-term accommodation that includes on-site facilities for guests and site management. The proposed chalets therefore fall within the definition of a "Tourist Development".

The proposed development of new pool/recreation area is considered to fall within the land use class of a "Tourist Development" as onsite facilities for the use of guests.

The Site is identified as a *Regional Open Space* on the Scheme Map for LPS3 (refer Local Zoning Plan in **Appendix W**). Clause 2.2 of LPS3 provides that:

2.2.1 The land shown as "Regional Reserves" on the Scheme Map are lands reserved under the Metropolitan Region Scheme and are shown on the Scheme Map in order to comply with the Metropolitan Region Town Planning Scheme Act.

2.2.2 Regional Reserves are not reserved by this Scheme.

2.2.3 The approval of the local government under the Scheme is not required for the commencement or carrying out of any use or development on a Regional Reserve.

The approval of the Council is therefore not required for the proposed development under LPS3.

6.0 STATE PLANNING ASSESSMENT

The key state planning instruments that are relevant to the assessment of the DA are:

- State Planning Strategy.
- Metropolitan Region Scheme.
- Bush Forever Policy.
- SPP 2.6 State Coastal Planning.



- SPP 3.7 Planning in Bushfire Prone Areas.
- SPP 5.4 Road and Rail Noise.
- Development Control Policy 5.3 - Use of Land Reserved for Parks and Recreation and Regional Open Space.

6.1 State Planning Strategy

Prepared by the Department of Planning Lands and Heritage (DPLHA) on behalf of the WAPC, the State Planning Strategy provides the strategic context for future strategies, plans, policies, and decisions related to the sustainable use and development of land throughout the State.

The following Strategic Direction of the State Planning Strategy is of relevance to the Site and the DA:

- Section 1.3 – Tourism.

It is considered that the proposed development is fully consistent with the Strategic Direction of the State Planning Strategy, in particular Section 1.3 – Tourism, in that the development will increase the availability of short-stay and tourism accommodation in the region of Coogee Beach, in Cockburn.

6.2 Metropolitan Region Scheme

The Site is depicted in the MRS as being reserved land for “Parks and Recreation” being defined under the MRS as “*Land of regional significance for ecological, recreation or landscape purposes.*”

The MRS does not set out the matters that the WAPC must have regard to in considering an application for planning approval on land reserved for “Parks and Recreation”.

6.3 Bush Forever Policy

The State mapping tool Locate 5 indicates that the Site is within *Bush Forever Area* - Site No 341. The Site is not within a *Bush Forever Reserve (existing or proposed)* (**Appendix X**).

The whole-of-government Bush Forever Policy aims to ensure bushland protection and management issues are addressed and integrated with broader land use management and decision-making.

Bush Forever Volume 1 includes:

- Implementation options, approaches and processes providing a decision-making framework for landowners, the community, local governments, and State Government agencies.
- A map showing the location of all Bush Forever areas and detailed maps showing individual Bush Forever areas and their associated site implementation recommendations.



Map Sheet No. 57 contained within Volume 1 shows that the Site is located at the northern end of a large Bush Forever Area ('Woodman Point, Coogee/Munster' Site 341) that extends from Woodman Point north to Coogee Beach (**Appendix X**).

Bush Forever Volume 2 includes:

- A guide to Bush Forever areas: an outline of the scope of Perth's Bush Forever project, background to its preparation, area selection, and delineation of Bush Forever areas.
- Bush Forever area descriptions: descriptions of each of the Bush Forever areas and all references.
- Appendices containing the terms and acronyms commonly used in Volumes 1 and 2, an introductory guide to the Bush Forever area descriptions, a table cross-referencing the Bush Forever areas to the System 6 recommendations, and an index to all Bush Forever Site descriptions and the Bush Forever area maps.

An extract from Volume 2 describes the Woodman Point, Coogee/Munster' Bush Forever Area Site 341 as bushland on a vegetated coastal peninsula with an area of 91.7 hectares (**Appendix X**). The description provides details on landforms and soils, vegetation, and flora, threatened ecological communities, landscape features, and fauna and notes that most of the Site 341 is within the Woodman Point Regional Park.

