PLANNING ASSESSMENT
OF THE IMPLICATIONS OF
THE GRACETOWN
DEVELOPMENT PROPOSAL

Prepared by Gordon G. Smith, Town Planner & Chartered Surveyor
in association with Halsall & Associates

5th July 2011
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PLANNING ASSESSMENT OF THE PLANNING IMPLICATIONS OF THE GRACETOWN DEVELOPMENT PROPOSAL

INTRODUCTION

The Commission

Gordon G. Smith, Town Planner & Chartered Surveyor in association with Halsall & Associates have been retained by the Gracetown Progress Association (GPA) to undertake an assessment of the implications for Gracetown of the proposal by Landcorp to subdivide and develop land to the south-east of the existing developed area of the settlement by creating some 140 new residential lots. The subject land is shown at Figure No 1.

Figure 1. Location Plan (Source - Shire of Augusta-Margaret River Report)

(Development Proposal relates to a 14.4ha portion of Lot 300 in north-western corner adjoining existing settlement)

The need for the assessment arises from action taken by the Council of the Shire of Augusta-Margaret River (the Council) to initiate Amendment No 2 (the Amendment) to its Local Planning Scheme No 1 (LPS 1) and to adopt a Structure Plan for the proposed subdivision and development for the purpose of setting out the form and structure the development will take. Collectively, these actions will be referred to as "the Proposals".

The Amendment, if approved by the Council and recommended for final approval by the WAPC with final approval granted by the Hon Minister for Planning, will result in the land to be subdivided and developed being classified "Future Development..."
Zone" under LPS 1, surrounding land being included within a new category of Reserve under that Scheme of "Recreation and Fire Management Reserve" with the balance being included within the "National Parks and Nature Reserves" classification.

The Structure Plan is to be adopted under the provisions of Part 6 of that Scheme so as to provide a basis for the ultimate approval by the Western Australian Planning Commission (WAPC) of a pattern of subdivision over the land concerned. The Structure Plan will require not only adoption by the Council but also by the WAPC in which agency control over subdivision throughout the State is vested.

Review

In preparing this assessment, the authors have reviewed relevant planning documents including the Leeuwin-Naturaliste Statement of Planning Policy 6.1, the Council's Local Planning Scheme, the Draft Local Planning Strategy and the Proposal documents that are in the public domain. In particular, the reports prepared by Transcore on Traffic Assessment and Traffic Management together with the critique on those reports prepared by Uloth and Associates (appended to this report as Appendix A) as well as the Planning Officer's report presented to Council at its Ordinary Meeting held on 9th March 2011 have also been reviewed.

The Principal Planning Issues

This document has been prepared against the normal criteria for the assessment of new developments to determine the likely impacts of the Proposals and how those impacts might be addressed. They will, of course, be myriad but, reduced to their essence, relate mainly to whether or not the Proposals fit within the framework of overall planning for the sub-region in terms of the locations for new development and, in the local context, the impact upon both the character and the amenity of the settlement, including enjoyment and safety of residents and visitors.

As to the overall planning framework, Statement of Planning Policy 6.1 - the Leeuwin-Naturaliste Ridge Policy - January 2003 envisages an increase in the size of Gracetown to accommodate around 500 residents and the Government has announced that an extension to the townsite is to occur. The fact that development of some form will be allowed within certain population constraints is, therefore, not in question and the Proposals would seem to fit generally within that general planning concept.

This prospect is also shown within Council's adopted Local Planning Strategy in which the area the subject of the Proposals is shown to be within Development Investigation Area G1. This envisages the observance of the process presently being followed by the proponents of providing justification for the Proposals and seeking reclassification of the land so that the proposed development can occur.
The manner in which that subdivision and development should occur forms the subject of this assessment and, in particular, the amenity and safety considerations that flow from what will effectively be a doubling of the number of dwellings in the settlement and, by extension, a potential to double the level of activity generated by the community itself. Additionally, increased development may well bring the attractions of the settlement to wider attention also resulting in greater numbers of visitors. Significant increases in development in the hinterland region to Gracetown will also increase pressure on the coast-side recreational facilities provided by the Bay and the town.

In terms of safety, the fact that Gracetown lies within an area exposed to an extreme fire hazard means that planning considerations must address the risks of developing in such an area with development only permitted where it can be seen to address adopted standards such as reductions in fire hazard rating and providing a second access route to the settlement as stipulated by the WAPC and the Fire and Emergency Services Authority (FESA) in their jointly published "Planning for Bushfire Protection Guidelines 2001".

The proposed new development will undoubtedly impact upon the aesthetics of the area with the new development being an extension of existing buildings up the slope from the Bay and visible from approaches into the settlement as well as from other vantage points. That, however, will be an inevitable consequence of the decision already made at various planning levels to allow additional development at the settlement. The requirement in the Council's decision to require the preparation of a "Detailed Area Plan", satisfying the provisions of LPS 1 for such documents, will include design initiatives to help minimise landscape impacts; all of which is commendable.

The single-most important factor that will impact the amenity of the settlement is the matter of road access and traffic management and it is this factor that forms the strongest focus of this report.

In this latter connection, a copy of a report prepared by Uloth and Associates (Uloth Report) on behalf of the Gracetown Progress Association is appended (Appendix A) as a critique of the reports prepared by Transcore Pty Ltd on traffic management issues associated with the proposed development. It will be seen from the Uloth Report that Transcore's projected figures for traffic volumes are not supported and will be heavier than predicted and that the second alternative access route (SAA) is a priority. That SAA, when constructed, will produce a range of beneficial outcomes not the least reduced traffic levels on Cowaramup Bay Road, Bayview Road and Salter Street. It is strongly advocated that the Uloth Report be given its due credence and, if necessary, the two consultancies be required to confer to reach a consensus view about the traffic outcomes.
EXECUTIVE SUMMARY

Introduction

Gracetown is an attractive coastal settlement, which in addition to its local population, attracts many visitors each year from the locality, the region, the State and also from overseas. While its natural features allows for recreational activities in the form of swimming, boating, and fishing, it is particularly attractive for the variety of surfing conditions that are created both within Cowaramup Bay as well as along the open coastline beyond. Its popularity, especially at peak times (at holiday periods and also when surfing conditions are at their peak combined with other recreational activities) already places considerable pressure upon existing infrastructure and facilities within the settlement.

