



*We're working for
Western Australia.*

October 2019

Metropolitan Region Scheme Amendment 1270/41



Ocean Reef Marina Redevelopment

Submissions

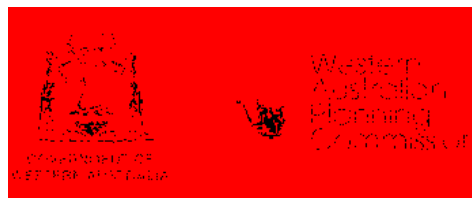
City of Joondalup

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Submissions

City of Joondalup



October 2019

The Western Australian Planning Commission acknowledges the traditional owners and custodians of this land. We pay our respect to Elders past and present, their descendants who are with us today, and those who will follow in their footsteps.

Disclaimer

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Western Australian Planning Commission
Gordon Stephenson House
140 William Street
Perth WA 6000

Locked Bag 2506
Perth WA 6001

MRS Amendment 1270/41 Submissions
File 809-2-30-17 Pt 2

Published October 2019

Internet: www.dplh.wa.gov.au
Email: info@dplh.wa.gov.au
Phone: (08) 6551 8002
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National Relay Service: 13 36 77

This document is available in alternative formats on application to the Department of Planning, Lands and Heritage Communications Branch.

Introduction to Metropolitan Region Scheme major amendments

The Western Australian Planning Commission (WAPC) is responsible for keeping the Metropolitan Region Scheme (MRS) under review and initiating changes where they are seen as necessary.

The MRS sets out the broad pattern of land use for the whole Perth metropolitan region. The MRS is constantly under review to best reflect regional planning and development needs.

A proposal to change land use reservations and zones in the MRS is regulated by the *Planning and Development Act 2005*. That legislation provides for public submissions to be made on proposed amendments.

For a substantial amendment, often referred to as a major amendment (made under section 41 of the Act), the WAPC considers all the submissions lodged, and publishes its recommendations in a report on submissions. This report is presented to the Minister for Planning and to the Governor for approval. Both Houses of Parliament must then scrutinise the amendment before it can take legal effect.

In the process of making a substantial amendment to the MRS, information is published as a public record under the following titles:

Amendment report

This document is available from the start of the public advertising period of the proposed amendment. It sets out the purpose and scope of the proposal, explains why the amendment is considered necessary, and informs people how they can comment through the submission process.

Environmental review report

The Environmental Protection Authority must consider the environmental impact of an amendment to the MRS before it can be advertised. Should it require formal assessment, an environmental review is undertaken and made available for information and comment at the same time as the amendment report.

Report on submissions

The planning rationale, determination of submissions and the recommendations of the WAPC for final approval of the amendment, with or without modification, is documented in this report.

Submissions

This document contains a reproduction of all written submissions received by the WAPC on the proposed amendment.

Transcript of hearings

A person who has made a written submission may also choose to appear before a hearings committee to express their views. The hearings proceedings may be recorded and transcribed, and the minutes of all hearings will be published and made available.

Submissions



Enquiries: Alex Jarvis on (08) 9323 6319
Email: alex.jarvis@mainroads.wa.gov.au
Our Ref: 16/9938 (D16#831924)
Your Ref: 809-2-30-17



ABN: 50 860 676 021

28 December 2016

The Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001
Email: mrs@planning.wa.gov.au

DEPARTMENT OF PLANNING	
29 DEC 2016	
FILE	

(via email)

ATTENTION: ANTHONY MUSCARA

Dear Sir

PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1270/41 – OCEAN REEF MARINA

Thank you for your correspondence dated 16 November 2016 requesting Main Roads comments on the above proposal.

Main Roads has no objection to proposed amendment 1270/41.

If you require any further information please contact Planning Information Officer Alex Jarvis on (08) 9323 6319 quoting file reference 16/9938 (D16#831924).

Yours faithfully

Justin McKirdy
A/DIRECTOR ROAD PLANNING AND DEVELOPMENT



ENQUIRIES : Cesar Rodriguez- Ph 6551 8092

OUR REF: 2016/0175-01

Ms Kerrine Blenkinsop
Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001



Dear Ms Blenkinsop

METROPOLITAN REGION SCHEME PROPOSED AMENDMENT 1270/41 - OCEAN REEF MARINA DEVELOPMENT

Thank you for providing the Department of Aboriginal Affairs (DAA) the opportunity to comment on the Metropolitan Region Scheme Amendment 1270/41 (the Amendment Scheme), intended to facilitate the redevelopment of the existing Ocean Reef Marina Harbour.

The DAA has reviewed the Amendment Scheme and I am able to advise there are no Aboriginal sites or any other known Aboriginal heritage places within the Scheme Amendment area. Please be advised however that the Scheme Amendment area covers a portion of coastal dunes which appear to be undisturbed and may have the potential to contain Aboriginal cultural material.

I am also pleased to learn from the attachment to your letter that the Western Australian Planning Commission has a Memorandum of Understanding (MOU) with the South West Aboriginal Land and Sea Corporation (SWALSC), requiring amendment proposals likely to have an Aboriginal interest be referred to SWALSC. I note the Scheme Amendment has been referred to SWALSC and I also recommend the proponents for the redevelopment also engage with SWALSC regarding the development.

It is recommended proponents for the redevelopment familiarise themselves with the State's Aboriginal Due Diligence Guidelines available at the link below prior to finalising plans for the works.

<http://www.daa.wa.gov.au/heritage/land-use/>

Please contact Mr Cesar Rodriguez , Manager Heritage Projects on (08) 6551 8092 or via email at Cesar.Rodriguez@daa.wa.gov.au should you require any further information.

Yours sincerely



Tanya Butler
A/EXECUTIVE DIRECTOR, HERITAGE

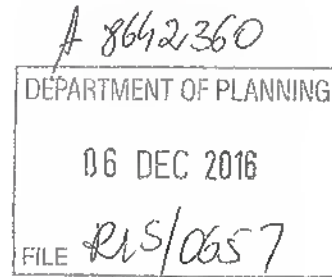
5 January 2017



Government of Western Australia
Department of Mines and Petroleum

Your ref: 809-2-30-17 Pt 1 (RLS/0455)
Our ref: A0159/201501
Enquiries: Colin Strickland - Ph 9222 3139 Fax 9222 3638
Email: colin.strickland@dmp.wa.gov.au

Ms Kerrine Blenkinsop
Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6000



Dear Ms Blenkinsop

**METROPOLITAN REGION SCHEME PROPOSED AMENDMENT 1270/41
OCEAN REEF MARINA REDEVELOPMENT**

Thank you for your letter dated 16 November 2016 inviting comment on the above proposed amendment for the rationalization of various zones and reserves within a 61 ha area of the Ocean Reef Marina Boat Harbour to facilitate redevelopment.

The Department of Mines and Petroleum has determined that this proposal raises no significant issues with respect to mineral and petroleum resources, geothermal energy, and basic raw materials.

Yours sincerely

Ben
Ian Tyler
Acting Executive Director
GEOLOGICAL SURVEY OF WESTERN AUSTRALIA

30 November 2016

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Submission 4

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS/0657

Name ATCO GAS AUSTRALIA (FIONA SNEELIN)
(PLEASE PRINT CLEARLY)
Address 81 PRINSEP RD, TANPAKOT, WA Postcode 6164
Contact phone number 6163 5000 Email address Fiona.Snellin@atcogas.com.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

ATCO GAS AUSTRALIA OPERATES BELOW GROUND GAS MAINS
AND ABOVE AND BELOW GROUND INFRASTRUCTURE.

ATCO GAS HAS NO OBJECTION TO THIS AMENDMENT BEING
APPROVED AS WE HAVE NO MAINS IN THIS IMMEDIATE AREA.

SHOULD THE REDEVELOPMENT CONSIDER A GAS SERVICE
I ENCOURAGE EARLY CONSULTATION WITH ATCO GAS
IS COMMENCED AS SOON AS POSSIBLE.

KIND REGARDS

MS SNEELIN

turn over to complete your submission

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:



No, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR



Yes, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:



Myself – My telephone number (business hours):

or



A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:



Public (members from the general public may attend your presentation)

OR



Private (only the people nominated by you or the hearings committee will be permitted to attend)

You should be aware that:

- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature



Date 2 DECEMBER 2016

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Bubanic, Marija

From: Snellin, Fiona <Fiona.Snellin@atcogas.com.au>
Sent: Friday, 2 December 2016 2:07 PM
To: mrs
Subject: LM16263_MRS Amendment for Ocean Reef Marina Redevelopment_MRS Amendment 1270_41_ATCO Gas Response
Attachments: ES201611219_MRS Amendment 1270_41 Ocean Reef Marina Redevelopment_ATCO Gas Map.pdf; Completed Submission Form 41 for MRS Amendment 1270_41_ATCO Gas Australia.pdf

For the Attention of Mr Anthony Muscara

Good afternoon Anthony,

Your Ref: 809-30-17 Pt 1 (RLS/0455)
Our Ref: ES201611219 and LM16263

***Metropolitan Region Scheme Proposed Amendment 1270/41
Ocean Reef Marina Redevelopment***

Thank you for recently providing ATCO Gas Australia (ATCO Gas) the opportunity to comment on the proposed Metropolitan Region Scheme Amendment 1270/41 for the proposed area identified within the Amendment Report and shown on the Figure named "Ocean Reef Marina Redevelopment-Proposed Major Amendment as advertised Proposal 1 dated 22 April 2014".

ATCO Gas Australia (ATCO Gas) has **no objection** to the proposed MRS Amendment 1270/41.

ATCO Gas owns and operates gas mains and infrastructure within the City of Joondalup . The ATCO Gas gas mains and infrastructure exist predominantly within the road reserves however in some instances they can exist also within private property.

I have considered the Land affected by this MRS Amendment and ATCO Gas do not have any assets in the immediate area the subject of the Amendment, as depicted on the attached Figure.

ATCO Gas has completed a Form 57 Submission in this instance however with No Objections.

Should you have any queries regarding the information above, please contact us on 6163 5000 or engineering.services@atcogas.com.au .

Kind Regards

Fiona Snellin
Land Management and Project Coordinator



ATCO Gas
AUSTRALIA

Connecting WA
to natural gas

www.atcogas.com.au



81 Prinsep Road, Jandakot, Western Australia, 6164

Telephone: (08) 6163 5058 | Mobile: 0476 831 540

All emails sent from ATCO Gas Australia (and any attachments) are intended only for the addressee and may contain information which is confidential and privileged. If you are not the intended addressee, you may not use, disseminate or copy this information. If you have received this information in error please notify ATCO Gas Australia immediately by return email and delete or destroy the email and attachments.

ATCO Gas Australia may collect personal information from you via email. For more information on how ATCO Gas Australia collects, uses, holds and discloses your personal information, see our privacy policy at www.atcogas.com.au/privacy.



ATCO Gas Australia MRS Amendment Area1270/41



WARNING !

**Refer to Cover Sheet
for further information**

Operator: Westollavellin Printed from GMS at: Dec 2, 2016 1:27:05 PM

Map Centre: E: 379,717,388 N: 6,465,539,388 Scale = 1: 5,641

GDMS4 MGA Zone 50

WARNING BEWARE

This location of pipes and services are approximate only, and show an indicative position at time of construction.

No guarantee can be given to the accuracy or completeness of information due to the age of some pipes and records.

Refer to "Occupational Safety & Health"

and Utility Providers "Code of Practice" for further useful information.

© ATCO Gas Australia Pty Ltd ABN 90 058 531 975

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Based on information provided by and with the permission of the
Western Australian Land Information Authority trading as Landgate



Government of Western Australia
Department of Water



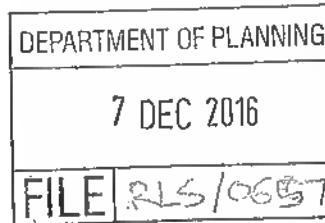
Your ref: 209-2-30-17

File ref: RF37-07

PA Ref: 11134

Enquiries: Bree Lyons

Tel: 6250 8035



Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

Attention: Anthony Muscara

Dear Sir/Madam,

Re: Metropolitan Region Scheme Proposed Amendment 1270/41 – Ocean Reef Marina Redevelopment

Thank you for the above referral dated 16 November 2016. The Department of Water (DoW) has considered the proposed amendment and would like to recommend the following condition:

District Water Management Strategy

The Department of Water (DoW) considers the proposed amendment should be supported by a District Water Management Strategy (DWMS). The DWMS should be consistent with the *Better Urban Water Management* document (WAPC, 2008) and the policy measures outlined in *State Planning Policy 2.9*.

If you wish to discuss the matter further, please contact Bree Lyons on 6250 8035 or via email – briony.lyons@water.wa.gov.au.

Yours sincerely,

Bree Lyons
A/Senior Natural Resource Management Officer
Land Use Planning
Swan Avon Region

7 December 2016

From: mrs
Subject: FW: Ocean Reef Marina MRS Amendment
Attachments: WRD246210 OCEAN REEF MARINA - DISTRICT WATER MANAGEMENT STRATEGY - DoWpdf

From: LYONS Bree [<mailto:Briony.Lyons@water.wa.gov.au>]
Sent: Tuesday, 13 December 2016 12:01 PM
To: Muscara, Anthony
Subject: Ocean Reef Marina MRS Amendment

Hi Anthony,

The Department of Water would like to update recent advice provided. The DoW has assessed the associated District Water Management Strategy associated with the Ocean Reef Marina and provided support for the document. As such, the DoW supports the proposed MRS amendment.

Kind regards,

Bree Lyons
Natural Resource Management Officer
Department of Water - Swan Avon Region
7 Ellam St Victoria Park WA 6100
Phone: 08 6250 8035 , Fax :08 62508050
Email: briony.lyons@water.wa.gov.au



Government of Western Australia
Department of Water

Save time with Water Online

*You can now lodge referrals electronically via the Water Online customer portal at www.water.wa.gov.au . **Water Online** provides the fastest and most efficient process for submitting referrals or requests for planning advice.*

Register for Water Online at www.water.wa.gov.au by clicking on the Water Online Login icon. If your organisation is already a registered user in Water Online, you just need to get the Key Account Holder to invite you to be a user / employee of your organisation. There are instructions on our website to help you with the registering process. These can be found by selecting the Quick Reference Guides link on the Water Online home page. If you have any questions regarding the Water Online portal please contact 1800 508 885 (select option 2) or email planning.enquiries@water.wa.gov.au .

Disclaimer:

This e-mail is confidential to the addressee and is the view of the writer, not necessarily that of the Department of Water, which accepts no responsibility for the contents. If you are not the addressee, please notify the Department by return e-mail and delete the message from your system; you must not disclose or use the information contained in



Government of Western Australia
Department of Water



looking after all our water needs

Your ref: COJ13066.01

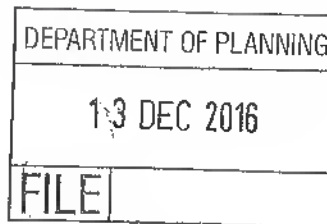
File ref: RF11345 SRS:36217

Enquiries: Tara Fox

Tel: 6250 8008

Stratzen
PO Box 243
SUBIAGO WA 6904

Attn: Margaret Dunlop



Dear Ms Dunlop,

OCEAN REEF MARINA – DISTRICT WATER MANAGEMENT STRATEGY

The Department of Water (DoW) gives approval to the above mentioned District Water Management Strategy (DWMS) dated April, 2014. The Department is now satisfied that the document is acceptable for this proposal to proceed to the next stage of development approval.

If you wish to discuss the matter further, please contact Tara Fox on 6250 8008 or via email - tara.fox@water.wa.gov.au.

Yours sincerely,

James Mackintosh
Program Manager
Land Use Planning
Swan Avon Region

11 June, 2014

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

A 8734790
DEPARTMENT OF PLANNING
03 JAN 2017
FILE RLS/0657
6 RMCY

Submission 6

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS/0657

Name Holena GIBBS
(PLEASE PRINT CLEARLY)
Address 266 Warwick Rd DUNCRIG Postcode 6023
Contact phone number 0400022622 Email address roshele@bigpond.com

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

1. The current submission is not in line with current economical conditions.
 2. I received my notification from the Shire on 22/12/2016 with the information that submissions could be made from 22/11/2016 (1 month previously) & dated 16 December 2016. A time for submission is not equitable & gives little time for written submissions.
 3. Our rates are horrendous at this date. I am not interested in venue raising for this project out of rates.
 4. There are only a limited number of shire residents who will directly benefit from this development - reflected by only 500 people attended the meeting held by Joondalup Shire.
 6. Our Rates should be reduced in the current financial status which is a global condition. I do not believe that the Joondalup Shire is outside of these fiscal constraints.
 7. I would be obliged to be informed where the monies are coming from - that is what concerns me as a ratepayer.
- turn over to complete your submission
more than environmental issues

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:



No, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR



Yes, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:



Myself – My telephone number (business hours):

or



A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:



Public (members from the general public may attend your presentation)

OR



Private (only the people nominated by you or the hearings committee will be permitted to attend)

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- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
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To be signed by person(s) making the submission

Signature



Date

22/12/2016

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

A-8612064
DEPARTMENT OF PLANNING
29 NOV 2016
FILE RLS/0657

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Submission 7

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS/0657

Name GARY MCCORMICK
(PLEASE PRINT CLEARLY)
Address 11 WEST VIEW BLVD, MULLAHOOD Postcode 6027
Contact phone number 0438821346 Email address gary.mccormick4@icloud.com

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

WITHIN THE OCEAN REEF MARINA DEVELOPMENT
AND CONSTRUCTIONS A NUMBER OF NATURAL SURFING
BREAKS WILL BE EITHER DESTROYED OR AFFECTED.

TWO NATURAL REEF SURFING BREAKS CALLED
MOZZIES AND PYLONS ARE SET FOR DESTRUCTION.

ONE NATURAL REEF SURFING BREAK CALLED
RACE TRACKS WILL BE IN THE SHADOW OF THE
NEW NORTH WALL.

MULLAHOOD POINT ON THE SOUTH SIDE WALL
'COULD' BE AFFECTED BY UNIFORM SAND
MOVEMENT AND SOUTH RUNNING CURRENTS.

WHILE THE GOVERNMENT SPENDS HUNDREDS
OF THOUSANDS OF DOLLARS PROVIDING FOR RECREATIONAL
SPORTING GROUNDS, THE SPORT OF SURFING IN
THE CITY OF SOONALUP, WITH LIMITED SURFING BREAKS

turn over to complete your submission

PTO

CAN NOT AFFORD TO LOOSE ANY NATURAL
SURFING BREAKS.

THE SURFERS OF THE CITY OF JOONDALUP ARE
CONCERNED AT THE IMMINENT LOSS OF, DESTRUCTION OF
AND EFFECTS THAT THE MORIND. HILL CAUSE.

SURFING IS AN IMPORTANT RECREATION AND BUSINESS
WITHIN THE CITY OF JOONDALUP AND THEREFORE SHOULD
NOT BE OVERLOOKED, OUR FUTURE STATE AND
NATIONAL SURFING CHAMPIONS NEED SURFING RESERVE
TO CONTINUE THEIR SPORT AND LIFE STYLE IS SURFING.

PLEASE DO NOT OVERLOOK THIS SITUATION.

A CAMPAIGN HAS ALREADY STARTED BY LOCAL SURFERS
WITH STICKERS AND T SHIRTS SAYING "SAVE MOZIE"
OF WHICH I AM NOT A MEMBER OF. I PROPOSE
TO LOOK TOWARDS A WORKING OUTCOME USING
INFORMATION SHARING AND DISCUSSION.

THE POWER OF LOCAL, STATE, NATIONAL AND
INTERNATIONAL SOCIAL MEDIA IS NOT A POSITIVE
ADDITION TO THIS SITUATION.

Regards

GARY MCLENNER.

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:

☐ **No**, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR

☒ **Yes**, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:

☒ Myself – My telephone number (business hours): 0438821346...

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:

☐ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

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- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature  Date 28th Nov 2016

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.



Gary McCormick 2015 State O/60's Longboard Champion.