The Biological Assessment prepared by Focused Vision Consulting (**Appendix N**) addresses all relevant aspects of the Bush Forever Policy.

6.4 SPP 2.6 State Coastal Planning

The purpose of SPP 2.6 State Coastal Planning Policy (SPP 2.6) is to provide guidance for decision-making within the coastal zone including managing development and land use change.

The objectives of this Policy are to:

1. *Ensure that development and the location of coastal facilities takes into account coastal processes, landform stability, coastal hazards, climate change and biophysical criteria;*
2. *Ensure the identification of appropriate areas for the sustainable use of the coast for housing, tourism, recreation, ocean access, maritime industry, commercial and other activities;*
3. *Provide for public coastal foreshore reserves and access to them on the coast; and*
4. *Protect, conserve and enhance coastal zone values, particularly in areas of landscape, biodiversity and ecosystem integrity, indigenous and cultural significance.*



Policy measures of SPP 2.6 include:

- 5.2(v) (v) *Ensure that land use and development, including roads, adjacent to the coast is sited and designed to complement and enhance the coastal environment in terms of its visual, amenity, social and ecological values.*
- 5.5(i) *Adequate coastal hazard risk management and adaptation planning should be undertaken by the responsible management authority and/or proponent where existing or proposed development or landholders are in an area at risk of being affected by coastal hazards over the planning timeframe. Coastal hazard risk management and adaptation planning should include as a minimum, a process that establishes the context, vulnerability assessment, risk identification, analysis, evaluation, adaptation, funding arrangements, maintenance, monitoring and review, and communicate and consult.*
- 5.5(iii) *Where risk assessments identify a level of risk that is unacceptable to the affected community or proposed development, adaptation measures need to be prepared to reduce those risks down to acceptable or tolerable levels.*
- 5.5(iv) *Where new information or methods become available that significantly modify the understanding of the coastal hazards then all areas within the newly defined risk areas should be reviewed again through the coastal hazard risk management and adaptation planning hierarchy above, as part of the ongoing monitoring and review process.*

The *City of Cockburn Coastal Adaptation Plan (2018)* *Coogee Beach Foreshore Management Plan (2020 to 2070)* were prepared under the provisions of SPP2.6. The lease between DHP and the Council for the Park gives effect to these documents and the other related technical publications that were referenced in the preparation of these documents.

The coastal setback proposals for the redevelopment of the Park have been developed in compliance with the Holiday Park Buffer Plan and the SLR Hazard Line referenced in the lease between the Council and DHP following extensive engagement between DHP and the Council.

An assessment of the proposed redevelopment of the Park against the relevant matters of SPP2.6 is provided in **Appendix Z**. The assessment confirms that the proposed redevelopment of the Park will not result in any conflicts with SPP2.6.

It is concluded that the proposed development is fully compliant with SPP2.6 and its associated guidelines and other publications.

6.5 SPP 3.7 Planning in Bushfire Prone Areas

The State mapping tool *PlanWA* indicates that *SPP 3.7 Planning in Bushfire Prone Areas* (SPP3.7) applies to the Site (refer **Appendix L**).



The BMP was prepared against and assessed all the relevant matters of SPP3.7 under the following headings:

- Environmental Conservation (Desktop Assessment)
- Bushfire Attack Level (BAL) Assessment
- Identification of Bushfire Issues
- Assessment Against the Bushfire Protection Criteria (Guidelines V1.4)
- Responsibilities for Implementation and Management of the Bushfire Protection Measures

Sections 2.2.15 and 4.7.14 of this report discuss the BMP in more detail.

6.6 SPP 5.4 Road and Rail Noise

The State mapping tool *PlanWA* indicates that *SPP 5.4 Road and Rail Noise* (SPP5.4) applies to the Site (refer **Appendix L**).

The road traffic noise assessment of the proposed development prepared by Acoustics Consultants Australia was prepared in compliance with SPP5.4 (refer **Appendix J**). Section 4.7.13 of this report discusses the road traffic noise assessment in more detail.