It is enclosed within an area of National Park - the Leeuwin-Naturaliste National Park - exposed to an extreme fire hazard rating which means that existing development is vulnerable to damage by fire and new development should only be permitted if the fire hazard can be reduced and also, and most significantly, an SAA is provided to the town (See WAPC and FESA's Planning for Bushfire Protection Guidelines 2001).

The Proposals already described will exacerbate a number of problems already in evidence. As they are now passing through the planning processes of a Local Planning Scheme Amendment, an assessment of what impacts they will have is fully justified and, as necessary, to identify any actions that need to be taken in the light of those impacts. Proper planning considerations would need to address such factors as the need to ensure that there is no net diminution in the enjoyment of the natural benefits the area has to offer, the level of amenity experienced within the settlement and the safety of vehicles and pedestrians using roads, footpaths and car parks within the town.

Planning Considerations

The principal planning issues that arise relate to the level of safety and amenity impact that will occur as a result of the Proposals. Safety issues relate, principally, to fire prevention/management and means of escape in case of fire but also pedestrian and vehicle safety in and around the town. Amenity issues would encompass aesthetic considerations, (landscape, appearance of buildings etc), social and community impacts (the ways in which the community relates its environs and the facilities within it), safety of movement to, and within the settlement, particularly relating to traffic management and pedestrian movement, and general enjoyment of the resources the settlement and its environs have to offer.

Of these two major considerations, it is seen to be imperative that the SAA is constructed as a prerequisite to the development to ensure a secure alternative
means of escape in case of fire but that changes to the form, appearance and safety as elements of amenity of the settlement will be the inevitable consequence of an expansion of the size of the town as anticipated in established planning documents. With proposed design guidelines, height limit restrictions on new development, the avoidance of sky-lining of development against the Leeuwin-Naturaliste Ridge and landscaping, it is accepted that the landscape impacts are unavoidable but manageable.

There will be social and community impacts with a virtual doubling of population and this will place pressure upon existing facilities; both natural and built infrastructure. The natural elements of the area are finite and mostly unchangeable but the built infrastructure may well prove to be inadequate especially as Council has already identified, notably within its works programmes, a range of improvements that need to be addressed for the benefit of the existing settlement.

Traffic management and pedestrian movement stand out as being by far the most important considerations with both safety and amenity consequences. This factor is the principal issue addressed in this report.

Gracetown presently depends exclusively on Cowaramup Bay Road/Bayview Drive for access with all of the limitations that that places upon the settlement in the event of damage or blockage for whatever reasons.

According to the Uloth Report, if an SAA is not provided as an adjunct to the proposed development, that road is destined to increase in traffic volume by 66.5% from 2,180 vehicles per day (vpd) on the section leading to Caves Road to 3,630 vpd with similar proportional increases elsewhere on roads in the town's hierarchy. With the provision of an SAA, existing traffic volumes are predicted to diminish which would help to preserve existing levels of amenity within the town.

It is reiterated, therefore, that the most important planning issue, deserving the strongest focus, relates to the matters of traffic management and pedestrian movement leading to improved levels of safety for residents and visitors together with maintained levels of amenity.

Significant problems of a single access road to Gracetown are:

- The population of the settlement could well be trapped in the event of a fire. Because the settlement is within an area already identified as being exposed to an extreme fire hazard: the SAA is a prerequisite to additional development according to established Government Policy;
- Without the provision of an SAA, there will be a 66.5% increase in traffic movements at the junction of Cowaramup Bay Road and Caves Road which will exacerbate existing problems. This intersection has already attracted "Black Spot" funding to improve the existing intersection having regard only
to existing traffic volumes and does not take the proposed development into account;

- An emergency such as flood damage or bridge collapse/wash out on Cowaramup Creek (an event not without precedent), fire between the settlement and Caves Road or a traffic or other emergency that effectively closes the road could also leave residents stranded;
- Increased traffic loads will produce greater dangers within the settlement given that all pedestrian traffic from dwellings to the beaches must, of necessity, cross Cowaramup Bay Road/Bayview Drive; and
- Existing roads are not designed to accommodate significant volumes of heavy construction vehicles required for subdivision works and development and which, without the SAA, will significantly detract from the amenity of the settlement - a matter over which considerable concern has been expressed within the community.

It is also worthy of note that traffic speed limits are frequently not observed and there are inadequacies in existing road configurations, intersections at the junctions between Salter Street and Bayview Drive and Georgette Streets and Langley Crescent and parking facilities in proximity to the store and restaurant, all of which will be brought more sharply into focus with additional traffic loading. Moreover, pedestrian movements across and alongside the principal roads are not appropriately constructed, managed or controlled.

**Issues of Concern**

Having assessed the Proposals against relevant planning documents and considerations the following issues of concern have been identified:-

a. **Fire risk:**
   The Proposals involve almost a 100% expansion of the settlement within an area rated as having an extreme fire risk dependent upon a single access road.

b. **Second, Alternative Access Road:**
   An SAA is required to satisfy Bushfire Protection Guidelines and as recommended in the proponents own Fire Management Plan but does not form an inherent part of the Proposals. Council's own resolution to initiate an Amendment to its Scheme with provisions that leave the need for the provision of the SAA as being capable of being disproved is not acceptable against the background of those documents. The other planning reasons for the provision of the SAA as already described give further justification for its construction as an inherent part of the implementation of the Proposals.

c. **Pedestrian Movement:**
   The Proposals will need to address limitations on safe and attractive pedestrian movement within the settlement with desirably some greater segregation between pedestrians and vehicles. In this connection,
improvements need to be made to existing pedestrian movement facilities and cross-walks need to be provided at the store and the junction of Bayview Drive and Salter Street. Desirably other cross-walks and footpaths need to be provided to improve pedestrian safety.

d. Car Parks:
Existing car parks are, although heavily used at peak periods, in the main poorly accessed with no formalised entrances/exits. The Proposals will exacerbate these issues and the deficiencies need to be mitigated.

e. Roads and Road Intersections:
The configurations of the intersections between Salter Street and Bayview Drive and Georgette Streets and Langley Crescent are poor requiring reconfiguration works to improve visibility and safety; especially given predicted increases in traffic movement along its length.

**Principal Findings and Required Actions**

The following general findings have been reached:

1. The Proposals will:

   • create an expanded community that will be exposed to an extreme bushfire hazard demanding actions not only to reduce the hazard rating in and around the proposed development itself but the provision by the proponent of an SAA to provide two alternative routes to escape from the settlement in the event of a wildfire as set out in the Bushfire Protection Guidelines; and

   • additionally, generate volumes of traffic almost equivalent to that already generated by the present settlement, and will, thus, produce outcomes that will compound current infrastructure shortcomings potentially to the point of overload. These shortcomings relate, in the main, to footpaths along and crosswalks over the principal access road, poor road intersections along Salter Street, the need for speed constraints and more efficient car park access.