Borne in Perth 7th February 1954 (62 years)

Address - 11 West View Blvd

Mullaloo WA 6027 (30 years)

Email - gary.mccormick4@icloud.com

Started Surfing, Summer of 1963-64 Miami Bay at 9 years of age, Introduced to surfing by Teena Christion State Female Surfing Champion 1964. Pioneer surfer of South & South West Coast of WA, Bali and Gnaraloo. Ventura Board Riders member 1975.

Surf Lifesaving WA-

Mullaloo SLSC Member, Retired Patrol and Patrol Captain and Ex BOM Education, Examiner and Coordinator Bronze Medallion.

Surfing WA-

Mullaloo Longboard Club Life Member and ex President, Secretary.

Surfing WA State BOM Member and State Longboard Representative, National Competition Director Longboard, State Coordinator, Head Judge and Judge Longboard Division.

Member of Marmion Angling Club 28 years and Lancelin Angling Club 35 years.

Commentator Ocean Reef Marina Proposal, Artificial Surfing Reef advocate City of Joondalup and spokesman for all Surfers and the Surfing Industry of the City of Joondalup.

Surfers of the City of Joondalup-

Shortboard Riders, Longboard Riders, Stand up Paddle Boarders, Body Boarders, Kite Boarders, Wind Surfers.

Surfing Industry of the City of Joondalup-

Surf Clothing Outlets

Surfboard Shops (fabrication and Sales)

Learn to Surf Businesses

Surf Industry Importers

From: Brett Williams <brett@ecologicalbuilding.com.au>
Sent: Friday, 23 December 2016 12:22 PM
To: mrs
Subject: Ocean Reef Marina Development

Hello,

I am very excited to see the Ocean Reef Marina Development becoming a serious reality.

My name is Brett Williams aged 55 and have lived at 32 Gnobar Way Mullaloo since 1997. Having surfed this area of coast for the last 40 years I would like to make a comment in regards to ocean sports for the proposed development.

It appears that the new marina will impact an existing surfing reef located just north of the existing marina. Would it be possible when planning the new northern side of the marina, that consideration could be given to a setup that is conducive to a new surf break that could replace the one that will be lost.

I am not proposing anything that is costly or fancy, just a simple configuration of the rock groin and sea floor at the optimum area.

With an increasing surfing population in this area it would be a tragedy to see a decrease in the amount of surf breaks available.

I am confident that if additional recreational ocean sports such as a surf break were added to the proposal, it would surely increase the viability and public acceptance of the development.

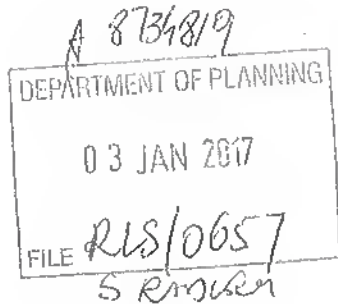
Please feel free to contact me if you would like discuss.

Yours sincerely
Brett Williams

Brett Williams
MANAGING DIRECTOR

Eco-Logical Building Pty Ltd (Builders Registration 12552)
PO Box 207, Hillarys WA 6923

T 0418 912179
E brett@ecologicalbuilding.com.au



13 Briston place, North Beach
Perth Western Australia 6020
bluewaterwildabalone@westnet.com.au
mob 0429 382 515
ABN 77 066 478 000
www.bluewaterwildabalone.com

To: Secretary Western Australian planning commission

MRS@planning.wa.gov.au

Att: Kerrine Blenkinsop,

Blue Water Wild Abalone

I'm writing to you in response to the proposed development of the Ocean Reef Marina and the potential effects it will have on the Roei abalone industry.

The Ocean Reef area, to be claimed for the marina, is considered the prime fishing area for Roei abalone within Western Australia. As I have personally dived the WA coast for abalone from Kalbarri to the South Australian border and no reef system is as productive as the Ocean Reef area. Between 24- 36 tons of Roei abalone is fished by quota in the Perth metropolitan area pa, with around 60% of that catch coming from Ocean Reef alone. Removing this area from the Perth metropolitan region will have detrimental flow on effects to the whole industry. High daily catches and low access costs at Ocean Reef offset the high access costs of fishing outside of the metropolitan area. As such, Ocean Reef provides a funding base to allow Roei fishing for the whole industry in areas that would ordinarily not be commercially viable without it. If the marina is developed, the currently industry is likely to crash.

The financial implications of the loss of access to Ocean Reef from the marina development to my business and my financial situation are significant. Over the last 27 years of fishing the Ocean reef area, my quota has expanded and my current quota for Roei abalone is ~ 9tons of which 60% is fished out of Ocean Reef. While the direct cost of the loss of this large component of my fishing quota can be calculated they do not reflect its true value. Since 2015 I have worked to develop a unique live market, with custom built tanks that I designed and fabricated myself. Because of this patented design I have grown the live market demand for Roei abalone by 5 tons in the first year alone. The business is expected to grow exponentially because for the first time the public can buy live abalone from seafood outlets around Perth. In addition I have developed an export market for canned abalone into China

with my product marketed as a high end luxury item in boutique stores. Loss of my quota of Roei abalone at Ocean Reef would have a catastrophic impact on these markets.

In receiving this letter, I would like you to acknowledge the economic, social and biological importance of the Ocean Reef area to the abalone industry in making any planning decision for marina development. At very least compensation should be commensurate to existing and emerging markets and based on fair forecasts of compounding growth.

As removal of the Ocean Reef quota through the development of the marina is likely to collapse the Western Australian Roei abalone market, myself and other divers will be seeking compensation through a class action should financial reparation not be sufficient.

Yours sincerely,

David Sutcliffe


Director, Bluewater Wild Abalone

23/12/2016

From: Karen Barnard <ckbarn@bigpond.net.au>
Sent: Friday, 20 January 2017 10:32 AM
To: mrs
Subject: Ocean Reef Marina Public Comment

To Whom It May Concern,

As a resident of Ocean Reef for over 20 years we have frequented the bush area between the North end of Mullaloo beach to Iluka. Exercising, walking dogs and enjoying the coastal environment with our children. We have regularly had the opportunity to observe amazing bird life, reptiles and small mammals.

Whilst we understand the development of the Marina has been included in planning for over thirty years we do not believe the original plans included large residential areas, more so short stay and possibly hotel accommodation. We can see no benefit to the general public or the environment of the current plans.

The only winners we see would be the developers, the Council and those wealthy enough to purchase and build a house or pen a large boat.

Also as a small boat user there is an increasing amount of days each year whereby it is impossible to use the boat for lack of parking. Any development should take into account the growing number of boat users and therefore facilities.

Regards,

Karen and Chris Barnard

6 Moth Court

Ocean Reef

Response ID ANON-5S6C-65NE-Y

Submitted to MRS Amendment 1270/41

Submitted on 2016-11-22 13:49:21

Introduction

1 What is your name?

Name:

Mark Jahn

2 What is your organisation?

Organisation:

3 What is your email address?

Email:

jahny@live.com.au

4 What is your contact phone number?

Phone number:

0433051449

5 What is your postal address?

Postal address:

12 Abness place Kingsley

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

I support the amendment as we need all the infrastructure along our coast line we can to keep up with the ever growing population but as a regular user of Ocean reef I'd oppose any reduction in boat ramps or car & trailer parking bays. Currently 8 ramps and any less would see it backing up unnecessarily like Hillaries marina has done.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-65NA-U

Submitted to MRS Amendment 1270/41

Submitted on 2016-11-22 19:52:35

Introduction

1 What is your name?

Name:

Michael

2 What is your organisation?

Organisation:

3 What is your email address?

Email:

jolley_pop@hotmail.com

4 What is your contact phone number?

Phone number:

0432939170

5 What is your postal address?

Postal address:

28A Cringle Steet, Ocean Reef, WA, 6027.

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

It is a much needed development that would be beneficial to all residents and tourists. I cannot wait for it to get approved and futher progress made on this amazing project.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Submitted to MRS Amendment 1270/41
Submitted on 2016-11-23 13:40:24

Introduction

1 What is your name?

Name:
Lance Matthews

2 What is your organisation?

Organisation:
Local resident

3 What is your email address?

Email:
Lance.matthews@downergroup.com

4 What is your contact phone number?

Phone number:
0438933226

5 What is your postal address?

Postal address:
4 Piver Corner Ocean Reef

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:
Increase in local infrastructure, job creation, land capital gains.
Tourism look how busy Hillaries is.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-65NY-K

Submitted to MRS Amendment 1270/41
Submitted on 2016-11-25 11:59:49

Introduction

1 What is your name?

Name:
Amy La Spada

2 What is your organisation?

Organisation:
N/A

3 What is your email address?

Email:
amy.laspada@icloud.com

4 What is your contact phone number?

Phone number:
0416303333

5 What is your postal address?

Postal address:
PO Box 99 Dianella WA 6059

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:
Looking forward to a new marina in Ocean Reef. I'm in full support of the proposal.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65NQ-B

Submitted to MRS Amendment 1270/41
Submitted on 2016-11-27 08:53:43

Introduction

1 What is your name?

Name:
Kim Johnson

2 What is your organisation?

Organisation:
Mullaloo Longboard Club

3 What is your email address?

Email:
kimjohnsonnow@mac.com

4 What is your contact phone number?

Phone number:
0411729212

5 What is your postal address?

Postal address:
PO Box 357 Albany 6330

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

The proposed Marina destroys 2 natural surfing breaks with no replacement by an artificial surfing reef.
This is blatant disregard for the many surfers who use this natural recreational asset and at the least the previously promised artificial reef should be part of the development.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65NB-V

Submitted to MRS Amendment 1270/41
Submitted on 2016-11-30 03:44:08

Introduction

1 What is your name?

Name:
Mat

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
wudinoz@hotmail.com

4 What is your contact phone number?

Phone number:
+64274812587

5 What is your postal address?

Postal address:
6 Harvey St, Walpahihi, Taupo, New Zealand

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:
Additional tourism, jobs and facilities to the region

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65NW-H

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-02 12:11:24

Introduction

1 What is your name?

Name:
R Keogh

2 What is your organisation?

Organisation:
Private Resident

3 What is your email address?

Email:
ronkeogh@emco.com.au

4 What is your contact phone number?

Phone number:
0411141513

5 What is your postal address?

Postal address:
1 Yulema St, Mullaloo, WA, 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

As a resident we have been waiting a long time for the Marina redevelopment. It is a much needed development for the area and I support the proposed amendment as it progresses the development.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65NS-D

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-06 21:23:50

Introduction

1 What is your name?

Name:

Brian Wood

2 What is your organisation?

Organisation:

3 What is your email address?

Email:

brwelect@bigpond.com

4 What is your contact phone number?

Phone number:

0447123000

5 What is your postal address?

Postal address:

6 Vigilant Terrace, Ocean Reef

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

Good for area

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-65NH-2

Submitted to MRS Amendment 1270/41

Submitted on 2016-12-07 13:34:57

Introduction

1 What is your name?

Name:

Jared Morskate

2 What is your organisation?

Organisation:

Western Power

3 What is your email address?

Email:

jared.morskate@westernpower.com.au

4 What is your contact phone number?

Phone number:

93266775

5 What is your postal address?

Postal address:

363 Wellington Street, Perth WA 6000

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

In addition to the commentary within the Scheme Amendment Report the following information is provided:

From a distribution perspective, the initial supply to the area upon commencement of development can be fed from the existing Mullaloo feeder.

Depending on loading and timing of the proposed marina development, further capacity may be required in Mullaloo substation to cater for the new loads.

Any network augmentation would need to be determined once a formal Design Quotation Application (DQA) has been submitted and we have performed our detailed connection study as part of future local planning processes.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65NM-7

Submitted to MRS Amendment 1270/41

Submitted on 2016-12-09 13:19:41

Introduction

1 What is your name?

Name:

Andrew Cass

2 What is your organisation?

Organisation:

Mullaloo resident and member of Ocean Reef Sea Sports Club/Mullaloo Surf Life Saving Club

3 What is your email address?

Email:

ajcass@live.com.au

4 What is your contact phone number?

Phone number:

0413 739815

5 What is your postal address?

Postal address:

19 Gunida Street

Mullaloo WA 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

The site in its current state is under utilised and provides for a unique development opportunity. The amendment makes way for development to happen and in a very considered and well thought out way. The mix of uses but with a strong focus on families is highly appealing.

The topography of the land allows for development to take place without any major impact on the views of those residents living adjacent to site.

There are few WA coastal sites that can so elegantly cater for hotels, restaurants, shops, residential, commercial and maritime facilities without any detriment to existing residents.

Hillarys Boat Harbour is at capacity. Mindarie is largely a residential precinct. A third marina with deep water between Hillary and Mindarie would not only alleviate the pressure placed on existing facilities but also create a unique area for water sports and maritime activities.

The sites proximity to the Joondalup CBD is also a distinct advantage.

The potential for events such as boat shows, concerts, sailing regattas and the like means that the development has the potential to deliver substantial economic and cultural benefits to the City.

The sea rescue group and sea sports club are long-term residents of the development site and it is reassuring that they there is firm commitment to protect the interests of both groups.

Whilst the estimated costs of development are large, the fact that it will be delivered in stages over a 13 year timeframe (And largely self-funded via land sales, leases and so on) and the fact that it results in an iconic asset that will remain for many generations to come gives a strong indication that it will be an extremely successful investment of time and energy on behalf of the City of Joondalup.

Finally, having read the Public Environmental Review document also, the fact that the marine component can be achieved with such a minimal environmental impact makes for a overwhelmingly compelling business case. Frankly, to not seize this opportunity would constitute a gigantic failure of State and local government.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

Response ID ANON-5S6C-65NN-8

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-11 10:01:40

Introduction

1 What is your name?

Name:
Shabhan Burke

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
shabhanburke@yahoo.com.au

4 What is your contact phone number?

Phone number:
0417597693

5 What is your postal address?

Postal address:
62 Southern Cross Circle, Ocean Reef

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

As a local resident I feel that the development will provide a great economic opportunity for the local community. The future businesses and resources that it will bring to our community will be positive.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-65NC-W

Submitted to MRS Amendment 1270/41

Submitted on 2016-12-17 07:53:47

Introduction

1 What is your name?

Name:

John Frame

2 What is your organisation?

Organisation:

3 What is your email address?

Email:

john.frame@email.com

4 What is your contact phone number?

Phone number:

0409163211

5 What is your postal address?

Postal address:

18 Laser Place

Ocean Reef

WA 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

The Ocean Reef Marina would create a desperately needed entertainment, sociability and community environment. It would bring vibrancy and employment to the Shire.

Hillarys Boat Harbour is a great benchmark for success - it's now overcrowded, difficult to find parking on weekends / holidays and commercially full.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65NF-Z

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-17 11:56:11

Introduction

1 What is your name?

Name:
Janet Frame

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
janframe@hotmail.com

4 What is your contact phone number?

Phone number:
94033996

5 What is your postal address?

Postal address:
18 Laser Place
Ocean Reef
WA 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

We need to have more recreation and social community facilities in this stretch of coast line. There is a large population between Hillarys and Mindarie with very little coastal recreation.

Hillarys is over full and congested.

Having a combination of recreation, accommodation and commercial / entertainment is wanted at Ocean Reef marina. Long overdue!

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65N4-E

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-17 10:20:33

Introduction

1 What is your name?

Name:
Peter Hawker

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
phawker78@yahoo.com.au

4 What is your contact phone number?

Phone number:
0414307175

5 What is your postal address?

Postal address:
17 Collaroy Court
Kallaroo WA 6025

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

Provides a safe harbour and further pens for the additional boats in the area. This will also support local employment and business as well as provide a more family orientated area (based on submission details) that moves away from a nightclub precinct such as Hillarys.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65N3-D

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-17 14:04:05

Introduction**1 What is your name?****Name:**

Virginia Marchetti

2 What is your organisation?**Organisation:****3 What is your email address?****Email:**

mac_etti@mac.com

4 What is your contact phone number?**Phone number:**

0403 981 131

5 What is your postal address?**Postal address:**

18 Yulema Street Mullaloo

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?**Nature of Support/Opposition:**

Reasons for opposing the proposed Metropolitan Region Scheme are:

- Destroying the pristine coastline of the Ocean Reef area; and
- The destruction of surf breaks Mozzies and Pylons with no compromise of a definite artificial reef

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

Yes

9 If yes, do you wish your hearing to be public or private?

Public

Submitted to MRS Amendment 1270/41

Submitted on 2016-12-19 09:37:51

Introduction

1 What is your name?

Name:

Stan Klimcke

2 What is your organisation?

Organisation:

Burns Beach Reident

3 What is your email address?

Email:

stanklimcke@gmail.com

4 What is your contact phone number?

Phone number:

0415701085

5 What is your postal address?

Postal address:

10 Tyinga Cres

Burns Beach

6028

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

I support the Ocean Reef Marina as it will be a great asset to the area and we need more boating facilities, it will also bring more visitors to our great state.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

...

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-65NZ-M

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-19 10:39:29

Introduction

1 What is your name?

Name:
W Shergold

2 What is your organisation?

Organisation:
None

3 What is your email address?

Email:
billsbbs1@hotmail.com

4 What is your contact phone number?

Phone number:
0410 692883

5 What is your postal address?

Postal address:
9 Bay Meadow Heights, Connolly, 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

- 1) We as a state are not running at a profit, the money would be better spent on roads, hospitals and schools.
- 2) This project is a total waste of money, boat pens at Hillarys, Mindary and Two Rocks are sitting vacant.
- 3) We don't need another Hillarys boat harbour, it will ruin the coast line and the environment.
- 4) The infrastructure is not adequate for the upgrade of this marina.
- 5) The upgrade of the Mitchell Freeway of three lanes going south from Burns Beach Road should be the priority, ask anyone caught up on it trying to go to work each morning and then if you waste money upgrading the marina.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-65NR-C

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-21 10:10:21

Introduction

1 What is your name?

Name:
Ian Kidd

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
kiddij@hotmail.com

4 What is your contact phone number?

Phone number:
0405837835

5 What is your postal address?

Postal address:
22 Angove Drive
Hillarys
6025

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:
There are currently not sufficient water front facilities in the area.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-65N2-C

Submitted to MRS Amendment 1270/41

Submitted on 2016-12-21 23:03:26

Introduction

1 What is your name?

Name:

Kaz Martin

2 What is your organisation?

Organisation:

Resident

3 What is your email address?

Email:

kazza666@westnet.com.au

4 What is your contact phone number?

Phone number:

0863640703

5 What is your postal address?

Postal address:

6 Camarino Drv

Woodvale

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

Where can you walk the dog?

Can you still launch your boat if you usually take the dog?

Are the public open areas dog friendly?

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-65NG-1

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-24 11:14:30

Introduction

1 What is your name?

Name:
chris forde

2 What is your organisation?

Organisation:
retired

3 What is your email address?

Email:
fordie_10@yahoo.com

4 What is your contact phone number?

Phone number:
0418944487

5 What is your postal address?

Postal address:
6 bounty place ocean reef

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

I am very much for the marina development. The City ,WA government and agencies appear to have been very thorough in all areas of catering for full community use while maintaining natural bush and care for the marine park. I am especially impressed by the Bush Forever concept and the swap involved. I believe this is a common sense and practical approach. The two sessions that I have attended have been very informative.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Submitted to MRS Amendment 1270/41

Submitted on 2016-12-27 12:49:48

Introduction

1 What is your name?

Name:

CARMEN IRWIN

2 What is your organisation?

Organisation:

3 What is your email address?

Email:

carmen.irwin@bhpbilliton.com

4 What is your contact phone number?

Phone number:

0424564657

5 What is your postal address?

Postal address:

50 OAKOVER WAY

HEATHRIDGE WA 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

We really want to see the Ocean Reef Marina development go ahead as quickly as possible, and know that this amendment is a key dependency for this progression.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-65ND-X

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-27 12:53:20

Introduction

1 What is your name?

Name:

Shane Irwin

2 What is your organisation?

Organisation:

3 What is your email address?

Email:

shane.j.irwin@bigpond.com

4 What is your contact phone number?

Phone number:

0423041733

5 What is your postal address?

Postal address:

50 Oakover Way Heathridge

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

Want a marina

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-65NJ-4

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-30 10:23:05

Introduction

1 What is your name?

Name:
Shannon Scott

2 What is your organisation?

Organisation:
Nil

3 What is your email address?

Email:
shannonscott1976@yahoo.com.au

4 What is your contact phone number?

Phone number:
0414984534

5 What is your postal address?

Postal address:
36 Transom Way, Ocean Reef. 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

I believe the MRS Amendment will bring fantastic opportunities to the Joondalup/Ocean Reef Area.
At present, the Hillarys Marina is massively overcrowded and the only tourist spot north of Scarborough.
Having the Ocean Reef Marina will relieve pressure off Hillarys Marina and bring more money, jobs and infrastructure to the Northern Suburbs which is greatly needed and appreciated by all. I feel this will only increase the need for further development in the northern suburbs in years to come which will continue to help the region grow and prosper.
The amendment seems to have accounted for all aspects of the public's needs along with the current local residents such as not restricting their views from Ocean Reef rd and the already changing road infrastructure which has improved congestion immensely

I am all for the MRS Amendment and the fantastic Ocean Reef Marina

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65NP-A

Submitted to MRS Amendment 1270/41
Submitted on 2016-12-30 10:33:32

Introduction**1 What is your name?**

Name:

Darcie Scott

2 What is your organisation?

Organisation:

None

3 What is your email address?

Email:

darcie.sargent@gmail.com

4 What is your contact phone number?

:

Phone number:

0405973834

5 What is your postal address?

Postal address:

36 Transom Way, Ocean Reef. 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

The amendment to the MRS looks to have thought of all areas the public and the local home owners would deem important.