6.7 SPP 2.8 Bushland Policy for Perth Metropolitan Region

The State mapping tool *PlanWA* indicates that SPP 2.8 Bushland Policy for Perth Metropolitan Region applies to the Site (refer **Appendix L**). The Site is not however within a *Bush Forever Reserve (existing or proposed)*.

6.8 Development Control Policy 5.3

Under Division 2 Clause 14(b) of the P&D Act requires that the WAPC prepare and keep under review planning policies, as a basis for *coordinating and promoting land use, planning, transport planning and land development in a sustainable manner, and for the guidance of public authorities and local governments on those matters*.

Development Control Policy 5.3 - Use of Land Reserved for Parks and Recreation and Regional Open Space (DCP5.3) (January 2017) establishes the WAPC position regarding the use and development of land reserved for Parks and Recreation in the MRS.



Section 3 of DCP5.3 states that:

the WAPC accepts that there will be occasions when it may be appropriate to permit incorporated clubs, community groups and in some circumstances private business to locate on land reserved for Parks and Recreation or Regional Open Space, provided that the applicant demonstrates that:

- (i) the nature and scale of the proposal is compatible with the use and zoning of surrounding land, the nature and purpose of the reserved land and the environmental character of the location;*
- (ii) there is a community need for the proposed facility in the proposed location;*
- (iii) the community and local government(s) support the proposal;*
- (iv) the proposal can be integrated with other planned facilities and sharing of facilities by more than one incorporated club, community group or private business; and*
- (iv) the proposal is consistent with existing and/or proposed land use and management plans.*

Under Section 5 of the DCP 5.3, the:

The use and development of land reserved for Parks and Recreation or Regional Open Space for purposes inconsistent with the purpose of the reserve will not be supported.

The use and development of land reserved for Parks and Recreation or Regional Open Space for commercial purposes ancillary and or compatible to the purpose of the reserve and likely to enhance the public access to and enjoyment of the reserve may be supported.

The use and development of land reserved for Parks and Recreation or regional space which would result in restrictions to public access, notwithstanding the possible benefit which could be derived from the use and development to the general community or to a specific educational or religious group within the community, will not be supported.

Under section 6 of the DCP 5.3, the WAPC may grant its approval only under certain circumstances. An assessment of the proposed redevelopment of the Park against the relevant matters of DCP5.3 is provided in **Appendix AA**. The assessment confirms that the proposed redevelopment of the Park will not result in any conflicts with DCP5.3.

6.9 Development Assessment Panels

Under Regulation 5 of the *Development Assessment Panel (DAP) Regulations 2011* (WA), development in a district outside of the district of the City of Perth that has an estimated cost of \$10 million or more must be determined by a Development Assessment Panel (DAP) as if the DAP were the responsible authority under the relevant planning instrument in relation to the development and cannot be determined by a local government or the WAPC.



DAP Assessment applies to the following Development Applications:

- Where the estimated development cost is \$10 million or more (mandatory); or
- Where the estimated development cost is - (optional) - applicant can choose to "opt-in" or not to.

The City of Cockburn is within the Metro Outer Joint Development Assessment Panel (JDAP), which also covers the local government areas of Armadale, Gosnells, Joondalup, Kalamunda, Kwinana, Mandurah, Mundaring, Murray, Rockingham, Serpentine-Jarrahdale and Swan.

In relation to the DA, the estimated cost of the Proposal is \$13.50 million.

As the estimated cost of the Proposal exceeds \$10 million, the DA requires mandatory assessment by the JDAP.

7.0 LOCAL PLANNING ASSESSMENT

7.1 Local Planning Strategy

The Council's website advises that the Council adopted a new draft Local Planning Strategy to replace the current Local Planning Strategy at the 8 October 2020 meeting.

The Council's website advises that the draft Local Planning Strategy will soon be sent to the WAPC for final endorsement. Until the new Local Planning Strategy is endorsed by the WAPC, the current version remains the relevant local planning strategy the City of Cockburn Local Planning Strategy (LPS).