If the development is to be properly integrated into the existing community then sound planning practice would demand that the proponents undertake such remedial measures as may be necessary to address the problems generated by their proposed development.

Actions that need to be taken have been identified and are, in brief, as follows:

i. Construct an SAA from the south of the proposed development back to Caves Road to provide a secondary means of escape from an expanded community within an area of extreme fire hazard to reduce exposure to wildfire and to provide other benefits in terms of amenity and reduced traffic
impacts on the town. The SAA should be constructed prior to development works commencing;

ii. Cross-walks be provided across Bayview Drive at the Store and at its junction with Salter Street (which is considered to require carriageway adjustments to effect a safe crossing) and desirably at other points already identified by Council;

iii. Pedestrian movements and vehicle access to the store and restaurant combined with parking need to be better coordinated to improve safety at this focal point in the settlement;

iv. Traffic calming devices, desirably in the form of chicanes, be installed on Bayview Drive near the store to enforce designated speed limits;

v. Entrances to the Foreshore Car Parks be constructed and formalised for safety reasons;

vi. That the pedestrian movement system between Langley Crescent via Galliers Street, the dedicated pedestrian access way (PAW) between Georgette Street and Osborne Street and Nicholson Street be improved by construction of street footpaths which combined with the rejuvenation of the PAW would provide a stronger pedestrian movement system away from principal roads;

vii. That intersections between Salter Street and Bayview Drive, Georgette Street, and Langley Crescent be improved to provide improved visibility and safety, given predicted significant increases in traffic volumes through these intersections;

viii. Council arrange with Main Roads WA for the relocation of the 60kph speed limit signs on Cowaramup Bay Road to a point east of the sweeping bend on the approach to town to make access into and egress from car parks safer.

The issue of the extent to which the developer should take responsibility for these actions is open to discussion. It is considered that the developer should take responsibility for the provision of the SAA as described at "i" above with serious consideration being given to the works set out in paragraphs "ii, iii iv, v, vi and vii" as issues of concern that will be exacerbated by the development. If total responsibility for the second group of issues cannot be seen to be fairly laid upon the developer, it may be that other avenues need to be considered for Council funding or conjointly between developer and Council.
Conclusion

From a planning perspective, it is considered vital that the Proposals should not be permitted to proceed to final approval or adoption as the case requires until it can be fully demonstrated that the consequences of additional subdivision and development have been addressed and relevant action required to be undertaken by the developer identified.

To ensure that all such actions are implemented, it will be necessary to modify the content of the Planning Scheme Amendment No 2 to LPS 1 by including within the Schedule of requirements under Structure Plan Area No 23 of Appendix 15 of the Scheme Text all of the actions that the proponent of the development is required to undertake and when. Alternatively, and less desirably, because the procedure is less secure, the requirements could be built into the provisions of the Structure Plan.

These modifications would be necessary before the documentation is adopted for the purpose of seeking final approval to the Scheme Amendment or before the Structure Plan is approved and adopted by both the WAPC and the Council.
DETAILED ASSESSMENT

Background

Location

Gracetown is a small coastal settlement established on the western slope of the Leeuwin-Naturaliste Ridge overlooking the Indian Ocean on the south-east side of Cowaramup Bay. Since its commencement some 50 years ago, it has grown to the point where it comprises some 150 properties; originally predominantly comprising beachside holiday houses of modest proportions with some now being redeveloped with more substantial dwellings.

It lies some 16km north-west of Margaret River, the principal service centre, and 12 km west of Cowaramup, a smaller settlement but expanding rapidly as a result of recently approved subdivisions and consequent on-going development. Yallingup, to the north, is 28km away by road and the larger settlements of Dunsborough and Busselton, also expanding apace, are both approximately 48km distant to the north and north-east.

The Gracetown townsite is currently accessed by way of a single access road, Cowaramup Bay Road that extends from the townsite of Cowaramup on Bussell Highway to the east, crossing Caves Road and terminating in Gracetown.

Settlement Function

The original function of the settlement was to provide principally holiday accommodation for those wishing to make use of, and enjoy what the Bay and its environs offer in terms of natural features - a function that persists today. Few would have anticipated the growth in numbers coming to stay, live and visit Gracetown to enjoy what the settlement has to offer particularly in terms of its natural features. Gracetown's natural features and attractions include the Cape-to-Cape Hiking Trail which passes through the town and along the neighbouring coast to the north and south, swimming at secluded bay beaches, excellent surfing at the many breaks within the Bay as well as to its south, fishing from both the shore and using the boat ramp, the creek, lookouts and numerous other walks in the area.

It is important to recognise at the outset that original planning for the settlement provided for a two way access into and out of the community; hence the reason for the dedicated alignment of Van Tripp Road to allow for access to the town from the south. The alignment of the dedicated Van Tripp Road reserve can be identified on Figure 4 - Alternative Road Access - Option 9 (copy at Page 18 and referred to later in this report) as Road Nos 14265 and 14266. Research of the reason for the dedication of that road reserve has revealed that it was put in place specifically to perform the function of a two way access in combination with Cowaramup Bay.
Road. If there was seen to be a demand for such a road at that time, there is far more reason for it now; although the Van Tripp Road alignment appears to be unnecessarily long and tortuous and the same function can be achieved with a much shorter and less obtrusive length of road linking the south of the town with Caves Road.

Gracetown is not just another coastal town facilitating access to, and enjoyment of the beach and ocean for swimming, fishing and boating. While those functions certainly form part of the activities conducted at Gracetown, it is also renowned for its attraction to the surfing fraternity given its very special natural features; lying, as it does, between Margaret River (Prevelly/Gnarabup) to the south and Yallingup (in the Shire of Busselton) to the north, at the heartland of the areas where surfing (and other like activities) can be undertaken along the Leeuwin-Naturaliste Coast. It contains over 15 surfing breaks of high quality in the Bay and accessible from the Bay immediately to the south working in almost all types of wind and swell size conditions.

**Purpose of Assessment**

There are various stages through which the planning Proposals the subject of this assessment must pass. It is envisaged, therefore, that this assessment will be used as a basis for the GPA to contribute to the deliberations about the merits or otherwise of the proposal and its implications at those various stages.

