Cr Ray Colyer  
Shire President 
Shire of Augusta Margaret River  
PO Box 61  
Margaret River WA 6285

9 December 2011

Dear Ray

Re: Gracetown Expansion

I understand that the Scheme Amendment for Landcorp’s proposed expansion of Gracetown may be released by the Shire for public comment during January 2012. There are two key issues that are fundamental to the proposed expansion that the Gracetown Progress Association (GPA) believes must be resolved before the release of the Scheme Amendment for public comment. They are:

- the decision to build a second access road for Gracetown, and
- the basic design and costing of the proposed waste water treatment facility

Unless these issues are resolved before the public comment period commences, the community will be looking at an incomplete proposal and will not be in a position to make a fully informed assessment of the Scheme Amendment. The main concerns of the GPA on these two issues are summarized below.

**Second Access Road**

Despite being instructed by the Shire Council at its 9 March 2011 meeting to provide “a Risk Assessment for the provision of a secondary access road to Gracetown ... in accordance with advice from the DEC, FESA, EPA and WAPC”, Landcorp has only within the past few weeks instructed a consultant to carry out this assessment, with a reporting timeline of pre-Christmas. This demonstrates the lack of priority being given to this issue by Landcorp and the lack of urgency with which Landcorp is treating the community’s concerns regarding the second access road. I wrote to Shire CEO Gary Evershed in March 2011 advising him that a survey conducted by the GPA showed that 72% of respondents, representing the majority of households in the Gracetown area, are in favour of a second access road.

GPA representatives recently met with Mr Roger Banks of Strategen Environmental Consultants, who has been commissioned by Landcorp to provide the risk assessment, to put the position of the community regarding the second access road. Among the issues raised were:

- the extreme fire risk in the Gracetown area and the need for a second road for emergency access to and exit from the town.
• that a second road is required to comply with both the Fire Management Plan prepared for Landcorp and FESA’s Planning for Bushfire Protection Guidelines 2001.
• that a second road is important for faster or alternative access in other emergency situations, such as shark attack or other injuries at the main surfing locations south of the town, traffic accidents and flooding due to storm surges that could cut Cowaramup Bay Rd near the main beach.
• that a second road would alleviate the safety risks and community impacts associated with the significant heavy construction traffic, and increased traffic generally, travelling past the main recreation areas and through the heart of the town as a result of the proposed expansion.


The fact that the proposal for a 100% expansion of the town, in an area of extreme fire risk, may proceed through the planning processes while debate continues around the need for a second access road, is surely unacceptable.

Waste Water Treatment Facility

The GPA has had discussions and correspondence with the Shire planners for several months seeking answers to the many questions that the community has regarding the design and operating costs of the facility. The planners have been very responsive and helpful in answering these questions to the best of their knowledge. However, the fact that many of the questions cannot be answered due to the lack of clarity around the design of the facility, and the responses regarding the in principle allocation of the operating costs of the facility, have raised several significant concerns.

The facility is, and has always been acknowledged as, a pilot facility to prove whether self contained water treatment and recycling facilities are viable in small communities in WA that are outside the Water Corporation license area. If successful, it will provide a model for other small communities around the State. The community is generally prepared to participate in this experiment provided that it is not worse off a result than other residents of the Shire, such as those in Cowaramup or Margaret River.

The main concerns with the facility at this stage are:

• the Shire has indicated that the full cost of operating the facility, including a provision for depreciation (and replacement) of the facility, will be passed on to residents and land owners through rates and consumption charges. As there is no information available as to likely operating costs, this is cause for alarm. It is also different to the in principle position outlined by the Director of Infrastructure Services in a letter to property owners in November 2009 regarding the Gracetown and Witchcliffe sewerage treatment systems, where he said that “it is planned to keep the cost of services to land owners very similar to water and sewerage connections in nearby towns such as Margaret River with similar annual rates and consumption charges applying...”.
• many of the properties in the existing town are below the level of the road where the collection pipes will run, and the sewer connections from those properties will therefore either need to be run down through neighbouring
properties or include pumps. This creates issues of cost (initial and ongoing) and disruption that have not been addressed.

- for all existing properties, the issue of the cost of and disruption caused by connection to the facility remains.
- the facility is important to the fire fighting capability of the town, in that it will provide for hydrants around the whole town and a 300,000 litre water storage. If the facility is not viable, and there are sufficient questions at this stage to indicate that it may not be, then it makes no sense at all to expand the town and significantly increase the current level of risk.

These and many other issues are apparently to be addressed in the business plan for the facility, which is currently being prepared but which we understand may not be available before the Scheme Amendment is released for public comment.

The issues discussed above were brought to the attention of Councilors in a presentation to the Council by Bruce Macaulay on behalf of the GPA on 9 March 2011, prior to the decision to initiate the Scheme Amendment. In view of the importance of the second access road decision and the viability of the waste water treatment facility to the whole basis and risk profile of the townsites expansion, the GPA believes that the second road decision should be made and the details and viability of the water facilities should be clearly established before the Scheme Amendment is released for public comment.

We ask that you ensure that the Scheme Amendment is not released for public comment before these issues are resolved. I have written to all the Shire Councilors, the Shire CEO and Planning Department, and Messrs Barry House MLC and Troy Buswell MLA, in similar terms.

Yours sincerely

[Signature]

David Martin
President
Gracetown Progress Association Inc.