Some of these being

: The views not being obstructed for the local residents,

: Bring business and job opportunities to the northern suburbs

: Making use of land that would otherwise be unused

: Not dramatically affecting the local wildlife or the bushland which seems to be minimally affected

I think the marina will bring massive prosperity to the area which will greatly out way the minimal flora and fauna disturbances

Cannot wait for the marina to go ahead

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65N9-K

Submitted to MRS Amendment 1270/41
Submitted on 2017-01-06 18:39:56

Introduction

1 What is your name?

Name:
Oliver Cooksey

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
oliver.cooksey@gmail.com

4 What is your contact phone number?

Phone number:
425042583

5 What is your postal address?

Postal address:
22 Paradise Turn, Burns Beach, WA, 6028

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:
Increased amenity and tourism to the area. Will help achieve the areas goals of being an independent destination from Perth.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65N8-J

Submitted to MRS Amendment 1270/41

Submitted on 2017-01-07 21:57:57

Introduction

1 What is your name?

Name:

Phil Gallagher

2 What is your organisation?

Organisation:

3 What is your email address?

Email:

aurora@arach.net.au

4 What is your contact phone number?

Phone number:

93004444

5 What is your postal address?

Postal address:

22 Gloriana View

Ocean Reef

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

To create work and Tourism.

Also to alleviate a shortage of space for boats and launching facilities.

Lift the profile of Joondalup City and create a link it to the ocean.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Submitted to MRS Amendment 1270/41
Submitted on 2017-01-07 22:05:31

Introduction

1 What is your name?

Name:
Jan Gallagher

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
aurora@arach.net.au

4 What is your contact phone number?

Phone number:
93004444

5 What is your postal address?

Postal address:
22 Gloriana View
Ocean Reef

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

To create a sheltered stretch of coast for families and to help families enjoy the ocean more, as this is a very windy area.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65NU-F

Submitted to MRS Amendment 1270/41

Submitted on 2017-01-12 07:43:54

Introduction

1 What is your name?

Name:

Ros Hawker

2 What is your organisation?

Organisation:

N/a

3 What is your email address?

Email:

hawkers@bigpond.net.au

4 What is your contact phone number?

Phone number:

0416071751

5 What is your postal address?

Postal address:

17 Collaroy Court

Kallaroo WA 6025

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

To finally have a fantastic marina facility to serve the northern suburbs for the long term. Whilst the new launch ramps are wonderful, there's little else in the way of facilities at Ocean Reef Marina. It's been promised for about 30 years. Time for action.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65N6-G

Submitted to MRS Amendment 1270/41
Submitted on 2017-01-13 10:46:00

Introduction

1 What is your name?

Name:

Robyn MacDonald

2 What is your organisation?

Organisation:

n/a

3 What is your email address?

Email:

robymac3@hotmail.com

4 What is your contact phone number?

Phone number:

0893079971

5 What is your postal address?

Postal address:

30 b Gunida Street, Mullaloo 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

The new marina will improve the area, however, I am concerned about the planning of the marina. For the past 10 years many ocean paddlers and SUP's have used the marina as part of their paddle - usually a one way downwind paddle from Hillarys to Ocean Reef. Car bays need to be provided in the new plans close to the water for loading and unloading surf skis & SUPs without fear of infringement. Even at Ocean Reef Marina currently there are limited car bays near the water and it is impractical to load and unload surf skis up the top.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65NT-E

Submitted to MRS Amendment 1270/41
Submitted on 2017-01-16 10:25:37

Introduction

1 What is your name?

Name:
Hayley clarke

2 What is your organisation?

Organisation:
N/a

3 What is your email address?

Email:
jugheadsrevenge@hotmail.com

4 What is your contact phone number?

Phone number:
0424361982

5 What is your postal address?

Postal address:
6 yulan close greenwood

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

Leave the coast as it is. There will be consequences for destroying the delicate natural eco system, both financially and environmentally. I do not wish for my coastline to turn into the goldcoast. Tourists come to our beaches for its natural beauty, not man made amenities.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-65N1-B

Submitted to MRS Amendment 1270/41

Submitted on 2017-01-16 11:25:34

Introduction**1 What is your name?**

Name:

Jane

2 What is your organisation?

Organisation:

home

3 What is your email address?

Email:

szewczak@bigpond.net.au

4 What is your contact phone number?

Phone number:

9401 5621

5 What is your postal address?

Postal address:

10 jetty place heathridge

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?**Nature of Support/Opposition:**

support - good for local jobs, good for tourism (needs to actively link to other facilities in joondalup and north on the coast), takes some pressure off hillarys marina, encourages social activities linked to coastal views, coastal path and environment (winter and summer)

concern - coastal long shore drift (ie the marina shape changes local sea currents) which may denude or alter the beaches north and south of the marina in a negative way including speeding up of the erosion on the fragile coastal cliffs and dunes and quality of the sand on the beaches. this could lead to cost implications to make good and compensate for damage north and south of the marina over the next ten years or so after the marina is built and needs to be costed as a provision (trust) into the project and not left to ratepayers and taxpayers to fund (after lengthy costly arbitration) at some later date

concern- local policing advice needs to be included from the planning stage onward so that aspects which discourage anti social behavior (which can be a costly factor in lives and funding) can be included throughout the building phase and once the marina is in place (refer to history of anti social behavior at hillarys marina which may often discourage families after sunset)

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Submitted to MRS Amendment 1270/41
Submitted on 2017-01-18 10:25:43

Introduction

1 What is your name?

Name:
Kerry Nichols

2 What is your organisation?

Organisation:
Private ratepayer City of Joondalup

3 What is your email address?

Email:
mollytruffledog@hotmail.com

4 What is your contact phone number?

Phone number:
0439690414

5 What is your postal address?

Postal address:
6 Alkin Place Ocean Reef 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

The Marina has been under proposal for nearly 30 years. There has always been comprehensive support from the community for this proposal. I believe that the building of the Marina will provide quality added facilities for the general public and also the increased demand for boating amenities. The plans also indicate that the height of any buildings would not impede the ocean views of any of the potentially impacted homes. As the plan has been discussed for so many years, I am confident that there has been an accumulation of substantial documents, consultations and reviews which would provide a quality assessment for this proposed Metropolitan Region Scheme amendment.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-657A-4

Submitted to MRS Amendment 1270/41
Submitted on 2017-01-24 10:53:39

Introduction

1 What is your name?

Name:
Craig Melbourne

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
craigmelbs@bigpond.com

4 What is your contact phone number?

Phone number:
0421827162

5 What is your postal address?

Postal address:
3 Trapeze ct
Ocean reef
6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:
Huge Improvement to local facilities and services and much needed in terms of west coast metro marine infrastructure

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

Submission 44

RLS/0657

Name NICKY JANE DANUGAR
(PLEASE PRINT CLEARLY)
Address 9 CUTLER CRES BELLON Postcode 6027
Contact phone number 0893076890 Email address al mummy@hotmail.com

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

- This submission might have been easier for stakeholders if it was in a word format. PDF is not editable without expensive software.
- The images on the Council website are totally incomprehensible - reader cannot determine where boundaries of Madron Park (Marina) from the Ocean Reef Marina proposal.
- No consideration expressed about traffic management to a public already stressed by too much population on the roads.
- No evidence to demonstrate what measures will be taken to preserve MULLALOO beach from degradation or ecological damage from building yet another road suburb. Question has to be raised about future water resources for 9 in demand just for drinking!
- People need to read documents at a normal reading level + correct font for people with disabilities. Some information is obfuscated - hard to understand + 9 for one cannot see what is being proposed.
- I fully support this wonderful concept but am very concerned that because the public have not been involved at the start - only business seems to be stakeholders.
- We would have raised questions such as
 - Water
 - Traffic
 - sewage
 - possible degradation to current beach shores.

Hearing of submissions

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Please choose one of the following:

☒ **No**, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR

☐ **Yes**, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:

☐ Myself – My telephone number (business hours):

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:

☐ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

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To be signed by person(s) making the submission

Signature W. O'Connell Date 24.01.2017

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Bubanic, Marija

From: Nicky Dangar <njdwol90@westnet.com.au>
Sent: Tuesday, 24 January 2017 4:23 PM
To: mrs
Subject: Submission Ocean Reef Marina
Attachments: mullaloo submission.pdf

To the Secretary

With reference: MRS Amendment Public Submissions – Ocean Reef Marina plans.

Please accept my submission which refers to my concerns and questions about how the material is being presented to the public. It is very confusing and difficult to conceptualize where Marmion Marine Park ends and the Ocean Reef Marina is to be developed. There is no clarity about the new suburb or any information whatsoever for management of traffic and other essential services such as water given the reported low levels of water all the time.

The material is not easily accessible to those with a disability or have no advanced computers.

Thank you.

It is not necessary to make it public because I want to alert you to the manner in which the material is being disseminated to public stakeholders.

I am not personally opposing this concept just require more information in a simple English for those without degrees.

Regards

Nicky Dangar

Bubanic, Marija

From: Karen Van Staden <karen.vanstaden@uwa.edu.au>
Sent: Tuesday, 31 January 2017 10:11 AM
To: mrs
Subject: Ocean Reef Marina Development

Hi,

Hillarys dog beach is extremely crowded. There should be another dog beach between Hillarys and Quinns beach.

Can you please include in your planning, provision for a new dog beach?

Thank you.

Regards
Karen

turn over to complete your submission

Hearing of submissions

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Please choose one of the following:

☐ **No, I do not wish to speak at the hearings.** (Please go to the bottom of the form and sign)

OR

☒ **Yes, I wish to speak at the hearings.** (Please complete the following details)

☒ **I will be represented by:**

☒ Myself – My telephone number (business hours): 0407383207

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

☒ **I would prefer my hearing to be conducted in:**

☒ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

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To be signed by person(s) making the submission

Signature Sen Bayl Date 30/01/17

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Contacts: Telephone - (08) 6551 9000; Fax - (08) 6551 9001; Email - mrs@planning.wa.gov.au; Website - <http://www.planning.wa.gov.au>

I am concerned about the proposed Ocean Reef Development and the amendment to the Metropolitan Regional Scheme (MRS) because of its lack of rigid assessment in regards to the land acquisition of a significant Bush Forever site which will be lost if this development is approved. In the draft plans and amendment reports there is acknowledgment that the surrounding coastal area where the marina is proposed will be significantly impacted by this development, however the EPA has assessed the MRS as not requiring environmental assessment because the environmental impacts on the bush forever site will be dealt with via an NPO (offset), while admitting that they do not know what the impacts of building this marina will be and how significant on the vegetation in this area.

These admissions alone highlight the lack of thorough environmental assessment of the entire Ocean Reef proposal as a whole. It is imperative that the MRS ensure that the land area is assessed in the context of the marina development and visa versa. I wish to highlight the following points to support a thorough environmental assessment of the MRS and hence changes to the current amendment to the MRS.

There will be a loss of a Bush Forever site with significant flora and fauna species. The proponents believe that no threatened species will be impacted by the development. The EPA disputes this. ***"The proponent has advised that no threatened species will be impacted by the development, however two Priority 3 species and a number of species considered to be significant in Bush Forever have the potential to be impacted. The site may also support three Priority Ecological Communities."*** Further, 6 species of birds that are designated of conservation significance have been seen at the site (bush forever 2000) and the habitat could support up to 22 additional species from historical data. The proponents suggest an offset of like for like and advise that they have a number of possible sites but do not identify these sites. It is imperative that these sites are identified and publicized to assure that they do fit the criteria as an offset for the loss of the Bush Forever area.

The proposed impacts of developing this area around the remaining Bush Forever are not being assessed. The City of Joondalup acknowledges that there will be impacts but as no assessment is being done by the EPA, the significance of those impacts remain unknown. There is no reference to impacts from:

- ❖ Initial construction of the marina including water pipes, sewage ect
- ❖ The change from dune and vegetation to urban development with impacts such as pesticides, fertilizer and introduced species and in particular feral species that may prey on any remaining native species.
- ❖ Increased human activity in the area and impacts on the remaining vegetation.
- ❖ Increased traffic

A rehabilitation strategy is to be prepared for the sites subject to clearing which includes monitoring and reporting actions. As there is no assessment of the impact on this land, to only be required to monitor the effects does in no way offer protection for this area. If the area is significantly affected by this development, any monitoring will be too late. There needs to be some contingency planning in place to act on possible impacts and therefore those impacts need to be thoroughly assessed and documented before any approvals to develop this significant coastal area proceed including a change in zoning.

The traffic assessment requested by the City Of Joondalup has only asked for parking, heavy vehicle and public transport impacts. A development of the size of the ocean reef marina would involve a significant increase of general traffic and noise on neighbouring roads both North and South of the Marina. Areas

either side of the development such as Mullaloo and Ocean Reef North need to be considered as these areas are already dealing with significant traffic issues, particularly along the beach front and suburban roads that lead onto the main arterial roads.

The Water Corp – have no water to the site. This means there will be a need for easements for pipes and mains which will require clearing. It is not clear whether this is the amount of clearing proposed or would be additional.

It is clear from the proposal that this scale of development on the coastal strip will significantly impact this area of land. The Bush Forever Site was originally classified as a Bush Forever site because of its significance to the maintenance of a healthy coastal strip. This has not changed and therefore I implore the responsible planning agencies to undertake extensive assessments in regards to the points raised before allowing such an amendment to go ahead nor development of the subject land.

Yours sincerely,

Susan Boylan

Su B/L
30/01/17

Bubanic, Marija

From: Jan Barton <janice.barton@bigpond.com>
Sent: Sunday, 5 February 2017 4:22 PM
To: Bubanic, Marija
Subject: Ocean Reef Development

Dear Marija

I am and have been a very frequent user of Whitfords Dog Beach for the last 19 years. Over the years it has become increasingly busier. It would be greatly appreciated if there was provision for another Dog Beach between Hillarys and Quinns Rock.

Although there are many local people using the beach, several come from far and wide to use Whitfords Dog Beach.

Kind regards

Janice Barton

11B Landsborough Way

PADBURY 6025

Bubanic, Marija

From: Rudi Seebach <rseebach@gmail.com>
Sent: Thursday, 9 February 2017 6:54 PM
To: mrs
Subject: Metropolitan Region Scheme Major Amendment 1270/41 - Ocean Reef Marina Redevelopment

To Whom it May Concern

I object to any development of over 4 stories in height along the Joondalup coastline.

The proposed development, if approved, will not fit in with surrounding developments set an unfortunate precedent for the high-rise developments along our coast line.

Please do not allow anything above 3-4 storeys.

Kind regards
Rudi Seebach

Joondalup Resident

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

Submission 49

RLS/0657

Name STEWART McINTOSH
(PLEASE PRINT CLEARLY)
Address 14 ROTHWALD PLACE, HILLARYS Postcode 6025
Contact phone number 0415 999 459 Email address mackie50@bigpond.com

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

I STRONGLY SUPPORT THE DEVELOPMENT OF THE OCEAN REEF
MARINA.
THIS PROJECT IS LONG OVERDUE FOR ITS COMMENCEMENT. IT
WILL BE SERIOUSLY VIABLE AND A WELCOME ADDITION TO PERTH'S
NORTHERN SUBURBS COASTLINE.

turn over to complete your submission

Hearing of submissions

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OR

☐ **Yes**, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:

☐ Myself – My telephone number (business hours):

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:

☐ Public (members from the general public may attend your presentation)

OR

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To be signed by person(s) making the submission

Signature

Date

13 FEBRUARY 2017

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Bubanic, Marija

From: Stewart Bigpond <mackie50@bigpond.com>
Sent: Tuesday, 14 February 2017 1:37 PM
To: mrs
Subject: Ocean Reef Marina Redevelopment
Attachments: S & C McIntosh.pdf

Dear Sir/ Madam,

My wife and I attach our Form 41's in respect of the above. We hope you receive/have received many, many more just like ours.

i.e. whole-hearted approval for the project to go ahead as soon as possible!

Kind Regards,

Stewart and Caroline McIntosh

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Submission 50

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS10657

Name CAROLINE ANN MCINTOSH
(PLEASE PRINT CLEARLY)
Address 14 RATHWOLD PLACE, HILLMAN Postcode 6025
Contact phone number 0415 999 101 Email address mackie502.b@gmail.com

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

I DEFINITELY SUPPORT THE REDEVELOPMENT OF OCEAN REEF MARINA.
I BELIEVE THE PROJECT IS LONG OVERDUE, ESPECIALLY DUE TO THE LATEST RESIDENTIAL DEVELOPMENTS IN THE NORTHERN SUBURBS. I WELCOME IT WITH OPEN ARMS.

turn over to complete your submission

Hearing of submissions

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☐ **Yes**, I wish to speak at the hearings. (Please complete the following details)

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☐ Myself – My telephone number (business hours):

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

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OR

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To be signed by person(s) making the submission

Signature  Date 13/02/2017

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Development Services 629 Newcastle Street Leederville WA 6007 PO Box 100 Leederville WA 6902 T (08) 9420 2099 F (08) 9420 3193



Your Ref: 809-2-30-17 Pt 1 (RLS/0455)
Our Ref: JT1 2007 11240 V01 - RPS346360
Enquiries: Kevin Purcher
Direct Tel: 9420 2385
Fax: 9420 3193

15 February 2017

Secretary
Western Australian Planning Commission
LOCKED BAG 2506
PERTH WA 6001

Attention of: Anthony Muscara

**Re: Metropolitan Region Scheme Proposed Amendment 1270 /41 -
Ocean Reef Marina Redevelopment**

Thank you for your letter dated 16 November 2016. The Water Corporation offers the following comments in regard to this proposal.

The statement/s made under Section 4 - Discussion - Infrastructure – Water and Wastewater does not now truly represent the current situation. The following should be considered in formulating a new statement.

Water

Reticulated water is not immediately available to serve the subject area but a preliminary planning review has taken place to determine the servicing strategy for the subject area based on the current assumed yields. All water main extensions for the subject area must be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice. Upgrading of some reticulated water mains will also be required.

Wastewater

Reticulated sewerage is not immediately available to serve the subject area but a preliminary planning review has taken place to determine the servicing strategy for the subject area based on the current assumed yields. That planning review indicates that a new permanent wastewater pump station (WWPS) and pressure main (PM) is required. All sewer main extensions required for the development site should be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice. Upgrading of some reticulated sewer mains in the surrounding area will also be required.

The headworks infrastructure (WWPS and PM) will be required to be constructed as part of the subdivision process of this proposed development. Consideration must be made to the location of the proposed pump station. A pump station will require

appropriate land to be provided for the works and the odour buffer that will surround the works. The extent of the buffer should be determined at the planning/design stage to ensure that only compatible land use is within the buffer. A route for the headworks mains will also be required, up to 20 metres wide. The route should be in the form of a road reserve.

These headworks wastewater infrastructure items are not scheduled on the current Water Corporation's 5-year Capital Investment Program.