While formal opportunities arise for public submissions to be made in respect of the proposed Amendment and proposed Structure Plan during the mandatory public consultation process for Amendments under the provisions of the Town Planning Regulations 1967 (as amended), other opportunities to contribute to the on-going debate about the acceptability of the two Proposals may arise as the matter proceeds.

Such other opportunities may include making submissions to the Environmental Protection Authority (EPA) if that agency requires the preparation of a formal environmental assessment of the Proposals. There may also be discussions aimed at identifying the ultimate form of the Amendment and Structure Plan where an evaluation of the implications of the Proposals as set out in this Assessment would form a basis for discussion.

This Assessment is intended to examine issues that are likely to become evident from what will effectively be a doubling of the present number of dwellings in the settlement by reason of the Proposals. The increase in resident population, both temporary and permanent, will also inevitably attract a greater number of visitors to the settlement as well as increases in the number of local residents taking up properties created in subdivisions and developments in the region generally.
It is intended to address the actions that are seen to be necessary to mitigate the less desirable outcomes stemming from the development of the land for its intended purpose, especially the additional demands likely to be placed on existing infrastructure and facilities.

THE PROPOSALS

Description of Proposals

Amendment No 2

The matters from which this assessment arises are two complementary Proposals by LandCorp submitted to the Council of the Shire of Augusta-Margaret River for consideration and action as appropriate.

The first proposal is a request for the rezoning of Lot 300 by way of an Amendment to Council's operative Local Planning Scheme No 1. The Amendment will be styled Amendment No. 2.

Proposed Amendment No 2 is intended to achieve the reclassification of an area of approximately 14.4 ha south of the existing townsite (as shown on the Structure Plan referred to below) to "Future Development Zone" under the Scheme to allow for a residential subdivision, with the area around and between the development being changed in its designation to "Reserve for Recreation and Fire Management": with the balance of the lot, some 230ha, being included within the National Parks and Nature Reserve classification.

It is understood that action complementary to the rezoning of the land under the provisions of the Planning and Development Act 2005 will involve a change under the Land Administration Act 1997 to the designation of the land that is not to be used for the proposed residential subdivision to include it within the Leeuwin-Naturaliste National Park as an 'A' Class reserve under that Act.

The Structure Plan

The second proposal is a Draft Structure Plan showing the proposed form of subdivision over the area to be classified Future Development into some 140 new residential lots. A plan of the Proposal and a more detailed plan of the proposed subdivision can be found at Figures 2 and 3.

The proposed subdivision will extend from Langley Crescent southwards to the road that services a Reserve (within the bounds of Lot 300), namely Reserve 38491 which is designated for Shire purposes and is located to the east of the proposed development. This latter Reserve has variously been used in the past as a refuse disposal site and also as a quarry.

The proposal envisages the use of Reserve 38491 for the purpose of developing a wastewater treatment plant to service not only the proposed development but also
the existing development within the settlement given that problems are apparently being encountered with on-site septic effluent disposal systems on sites within the town. This treatment plant is also to operate so as to provide for a recycled, reticulated, water supply service to the both new and existing development for use for non-potable purposes.

General Implications of Proposal

The impact of creating some 140 new residential lots as an extension to a settlement comprising only 150 existing lots will be significant and nearly double the number of dwellings within the town most of which will be dependent upon the existing services of the settlement.

Development of this scale in proportion to the size of the existing settlement that already shows evidence of stress at peak periods makes it necessary to consider what actions need to be taken to ensure that the settlement can continue to operate in a manner that protects the current lifestyle and amenity of the area and, above all, does not detract significantly from the aesthetic and environmental qualities of its setting within a National Park.

Additional population will generate increased traffic and given the distance of the proposed development from its service store, restaurant and swimming and surfing beaches in the Bay, there is greater likelihood of vehicles being used rather than walking to or from intended destinations, although pedestrian movement will also occur. The additional traffic will impact heavily on the existing road network, the pedestrian movement patterns from the settlement itself to the Bay at points where the strongest pedestrian desire lines cross roads such as Bayview Drive and will increased dangers to all involved.

Action Taken by Council to Date

The proposal has been assessed by an officer of the Shire of Augusta-Margaret River and was presented to the Council on 9th March 2011 with the result that a general resolution to initiate Amendment No 2 to Scheme No 1 was passed. The resolution was, however, subject to a range of actions relating to the documentation for the Amendment to both the Scheme Map and to the Scheme Text.

Of particular note is advice to the proponent "that the need for an alternative access road should be further detailed through the provision of a risk based analysis of the potential road alignments undertaken in consultation with FESA (Fire & Emergency Services Authority), the DEC (Department of Environment and Conservation), DoP (Department of Planning) and the Shire and that this analysis will be a factor in the final recommendation provided by the Shire to the WAPC on this amendment and structure plan". This part of the resolution by Council anticipates the possibility that the SAA may perhaps be argued to be unnecessary; a conclusion that cannot be accepted on the basis that it is required under
Government Policy and for other reasons associated with the preservation of community amenity as argued later in this report.

At the time of preparing this Assessment, it is understood that the Council has received from the proponents revised Amendment documentation sufficient to allow it to be referred to the Environmental Protection Authority (EPA) as required by environmental and planning legislation.
Figure 2. The Proposal
(Source Shire of Augusta-Margaret River Report)
Figure 3 Gracetown Development Proposal
(Source: Landcorp Development Proposal)
ISSUES ELIMINATED FROM DETAILED CONSIDERATION IN THIS REPORT

Because decisions have been made at both State and Local levels of Government that Gracetown should be allowed to be expanded by a development of the kind set out in the Proposals, there is little purpose in examining the justification for the subdivision and development or its relationship to the existing town. However, the manner in which it should be allowed to proceed and the measures necessary to mitigate its impacts requires determination.

It is also accepted that matters related to the form of built development will be examined in more detail as part of deliberations on the "Design Initiatives" report and the Visual Impact Management Statement required as part of the planning process by the Amendment provisions and/or Council's resolution.

Therefore, it is not proposed here to discuss the planning justification for a development of the magnitude proposed nor its location in relation to existing development but rather to focus on the implications of the development on amenity, character and safety within the settlement.