A review of the LPS indicates that the only aspect of direct relevance to the proposed redevelopment of the Park is strategy 6.14 Coastal Development of the strategies and actions in Chapter 6:

Strategy – To encourage appropriate forms of development on and adjacent to the coast, enhance possible recreational use and public access consistent with the protection of coastal areas.

Action –

- (1) Implement those elements of WAPC Policy DC 6.1 as are appropriate to a metropolitan coastline.*
- (2) Implement the recommendations of the Council's 'Integrated Coastal Management Strategy' (1999).*
- (3) Actively seek to minimise the scope for further potential industrial development on the coast and where possible encourage its relocation.*
- (4) Encourage the replacement of industrial coastal land with residential development.*
- (5) Oppose the establishment of industries on the coast which have no relationship to or need for a coastal location.*



With regards to strategy 6.14, it is noted that the City of Cockburn Coastal Adaptation Plan (2018) Coogee Beach Foreshore Management Plan (2020 to 2070) were prepared in consideration of the Council's 'Integrated Coastal Management Strategy' (1999) and the more recent Coastal Hazard Risk Management and Adaption Planning (CHRMAP). The lease between DHP and the Council for the Park gives effect to these documents and the other related technical publications that were referenced in the preparation of these documents.

The relevant provisions of the LPS are provided and addressed in the Planning Scheme. The DA is consistent with the identification of the Site on the City-Wide Strategy Map as *Tourism* and will support the achievement of the broad statements of intent of the land use planning themes.

7.2 Local Planning Scheme

The Site is identified as a *Regional Open Space* on the Scheme Map for LPS3.

Part 2 of LPS3 advises that Regional Reserves are not reserved by this Scheme and that the approval of the local government under the Scheme is not required for the commencement or carrying out of any use or development on a Regional Reserve.

There are no items on the Heritage List on the Site.

8.0 CONCLUSION

This Planning Assessment Report has been prepared by MasterPlan in support of a DA made by DHP seeking planning approval for a proposal to redevelop an existing tourist development Coogee Beach Holiday Park. The application is made to the Council for assessment and determination by the Metro Outer Joint Development Assessment Panel on behalf of the Western Australian Planning Commission under the *Planning and Development Act 2005 (WA)*.

The application is made over land located at 3 Powell Road, Coogee (Site). The Site is a Reserve. The Council is responsible for the care, control, and management of the reserve for the purpose of a caravan park. DHP entered a lease of the Site from the Council on 6 May 2022. The Commencement Date of the lease is 2 August 2023. The term of the lease is 21 years commencing on the Commencement Date.

In accordance with the provisions of the lease, DHP proposes to undertake redevelopment of the accommodation and facilities in the Park over two (2) stages

Stage 1 – Demolition and Development:

- Demolition and rebuilding of the manager's residence and office.
- Demolition of the camp kitchen and ablution blocks.
- Relocation of 10 Park Homes



- Demolition of cabins (Units 201-205)
- Construction of new pool and recreation area
- Construction of new camp kitchen and amenities/laundry.
- Construction of 29 new tourist cabins.

Stage 2 – Removal and Development:

- Removal of 24 park homes from the Site.
- Construction of 28 new tourist cabins:

In relation to the proposed changes to accommodation (tourist and permanent) units:

- The number of permanent accommodation units (Park Homes) in the Park, will be reduced by twenty-four (24).
- The number of tourist accommodation units at the Park, will be increased by forty-eight (48).
- The number of powered sites in the Park, will be reduced by six (6).
- The overall number of accommodation units in the Park, will be increased by eighteen (18).

The Site is reserved for *Parks and Recreation* under the Metropolitan Region Scheme. Pursuant to Clause 13/Division 1/Part II of the MRS, the written approval of the WAPC is required for the proposed redevelopment triggering the need for the DA to be made.

The Site is depicted as *Regional Reserve* in the *City of Cockburn Local Planning Scheme No. 3* (LPS 3) The use and development of the Site is not regulated by LPS3. The approval of the Council is therefore not required under LPS3 for the Proposal.

Pre-lodgement communications were conducted with the Council and the state Government (DPLH and DFES) prior to lodging the development application. The outcomes of those communications have informed the preparation of this report.