Land Matters

The Water Corporation is the Registered Proprietor of the land which comprises of Crown Reserve 36732 and Freehold Lot 9000 on Plan 54595 that is affected by the proposal. This land is required by the Water Corporation for current and future operational purposes associated with the Beenyp Wastewater Treatment Plant Ocean Outfall, a strategic asset for the community. The Water Corporation intends to retain the freehold portion of the site as a potential laydown area and for other works associated with the outfall, but would be prepared to negotiate a lease on commercial terms for the surface use of the land for uses like boat trailer parking.

Please note the Corporation will always require ongoing access rights to the outfall pipe and any proposal will require the following:

- Commercial lease arrangements being completed to the satisfaction of the Water Corporation for the use of the land with the Marina Operator;
- There are to be no permanent structures over the pipeline; and
- Lease arrangements shall include the right to access the land for planned and emergency maintenance and installation of new assets by the Water Corporation as required.

Protection of Strategic Assets

As stated above the Beenyp Wastewater Treatment Plant Ocean Outfall is a strategic asset for community. It is vitally important that it is protected and the integrity of the outfall is not disturbed. The proposed construction of a rock groyne close to the outfall (two pipelines) could be a major risk. To prevent any disturbance the developer will need to have the outfall surveyed and plotted through the development. When the survey is completed the developer should initiate discussion with the Water Corporation to determine the best form of protection for both during construction and whilst carrying out work on car park overlaying our pipelines. Discussion can also then take place regarding Land Matters (possible easements) that will protect the Water Corporation assets in the future (please see above).

General Comments

The principle followed by the Water Corporation for the funding of subdivision or development is one of user pays. The developer is expected to provide all water and sewerage reticulation if required. A contribution for Water and Sewerage headworks

may also be required. In addition the developer may be required to fund new works or the upgrading of existing works and protection of all works. Any temporary works needed are required to be fully funded by the developer. The Water Corporation may also require land being ceded free of cost for works.

The information provided above is subject to review and may change. If the proposal has not proceeded within the next 6 months, the Water Corporation should be contacted to confirm if the information is still valid.

Please provide the above comments to the land owner, developer and/or their representative.

Should you have any queries or require further clarification on any of the above issues, please do not hesitate to contact the Enquiries Officer.

A handwritten signature in black ink, appearing to read 'K Purcher', with a stylized, flowing script.

Kevin Purcher
Senior Development Planner
Development Services

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Submission 52

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS/0857

Name ANTONY WOODARD

(PLEASE PRINT CLEARLY)

Address 55 HARCOURT DRIVE HILLARYS Postcode 6025

Contact phone number 0401 832706 Email address woody7@westnet.com.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

The northern coastal region extending approximately from Scarborough to Quinns Beach already has two marinas, Hillarys and Mindarie.

The Ocean Reef Marina is only 6-8 kilometres away from the Hillarys Boat Harbour.

As a resident I think we have enough marinas in this region.

Furthermore money invested in a project such as this is better spent improving existing services such as proposed underground power installations and therefore reducing/removing the costs expected to be paid by the rate paying resident.

turn over to complete your submission

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:



No, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR



Yes, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:



Myself – My telephone number (business hours):

or



A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:



Public (members from the general public may attend your presentation)

OR



Private (only the people nominated by you or the hearings committee will be permitted to attend)

You should be aware that:

- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature



Date

18/2/2017

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Bubanic, Marija

From: An L <vho737911@gmail.com>
Sent: Sunday, 19 February 2017 12:45 PM
To: mrs
Subject: METROPOLITAN REGION SCHEME AMENDMENT NO. 12870/41
Attachments: METROPOLITAN REGION SCHEME AMENDMENT NO.docx

Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

Dear Sir/Madam

Please find attached my submission for the above.

I do not wish to appear before the WAPC.

Thank you
An

METROPOLITAN REGION SCHEME AMENDMENT NO. 1270/41

OCEAN REEF MARINA REDEVELOPMENT

I am opposed to the proposed Metropolitan Region Scheme Amendment No. 1270/41 Ocean Reef Marina Redevelopment (the Amendment) for Bush Forever Site 325 (BFS 325).

RECOMMENDATION:

That the proposed exclusion area of BFS 325 be reduced to a more conservative size, given the adverse and irreversible impacts on the remaining BFS 325, and that it is proposed to develop the Alkimos/Eglington marina and upgrade the facility at Two Rocks.

State Planning Policy 2.8 (SPP2.8), Bushland Policy for the Perth Metropolitan Region, at 3.1 states:

...an adverse impact includes direct impacts (through the clearing of regionally significant bushland) and indirect impacts (such as development abutting regionally significant bushland within a Bush Forever area which will have a significant indirect impact).

SPP2.8 further states that:

Bush Forever seeks to protect a target of at least 10 per cent of the original extent of each vegetation complex with the Perth Metropolitan region portion of the Swan Coastal Plain.

The proposed Amendment footprint is **not** conservative in size and will have significant direct and indirect impacts on the remaining BFS 325. The remaining BFS 325 will not provide an uninterrupted green link corridor for wildlife to range freely.

FLORA AND VEGETATION

- Of the proposed 27.5 hectares of BFS 325 to be excluded from BFS 325, 19.5 hectares is to be cleared. This land comprises native vegetation, including high sand dunes, which is considered to be good to excellent.
- Development of the 27.5 hectares will facilitate the introduction of weeds and pests (that do not currently occur) in the remaining BFS 325.
- Increased bush fires on the remaining BFS 325 due

The Negotiated Planning Outcome (NPO) will not benefit the flora and vegetation on the remaining BFS 325. The loss of an important area of quality vegetation, which is in good condition to excellent condition, and the inevitable changes in the remaining BFS 325 caused by weed invasion, plant disease, fire and hydrological issues will have a significant adverse environmental impact and is unacceptable.

TERRESTRIAL FAUNA

- Loss of nesting habitat for birds that frequent BFS 325.
- The proposed Amendment will destroy the feeding habitat of the Carnaby's Black Cockatoo, the Peregrine Falcon and other birdlife which regularly feed at BFS 325 and surrounding road verge areas.

Clearing of the feeding habitat for the Carnaby Black Cockatoo is irresponsible and unacceptable, particularly as it is a threatened species. The feeding cockatoos are a delight to behold when using the dual pathways along the foreshore. An NPO will not mitigate or compensate the loss of feeding habitat, for the cockatoos or any of the other identified and threatened species.

ENVIRONMENTAL FACTORS ASSOCIATED WITH MARINE INFRASTRUCTURE COMPONENTS

- The adverse impact on the remaining BFS 325 brought about by the construction phase of the marina:
 - Earthworks;
 - Dumping of rocks;
 - Hydraulic rock breaker used to excavate rocks;
Noise and vibration brought about by the earthworks such as driving piles into the ocean bed;
 - Dust;
 - Diesel emissions/pollutants from increased heavy vehicle traffic and trucks used to dump core material -
 - every 6 minutes
 - 10 hours per day
 - 5½ days per week during the breakwater construction.
- The service infrastructure required to establish the marina.
- Road-kill of native fauna by the large industrial trucks and vehicles entering and exiting the remaining BFS 325 site.
- The impact that the construction of 700 residential dwellings and associated services, a nine story hotel, and retail facilities will have on the remaining BFS 325.
- The litter and rubbish that will invariably be discarded, and blown onto, the remaining BFS 325 by people working onsite and those who visit development.
- The impact that noise and pollution a facility such as a working marina, servicing commercial and marine industrial uses, will have on the environment and wildlife which inhabits the remaining BFS 325.

The proposed size of the Ocean Reef Marina development to cater 750+ boat pens (which is twice the number of boat pens at Hillarys Boat Harbour and three times that at Mindarie Boat Marina and Two Rocks Marina) is far too big. The implementation, operation and management of the Ocean Reef Marina will adversely impact on the remaining BFS 325.

Bubanic, Marija

From: Lesley Solly <solly@upnaway.com>
Sent: Monday, 20 February 2017 10:39 AM
To: mrs
Cc: Joondalup City; ceo@joondalup.wa.gov.au; info@epa.wa.gov.au; Jan.Norberger@mp.wa.gov.au
Subject: Ocean Reef Marina Public Comment

To Whom It May Concern,

Thank you for the opportunity to comment on the proposed re-development of the Ocean Reef Marina.

Please accept this email as my input/feedback due to by 24th February 2017.

I totally support the development and believe it to be a very exciting opportunity for the City, the region and WA.

I would like to see the proposed Ocean-Fed Swimming Pool catering for both the competitive and leisure swimmers, returned to the Concept Plan as a priority. It was removed as at Concept Plan Version 7.2 and placed as "optional" for future consideration. The current business plan presented to the State Government by the City of Joondalup is based on the Concept Plan Version 7.2.

The Ocean-Fed Pool would be the first of it's kind in WA. In terms of the cost to build and operate aquatic facilities, it is the cheapest option. There is significant demand for another competitive and leisure aquatic facility to service the northern region. The uniqueness of an Ocean-Fed pool would meet the requirements of a regional and state 'attractor' adding to the Ocean Reef Marina being a state of the art iconic facility that meets both current and future demand for public amenities for local, regional, state and tourist visitors. Such a facility would compliment the proposed residential and commercial amenities. The pool would have minimal impact on the environment.

An Ocean-Fed pool would contribute in a positive manner bringing social, economic and environmental benefits to the City of Joondalup, the region and it will be one of essential catalysts for regional tourism development. It's inclusion strategically aligns with the major objectives and targets of numerous Local, State, Regional and Federal Government planning documents focused on sustainability.

I would like to see an Ocean-fed pool returned to the Concept Plan currently under consideration and not simply listed as a 'potential future additional facility.'

Kind regards,

Lesley Solly

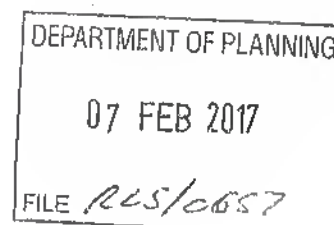
Submission 55



Government of Western Australia
Department of Sport and Recreation

DSR file 2016/196
Enquiries James Atkinson
Phone 9492 9705
Email james.atkinson@dsr.wa.gov.au

The Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6011



Dear Sir/Madam

METROPOLITAN REGION SCHEME MAJOR AMENDMENT 1270/41 - OCEAN REEF MARINA REDEVELOPMENT

Thank you for the opportunity to comment on the Metropolitan Region Scheme Major Amendment 1270/41 - Ocean Reef Marina Redevelopment. The Department of Sport and Recreation (the department) is supportive of the proposal subject to the following commentary in relation to any future redevelopment.

- The department wishes to ensure that recreational outcomes are considered in any future redevelopment of the Marina. Managing improved and safe access to the beach should be considered, as should enhanced infrastructure to foster recreational fishing, diving and possibly surfing within Marina design. The department encourages future planning to consider multiple opportunities for recreational outcomes.
- Kayak/canoe launching infrastructure and associated car parking away from the boat ramp should be considered to reduce conflicts with power boats and other users launching water craft.
- There is an existing dual use path adjoining the ocean reef marina which should be maintained and enhanced. In this context pedestrian/cycling connectivity through any future redevelopment to enable safe and efficient commuting from north to south should be an important consideration.
- The department is planning to undertake research into coastal usage within the Perth Metropolitan area. The purpose of the project will be to better understand the coastline, where complementary or conflicting uses may exist, and consider future requirements for recreation. From there a beach classification framework could be developed to help guide development and assist Local and State Governments in considering growth and usage. Coastal hazard risks will be an



Building stronger, healthier, happier and safer communities

246 Vincent Street Leederville Western Australia 6007
PO Box 329 Leederville Western Australia 6903
Telephone (08) 9492 9700 Facsimile (08) 9492 9711
Email info@dsr.wa.gov.au
Web www.dsr.wa.gov.au

important consideration. The department intends to liaise with Local Governments with a coastal boundary as part of the project.

Should you wish to discuss the department's comments please contact James Atkinson, Facilities Consultant, on 9492 0705 or via email to james.atkinson@dsr.wa.gov.au.

Yours sincerely

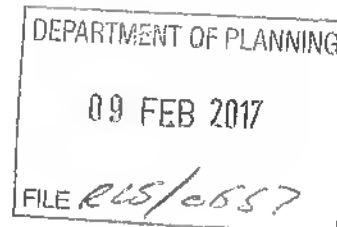
A handwritten signature in cursive script, appearing to read 'R. Didcoe'.

Rob Didcoe
Director, Facilities and Camps

31 January 2017

48883474

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41



Submission
Metropolitan Region Scheme Amendment 1270/41
Ocean Reef Marina Redevelopment

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

Submission 56

RLS/0657

Name *Lycoffrey, James*
Address *34 Page Drive Mollaloo* Postcode *6475*
Contact phone number *08 28450041* Email address *j.a.73018@bigpond.net.au*

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

Attached hereto

turn over to complete your submission

SUBMISSION

OCEAN REEF MARINA - PUBLIC ENVIRONMENTAL REVIEW

November 2016.

Name Jeffrey Austin James
Address 34 Page Drive Mulleloo 6027 Phone - 0428950041
Date 2/2/2017 this submission kept confidential? - ~~yes/no~~ No
I would like a hearing - Yes/~~no~~

Chairman Environmental Protection Authority,

Email - <https://consultation.epa.wa.gov.au>

or - Locked Bag 10 East Perth W.A. 6892.

Dear Sir,

I have 2 major concerns with the proposed Marina.

① The possibility of erosion to the Mulleloo Beach which is located South of the Proposed Marina. This beach has been described as one of the ten best city beaches in the World. Ref: Interview by an expert on this subject on the A.B.C. morning programme 720, approx 6 years ago. Most marinas that alter the natural coast line cause severe erosion from the currents or winter storms.

② If the proposed Marina is to proceed with the current design I consider the entrance far too small, this running a risk of Algal ~~flor~~ bloom and or water stagnation a current problem in the Mindari Marina. I would be recommending a much wider opening with a solid steel buffer at sea level that allows water movement under the buffer and boat access at both ends.
Go James

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:

☐ **No**, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR

☐ **Yes**, I wish to speak at the hearings. (Please complete the following details)

☒ **I will be represented by:**

☒ Myself – My telephone number (business hours): 042 895 0047

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:

☐ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

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- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
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To be signed by person(s) making the submission

Signature  Date 2-2-2017

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

SUBMISSION MRS Amendment

OCEAN REEF MARINA DEVELOPMENT

Ocean Reef Sea Sports Club

Boat Harbour Quays Ocean Reef (P.O. box59 Hillarys 6923)

Telephone - 9401 8800

e-mail - office@orssc.asn.au

Dated - 12th January 2017



Interest -

Representing Sea Sports and boating in particular in the Ocean Reef and surrounding districts, plus the general interests of club members (recently numbering 900) and their families in the greater marina. We wish to continue to serve juniors, disadvantaged and disabled in the community.

The Secretary,

Western Australian Planning Commission,

Locked Bag 2506

Perth. W.A. 6001

Dear Sir / Mme.

We thank you for the opportunity to comment on the MRS changes necessary to progress the redevelopment of the Ocean Reef Marina and wish it speedy passage.

This may be treated as an open document.

We welcome the description of the development as "a mixed use working marina, enabling club, commercial, marine and industrial use".

Ocean Reef Sea Sports Club.

Summary

- O.R.S.S.C. believes that an **'ICONIC'** world class marina is a necessity on the north metropolitan coast and that anything less than ICONIC would waste a rare opportunity for our state to rectify serious shortcomings in the core areas of Maritime facilities, Tourism infrastructure and public amenity.
- Planning should be forward looking to obviate premature need for the next marina to pick up the shortfall in the core needs maritime, tourism infrastructure and public amenity.
- We note that the study shows the site proven to be most suited for such a development.
- We support such amendments to the MRS as will facilitate progressing of this project.
- It is most likely that properly planned, the deeper draft, location and infrastructure of the Ocean Reef marina will set it apart such that it would be capable of hosting prestigious national and international maritime and tourist events yet to be attracted to W.A.
- We would wish to see all land and water area within the marina precinct allocated most judiciously to core uses. These we believe to be – Maritime, Tourism (including short term accommodation) and public recreational and leisure amenity.
- As an expanding Sea Sports Club of some 43 years in the area, we see as essential, a maximum use of water area for both club and public pens, sufficient land space to operate a viable boat stacking operation to relieve pressures on boat storage and ample space for a boat lifter with all associated trades that it may address the shortfall in these services.
- We believe for the marina to be truly 'ICONIC and world class, it requires a Sea Sports Club of appropriate standing that it may host prestigious events. Such club must be allocated sufficient area that it can service a considerable portion of the expected strong community enquiry for membership, be of benefit and service to the greater marina and continue to serve juniors, disadvantaged and disabled in the community.
- The area allocated to a club on the concept plan does not appear near sufficient for normal club activities or a stacking operation (the planners recommendation was 4ha.). This requires further consideration.
- We would like a thoughtful and considerate transition plan formulated for Whitfords Volunteer Sea Rescue and Ocean Reef Sea Sports Club, such that both organisations may move to their new marina site with minimal disruption.
- Whilst acknowledging the short term financial benefits of including freehold residential sites within the development, we question its wisdom over the 100 year projected life of the marina, both financially and as a conflicting use. We believe it not only takes precious ground from core uses but will be the source of ongoing complaints about core uses. This area should be revisited.
- We wish the project a speedy passage.

Pge 1 - 'PURPOSE'

We identify an urgent need for a truly 'Iconic' coastal tourist attraction to compliment Perth's beautiful coast and magnificent sunsets and believe that anything less would fail in many areas.

We strongly support such redevelopment as would help relieve Perth's boating crisis as identified in the Perth Boating Study of 2008, including pens, stacking, lifting and servicing facilities which have for so long been in very short supply on the northern metro coast.

With its exclusive deeper draft and excellent facilities, we believe such a marina would surely attract prestigious maritime events and international superyachts bringing much employment and financial reward to our state.

In order to host and manage such expected national and international maritime activities, a **Sea Sports Club of substantial reputation and standing is essential and should be provided for in planning the development.**

Though it is financially desirable to raise funds for the development, we see the inclusion of freehold residential lots within the precinct, as a long term detriment both financially and as a conflicting use.

Pge 1 - 'BACKGROUND' (para 2)

Mention is made here of Ocean Reef Sea Sports Club and Whifords Volunteer Sea Rescue. The club is 43 yrs. old and both organisations are currently resident on the development site. They have much invested in their premises.

The Sea Sports Club, it should be noted has developed all its assets from member funds. At February 2016 their buildings alone had an insce. Value of \$1.65 mill. Plus external assets. They will lose all that they cannot carry in the demolition for the development and should be afforded every assistance to relocate to their new site in the marina. Any disruption in the transition would seriously affect finances, membership numbers and the jobs of its many employees. - Club management is committed to protect the interests and finances of its members and the jobs of its many employees.

It goes without saying that the essential services of Whitfords Voluntary Sea Rescue should also be relocated with minimal disruption.

'BACKGROUND' (para 6)

'City of Joondalup District Planning Scheme No.2'

It is apparent elsewhere in the record of 'stake holders consulted', that there has been a grave omission in the consultation process. Two major organisations in (a) 'Boating Western Australia' and (b) 'Boating Industry Assn.' have not yet been consulted. One represents the 98,000 registered boat owners in W.A. and the other, the representative body of the entire boating industry in W.A., a major employer group.

We would hope to see their expertise utilised in DPS2 to ensure efficient planning for the project in the future.

Pge 2 - 'COMMUNITY CONSULTATION'

It should be acknowledged that the concept plan put to the community and which received strong support, was in fact the plan known as 'Concept 7'. This plan did not include freehold residential and showed more water area, approx. 150 more boat pens, a second internal beach and a 3.022ha land allocation for the Sea Sports Club. (which has, it appears, now been reduced to 1.912ha.)

We regret as a result of the inclusion of freehold residential, the loss of the family beach, junior sail training area and lagoon for disabled sailing.

Our club has been approached by both the Mullaloo Sea Scouts and T.S. Marmion naval cadets to share our facilities in a new marina as they both currently have tenure problems. The club would welcome this but fears the shortage of space may preclude it.

A boat stacking operation will be in demand to house boats which can no longer be fitted in smaller residential lots. Such a facility appears to need a capacity for a minimum of 250 units to operate viably. The indicated club area could not accommodate this without seriously reducing other essential uses.