ISSUES OF CONCERN

The following summary of issues are listed as those that should be given serious consideration as part of the deliberations that are given as to whether or not the Proposals should be allowed to proceed. They arise out of the belief that the Proposals will create problems significantly additional to those already in evidence in the town and its environs necessitating action by the proponents as pre-requisites to subdivision and development being permitted to proceed. Each will subsequently be reviewed under the respective headings:-

  a. Fire risk;
  b. Alternative Access Road
  c. Pedestrian Movement
  d. Other Pedestrian Issues
  e. Roads and Road Intersections; and
  f. Car Parks.
a. Fire Risk

Gracetown and its environs have been assessed as being exposed to extreme bushfire hazard as a result of a Shire-wide evaluation of fire risks across the Municipal District. A bush fire in 2007 that started in the Big Rock Car Park brought this danger to the fore when it burnt to the fringes of the settlement and was only fortuitously controlled at that point.

At the time when the town was first settled such considerations were not viewed with the same concern as they are today and so there is a legacy of danger with respect to fire. That stated, however, provision was at least made, in planning terms, for a second access road to serve as an means of escape in case of fire in the form of the dedicated road reserve of Van Tripp Road although this has never been constructed; possibly for what has since been realised it is longer, and unnecessarily tortuous and environmentally insensitive alignment when compared to other routes previously examined.

The WAPC's publication "Planning for Bushfire Protection Guidelines 2001" (Fire Guidelines) advocates that no new development should be permitted within areas exposed to an extreme bushfire hazard unless they "are considered unavoidable". Obviously development at Gracetown is avoidable and does not have to occur. However, it is accepted that there are demands for additional coastal development and this is one place within which it can occur as anticipated by the Leeuwin-Naturaliste Ridge Statement of Planning Policy issued by the WAPC and by the Council's Draft Local Planning Strategy.

If it is to be permitted, however, all necessary pre-requisites of the Fire Guidelines should be implemented such as "permanent hazard reduction measures" and "two different access routes, both of which connect to the public road network are available to all of the residents/the public at all times" as would be expected of any private developer. The provision of such a road is advocated in the Fire Management Plan prepared for the proponents by FirePlan WA.

Reference has already been made to the fact that Gracetown is solely dependent upon Cowaramup Bay Road for access and egress notwithstanding that there is an unconstructed road reserve, Van Tripp Road, to the south of the settlement back to Caves Road which was seen to be necessary when the settlement was founded but has never been constructed.

Eleven years ago when additional development in Gracetown was being considered, it was taken for granted that an SAA needed to be provided and, in a report by Koltasz Smith entitled "Gracetown Development Investigation Report - Stage 1", 9 different route options were considered. Option 9 was the preferred option having minimal impact upon the Leeuwin-Naturaliste National Park, the least visual impact and with reasonable gradients. This route is shown at Figure 4.
Figure 4 - Option 9 - Alternative Access Road (SAA)
If, at the outset, when the development of the town was commenced, as well as when additional development of the kind now envisaged was assessed 11 years ago, an SAA was considered to be necessary, more recent tragic fire events in Toodyay, Lake Clifton and Kelmscott should lead, even more emphatically, to the same conclusion to avoid their replication in Gracetown. In planning terms, the need for such an SAA is vital to mitigate means of escape in case of fire concerns, to satisfy State Government Policy and to comply with the conclusions of its own Fire Management Plan prepared by FirePlan WA in June 2010.

As an agent of Government in promoting the development, compliance with Government Policy is imperative if the Policy is to remain credible.

Accepting that it is imperative that the SAA be provided, it is submitted that its construction should occur before the subdivision and development is permitted. The alignments, geometry and gradients of the existing roads accessing the site are not considered to be adequate to carry the types and volumes of traffic required to carry out subdivision and development.

b. Other Reasons justifying SAA.

Not only is the provision of the SAA an imperative for reasons associated with escape from fire, there are other planning reasons why such a road should be provided. Firstly, it will provide a more direct route (particularly if Option 9 is selected) between Gracetown and Margaret River, the district's regional town. Significantly, this would be of great benefit for emergency vehicles travelling between the two destinations: minimising the time taken to reach, for example, hospital services. The tragedies that have occurred in Gracetown with shark attacks and the cliff fall in recent years stand as stark testimony to this need. Such an SAA will allow for speedier and more direct access to surfing beaches to the south of the town for rescue purposes.

Secondly, as set out in the Uloth Report, the construction of such an SAA will alleviate the predicted pressure upon the capacity of Cowaramup Bay Road/Bayview Drive/Salter Street to accommodate significantly increased traffic volumes that will result from the development.

Thirdly, according to the Uloth Report, if no SAA is provided as an adjunct to the proposed development, that road is destined to increase in traffic volume by 66.5% from 2,180 vehicles per day (vpd) particularly on the section leading to Caves Road to 3,630 vpd with similar proportional increases elsewhere on roads in the town's hierarchy. With the provision of an SAA, existing traffic volumes are predicted to diminish which would help to preserve existing levels of amenity within the town.

Without an SAA, a 66.5% traffic increase on Cowaramup Bay Road will place greater pressure on its intersection with Caves Road. That intersection has already
attracted 'Black Spot' funding to stagger the junctions of the two parts of Cowaramup Bay Road (i.e. both east and west of Caves Road) to remove the present cross-road configuration.

Crash statistics at this junction that gave rise to the justification for the Black Spot funding are that there have been 6 accidents in the last 5 years including 1 fatality, one requiring hospital treatment, one requiring medical attention and 3 involving major property damage.

Contact with officers of Main Roads WA has established the fact that the funding is for road construction works intended to improve an existing dangerous intersection based on current vehicle numbers. It has no bearing on the development prospects of land in Gracetown or the likely increase in traffic generated by it. Conceivably, the additional development and the 66.5% increase in traffic may, in fact, produce a situation where even the presently proposed remediation works will not be effective and the dangers to traffic be as acute as ever.

The RAC in conjunction with WA Police has already quoted in its Roads 2010 Summary that statistics relating to fatal and serious injury road accidents are already the highest of any country region within the State. If the intersection between Cowaramup Bay Road and Caves Road is already recognised as being a Black Spot junction without the impact of the proposed development even more serious consideration needs to be given to the implications arising from the Proposals. As already noted, the construction of the SAA will reduce those concerns.

Fourthly, the provision of an SAA will not only provide an alternative access in the event of wildfire, but it will also provide a secondary means of access to, or egress from the town in the event of other emergencies. Such movements on a single access road are potentially vulnerable if the road is closed, blocked, or otherwise damaged by natural or man-made actions. For example, there is precedent for the bridge at Cowaramup Creek being impassible and damaged as a result of flooding.