In response to the pre-lodgement communications and relevant assessment matters, DHP commissioned several technical reports to support the DA:

- The Park and extensive areas of surrounding lands are designated by the FES Commissioner as Bush Fire Prone Areas. A BMP has been prepared by Bushfire Prone Planning to accompany the DA. The BMP provides assessment statements on relevant acceptance solutions and confirms that the development is compliant with relevant acceptance solutions (Section 5.3).



- A TIA has been prepared under the Western Australian Planning Commission Transport Assessment Guidelines.
- The Site is connected to reticulated urban infrastructure including water, sewerage, stormwater, telecommunications, and electricity as detailed in a Services Report
- An arboricultural impact assessment has been prepared to assess the impact of the proposed redevelopment of the Park on the existing trees within the Park. The AIA identifies trees where design modifications are required for the trees to be retained.
- A Biological Assessment report has been prepared to provide an assessment of flora, vegetation, fauna and habitat features and values of the Park and potential impact of the development on those values. The report advises that clearing or impacting any of the native vegetation represented within the five vegetation units that support isolated endemic trees (including the eight mature Tuart trees that are Black-Cockatoo potential future breeding trees) or shrubs should be avoided in the new development. In consideration of the AIA and the Biological Assessment, DHP acknowledges that further arborist and ecological investigations and design review is required to fully address the implications of these two critical technical investigations. DHP acknowledge that the work necessary to progress the details of the park redevelopment in the context of these investigations and review will require the provision of further information to support the DA.
- In accordance with the Council's Local Planning Policy 1.14 Waste Management, a waste management plan was prepared to ensure that the waste storage and collection activities are suitable for the operational phase of the proposed development.
- A road traffic noise assessment of the proposed development in the context of State Planning Policy 5.4 with regards to noise intrusion due to Cockburn Road.

The proposed redevelopment of the Park is assessed to be consistent with several relevant management plans prepared by the Council:

- Woodman Point Regional Park Management Plan (2010)
- City of Cockburn Coastal Adaptation Plan (2018)
- Coogee Beach Foreshore Management Plan (2020 to 2070)

The lease between the Council and Discovery over the Site has been prepared in the context of these management plans. In particular, the location of the proposed redevelopment works relative to the Holiday Park Buffer Plan and the SLR Hazard Line referenced in the lease between the Council and DHP is consistent with the relevant sections of the Foreshore Management Plan. DHP will not construct any permanent structures on those parts of the Site which are west of the Holiday Park Buffer Line. Development on those parts of the Site west of the Holiday Park Buffer Line will be limited to transportable accommodation which can be relocated, removable infrastructure, and services which are necessary to support the transportable accommodation and removable.



In respect of State Planning Policies the report concludes that:

- The report concludes that the proposed development is fully compliant with SPP 2.6 State Coastal Planning Policy SPP2.6 and its associated guidelines and other publications.
- The BMP was prepared in compliance with the relevant matters of SPP 3.7 Planning in Bushfire Prone Areas.
- The road traffic noise assessment of the proposed development prepared by Acoustics Consultants Australia was prepared in compliance with *SPP 5.4 Road and Rail Noise SPP5.4*.

The assessment contained within this report confirms that the proposed redevelopment of the Park will not result in any conflicts with Development Control Policy 5.3 - Use of Land Reserved for Parks and Recreation and Regional Open Space.

This report has demonstrated that the proposed redevelopment of the Park is a suitable development for the Site. The assessments contained in this report conclude that:

- The Site is suitable for the intended purpose.
- The intended use of the Site is compatible with its neighbourhood.
- The nature and scale of the Proposal is suitable for the local context.'
- The development will not introduce negative impacts on the surrounding area.
- The Proposal does not conflict with the relevant State Planning Policies or Development Control Policy 5.3.

Our assessment in consideration of the requirements of all relevant statutory planning tests of the P&D Act and subordinate planning instruments is that there are strong grounds for the development application subject to reasonable and relevant conditions.

Peter Stanley RPIA, BTP
Queensland State Manager

20 March 2024