Given such a small land area, the club will have serious challenges to operate efficiently. It could not possibly meet the expected membership enquiry with the reduced area and surely would not attain a standing befitting an 'Iconic' marina.

It may be worth noting that in the early stages of planning this marina, the planner said –“HIS BIGGEST REGRET WHEN PLANNING THE MANDURAH MARINA WAS THAT HE DID NOT ALLOCATE ENOUGH LAND TO THE YACHT CLUB” (Mandurah Offshore has approx.. 2.7ha.) HE RECOMMENDED 4ha.OF LAND BE ALLOCATED TO A CLUB AT THE NEW OCEAN REEF MARINA.

We would hope for this situation to be revisited in the DPS2 stage.

Pge 3 - 'SCOPE AND CONTENT OF THE AMENDMENT'

We note the 60.86ha subject to the amendment and support those measures as will allow the development to proceed.

We support the development of the site as described - **"Future Strategic Tourism", "public open space" and "marine based recreational activities"**. We however consider that accommodation within the precinct should, where possible, be limited to 'short term' for the following reasons.

- All coastal development, for environmental reasons, should be limited.
- We note the difficulty and expense to prove a marina site for development.
- For these reasons we believe that areas within these approved precincts should be used most judiciously.
- Core uses should be carefully identified and prioritised in the development.
- The most valuable and appropriate uses for a marina site we believe to be (a) maritime activities. (b) Tourism facilities including short term accommodation. (c) Public recreational and leisure amenity.
- The inclusion and location of freehold residential in the plan we believe will create conflict due to fork lifts launching boats at and before dawn, running up of motors, dust and noise from industrial activity and heights of the essential boat stacking spoiling views for permanent residents, to mention but a few.
- Would the adjacent auditorium be hamstrung by complaints?
- A core purpose for the development is to create jobs. Freehold residential does not do this yet precludes other activities which do create employment.
- Freehold residential would be a conflicting use causing perpetuating problems for core uses and council long after the cost of construction is forgotten.
- Given a marina life of 100+ yrs., we also question the long term benefits in financial returns of freehold residential areas over land sold for short stay, lease hold uses and extra pens.
- Non- core uses will only bring premature requests for more marinas.

We would like to see the amount of freehold residential and its locations revisited.

We support the structure planning for the land component to, as stated – **"seek to maximise the potential for commercial and tourism attractors and job creators"**.

Having said that, we point out that the inclusion of freehold residential is in direct conflict with this aim.

Whilst supporting the development at Ocean Reef, the numbers emanating from this 2008 report we believe fall short in reflecting the true demand for boating facilities of all kind in the northern areas of Perth which have been sorely lacking.

This demand will grow rapidly and for the marina to serve a useful purpose for the medium term, boating facilities within it should be maximised to the marinas absolute potential.

Pge 5 - 'STATE PLANNING POLICY 2.6' (Coastal Planning)

This policy validates our comment on the need to only use coastal assets for core purposes and we support it whole heartedly.

It speaks of the values of the coastal zone and the need to use it sustainably and wisely.

We see the inclusion of freehold residential sites within the marina precinct to be in conflict with this policy.

Pge 6 - 'STATE PLANNING POLICY 2.6' (para 4)

We note the planning of the marina has taken into account expected developments in sea level and climate change over a 100 year period and find it appropriate.

Pge 7 - 'ENVIRONMENT'

We have dealt with this aspect in detail in our PER submission and summarise here that we found the report to be most thorough and its conclusions most encouraging in the selection of the Ocean Reef site for this development.

Pge 8 - 'WATER AND WASTEWATER'

We are pleased to see that there are no major problems in this area and that the Water Corporation site 36732 may be made available and can be used to assist in the parking problem for the development.

Pge 10 - 'BOATING FACILITIES'

We would hope for adequate parking facilities to be made available for boat owners, both pen boats and trailer boats. It should be recognised that the existing parking at the public ramps, for trailers is, on a good day, far from adequate with trailers being parked far from the facility in unapproved areas.

It is also worth noting that the resident club is historically (43 yrs) a trailer boat club and ramps are planned within its area. Due to severe cut backs in the original planned area for the club, no parking for trailers has been factored in for their ramps, this will cause major operational problems for the club. Security for vehicles and trailers is a major problem for boaters wishing to stay away overnight. The club needs to be able to offer secure overnight parking.

Cut backs in club land area also threatens the viability of a stacking operation for the marina, an ever increasing necessity. Future planning should look to rectify this.

Here again we agree with the aims to, as stated – “facilitate recreational activities, activation of beachfront, provision of public passive/active open space, retail/ commercial development for jobs”.

Again, we find freehold residential taking area from all these essential core uses and degrading the mentioned 'social and economic outcomes for the marina'.

We support the necessary changes to the MRS as will facilitate the speedy passage of this essential and overdue development.

A handwritten signature in black ink, appearing to read 'G. Bell', with a stylized flourish at the end.

Gary Bell (Commodore O.R.S.S.C.)

Response ID ANON-5S6C-657Q-M

Submitted to MRS Amendment 1270/41
Submitted on 2017-02-09 08:44:05

Introduction

1 What is your name?

Name:
Nicola Macpherson

2 What is your organisation?

Organisation:
Local Resident

3 What is your email address?

Email:
nicola@mfsa.com.au

4 What is your contact phone number?

Phone number:
0430977311

5 What is your postal address?

Postal address:
4 Aquarius Ramble
Ocean Reef WA 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

One of the reasons that we bought in the Ocean Reef area was due to the proposed Ocean Reef Marina. Hillarys while an excellent venue is still at least a 15min drive and now quite crowded.

The opportunity to spread tourism opportunities further north as well as tourist accommodation which is sadly lacking in Joondalup and Wanneroo will also add to bringing tourists further north of the city.

The idea of a cat bus to run from Joondalup to the new marina will also attract many more people to come and visit the shops, new beach facilities and hotel. Both my husband and I have been supporters of the project from the start and appreciate receiving emails from Genevieve Hunter as to meeting venues for updates and progress on the Project.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-657B-5

Submitted to MRS Amendment 1270/41
Submitted on 2017-02-09 11:42:25

Introduction

1 What is your name?

Name:
Alan Brennan

2 What is your organisation?

Organisation:
Member of public - residing in Joondalup council

3 What is your email address?

Email:
lahs10@hotmail.com

4 What is your contact phone number?

Phone number:
0458379291

5 What is your postal address?

Postal address:
17 Henderson Dye, Kallaroo, WA 6025

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

It shows that the necessary due diligence for the sharing of information and the introduction of the proposed works, the purpose and impacts of the Marina has been completed. Although the sharing of information on a project this size is ongoing the MRS document for the Ocean Reef Marin is reasonably comprehensive.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-657W-T

Submitted to MRS Amendment 1270/41
Submitted on 2017-02-09 16:53:22

Introduction

1 What is your name?

Name:
Clint Bryan

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
clinty_b@hotmail.com

4 What is your contact phone number?

Phone number:
0414658528

5 What is your postal address?

Postal address:
17 Afric Way Kallaroo Wa 6025

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:
The Marina will destroy a surf spot on the northern side of the current marina.

I am also concerned that the new marina will change the flow of ocean currents and also affect Mullaloo point and destroy that surf spot also. Just as Hillarys Marina has changed the beaches to the south.

I feel that the plan should include protecting these spots and/or enhance these spots not destroy and degrade.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-657S-P

Submitted to MRS Amendment 1270/41
Submitted on 2017-02-09 17:57:50

Introduction

1 What is your name?

Name:
Wes Buzza

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
wesbuzza@hotmail.com

4 What is your contact phone number?

Phone number:
0414884201

5 What is your postal address?

Postal address:
9 Carnac Way

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

I think the plan amendment is good because it will help to create the best land use for the area being developed. Without it the development will be compromised and not be able to reach its true potential

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-657H-B

Submitted to MRS Amendment 1270/41
Submitted on 2017-02-09 18:38:35

Introduction

1 What is your name?

Name:
Ian Manning

2 What is your organisation?

Organisation:
None

3 What is your email address?

Email:
ian.manning@outotec.com

4 What is your contact phone number?

Phone number:
0407019862

5 What is your postal address?

Postal address:
27 Fleetwing Heights
Ocean Reef
WA
6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

I have been an Ocean Reef resident for over 14 years and I fully support the Ocean Reef Marina Project and feel the creation of this world-class facility would be a huge boost to the community and the economy of Western Australia.
I fully agree with and approve of the metropolitan region scheme amendment and with the proficiency with which this process has been managed.
Furthermore, I applaud Joondalup council and the associated agencies in their professionalism in to how they have gone about this lengthy and detailed process, resulting in very comprehensive report(s) on the anticipated outcome of such a major and well deserved project such as the Ocean Reef Marina Project.
On review of reading all documentation presented, I cannot see any reason why such a project could not go ahead given the negligible impact (if any) on re-zoning and bushland versus the profound social and economic boost to the area and to WA (and tourism) as whole.

Regards
Ian

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-657M-G

Submitted to MRS Amendment 1270/41
Submitted on 2017-02-12 10:21:38

Introduction

1 What is your name?

Name:
Mike Evans

2 What is your organisation?

Organisation:
Individual / Local Resident

3 What is your email address?

Email:
mike.evans.mre@gmail.com

4 What is your contact phone number?

Phone number:
0407975000

5 What is your postal address?

Postal address:
28 Gloriana View
Ocean Reef
WA 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

I support the amendment, but would like to call attention to four important planning considerations:

1) Need to discourage use of Resolute Way as entrance to new marina.

While I understand the primary entrance will be via Hodges avenue, it appears that an entrance from the intersection of Ocean Reef Road and Resolute Way will also be created. This is a safety hazard. Resolute Way is a fairly steep hill, and traffic already goes too fast. The roundabout at the intersection of Ocean Reef road and Resolute Way is likely to be a major safety issue. The use of highly residential streets to access the facilities should not be encouraged.

2) There is the need to confirm that the creation of the break water will not negatively impact the beaches and seaweed conditions either north or south of the proposed break water. As we have seen in many of the ocean-side developments (including Hillary's and Port Geographe in Busselton), poor engineering and design leads to both unwanted seaweed accumulation and/or to erosion of sand on beaches on the north side of the developments.

3) Height restrictions on development at the new marina. While we support the marina development, we believe it is important that height restrictions (such as no development over 3 storeys) is included as part of the general planning. It is not fair to local residents to have large, very high apartment or other towers being developed, which would decrease their views and property value.

4) We do not support any widening of Ocean Reef Road north of Hodges Drive. Any such move would be detrimental to safety in the neighborhoods.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Bubanic, Marija

From: Robert & Sharon <rsadams@amnet.net.au>
Sent: Monday, 20 February 2017 10:03 PM
To: mrs
Subject: Ocean Reef Marina

Robert & Sharon Adams

9 Curacao Lane Hillarys WA6025

04070988544

Rsadams@amnet.net.au

Dated - 20 Feb 2017.

Dear Sir / Mme.

We thank you for the opportunity to comment on the MRS changes necessary to progress the redevelopment of the Ocean Reef Marina and wish it speedy passage.

- We believe that the marina is a necessity on the north metropolitan to rectify serious shortcomings in the core areas of Maritime facilities, Tourism infrastructure and public amenity.
- We note that the study shows the site proven to be most suited for such a development.
- We would wish to see all land and water area within the marina precinct allocated most judiciously to core uses. Maritime, Tourism, accommodation and public recreational and leisure amenity.
- We see benefits of including residential High density and low rise sites within the development.
- We would like to see the expanding Sea Sports Club, a maximum use of water area for both club and public pens, sufficient land space to operate a viable boat stacking operation to relieve pressures on boat storage and ample space for a boat lifter with all associated trades that it may address the shortfall in these services.
- It requires a Sea Sports Club of appropriate standing that it may host prestigious events. Such club must be allocated sufficient area that it can serve the expected strong community enquiry for membership, hold events to benefit the greater marina and continue to serve juniors, disadvantaged and disabled in the community. All this with a view to the future.
- The area allocated to a club on the concept plan does not appear near sufficient for normal club activities or a stacking operation (the planners recommendation was 4ha.). This requires further consideration.
- We would like a thoughtful and considerate transition plan formulated for Whitfords Volunteer Sea Rescue and Ocean Reef Sea Sports Club, such that both organisations may move to their new marina site with minimal disruption.
- We wish the project a speedy passage.

The land area allocated to the Sea Sports Club has been reduced from 4ha (recommended by the planners), firstly to 3.022ha, then to apparently 1.912ha. seriously limiting the clubs viability and losing its parking area. There now appears insufficient room to run a viable boat stacking operation, so essential to overcome the ever increasing shortage of boat storage and denying the club funds that it may remain independently funded.

The club has historically been the only club to fully cater for trailer boats and in a new marina will have ramps included for launching, yet the 50-55 parking bays for trailers required by regulation for each public ramp does not appear to be factored in. No other clubs can cater for these boat users and they would have to use the public ramp one kilometre away from the club. If they are away overnight on a club event, this creates a major security problem with their vehicle and trailer.

The planned new public boat ramp is shown as only 8 lanes, no change from the current situation. The club ramps if they had trailer parking would take pressure off the public ramps and parking.

Membership enquiry in a club at the new marina is expected to be most substantial and numbers to or beyond 3,000 families could well be expected. The club area as shown could, with difficulty, cope with possibly half of that number.

If the marina is to be, as stated, - 'Iconic', it must surely require a resident club of appropriate stature and capability. The current plan appears to show less than 2ha. of club grounds. We refer back to the planners recommendation of 4ha. land area for the club and request the matter be reconsidered in the 2nd stage of planning.

We strongly support the marina being planned, as stated, to be an **'Icon' for tourism, maritime and public leisure and recreational activities**. Any lesser status would fail to meet requirements in many fields and render the project far less successful in all aspects. A truly **'Iconic'** attraction on our coast would ensure the commercial success of the development.

We agree with the points made under this heading in the PER - we also offer the following –

Suitability of the Ocean Reef site –

- Western Australia desperately needs an 'Iconic Marina' with a **WOW** factor to compliment its beautiful coast and spectacular sunsets. It could well become the number one tourist attraction in our state.
- Link transport is easily arranged from Joondalup centre. Joondalup is served by heavy rail.
- The site is an accessible distance from the popular boating destinations of Rottnest, Fremantle, Swan River, Cockburn Sound and bountiful fishing grounds.
- It can cater for deeper draft vessels incapable of using other marinas.
- This opens up for the first time in W.A. great potential for hosting prestigious national and international sailing events ever looking for new destinations.
- Given suitable facilities, it would alone be capable of accepting Superyachts to our state with their fat wallets and ability to draw local tourists. They too are always seeking new destinations.
- The potential for employment would be most significant for the district which currently has very limited employment opportunities.
- The Ocean Reef site would expand to full potential far earlier than any other marina site being considered for development.
- Marinas proposed further north are not a practical distance from popular boating destinations and would possibly only offer service to smaller craft on day fishing trips etc.

Regards

Robert Adams

Sharon Adams

Bubanic, Marija

From: rrepke@bigpond.net.au
Sent: Tuesday, 21 February 2017 2:06 PM
To: mrs
Cc: jan norberger
Subject: Ocean Reef Marina , MRS 1270/41

Submission:

I agree with the MRS.

The ORM is long overdue as part of the development of the Coastline of the Metro area, the MRS is a comprehensive and professionally drafted paper.

Rainer Repke
1 Pittwater Close, Kallaroo, 6025
9402 5147

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

DEPARTMENT OF PLANNING	
22 FEB 2017	
FILE	

Submission
Metropolitan Region Scheme Amendment 1270/41
Ocean Reef Marina Redevelopment

Submission 66

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS/0657

Name GARRY HUNT, CHIEF EXECUTIVE OFFICER, CITY OF JOONDALUP
(PLEASE PRINT CLEARLY)
Address PO Box 21, JOONDALUP WA Postcode 6919
Contact phone number (08) 9400 4345 Email address info@joondalup.wa.gov.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

Please refer to the City of Joondalup's submission provided as an attachment to this form.

turn over to complete your submission

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:

☐ **No**, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR

☒ **Yes**, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:

☐ Myself – My telephone number (business hours):

or

☒ A spokesperson

Name of spokesperson: KAREN HYDE, Taylor Burrell Barnett

Contact telephone number (business hours): (08) 9226 4276

Postal address: PO Box 7130, CLOISTER SQUARE WA 6850

I would prefer my hearing to be conducted in:

☒ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

You should be aware that:

- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature  Date 21.2.17

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Date: 20 February 2017

Your Ref: MRS Amendment 1270/41

Enquiries: Garry Hunt

Our Ref: 04171B

The Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

Dear Sir/Madam

**ADVERTISING OF MRS AMENDMENT 1270/41 – OCEAN REEF MARINA
REDEVELOPMENT**

In response to the release of MRS Amendment 1270/41 – Ocean Reef Marina Redevelopment (November 2016), the City of Joondalup (the City) is pleased to lodge this submission as an addendum to Form 41.

The City's submission has been prepared in collaboration with town planning consultant Taylor Burrell Barnett.

This submission outlines the City's support for the zones and reserves proposed in MRS Amendment 1270/41. It is structured in a manner that covers the chronology of the Ocean Reef Marina project (the project) and provides an overview of the proposed next steps.

An update and response is also provided in relation to:

- Negotiated Planning Outcome for Bush Forever Site 325 (NPO);
- Coastal Hazard Risk Management and Adaptation Plan (CHRMAP);
- identification of the waterways manager; and
- Bushfire Management Plan (BMP).

The City remains committed to collaboratively working with the Western Australian Planning Commission (WAPC), Office of the Environmental Protection Authority (OEPA) and the relevant government departments (Department of Planning (DoP), Department of Transport (DoT) and the Department of Parks and Wildlife (DPaW)).

As indicated in the completed Form 41, the City requests an opportunity to present the basis of our submission at a public committee hearing.

The following details the basis for the City's support for MRS Amendment 1270/41.

Background

To determine if the project site was suitable for a marina development, over 32 preliminary investigations were undertaken by the City from 2000-2009.

In 2004 the State Government provided a grant of \$700,000 to assist the City to prepare a concept plan and structure plan for the project.

Throughout the development of the concept plan extensive consultation was undertaken with the community, State Government and other key stakeholders. In addition, the Ocean Reef Marina Community Reference Group (established in 2008) and the Ocean Reef Marina Government Steering Committee (established in 2007) made substantial contributions to the development of the concept plan.

In 2009 the Joondalup Council endorsed the release of the concept plan for community consultation and a survey was distributed to approximately 60,000 properties within Joondalup. The City received 11,728 survey responses and 95.6% of people 'strongly supported' or 'supported' the proposal to develop the marina.

A financial feasibility analysis of the concept plan was undertaken in 2011 (supported by a grant from the Recreational Boating Facilities Scheme) which resulted in amendments to the concept plan. The amended plan was subsequently endorsed by the Joondalup Council as the basis for the preparation of a structure plan for the project.

In 2012 the City executed a Memorandum of Understanding (MOU) with the State Government. Co-signed by the Ministers for Transport and Planning, the MOU acknowledged the strategic alliance and shared commitment of the City and the State Government, as joint landowners of the site, in bringing the project to fruition. In recognition of this shared commitment, the DoP was identified as the lead agency for the project through the State Government's Lead Agency Framework.

Throughout the life of the project, the City and the Project Team have undertaken substantial engagement with the DoP and other departments and agencies. In consultation with State and Federal Government agencies and other significant stakeholders, an environmental and planning approval strategy was agreed culminating in a concurrent approval process for the marine and terrestrial components of the project.

The City submitted a MRS Amendment Request to the WAPC in 2013. The WAPC initiated MRS Amendment 1270/41 in April 2014 and referred the amendment to the Environmental Protection Authority (EPA) in May 2014. In June 2014 the EPA determined that the terrestrial components of the project did not require formal environmental assessment and could be adequately managed through the relevant planning processes.

Following referral of the marine based components to the EPA in April 2014, the determination was made for a Public Environmental Review (PER), the highest level of assessment.

Advertising of MRS Amendment 1270/41

Following negotiations between the WAPC and OEPA, it was agreed that concurrent advertising would be undertaken for MRS Amendment 1270/41 and the PER, from 22 November 2016 until 24 February 2017.