Fifthly, the provision of an SAA will enable those approaching from outside Gracetown and wishing to access the coast south of the settlement to do so without having to pass through the town itself thus reducing the incidence of conflict between passing and local traffic and improving pedestrian safety in town. Statistically, as is shown in the Uloth Report, a large proportion of the current traffic through Gracetown is for the purpose of accessing that coastline (predominantly surf related traffic accessing the reliable quality surf coastline south of Gracetown known as the Lefthanders region commencing at dawn).

c. Pedestrian Movement

Priorities

There are no formalised pedestrian cross-walks within the town. Increased population and vehicular traffic will increase conflict between the two movement
patterns. This will be no more obvious than at the local store and restaurant area when pedestrian/vehicle conflict is already an issue demanding not only a crosswalk for improved pedestrian safety and protection but some additional action to formalise on-site parking access, street parking and pedestrian movement.

Traffic movements into and from these commercial facilities combined with increased pedestrian movements across Bayview Drive at this point by those using the beach and foreshore areas makes provision of a formalised pedestrian crossing very important if accidents are to be prevented. Additionally, the present uncoordinated jumble of parking both on and off the street and pedestrians moving along Bayview Drive is dangerous and requires more distinctive delineation (See Plates 1 & 2)

Plate 1 showing forecourt to restaurant

Plate 2 showing one access to store and restaurant.

The need for this crosswalk at the store, in common with others, was recognised previously in such documents as the Council's Cowaramup Bay 5 Year Works Plan (June 2006). These were considered to be necessary at:-
i. North Side of Bridge;
ii. Store to Main Beach
iii. Corner Percy Street and Bayview Drive;
iv. Corner Bayview Drive and Salter Street; and
v. The entrance to the Community Hall and Tennis Courts.

The strongest pedestrian desire lines for crossing Bayview Drive are firstly at the store and secondly at the three-way intersection of Bayview Drive and Salter Street. This intersection is a 'T' junction where Bayview Drive stops at the alignment of Salter Street, The road configuration, however, favours movement between Bayview Drive into Salter Street south; with Salter Street north being the less dominant. The dangers of crossing at the latter junction are heightened because of a serious lack of visibility caused by the alignment of the roads and the not-infrequent traffic movements into and out of Salter Street north leading to the South Point car park. Uloth reports that existing traffic movements into Salter Street north and this car park are 740vpd projected to increase to 1060vpd. With existing facilities already heavily used to overflowing (see Plate 3 below), it is difficult to see how the additional traffic volumes can be managed safely without significant modification to the road junction.

Plate 3 - peak usage of Salter Street north showing overflow parking on verges.

Salter Street not only forms part of the principal road network but also, as noted, services South Point Car Park between Bayview Drive and the Car Park itself. The carriageway on this section of Salter Street is particularly attractive to skate boarders because gradients are low and the surface good, in common with the car park, making them attractive for that purpose. This attraction combined with
pedestrians wanting to reach South Point means that there is a strong pedestrian desire line across Bayview Drive at its intersection with Salter Street which, as already noted is a dangerous corner for traffic but more so for pedestrians.

Of the five crosswalk locations identified by Council in its Works Plan 2006, it is considered that the priorities are those just described and should be provided in conjunction with the development. Lesser urgency attaches to the other three; although their provision would, nonetheless, be highly desirable with greater numbers of people likely to be moving between homes and the foreshore areas.

**d. Other Pedestrian Issues**

Further protection for pedestrians is also considered appropriate in the form of devices to effect traffic calming along Bayview Drive especially in proximity to the Store. Chicane devices would produce the desired outcome and enforce the existing 50kph speed limit which, it is understood, is frequently not observed. Such speed restriction devices could also be combined with some lower branch trimming of vegetation of trees on the south side of Cowaramup Bay Road near the bridge to improve visibility. Removal of those trees would not seem to be necessary if traffic speeds are kept within stipulated limits.

Very limited provision has been made for pedestrian movement within the town or between the town and features such as the surfing point car parks, swimming beaches, boat launching ramps etc. Increasingly the roads are used for pedestrian purposes for people to exercise, to move from residential properties within the town and significant destinations along the coast (specifically Main Swimming Beach and picnic areas on the foreshore) and to move between the caravan park on Cowaramup Bay Road into town.

The absence of dedicated footpaths on the verges of Galliers and Nicholson Streets and the lack of maintenance of the pedestrian access-way (PAW) between Georgette and Osborne Streets (See Plates 4 & 5) within the existing subdivision does not present an attractive option for local residents and visitors to use.

With the exception of portions of Bayview Drive and Salter Street, there are no footpaths on the sides of roads within the town which must discourage pedestrian activity and forces people on foot onto road carriageways. This is a significant deficiency on parts of Salter Street given its importance in the road hierarchy within the settlement and the way it gathers, and will increasingly gather, not only vehicles but pedestrians also feeding into key attractions at the foreshore. Additional separation of the pedestrian and vehicular functions on Salter Street in particular would seem to be highly desirable, given the increased usage that is likely to be experienced on that street.
Plate 4 showing Degraded Condition of PAW.

Plate 5 showing absence of footpath on Galliers Street to link with PAW.

Pedestrian/cyclist movements along Cowaramup Bay Road and the town's beaches and foreshores are also somewhat hazardous and a dedicated dual use path along its length, as identified by Council in its Gracetown Townsite Strategy (1996) and incorporated into its Gracetown Initiatives Plan (March 2008) would be highly desirable.
e. Roads and Road Intersections

While other road and road junction deficiencies exist and require attention, they do not carry the same weight as the provision of the SAA which is considered the highest priority.

That SAA when provided will, as already described, have the significant benefits for the town already described and will reduce the pressure to address the issues now described.

The intersections between Salter Street with Langley Crescent, Georgette Street, and Bayview Drive are unsafe in their present configurations, alignments and visibility and additional traffic from a doubling of the town size alone, exaggerated by increases in visitor numbers, will exacerbate the risks in using these intersections. The problems associated with the intersection between Bayview Drive and Salter Drive have already been described.

The intersection between Salter & Georgette Streets is further complicated by the existing unconstructed access-ways, each with poor visibility, into the area containing the bore for access to water, the community hall, tennis courts, and fire and rescue facilities on the western side of Salter Street.