During the concurrent advertising period, the City has been active in updating the local community and stakeholders about the project, explaining the approvals process and how the community can have their say.

Extensive advertising was undertaken together with a City-wide mail out providing detailed project information. The City also invited stakeholder groups to meet with City officers and the Project Team to be briefed on the contents of the PER, MRS Amendment, draft NPO and the draft preliminary Ocean Reef Marina Structure Plan.

Approximately 250 people attended three community forums held during the concurrent advertising period:

- 5 December 2016, Ocean Reef Sea Sports Club
- 8 December 2016, Ocean Reef Sea Sports Club
- 15 February 2017, Beaumaris Community Centre

MRS Amendment 1270/41 Zones and Reserves

The City is supportive of the advertised MRS Amendment 1270/41 which proposes to appropriately reclassify the project area from 'Parks and Recreation', 'Waterways' and 'Public Purposes' to:

- 'Urban' zone: 29.71 hectares
- 'Parks and Recreation' reservation: 4.03 hectares
- 'Waterways' reservation: 0.9324 hectares
- 'Other Regional Roads' reservation: 0.1715 hectares
- 'Public Purposes (Special Uses)' reservation: 0.0538 hectares
- Bush Forever (Site 325) removal: 25.95 hectares (of which only 16.79ha is identified as vegetation for clearing)

The City's support for the zones and reserves is outlined as follows:

Urban Zone

The 'Urban' zoning is critical to the successful delivery of the project. The concept plan proposes a "working marina", mixed use development to deliver a recreational, residential, boating and tourism development. To do this, the concept plan identifies land requirements to enable:

- Club, service commercial and marine industrial uses in the north of the project, consistent with the DoT's *Perth Recreational Boating Facilities Study 2008* and its recommendation to develop a new harbour with boat pens at the existing Ocean Reef Boat Harbour.

The northern precinct will integrate existing club facilities as part of the long-term planning for the project.

- A central retail, tourism and residential precinct, consistent with the City's *Expanding Horizons* economic development strategy which recognises the project as an attractor for the City and a driver for the local economy. It is also consistent with the City's draft *Local Planning Strategy* which identifies the project as a 'Future Strategic Tourism Site' and a 'Future Development Site for Housing'.

Further, *Joondalup 2022 – Strategic Community Plan 2012-2022* identifies the project as an essential catalyst for regional tourism development and the provision of diverse housing and accommodation options across the City into the future.

- A southern boating precinct inclusive of ramps, coastal amenities and parking. The southern boating precinct will replace the existing ramps and trailer parking with larger and more robust facilities.

The 'Urban' zoning correctly refers to the areas of the concept plan identified for future residential, retail, community facilities, mixed use, hotel, food and beverage and the marina industry, chandlery and club facilities. It is intended that, through the Ocean Reef Structure Plan, building design will respond to the coastal setting and environment and integrate with the public domain to provide high amenity.

Parks and Recreation reservation

The 'Parks and Recreation' reservation will appropriately reflect the:

- northern and southern breakwaters;
- foreshore boardwalks;
- internal swimming beach; and
- some of the proposed open space identified in the concept plan.

This reservation classification is considered appropriate and reinforces the vision for the project to deliver social and economic benefits to all residents, with a balance of public, residential and commercial amenities and an equitable facility for visitors and residents alike. It also strengthens the values of State Planning Policy 2.6 – *State Coastal Planning* (SPP 2.6) with the provision of public access to the full extent of the waterfront, with a public interface (as listed above) being retained within the 'Parks and Recreation' reservation.

The open space network and landscaping will play a significant role in creating a strong visual setting and identity for the project. This will be established against a vegetated backdrop and will draw on the relationship of the project with the coastal landscape and the Indian Ocean.

Waterways reservation

The 'Waterways' reservation reflects the removal of the existing groyne and the proposed earthworks to create a larger waterbody edge. The 'Waterways' reservation reflects the intention to create an internal boardwalk that maintains

public access to the internal waterbody and provides a discernible edge to the development.

Other Regional Roads reservation

The 'Other Regional Roads' reservation reflects the future construction of the central marina access road which is the main access point into the project from Hodges Drive. The reservation takes into account design requirements for an intersection at Ocean Reef Road and Hodges Drive.

The central marina access road will be classified as a 'Neighbourhood Connector A' road and will provide a safe environment for all road users and pedestrians. The Traffic and Transport Micro-simulation report prepared for the draft preliminary Ocean Reef Marina Structure Plan confirms that the proposed intersection is suitable to accommodate forecasted traffic volumes.

Public Purposes (Special Uses) reservation

The 'Public Purposes (Special Uses)' reservation relates to the proposed southern access road for access to the boat ramps and trailer parking. The southern access road primarily runs within Lots 1029 and 1032 both of which are currently owned in fee simple by the City.

Bush Forever (Site 325) removal and Negotiated Planning Outcome

It is important to clarify that the removal of 25.95 ha of Bush Forever from the MRS Scheme Map does not translate to the clearing of 25.95 ha of vegetation. As outlined in the draft NPO, the extent of vegetation clearing has been calculated 16.79ha ranging in vegetation quality from 'Degraded' to 'Excellent'.

The City addresses the offset requirements outlined in State Planning Policy 2.8 *Bushland Policy for the Perth Metropolitan Region* (SPP 2.8) through the preparation of the draft NPO. A ratio of 1:1.5 has been applied and in accordance with SPP 2.8, it was negotiated with DoP and DPaW that offsets be provided in the form of 90% land acquisition (acquired through DPaW) and 10% through land rehabilitation within Bush Forever Site 325.

The MRS Amendment Report states the following:

The draft NPO requires a conservation area management plan to be developed for the land acquired for the conservation estate and a rehabilitation strategy prepared for the sites subject to rehabilitation which includes monitoring and reporting actions. Additional management strategies and actions to address potential impacts on the environment and provide long-term conservation outcomes for the surrounding Bush Forever site may also be required of the NPO.

The WAPC requires that the NPO be agreed to by the DoP, DPaW and the OEPA, prior to a final decision being made on the amendment. A legal agreement between the State of WA and the City of Joondalup is to be entered into, to ensure the obligations and agreements contained in the NPO are implemented.

The conservation area management plan relates to the land to be purchased with the funds agreed through the NPO. This management plan will inform how the purchased land parcel/s for the conservation estate are managed to achieve the appropriate conservation outcomes. The management actions to be included in the management plan will be dependent on the land parcel/s to be purchased.

The overall high level rehabilitation strategy is outlined in section 5.3 of the draft NPO. Depending on feedback from the community and stakeholders, minor modification to this high level strategy may be required. It is intended that a detailed rehabilitation strategy be prepared that would specify which portions of Bush Forever Site 325 will be rehabilitated with measurable targets identified to demonstrate when rehabilitation milestones are achieved.

The required legal agreement to ensure the enforceability of the NPO will include a commitment to the rehabilitation strategy and payment of funds by the ultimate proponent for both the rehabilitation and land purchase.

Coastal Hazard Risk Management and Adaptation Plan

The MRS Amendment Report states the following:

The WAPC has received a Coastal Hazard and Risk Management Adaptation Plan (and associated information), which will require approval prior to a final decision being made on the amendment.

The City considers that the CHRMAP is substantially progressed and is capable of being finalised. The prepared CHRMAP has been extensively peer reviewed with the reviewer's comments incorporated into the plan and final endorsement of the CHRMAP was received from the peer reviewer in June 2016.

The CHRMAP has been rigorously assessed and is considered to be complete to the extent that any review comments received from the DoP would be considered for inclusion prior to final approval by the relevant agencies. It is important to note that the CHRMAP is essentially a 'living document' and should be updated in response to additional data and policy requirements as considered appropriate.

The City has demonstrated how development of the project can be undertaken in accordance with SPP 2.6. Following submission of the CHRMAP to the DoP the plan was referred to the DoT for review and the following commentary was received:

We understand the DoP has reviewed the land use planning aspects including coastal vulnerability and CHRMAP related documents. We are supportive of their comments and recommendations.

As any minor technical edits to the plan will not require substantial changes to the zones, reserves or other physical details relevant to MRS Amendment 1270/41, the City considers that the CHRMAP is sufficiently progressed to be approved by the DoP.

Identification of the Waterways Manager

The MRS Amendment Report states the following:

DC 1.8 [Development Control Policy 1.8 Canal Estates and Artificial Waterway Developments] states that the identification of a waterways manager would occur prior to the local planning scheme amendment being finalised. However, the WAPC has resolved that confirmation of a waterways manager for this marina is required, prior to a final decision being made on the amendment.

The WAPC is aware that the City will require the preparation of a local planning scheme amendment for the project (MRS Amendment Report, section 6, page 11 refers). The Minister for Planning and the WAPC will be in a position to ensure that a waterways manager is identified prior to the final approval of the local planning scheme amendment.

The WAPC may also be aware that the City has long held the position that it will not be the developer of the Ocean Reef Marina. Discussions are on-going with the State Government regarding the City's involvement and role in the implementation and future management of the project. Until there is certainty in the planning framework it is difficult for these discussions to be finalised. The identification of a waterways manager prior to the establishment of the ultimate developer is also problematic.

It is considered premature to require confirmation of the management entity and to seek long-term management commitments prior to a final decision on the PER and MRS Amendment. The project can only proceed if the MRS Amendment is finalised and can then only proceed once the local scheme amendment is finalised and approved in order to allow structure planning, subdivision and development to take place. DC 1.8 states that at the local planning scheme amendment stage, identification of a waterways manager is necessary in order for a deed of agreement to be entered into; addressing potential environmental impacts and contingency management strategies.

It is the City's preference that negotiations commence following gazettal of MRS Amendment 1270/41 which will provide some certainty at a state and regional planning level that the project will be able to proceed to the next stage of planning and approval.

Given the above, the City considers that identification of a waterways manager is not a critical step in the decision making process for MRS Amendment 1270/41. The MRS Amendment simply allows the City to proceed with further work, including amendments to its district boundary and local planning scheme and the preparation of the Ocean Reef Marina Structure Plan to guide future subdivision and development.

Therefore the City respectfully requests that the WAPC accept that other processes will ensure compliance with the provisions of DC 1.8 and allows MRS Amendment 1270/41 to be finalised prior to the identification of the waterways manager.

Bushfire Management Plan

The MRS Amendment report states the following:

The WAPC has received a Bushfire Management Plan which will require approval by the Department of Fire and Emergency Services, prior to a final decision being made on the amendment.

Further amendments to the BMP are currently being undertaken in accordance with comments received from the Department of Fire and Emergency Services (DFES) following which the BMP will be resubmitted for approval. The City anticipates that DFES' approval of the BMP will be relatively prompt and is not expected to hinder the ability for a final decision to be made on MRS Amendment 1270/41.

Coordinated finalisation of processes

The City appreciates the integrated process in relation to the concurrent advertising of the PER and MRS Amendment 1270/41. The City took advantage of this process by making the draft NPO and preliminary draft Ocean Reef Marina Structure Plan available to the community at the same time and invited comments on these documents.

As lead agency for the project the assistance provided by the DoP has been a valuable contribution to the current approval processes. The City respectfully requests that this assistance be extended to coordinating the relevant state government agencies to secure approval for:

- Public Environmental Review – relevant Minister, OEPA, City;
- Negotiated Planning Outcome for Bush Forever Site 325 and associated legal agreement – DoP, OEPA, DPaW, City;
- Coastal Hazard Risk Management and Adaptation Plan – DoP, DoT, City;
- agreement for the identification of the waterways manager to be determined prior gazettal of the local planning scheme amendment – DoP, City (or ultimate proponent); and
- Bushfire Management Plan – DoP, DFES, City.

The City is aware of the caretaker conventions in place as a result of the upcoming State Election on 11 March 2017. The City welcomes the proactive role DoP can play in progressing all aspects of the project as far as possible during this time. The City understands that the caretaker conventions do not hinder the WAPC from exercising its decision-making capabilities.

Review of submissions

As the current proponent for the project, the City recognises its responsibilities in assisting DoP in reviewing MRS Amendment 1270/41 submissions and preparing responses for consideration by WAPC. The City is supportive of this process and is appropriately resourced to respond in a timely manner.

Other processes

The gazettal of MRS Amendment 1270/41 will enable the City to apply for an amendment to its district boundary and progress a local planning scheme

amendment. The scheme amendment will propose a boundary change to expand the scheme area to include the entire project and to zone the project area to 'Urban Development'. Both the district and scheme boundary amendments would be cognisant of the comments from DoT ensuring sufficient flexibility for detailed design modifications and future maintenance requirements for the proposed breakwaters. The 'Urban Development' zone properly establishes the requirement for the Ocean Reef Marina Structure Plan to guide subdivision and development.

Conclusion

The City remains committed to the development of the Ocean Reef Marina and is strongly supportive of MRS Amendment 1270/41.


As outlined in this submission, the City requests that the WAPC reconsiders its position on the identification of a waterways manager prior to finalisation of MRS Amendment 1270/41. The City respectfully requests that identification of the waterways manager occurs following the completion of the MRS Amendment process.

The MRS Amendment process presents an orderly and planned approach towards securing the necessary planning and environmental requirements including:

- Negotiated Planning Outcome for Bush Forever Site 325;
- Coastal Hazard Risk Management and Adaptation Plan;
- identification of the waterways manager prior to the finalisation of the City's local planning scheme amendment; and
- progression of the draft preliminary Ocean Reef Marina Structure Plan in consultation with government agencies and key stakeholders.

The City appreciates the opportunity of a public hearing and looks forward to presenting its submission to the hearings committee.

Yours faithfully



GARRY HUNT PSM
CHIEF EXECUTIVE OFFICER

Bubanic, Marija

From: Hunter, Genevieve <Genevieve.Hunter@joondalup.wa.gov.au>
Sent: Wednesday, 22 February 2017 9:26 AM
To: mrs
Subject: MRS Amendment 1270/41 - Ocean Reef Marina: Submission
Attachments: HPRM MRS 127041 Amendment Submission CoJ February 2017.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Good morning,

Please find attached a submission from the City of Joondalup in relation to MRS Amendment 1270/41 for consideration by the Western Australian Planning Commission.

I would be grateful if acknowledgement of receipt of this email could be forwarded by return email.

Kind regards,

Genevieve Hunter
Senior Projects Officer
City of Joondalup

Tel: 08 9400 4349
Fax: 08 9300 1383
Mob: 0403 288339
Email: genevieve.hunter@joondalup.wa.gov.au

Follow:



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A Global City: Bold | Creative | Prosperous

Bubanic, Marija

From: ryanbroom1979 <ryanbroom1979@gmail.com>
Sent: Wednesday, 22 February 2017 6:08 PM
To: mrs
Subject: Submission

You cant do anything right! Hillarys or Mindarie is sufficient! Scarborough gona be. Your nightmare! Good luck!

Sent on the go with Vodafone

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

Submission 68

RLS/0657

Name MELANIE LEATHER
(PLEASE PRINT CLEARLY)
Address 31 Swanson Way, Ocean Reef Postcode 6027
Contact phone number 93073848 Email address clea9722@bigpond.

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

I HAVE NO OBJECTION TO THIS AMENDMENT OTHER THAN

TO SAY THAT THE PROCESS IS TOO PROTRACTED.

THE AMOUNT OF WORK DONE TO GET TO THIS POINT

MUST BE SO PHENOMINAL AND THEREFORE

UNBELIEVABLY EXPENSIVE TO THE TAXPAYER.

turn over to complete your submission

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:

☒ **No, I do not wish to speak at the hearings.** (Please go to the bottom of the form and sign)

OR

☐ **Yes, I wish to speak at the hearings.** (Please complete the following details)

I will be represented by:

☐ Myself – My telephone number (business hours):

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:

☐ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

You should be aware that:

- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature

Date

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Bubanic, Marija

From: will.greene39@bigpond.com
Sent: Thursday, 23 February 2017 9:37 PM
To: mrs
Subject: Ocean Reef Marina Submission
Attachments: Summary of Marina MRS submission.docx

As a long term resident of North Beach and the Sorrento districts (65 yrs), my family have seen the gradual expansion of patronage of Marmion Angling Club; Ocean Reef marina and the Ocean Reef Sea sports club. The later Hillary and Mindarie Marina's from a slow start, have now progressed with the boat ramps and associated parking bays filled to capacity many days through the summer months.

The time for a larger facility to cater for the rapidly increasing northern suburbs population growth is now! Having read the Ocean Reef Sea Sports submission to the M.R.S. I agree with the submissions logic, and therefore endorse it. Attached is their summary.

Regards
W. Greene

Summary

- O.R.S.S.C. believes that an **'ICONIC' world class** marina is a necessity on the north metropolitan coast and that anything less than ICONIC would waste a rare opportunity for our state to rectify serious shortcomings in the core areas of Maritime facilities, Tourism infrastructure and public amenity.
- Planning should be forward looking to obviate premature need for the next marina to pick up the shortfall in the core needs maritime, tourism infrastructure and public amenity.
- We note that the study shows the site proven to be most suited for such a development.
- We support such amendments to the MRS as will facilitate progressing of this project.
- It is most likely that properly planned, the deeper draft, location and infrastructure of the Ocean Reef marina will set it apart such that it would be capable of hosting prestigious national and international maritime and tourist events yet to be attracted to W.A.
- We would wish to see all land and water area within the marina precinct allocated most judiciously to core uses. These we believe to be – Maritime, Tourism (including short term accommodation) and public recreational and leisure amenity.
- As an expanding Sea Sports Club of some 43 years in the area, we see as essential, a maximum use of water area for both club and public pens, sufficient land space to operate a viable boat stacking operation to relieve pressures on boat storage and ample space for a boat lifter with all associated trades that it may address the shortfall in these services.
- We believe for the marina to be truly 'ICONIC and world class, it requires a Sea Sports Club of appropriate standing that it may host prestigious events. Such club must be allocated sufficient area that it can service a considerable portion of the expected strong community enquiry for membership, be of benefit and service to the greater marina and continue to serve juniors, disadvantaged and disabled in the community.
- The area allocated to a club on the concept plan does not appear near sufficient for normal club activities or a stacking operation (the planners recommendation was 4ha.). This requires further consideration.
- We would like a thoughtful and considerate transition plan formulated for Whitfords Volunteer Sea Rescue and Ocean Reef Sea Sports Club, such that both organisations may move to their new marina site with minimal disruption.
- Whilst acknowledging the short term financial benefits of including freehold residential sites within the development, we question its wisdom over the 100 year projected life of the marina, both financially and as a conflicting use. We believe it not only takes precious ground from core uses but will be the source of ongoing complaints about core uses. This area should be revisited.
- We wish the project a speedy passage.

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Submission 70

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS/0657

Name Sharon McArthur
(PLEASE PRINT CLEARLY)
Address 14 Spiral Flag Road, Yanchep Postcode 6035
Contact phone number 0498981525 Email address smcarthur63@gmail.com.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

...I am strongly opposed to MRS Amendment 1270/41 due to
...the many negative environmental impacts and socially
...inequitable outcomes the project would result in.
...I have found the preparation of my comments difficult due
...to inconsistency within and between various reports, lack
...of cross references and inaccessible documents.
...I have endeavoured to include most of my objections to the
...proposal in the attached comments.
...I can only hope someone recognises the importance and
...value of retaining and protecting our precious natural
...environment and stops this damaging project.

turn over to complete your submission

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

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Please choose one of the following:

☐ **No**, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR

☒ **Yes**, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:

☒ Myself – My telephone number (business hours): 0498981525

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:

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To be signed by person(s) making the submission

Signature  Date 23/2/17

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Bubanic, Marija

From: Sharon McArthur <smcarthur63@gmail.com>
Sent: Friday, 24 February 2017 8:30 AM
To: mrs
Subject: MRS Amendment 1270/41 Ocean Reef Marina
Attachments: McArthur-MRS_127041_Submission_Form.pdf; SMcArthur-MRS Amendment Comment 21_2_17.docx

Dear Secretary
Western Australian Planning Commission,

Please find attached Submission Form and submission detailing my strong opposition to MRS Amendment 1270/41.

Yours sincerely
Sharon McArthur

Sharon McArthur
14 Spiral Flag Road
Yanchep WA 6035
20 February 2017

Metropolitan Region Scheme Amendment 1270/41 Ocean Reef Marina



Redevelopment - Public Comment

Figure 1 Osprey at Ocean Reef

I am strongly opposed to MRS Amendment 1270/41 and the purpose of the amendment to rationalise various zones and reserves in the Metropolitan Region Scheme (MRS) that would facilitate the development of the existing Ocean Reef boat launching facility into a high rise, high density urban and marina infill development to be built predominantly on what is currently Bush Forever Site 325 and the A Class Reserve, Marmion Marine Park (WA's first Marine Park).

I am opposed to the proposed development due to many damaging environmental and social impacts detailed in this submission. In my opinion the proposed development is far larger than anything required and would cause irreversible damage to the conservation and social values of Bush Forever Site 325 and Marmion Marine Park.

I have been the Coastcare Coordinator for Mullaloo Beach Community Group, a Committee Member of Joondalup Community Coastcare Forum and an active member of Friends of North Ocean Reef Iluka since 2009. I have developed a deep knowledge of and appreciation for the biodiversity of the coastal zone during successive Coastwest and State NRM funded projects at Mullaloo and South Ocean Reef within Bush Forever Site 325 that have engaged hundreds of people in thousands of hours of practical biodiversity protection activities. I annually attend numerous training workshops, seminars, public lectures and conferences related to biodiversity conservation and coastal management offered by organisations such as the City of Joondalup, City of Wanneroo, Perth NRM, Urban Bushland Council, EWAN, Conservation Council, Kwongan Foundation, Wildflower Society, WA Naturalist Club, Tangaroa Blue, University of Western Australia, Curtin University, Murdoch University, Edith Cowan University, WA Museum, DPAW, ORRCA, Perth Zoo, CREEC, AQWA, Herdsman Wildlife Centre and others.

In my opinion the proposed development is too large and socially inequitable. It exceeds the increase in the number of boat pens recommended in the Perth Recreational Boating Facility Study 2008 by 300%, and would concentrate boating facilities in the Marmion Marine Park.

It would also divert resources from developing facilities where they are needed in the rapidly growing suburbs in the City of Wanneroo (98.39% population growth to 2041, City of Joondalup 9.38% to 2036-via google search 13/2/17) and add to already significant traffic congestion in the northern suburbs. Many of the proposed recreational facilities could be provided in less environmentally sensitive areas, for example, the water playground would provide for more benefit to the communities of isolated, poorly serviced new suburbs on the urban fringes.

I believe most of the needed proposed facilities could be better provided by more efficient land use within the already developed areas at Hillary's Boat harbour (9km to the South), Mindarie Marina (12 km to the north), the Joondalup CBD (6km to the east) and more efficient use of the land already cleared within Bush Forever Site 325 at the existing Ocean Reef Boat Harbour. High rise, high density development is not consistent with character of current coastal developments on the Perth coast. The existing facilities at the existing Ocean Reef Boat Harbour could be upgraded and public facilities provided within the currently cleared footprint within Bush Forever Site 325 at a much lower cost without the damaging environmental impacts.

I do not think it is appropriate for our conservation estate to be lost to provide mainly private benefits in the forms of private housing and boating facilities of primary benefit to a small portion of the population. I am strongly opposed to greenfield development in areas long recognised for their conservation values in the southwest global biodiversity hotspot. This proposed development at the widest part of Bush Forever Site 325 would overshadow the entire Joondalup coastline and irreversibly damage coastal amenity, seascapes, biodiversity, ecological linkages and natural heritage.



Figure 2 Limestone Ridge Forming Cliffs proposed to become a seawall

Indigenous heritage

I find it disturbing that local Noongar elders have not been involved in the development of this proposal. I find it distressing that the government is still proposing developments that perpetuate the "sense of loss, powerlessness and anger" identified during community consultation as part of development of the Perth Coastal Planning Strategy as summarized in the Community Engagement Program-Nyungar Forum Summary Report, Perth Coastal Planning Strategy-please refer to Attachment 1.

My understanding is that the coast is a culturally significant place for Noongar people and the proposal area is still used for traditional practices. The proposal area contains abundant terrestrial and marine fauna, fresh water close to the surface, caves for shelter and numerous "bush tucker" plants with various medicinal, nutritional and practical uses such as (and possibly many others that I'm not aware of):

Bain, *Carpobrotus virescens*

Kerbein, *Lepidosperma gladiatum*

Wilyawa, *Acacia cyclops*

Coojong, *Acacia saligna*

Panjang, *Acacia lasiocarpa*

Pudjak, *Banksia sessilis*,

Taarauk, *Clematis linearifolia*

Djuk, *Exocarpus sparteus*

Rhagodia *baccata*

Myoprum *Insulare*

Berrung, *Grevillea*

Yowarl, *Melaleuca*

Yackal Djarr, *Templetonia retusa*

Waakal Ngarnak, *Ficinia nodosa*

Koorla, *Hardenbergia comptoniana*

Yoont Djet, *Senecio pinnatifolius*

Quandong, *Santalum acuminatum* (still collected by local Noongar people)

Spinifex

Nitraria billardierei

Figure 3 Interpretive Signage at northern boundary of proposal area

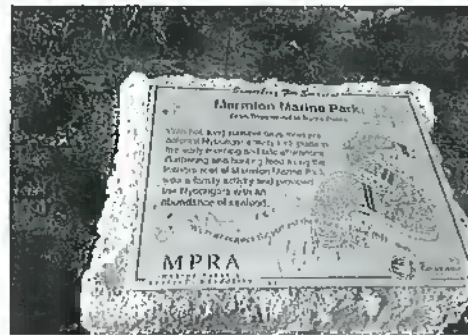
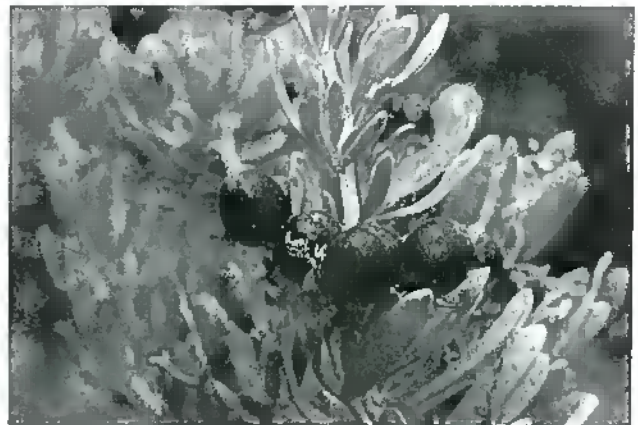


Figure 4 *Nitraria billardierei*

Photo Credit Richard McDowell



Social Impacts

I consider the proposal to be socially inequitable. There would be irreversible loss of recreational amenity and opportunities for a number of groups including surfers, abalone fishers, bird watchers, photographers, walkers and other nature lovers who currently value this much-loved stretch of coastline. The current coastal shared path would be diverted to the rear of the development with views of the ocean lost.

It would also divert limited resources from developing facilities where they are needed in the poorly serviced, remote, rapidly growing suburbs in the City of Wanneroo (98.39% population growth to 2041, City of Joondalup 9.38% to 2036-via google search 13/2/17) and other areas on the fringes of urban development. It would also further add to traffic congestion problems in the northern suburbs.

Destruction of the "Mozzies" surf break will deprive current and future generations of a popular surfing spot and increase congestion at remaining surf breaks.

The loss of 40% of Burns Beach Reef would result in a significant loss of an important recreational activity for current and future generations of Abalone fishers (which appears to be a culturally significant activity due to its popularity and the wide age range of participants) and exacerbate damaging environmental impacts of the activity on the reefs and dunes as it would be further concentrated on remaining reefs throughout the metropolitan area.

The enormous size of the project means it will dominate the coast and realise the community's fear for the area of over-development that was identified in community consultation undertaken in the development of the Perth Coastal Planning Strategy.

I have been an active conservation volunteer in the city of Joondalup since 2009 and have frequently felt insulted at public meetings discussing the Marina development where my values and beliefs in the importance of protecting biodiversity and natural heritage have been ridiculed and dismissed. It is disappointing that minority opinions have been ignored, even excluded completely from reports, e.g. in the 2009 Community Survey 95.6% of responded the significantly different Concept Plan presents, the views of the 4.4%, 496 people, who didn't support the Concept plan where excluded from the analysis.



Figure 5 Abalone Fishing Ocean Reef Iluka January 2017

In the end we will
 conserve only what
 we love;
 we will love only
 what we
 understand;
 and we will
 understand only
 what we are taught."
 (Baba Dioum, 1968.)



Figure 6 - Quenda in BF 325 January 2017

Environmental Impacts

The proposal area is on the Quindalup/Spearwood dunes of Bush Forever Site 325 and Burns Reef of Marmion Marine Park. The conservation values of the marine and terrestrial environment have been long recognised. The proposed 80.5292ha (from Draft Structure Plan) development would substantially increase threats to biodiversity and diminish linkage values of the 195.3ha Bush Forever Site 325. It would require the excision of approximately 13% of Bush Forever Site 325, along approximately 1km of the area described as the "best remaining example of a "limestone ridge forming cliffs" in the north-west corridor of the PMR (Semeniuk, V&C Research Group 1991)" in the Bush Forever Site 325 Site Description.

I believe the long term detrimental impacts of the proposal including:

- degradation of ecological linkages and processes,
- significant increase in edge effect degradation
- fragmentation of Bush Forever 325
- loss of habitat for both threatened and other indigenous fauna species,
- Changes to topography and hydrology that could impact microclimates and soil conditions that would threaten the long-term viability of the vegetation of the fragmented remnants Bush Forever Site 325
- interruption of coastal processes and impacts on beaches to the north and south
- light pollution that could negatively impact nocturnal pollinators and hence viability of the remnant vegetation of Bush Forever 325 and associated food webs,
- spread of weeds and pathogens,
- predation of native fauna by pets resident in the development and feral animals (such as foxes and especially cats as unwanted kittens are often dumped at marinas e.g. Hillarys Boat Harbour where Kings Skinks have been observed in cat's mouths), pose a significant risk to native fauna,
- increased terrestrial and marine litter pollution,
- risks of ground water contamination,
- increased stormwater run-off and the pollutants it contains,

- increased traffic and the associated higher risk of injury and death to fauna caused by vehicle collisions,
- introduction of marine pests and diseases. The reports indicate that there are currently no marine pests recorded at the Ocean Reef boat launching facility but they are present at the marinas at Hillarys and Mindarie
- I am appalled that marine mammals and their conservation status have been misidentified. This large development in an area of the coast known for pinniped haul outs has a PER document that refers to Australian Fur Seals and ignores pinnipeds found in WA such as New Zealand Fur Seals, and the threatened species sub-Antarctic fur seal (*Arctocephalus tropicalis*), the southern elephant seal (*Mirounga leonina*) and the Australian sea lion (*Neophoca cinerea*).
- loss of irreplaceable marine habitat
- release of large quantities of marine debris into the marine environment that is currently wedged in the sea walls of the existing boat harbour during construction
- Impacts on marine fauna and water quality associated with increased boating activities

and other consequences associated with the changed land use to a high rise, high density, high use development not seen anywhere else on the Perth coast make the proposal unacceptable.

The loss of foraging habitat for Carnabys Cockatoos, destruction of Graceful Sun Moth (P4 species) habitat and haul out sites for Australian Sea Lions alone makes the development unconscionable in my opinion.

I am concerned that the opportunity cost of the potential loss of alternative values of the site such as its important role in passive recreation, human mental and physical health, environmental education, research and ecotourism potential of the area have not been considered.

I am also concerned that historic scientific advice that this area is not suited to such a development has been ignored. I also wonder why a proposal to develop a privately funded smaller marina at Burns Beach, outside of Marmion Marine Park did not proceed.

This development at the widest part of Bush Forever Site 325 would overshadow the Joondalup coastline and irreversibly damage coastal amenity, seascapes, biodiversity and natural heritage. The lost intergenerational equity appalls me, future generations should be able to enjoy at least a small part of their natural heritage - sadly so much has largely been lost already in the metropolitan area.

Figure 7 Carnabys Cockatoos flying over BF 325, photo credit Dr M. Apthorpe



Terrestrial Environmental Impacts

VEGETATION

The proposal site contains a complex and unusual mosaic of Quindalup and Cottesloe Central and South vegetation (already below the 10% recommended retention rate for conservation) communities that supports a biodiverse assemblage of invertebrate and vertebrate fauna.

I find it disappointing that more than 3 hectares of what the City of Joondalup described in 2000 as its Number 1 reserve for both conservation and management is now considered to be in degraded condition. It concerns me that more than 30% of the vegetation communities rated as in excellent condition will be cleared.



Figure 9

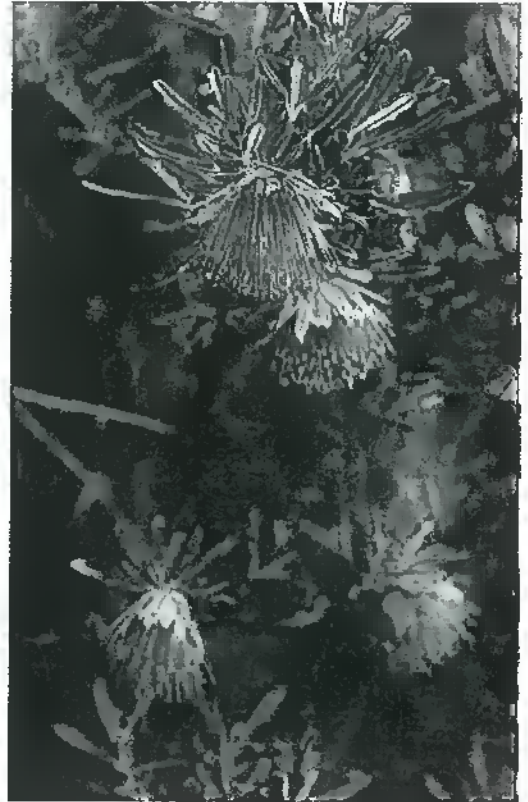
Solanum symonii

Photo Credit Richard McDowell

Figure 8

Diplolaena angustifolia

Photo Credit Richard McDowell

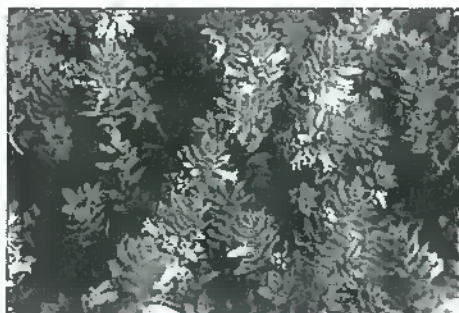


I am concerned that a number of important regional flora species were not identified in the

Figure 10

Leucopogon insularis

Photo Credit Richard McDowell



vegetation mapping process:

- *Diploaena angustifolia*, believed to be the last examples of this in the broader metropolitan area
- *Scaevola globulifera*
- *Gastrolobium nervosum*
- *Solanum symonii*
- *Nitraria billardierei*

Fauna

The proposal would greatly increase the threatening processes already faced by Bush Forever Site 325 and the Marmion Marine Park with negative consequences for both terrestrial and marine fauna.

TERRESTRIAL FAUNA

I am constantly surprised by the diversity of fauna I came across during Coastcare projects in the Quindalup dunes of the much narrower and more disturbed section of Bush Forever Site 325 south of the proposal area at Mullaloo. To date our Friends of group have compiled a list of 13 reptile species, 19 bird species, 3 mammals, 1 frog as well as diverse invertebrates including centipedes, spiders, scorpions, crabs, molluscs, ants, weevils, beetles, butterflies, moths, native bees, flies, wasps and dragonflies that we are only just beginning to try and identify to species level with the assistance of the Spineless Wonders Iluka Foreshore Macrofauna (macroinvertebrate and herpetofauna) Inventory Survey 2015-16.

The proposal area is at the widest point of Bush Forever Site and due to the largely undisturbed mosaic of Quindalup/Spearwood dune habitats available I believe the fauna diversity would most likely be higher than at Mullaloo and include more mammal species such as bats and the Ash Grey Mouse. In its assessment of the Burns Beach residential development the EPA Bulletin 880 stated that in "zoogeographic terms, the Quindalup/ Spearwood dune system has a richer bird and reptile fauna than other dune systems on the Swan Coastal Plain."

I am distressed by the proposed destruction of important bird habitat for numerous marine and migratory birds (Cormorants, Australasian Darters, Pacific Gull, various Terns etc.) and bush birds (White Cheeked Honey Eaters, Brown honey Eaters, Singing Honey Eaters, New Holland Honey

Eaters, Buff Banded Rails, Quails, Blue Fairy Wrens, White winged Fairy Wrens, Variegated Fairy Wrens, White Breasted Robin, djidi djidis to name a few) and uncommon birds of prey(Nankeen Kestrels, Black Shouldered Kites, Australian Hobbies, Little Eagles etc.)

It is heartbreaking to see the Eastern Osprey perched on the cliffs watching for prey in the ocean in the same spot I have seen him/her for decades knowing the plans to turn those cliffs into breakwater rubble. (Figure 1)

The callous destruction of Carnabys Black Cockatoo foraging habitat appalls me. The Foreshore reserve is an important link in the local flocks ever diminishing foraging mosaic, it will jeopardise the viability of successful breeding program at ECU just a few kilometres away through increasing the risk of vehicle strikes and reducing available f.

The lack of surveys of the largely unstudied diverse invertebrate species of Bush Forever Site 325 disturbs me. Light pollution from the development would have negative impacts on the diverse nocturnal pollinators of Bush Forever 325.

The Environmental Assessment and Management Strategy report identified that Karstic formations such as solution channels and caverns may occur in the area, yet no surveys of troglobitic (cave dwelling) fauna appear to have been undertaken.

In my opinion the proposed Negotiated Planning Outcome for the losses in Bush Forever 325 does not provide a satisfactory conservation outcome as detailed in Attachment 2

MARINE FAUNA

The development is proposed to be partially built on a large area of the Indian Ocean with a variety of habitat types and will result in the destruction of the natural ecosystem of an unspecified amount of the A Class Marine Reserve, Marmion Marine Park.

The loss of marine habitat that cannot be replaced saddens me.

This relatively inaccessible stretch of coastline provides foraging habitat and haul out sites for Australian Sea Lions, New Zealand Fur Seals and Sub Antarctic Fur Seals. I find it astounding that the PER Report for this development states "Australian fur seals do not have specific conservation significance but are an iconic species that would also be likely to occur within the Development Envelope. The potential impact of habitat loss for dolphins and fur seals are not considered significant as the area around the Development Envelope is not an important habitat (i.e. not used for breeding or important foraging habitat) and the species and their habitats are widespread in the region". According to the Australian Museum (<https://australianmuseum.net.au/australian-fur-seal>) "The Australian Fur Seal has a relatively restricted distribution around the islands of Bass Strait, parts of Tasmania and southern Victoria. They can be seen hauling out (coming ashore) on islands off South Australia and areas of southern New South Wales such as Montague Island with the occasional animal appearing as far north as the mid north coast of New South Wales". The **Australian Sea Lion**, which is found along the Perth Coast" is protected by Australian State and Federal government legislation and listed as rare by the IUCN. Australian Sea Lion numbers are relatively small compared to other seals in the area and like most it suffered heavily during the 19th century sealing period with many colonies being wiped out" (<https://australianmuseum.net.au/australian-sea-lion>). This failure to correctly identify one of the largest animals found in Western Australia makes me question the accuracy of all the information contained in reports relating to this project.

The potential release during construction of debris wedged into the sea walls of the current boat harbour poses serious risks to marine fauna.

Figure 11 Sub Antarctic Fur Seal entangled in Marine debris photographed at an ORCCA Incident



Dec 2016 north of Perth

I find the proposed offsets for the marine components to be grossly inadequate.

Please refer to Attachment 3 for more detailed comments on the marine components of the proposal.

General

The existing land uses include extensive car and boat trailer parking, boat ramps, coastal recreation and amenities, club facilities for the Whitfords Volunteer Sea Rescue Group and the Ocean Reef Sea Sports Club and are low intensity in nature and have allowed the surrounding tracts of coastal reserve to continue to function as relatively intact ecosystems and provide an important sense of place to the local community and visitors from overseas, interstate and other parts of Western Australia. The proposed development would irreversibly destroy this.