Salter Street acts as the only major collector road for traffic emerging from the existing development within the town and will increasingly serve that function for the proposed new development. It is considered that works to rectify these deficiencies should be undertaken in conjunction with the development as their inadequacies will become far more evident with increases in traffic movements from 490 vpd to 1,650 vpd (237%). Safe traffic movements from Langley Crescent and Georgette Street will be even more significantly compromised as a result of the development as these figures show.

f. Car Parks

While there are many car parks along the foreshore used variously for observation, boat launching, parking while surfing or swimming or for picnics, their capacities, especially at South Point and the Main Swimming Beach, are sometimes limited in their capacity to meet demand especially at peak periods. As a result, verge parking occurs along both sides of the section of Salter Street between Bayside Drive and South Point Car Park as overflow to that car park and verge parking occurs along Bayside Drive as overflow to the Main Swimming Beach Car Park. This is typified by the photographs at Plates 4 (inserted earlier) and 6 below. The safety issues are patent.
Plate 6 Showing peak usage of Parking Areas and at an unformed access way along the main road into town.

Access-ways to the unmade car parks along the foreshore are also unformed with no control over the way vehicles enter and leave the respective facilities. Visibility from some of the access points is poor and the camber on parts of Cowaramup Bay Road are not favourable to entry to and exit from the car parks. Many of these deficiencies in car parks have already been identified in such documents such as the Gracetown Townsite Strategy (1996). Recent funding for improvement to the boat launching facilities and car park will assist with the deficiencies at this point but the others remain.

There is a need for the access-ways onto Bayview Drive and Cowaramup Bay Road to be formalised and constructed to improve safety both for pedestrians as well as the drivers of vehicle entering and leaving these facilities.
**ACTIONS THAT SHOULD BE UNDERTAKEN TO ADDRESS ISSUES OF CONCERN**

**Introduction**

To obviate the issues of concern, it is clear that a range of actions need to be undertaken in the context of the Proposals to ensure an outcome does not eventuate that leaves the community with greater difficulties than presently exist and/or with diminished levels of amenity and safety. Indeed, the preferred situation is that the proposed development would see, not only measures taken to address the outcomes generated by the development itself, but also help to resolve problems already in evidence.

**Second Alternative Access Road (SAA)**

To address the issues of concern relating to the extreme fire hazard to which the settlement is already exposed and the increased extent to which it will be exposed with substantial additional development, it has already been shown that it is imperative that a route for an SAA be identified and the facility constructed before the development is allowed to proceed.

Compliance with this requirement will:-

- provide an alternative means of escape from the settlement in case of fire or other emergency;
- provide a point from which fires can be fought and accessed;
- set the necessary example of a Government Agency complying with its Government's Policy - Planning for Bushfire Protection Guidelines 2001. (the Fire Guidelines) giving it credence and validity so that it can be applied and implemented elsewhere; and
- be consistent with the Fire Management Plan prepared for the Proposals by FirePlan WA; the proponents own fire management consultants.

It will also provide additional desirable planning outcomes that will preserve amenity and safety within the settlement by:-

- providing an alternative, shorter and more convenient route for emergency vehicles of all kinds from Margaret River to reach surfing beaches and buildings within the town;
- providing an alternative route for movement in and out of the town in the event that Cowaramup Bay Road is blocked, damaged or inaccessible for any reason as has occurred in the past;
- reducing traffic impacts caused by large increases in vehicle movements within the settlement especially along the principal traffic routes of Salter Street, Bayview Drive and Cowaramup Bay Road;
• reducing traffic impacts caused by large increases in vehicle movements within the settlement especially Cowaramup Bay Road to its junction with Caves Road already identified as an intersection requiring modification with Black Spot funding based on present traffic volumes;
• providing an alternative route for construction vehicles required for subdivision and development for which existing roads are not suitable; and
• providing access to surfing beaches south of the settlement without the need to travel through the town for those approaching from the south.

The preferred option for the alignment of this road has previously been identified as "Option 9" as shown at Figure 4 as the least obtrusive and shortest route.

Contrary to the position adopted by Council in its resolution to initiate Amendment No 2, it is not accepted that there is any reason that could be advanced to justify proceeding with the development without the provision of the SAA. The Policy position is unequivocal.

It is considered that the Amendment documentation should be changed, probably by way of additions/modifications to the list of conditions under Structure Plan Area No 23 of Schedule 15 to the Scheme Text to include provisions requiring the provision of the SAA by the proponents prior to the commencement of subdivision.

**Pedestrian Movement**

To address these issues of concern, the following actions are also seen to be important:

• Cross-walks need to be provided at the store and at the junction of Bayview Drive and Salter Street to ensure public safety and convenience when moving from the town's development, especially near the store and restaurant, to the recreational destinations around the Bay. Existing crossings at these two places are already unsafe; a situation that will be exaggerated by the proposed development. The provision of these cross-walks are considered to be appropriately provided by the developer or conjointly with the Council;
• The road-side parking, open forecourts used for parking and footpaths at the store and restaurant are unstructured and dangerous. Access to on-site parking areas need to be more clearly identified, footpath priorities designated and street parking spaces delineated to provide clear separation between the respective functions to improve safety. As the Uloth report shows, without provision of the SAA traffic volumes will increase 57% (2040vpd to 3440vpd) along Bayview Drive and Cowaramup Bay Road. Notwithstanding that traffic volumes will decrease with the provision of the SAA the present inadequacies still need to be rectified.

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• Footpath extensions along Salter Street from its present termination south to, and along the frontage of the proposed development and from the intersection of Salter Street with Bayview Drive are required to provide safe pedestrian use of this principal vehicle and pedestrian movement collector road to provide greater safety for those using that route;

• The pedestrian movement system along Galliers Street, the PAW and Nicholson Street needs to upgraded to encourage pedestrian movements away from Salter Street. The absence of footpaths in the two streets and the unkempt nature of the PAW does not make this movement route attractive. This may well be action to be undertaken by Council as a complement to the development and its impacts although the proposed development will generate additional usage; which could be argued as being the responsibility, or part responsibility of the proponents;

• A footpath along the northern side of Salter Street from the store to the Main Swimming Beach Area to separate vehicle and pedestrian functions on that road or alternatively and extension of walkways within the foreshore area with connection back to Salter Street at the store;

• Traffic calming devices, in the form of chicanes, are seen to be justified to ensure that the speeds of vehicles using Bayview Drive are reduced to levels which are consistent with the function the road performs, particularly near the principal activity nodes. The moderation of traffic speed will make pedestrian crossing safer and reduce the risk of accident.

• Other crosswalks in positions identified by Council in its Cowaramup Bay 5 Year works Plan 2006 at Percy Street, near the bridge on Cowaramup Bay Road and on Salter Street near the community hall would also be desirable.

• A multi-use path along Bayview Drive and Cowaramup Bay Road from the caravan park into the settlement is seen to be highly desirable as identified in the Shire of Augusta-Margaret River Coastal Management Plan (2005). An alignment for that multi-use path within the town area should be selected so as to separate pedestrian/cycle functions from vehicular traffic.

While the costs associated with the provision of traffic calming devices, footpaths (other than those along Salter Street) and the three crosswalks at Percy Street and near the bridge on Cowaramup Bay Road and the cross-walk on Salter Street near the community hall may not reasonably be applied in full to the developer, there will be a need for Council to consider how these facilities might be funded to avoid future serious problems arising from the development.

**Roads.**

As a direct consequence of the development, additional vehicular traffic will be attracted onto Salter Street accentuating the deficiencies in its alignment and intersections as identified in the issues of concern. Additional pedestrian traffic will also be attracted to this street as just noted.
Desirably the intersections between Salter Street and Langley Crescent, Georgette Street and Bayview Drive should be upgraded to improve their configurations and, as a result, visibility and safety.

Of the intersections on Salter Street, the least safe is seen to be its junction with Bayview Drive. The conflicts between pedestrian and vehicle are second only to those at the store and restaurant and requires resolution by improvements to provide greater visibility, ensuring traffic movements are slowed and pedestrian movements are given higher priority. The Uloth Report recommends against a roundabout at this intersection which is a suggestion put forward by Transcore to address this issue.

To slow vehicles approaching the sweeping bend on Cowaramup Bay Road heading into the town and to increase safety for those attempting access to, and egress from the car park at the look-out, it is considered that Council in conjunction with Main Roads WA, should arrange for speed limitation signs to be re-positioned to restrict speeds to 60kph east of that bend.

**Car Parks**

Unconstructed access-ways into car parks along the foreshore has been identified as an issue of concern with potential for serious accident. Apart from South Point Car Park, none of the other parking facilities are formed nor access-ways given a sealed surface.

The fact that access-ways to those car parks are unconstructed permits unconventional approaches into and exits from the spaces concerned. The configurations of these access points and the camber of the adjoining roads in some cases means manoeuvres into and out from the car parks can be difficult and potentially dangerous.

Significantly increased traffic movements within the town and with a similar increase in the use of parking areas, especially Main Swimming Beach Car Park, portends increased prospect for accidents if no action is taken and construction and formalisation of these access-ways is seen to be necessary to control access and egress for movements into and out of the car parks.

With the predicted increases in the use of car parks within the Bay most of which can be attributed to the effects of the development, it can again be argued that these access improvements are works that should be undertaken by the developer.
IMPLICATIONS FOR PLANNING PROCEDURES

It is perhaps unfortunate that the Council has chosen to initiate Amendment No 2 to LPS No 1 and adopt the draft Structure Plan for the purpose of seeking public comment without requirements being incorporated into the Amendment documents mandating the provision of a number of actions by the developers as a pre-requisites to subdivision. It also leaves Council in a position where, having commenced the process of initiating an Amendment that the Hon Minister for Planning has the capacity to direct the outcome of the matter even if Council is not satisfied with those outcomes.

Opportunity does exist for representation to be made by the GPA and others to the Proposals through the obligatory public advertisement periods for both the Amendment and the Structure Plan and for the Council to modify the provisions of the Amendment, in particular, to address issues requiring actions by the proponents to counteract the negative outcomes that are likely to result from the development.

Other opportunities may present themselves through possibly the environmental assessment process and discussions between the GPA and the Shire to determine, not only the actions that it may require of the developers, but also the actions to be taken by the Council itself to achieve improvements in local facilities and services so as to mitigate the problems likely to be generated by the development.
CONCLUSION

The repercussions of permitting a development of a magnitude that increases the size of the existing settlement by nearly 100% in an area exposed to an extreme fire hazard makes provision of an SAA a necessity according to Government Policy and the fire management and mitigation measures identified by the proponents Fire Management Plan. It is considered that the development should not be permitted until its provision by the developer is assured and that it is constructed prior to subdivision and development to accommodate construction traffic and heavy delivery vehicles for which Cowaramup Bay Road, Bayview Drive and Salter Street are not well suited.

The proposal will increase pedestrian movements within the town as expanded by virtue of the development and improved facilities are seen to be necessary. These are:-

- cross-walks across Bayview Drive at the store and at its intersection with Salter Street;
- footpath extensions to connect the development to South Point Car Park;
- improvements to road intersections on Salter Street at Langley Crescent and Georgette Street, but especially at Bayview Drive which is already very dangerous;
- improved delineation of footpaths near the store and restaurant;
- formalisation of the footpaths along Galliers and Nicholson Streets and the restoration of PAW link between them;

Because the need for these facilities arises from the scale of the Proposals in comparison with the size of the existing settlement, the cost of these facilities can be considered as being reasonably applied to the developer unless the Council is prepared to assist with their provision.

Construction of the access-ways to car parks is also seen to be desirable given the likely increase in their use by additional numbers of residents and visitors to enable them to cope with demand and to improve the safety of their use.

From a planning perspective, it is considered vital that the Proposals should not be permitted to proceed to final approval or adoption, as the case requires, until it can be fully demonstrated that the consequences of additional subdivision and development have been fully addressed and quantified. All of the actions that have been identified in this report as being necessary to mitigate the effects of the development need to incorporated into the Amendment to ensure a clear delineation of responsibilities.

To achieve this outcome, it will be necessary to modify the content of the Planning Scheme Amendment No 2 to LPS 1 by including within the Schedule of requirements under Structure Plan Area No 23 of Appendix 15 of the Scheme Text a
list of actions that the proponent of the development is required to undertake to meet the issues set out in this report and when those actions are required. Alternatively, and less desirably, because the procedure is less secure and enforceable, the requirements could be built into the provisions of the Structure Plan.

These modifications will be necessary before the documentation is adopted for the purpose of seeking final approval to the Scheme Amendment or before the Structure Plan is approved and adopted by both the WAPC and the Council.

Gordon G. Smith

4th July 2011
APPENDIX A - REVIEW OF TRAFFIC MANAGEMENT PLAN

GRACETOWN RESIDENTIAL DEVELOPMENT

prepared by

ULOTH AND ASSOCIATES

16th November 2010