The Site is located on the Swan Coastal Plain that forms part the South West Australia Global Biodiversity Hotspot. The proposal would result in clearing and fragmentation of native vegetation, one of the most significant threatening processes in this globally significant landscape.

Please refer to Attachment 4 for general comments on the MRS Amendment Report

Conclusion

I am strongly opposed to MRS Amendment 1270/41- Ocean Reef Marina Redevelopment because of the many damaging social and environmental impacts associated with the development as detailed in this submission.

I have found the community consultation process to be highly selective in favour of those in favour of the project and very dismissive of genuine concerns about negative impacts caused by the change in land use during construction and operation of the proposed marina.

I have found many of the reports associated with the MRS Amendment request contradictory, inconsistent and inaccurate. Some being inaccessible. (Appendix 6 PER Document)

I can only hope the principles of Intergenerational Equity and the Precautionary Approach prevail and the MRS Amendment is not approved and the important sense of place this special part of the coast provides is protected as earlier planning processes have recognised.

Attachment 1

Indigenous Heritage

It's seems futile to undertake community consultation if the results of the consultation are ignored:

Page 9

https://www.planning.wa.gov.au/dop_pub_pdf/Indigenous_FINAL.pdf

"The Elders stated that they did not want the coast developed as it would destroy their heritage sites and spiritual dreaming. According to the groups consulted, the coastal dunal system which extending from Two Rocks to Augusta is spiritually significant to them as it represents the dreaming track of the Waugal (Wagyl, Wagyle).

As one of the Elders stated with reference to the destruction of the coast by development in the Mandurah/ Rockingham area, that his dreams have now become nightmares as far as preserving the coast was concerned. This was not only referring to the spiritual significance of the coast but also the environmental destruction that he perceived.

Another important factor that came out of the group discussion was that the natural landscape is an integral part of indigenous cultural heritage. The Aboriginal people derived their food, medicine and mythology from the natural environment.

Land has always been considered by Aboriginal people to have an intrinsic spiritual meaning especially that land which they regard as their 'own country'. One cannot extricate Aboriginal heritage from the surrounding natural environment as Aboriginal cultural heritage and history is written in the landscape. To destroy that landscape is tantamount to destroying their cultural heritage and history.

It was pointed out by an Elder that the mythology did not stop at the edge of the land but continued out past the continental shelf, and that even though Nyungar people did not have boats, their beliefs went deep into the ocean which at a previous time had been dry land and part of their hunting grounds. As stated by the Elder "This was the place where our ancestors once lived, hunted and had ceremonies...

Please read the report

Attachment 2



Bush Forever Negotiated Planning Outcome

Public Comment

Ocean Reef Marina

Bush Forever

Negotiated Planning Outcome

Prepared by: Sharon McArthur

15 January 2017

EXECUTIVE SUMMARY

I have grave concerns for the future of both Marmion Marine Park and Bush Forever Site 325 if the proposed Ocean Reef Marina development proceeds in its current form.

Because of my involvement in coordinating thousands of hours of on-ground Coastcare work I have developed a deep appreciation for and understanding of the unique biodiversity of the coastal strip. Opportunistic sightings of fauna have allowed me to develop comprehensive fauna lists. I am aware of the challenges the extreme natural conditions and human pressures pose to protecting biodiversity on the edge of urban development.

I have been coordinating MBCG Coastcare projects that actively address some of the threats to biodiversity in Bush Forever 325 since 2010. Every year hundreds of members of the community, local school students and other groups are involved in many Coastcare events that involve weed management, planting, litter reduction, night walks, pollinator counts and indigenous heritage talks. I work closely with the Natural Areas Crews of the City of Joondalup and regularly report vandalism, illegal dumping, feral animal sightings and any other unusual events.

I do not believe adequate surveys of fauna have been undertaken and the unique diversity of fauna has been ignored. It is disturbing that all reference to the *Synemon Gratuosa*, Graceful Sun moth has been removed. The EPBC Act listing of this species was removed during development of the proposal due to the discovery of previously unknown coastal populations. However, it remains a P4 species under State legislation and initial analysis of 2010 surveys showed it still remains within the 'endangered' category of the IUCN (2008) criteria (Interim Graceful Sun-moth report, Bishop, C et al). Habitat for the species will be cleared and remaining habitat will be fragmented, subject to more edge effect degradation and further degraded by the proposed formalization of existing sandy tracks used for breeding displays.

I have reviewed the Ocean Reef Marina Bush Forever Negotiated Planning Outcome (NPO) and do NOT believe it secures an appropriate conservation outcome.

I am concerned that there is no safe guard to protect the remnants of Bush Forever 325 from being cleared for future expansion or improved financial viability of the proposal through expansion of the residential component.

The amenity of Bush Forever Site 325 will also be degraded, both by the extensive built form and the planned diversion of the current shared coastal path to the rear of the development that endangers safety as it will require cyclists and pedestrians too cross three main roads at roundabouts and destroy seascape views from the highly used and valued path.

It is my opinion that the key impacts of the proposed development and conservation values of Bush Forever Site 325 have been understated in the NPO and the proposed mitigations are inappropriate and inadequate.

Impacts to Bush Forever Site 325

I am concerned that local Noongar elders have not been involved in the development of the project.

The proposed development would significantly increase the many threatening processes Bush Forever Site 325 already faces due to vegetation clearing, habitat fragmentation and other anthropogenic pressures.

Bush Forever 325 is a long narrow reserve of coastal heath that provides significant north-south ecological linkages and partial linkages to bushland and wetland areas to the east. Ecological processes within the terrestrial reserve are closely linked with the marine environment.

The proposed development is in the widest part of the reserve and would result in Bush Forever 325's already poor area to perimeter ratio being made significantly worse.

The three proposed entry roads described as a "partial interruption of north south linkage values" not only creates two isolated remnants within Bushfore 325 it also increases fragmentation of the reserve as a whole and increases the risk of vehicle strike for Carnabys Black Cockatoos and other birds, reptiles, Quenda and Echidnas in the area but would prevent north south movement of the many species of small birds, burrowing reptiles and invertebrates in the reserve. There appears to be potential provision for fauna underpass at one of the three entry roads but I am concerned that native fauna such as Quenda would be too shy to use an underpass and if they did would be at increased risk of predation by foxes, dogs and cats (both feral and pets from the development and the adjacent suburbs).

Fauna surveys undertaken during development of the project do not show the same diversity of invertebrate species recognised in the Spineless Wonders Report, Iluka Foreshore Macroinvertebrate and Herpetofauna Inventory Survey September, October and November 2015 or records of opportunistic sightings at Mullaloo.

I am concerned that unique features of the vegetation have not been considered:

- key regional species were not identified in the 65 mapping sites surveyed
- we appreciate that the boundaries appear to have been changed to protect the P1 Grevillea sp. Ocean Reef from the Hodges drive extension, but are concerned that the species may be impacted by proposed paths and related fencing
- I believe that SCP 29a that accounts for 67% of the development area should be considered as both a PEC and locally significant as it contains scarce, unusual species (*Diploena augustifolia*); has novel combination of species and has a restricted distribution.
- The large communities of stand-alone *Melaleuca cardiophylla* on limestone capping are unique to the area and I think should be considered as at least regionally significant and investigated for possible unique habitat function.
- I am concerned that there appears to have been no further investigation or consideration of the potential new taxon, *Tetraria*, identified during 2013 Mattiske survey.
- I am concerned that a number of important species at the sight are missing from the 2013 Mattiske Level 2 Flora and vegetation survey:

Diplolaena angustifolia. (would favour SCP.29a)

Specimens at Ocean Reef Marina are believed to be the last not only on the Joondalup coastline, but the last examples of this within the broader metropolitan area. (Refer Urban Bushland Council WA Inc. Summer 2015 newsletter)

Florabase lists *D. angustifolia* as occurring in LGAs; Carnamah, Coorow, Dandaragan, Irwin, Moora, Perth and Wanneroo.

I believe some updating of these records would seem appropriate, particularly with reference to *D. angustifolia* Florabase records re. Wanneroo and Perth.

I would like to see *D. angustifolia* be investigated for Threatened Status listing.

D. angustifolia is mentioned in the NAMS report as Conservation Value Flora.

I am concerned that the Matiske report fails to identify the *D. angustifolia* at all never mind at section 5.2.6 Other Flora of Conservation Significance.

Scaevola globulifera

Another species that favours the high limestone content SCP29a

Gastrolobium nervosum.

Yet another species that favours the high limestone content SCP29a

Solanum symonii (favours low-lying damp spots).

Species is seen variously around City of Joondalup Natural Areas, but more so alongside Lake Joondalup and Central Park. This coastal occurrence at Ocean Reef is perhaps unusual, but the species has been observed at Iluka in the vicinity of secondary dunes. It is not noted in the NAMS report.

Nitraria billardiarei (Nitrc Bush)

A large community of this Bush Tucker plant exists adjacent to the southern, lower-level car park at the Ocean Reef marina, extending southwards in significant quantities onto limestone capping directly adjacent to the Ocean.

A large urban development in the widest section of the coastal reserve would significantly increase risks to biodiversity caused by weed invasion, light pollution, predation by pets and feral animals, inappropriate human activities, introduction of nutrients and pathogens from private gardens and public open spaces, increased litter pollution posing threats to human health and terrestrial and marine fauna, and increased fire risk.

I hope that there will be covenants to prevent cats and dogs being kept within the development and preemptive management measures against dumping of kittens in the marina to prevent a similar feral cat problem as occurs at Hillarys Boat Harbour.

The increased light pollution from the development would severely impact the diverse macroinvertebrate and other nocturnal fauna (Quenda, Echidnas, bats and diverse reptile species) of the reserve and potentially pollination in the remnants of Bush Forever 325.

Exotic plants used in landscaping in the development would require fertilizers that are damaging to native vegetation, soil and water quality. Many exotic species become weeds in urban bushland and would also encourage more feral bees and birds to the reserve and add further competition for native pollinators with detrimental impacts on native vegetation in the remaining remnants of Bush Forever 325.

The loss of over 1 km of natural rocky coastline and beaches would significantly interrupt marine/beach/heathland ecological processes. I am concerned that no consideration has been given to the loss of habitat for marine and migratory birds and haul out sites for pinniped species.

I am concerned that inadequate consideration has been given to impacts of loss of habitat on Ospreys, *Merops ornatus* —Listed as a Migratory species and a Marine species under the Environment Protection and Biodiversity Conservation Act 1999. There is a known nesting and hunting site on the limestone cliffs that would be destroyed by the proposal.

The coast at Ocean Reef is relatively inaccessible and is rare in Perth as it is not overshadowed by development. Pinnipeds are regularly seen hauled out and in the ocean. The loss of this shoreline would have detrimental impacts on pinniped species in the area- Endangered Australian Sea Lions(<http://www.pinnipeds.org/seal-information/species-information-pages/sea-lions-and-fur-seals/australian-sea-lion>), New Zealand Fur Seals(<https://www.dpaw.wa.gov.au/management/marine/marine-parks-wa/facts/433-new-zealand-fur-seal>) and sub Antarctic Fur Seals(<http://www.pinnipeds.org/seal-information/species-information-pages/sea-lions-and-fur-seals/subantarctic-fur-seal>) - **not** Australian Fur Seals as stated in the PER document.

The Ocean Reef Marina Development would result in over 13% of the native vegetation in Bush Forever Site 325 being cleared at its widest point. This would have significant negative impacts on the ecology of the entire reserve, not just the development envelope. 82.75% of the vegetation to be removed is in good to excellent condition and the loss of this important habitat would be detrimental to the diverse local fauna. The NPO does not take into account the cumulative losses of native vegetation for road widening, new paths and lookouts nor the native vegetation to be cleared in the water Corporation land. The City of Joondalup advised the Joondalup Community Coast Care Forum that 29.12 hectares of native vegetation would be cleared, significantly higher than the 19.5 hectares requiring remediation recognised in the NPO.

Mitigation

Land Acquisition

In my opinion the amount set aside for land acquisition is inadequate and the land acquisition criteria will not result in the stated objective of an "increase in the area of coastal vegetation protected in the conservation estate"

Bush Forever Site 325 is an urban coastal reserve and in my opinion has unique ecological processes and educational, conservation and heritage values. Bush Forever Site 325 with its diverse fauna and coastal landscape in such close proximity to urban areas and educational institutions of all kinds (childcare centres through to universities) provides a unique opportunity for people of all ages to interact with, learn about and care for their natural environment.

Page 1 of the NPO states "increase in the area of coastal vegetation protected in the conservation estate". While I recognise there are other areas in need of conservation I do not believe that the criteria "within 10 km of the coast" on page 13 of the NPO would represent an "increase in the area of coastal vegetation protected in the conservation estate". I do not believe land purchased further from the coast than the native vegetation to be cleared in Bush Forever Site 325 could be considered to result in an "increase in the area of coastal vegetation protected in the conservation estate".

Ecosystems 10km from the coast are significantly different to that on the coast-climate, vegetation and soils are completely different and purchase of land so far from the coast would not mitigate the losses of coastal habitat in Bush Forever 325.

Significant impacts on pinnipeds and marine and migratory birds still need to be addressed.

The mitigation package does not compensate for the loss of the important educational value of this natural area with native fauna near an urban area with diverse education facilities. Bush Forever Site 325 is very popular with both the local and wider community and many families and hundreds of school, TAFE and university students are engaged every year in hands on conservation activities in community projects. Through engagement in caring for the local environment I believe people learn to appreciate biodiversity and treat it with more respect. Loss of this area which provides an irreplaceable sense of place would result in further disconnection of people from their natural environment with broad negative conservation outcomes. There is growing recognition of the importance of connection with nature for people, especially in the development of young children e.g. Last Child in the Woods by David Louve. The coast is probably the natural area most people are likely to visit, and areas with native vegetation and fauna such as Ocean Reef provide a unique opportunity to maintain a sense of place and connection with nature, unlike built environments such as marinas and housing developments.

Bush Forever Site 325 Rehabilitation

This section of the report seems to indicate activities that are already the City of Joondalup responsibility as land manager and as such I do not consider that it in anyway compensates for the damage to Bush Forever 325.

I do NOT think it is appropriate to now suggest that volunteers abandon their current project areas to access limited, competitive Coastwest funding to undertake the rehabilitation work of the offset package. The rehabilitation component should be fully funded by the proponent.

There is no proposed mitigation for the ongoing detrimental impacts of the increased human population on the remaining 87% of Bush Forever Site 325. A funding mechanism is needed to ensure management of anthropogenic and physical impacts caused by the developed and the related increased population on both the remnants of Bush Forevern325 and Marmion Marine Park.

There seems to be no provision to ensure that any future expansion or additional housing to ensure the financial viability of the development is not funded by further losses of Bush Forever 325 or Marmion Marine Park

Attachment 4

General Comments on MRS Amendment Report

There is currently no marina at Ocean Reef. There is an artificial harbour that provides boat launching facilities.

The proposal would irreversibly alter the character, amenity and biodiversity values of the northern Joondalup coastline

In my opinion it is not appropriate for conservation estate, to be sold to contribute to the financial viability of a development proposal.

The area has long been recognised as having outstanding conservation value.

The proposal ignores the "diversity of natural resources has educative and interpretive values, particularly given their proximity to the metropolitan area" feature of Marmion Marine a park identified in its Management Plan. Shipwrecks and other cultural features along the coast are also of interest:

"Lalla 1917

Built in 1874 in Nova Scotia, Canada as a three-masted wooden barque, the 1,087-tonne Lalla was converted for use as a hulk in 1906. It was lost on August 17, 1917 while being towed away for scuttling. The tow-line parted and the hulk disappeared somewhere off Halis Bank, pushed along by a strong south westerly wind. Iron framework and a section of decking that may be from Lalla lie 20 metres off Ocean Reef Beach, 1 km north of Ocean Reef Marina. In 1913 the ship's bell was presented to the Cottesloe Surf Life Saving Club for use as a shark alarm." <http://museum.wa.gov.au/sites/default/files/Wanneroo.pdf>

The Marmion Marine Park Management Plan states "Marinas require consideration of equity to all Park users, the environmental impact on natural resources and the effect of increasing subsidiary management costs of the Park". This has not occurred for this proposal.

The development would increase all the threats to biodiversity listed in the City of Joondalup Biodiversity Action Plan ([http://www.joondalup.wa.gov.au/Libraries/Documents/Biodiversity Action Plan 2009-2019.pdf](http://www.joondalup.wa.gov.au/Libraries/Documents/Biodiversity_Action_Plan_2009-2019.pdf))

Biodiversity Threats

Clearing

Clearing native vegetation is a key threat to biodiversity. It causes species loss, reduction of species abundance, habitat removal, change or degradation in vegetation structure, soil erosion, altered hydrology, displacement of native fauna and ecosystem fragmentation and genetic isolation.

Fragmentation

Fragmentation is a direct result of vegetation clearing and has the same negative effects on biodiversity. A major concern is the pressure on fauna species whose restricted movement reduces the area available for their habitat.

Uncontrolled access

Uncontrolled access into natural areas by humans and pets occurs where natural areas are in urban surroundings. This is a significant threat to biodiversity as it causes disturbance to ecosystems, soil compaction and introduces weeds and diseases into natural areas.

Environmental Weeds

Environmental weeds have many negative impacts: they out-compete the native plants for nutrients and space, thus reducing the native plant's ability to thrive and reproduce; they harbour pests and diseases which can threaten native plants; they choke natural open spaces used by fauna, e.g. reptiles, for breeding; and they may not provide adequate food and shelter to fauna compared with the native local flora they replace.

Fires

Rubbish dumping

Discharge of stormwater

Plant Diseases

The Department of Transport report identified the need for 250 pens not the 750 proposed. The proposal does not seem to have taken into account the recent downturn in economic activity and the resulting decreased demand for luxury housing and boats. Nor does it seem to have considered the possibility of decreased demand for boat ownership due to ageing of the population.

The site is already a significant natural tourist asset and very popular with local residents. The proposed development would irreversibly destroy this natural asset.

The draft NPO currently open for public comment understates and omits several impacts of the development, understates the ongoing impacts on the fragmented remnants of Bush Forever 325, ignores the loss of native vegetation in the proposal area not within Bush Forever Site 325 and ignores impacts to pinniped species and marine birds.

There are significant discrepancies between and within reports and many significant fauna (e.g. Australian Fur Seals included in the PER while ignoring the species that are found in WA waters) and flora species misidentified or omitted

There seems to be no mechanism for funding to implement management plans for land acquired or the remnant fragments of Bush Forever Site 325.

There is no mechanism to protect the land acquired under the NPO or the remnants of Bush Forever 325 being used to fund future expansion or improve financial viability of the proposed marina or even other developments.

This development heavily favours highly consumptive, damaging users of the marine park. The proposal hasn't taken into account "Marinas require consideration of equity to all Park users, the environmental impact on natural resources and the effect of increasing subsidiary management costs of the Park" that is required by the Marmion Marine Park Management Plan.

The development would destroy 40% of the Burns Reef in direct violation of the policy principle "current and future generations of Western Australians can benefit from opportunities presented by the values and resources of the Western Australian coast"

The new facilities are primarily of private benefit to a few individuals.

The interruption of coastal processes has the potential to have negative impact to beaches to the north and south

It is indicated in the PER that beach nourishment will be required for the northern beaches which have no vehicle access, this would result in further vegetation losses in Bush Forever 325.

Has the waterways manager been decided?

It is unclear if requirements under this policy would be contained within the development envelope or would result in further degradation of Bush Forever 325

The City of Joondalup have advised the Joondalup Community Coastcare Forum that 29.12 hectares of native vegetation will be cleared- why does the NPO refer to 19.5ha? Many of the figures within reports are conflicting and inconsistent between reports and this has made it extremely difficult to prepare a public comment.

The widening of roads will result in further losses of native vegetation and increase risks of vehicle strike to fauna. Increased traffic will also result in higher levels of hydrocarbon pollution of stormwater runoff and groundwater.

Sharon McArthur
14 Spiral Flag Road
Yanchep WA 6035
Feb 24, 17, 9:35 AM

Ocean Reef Marina Public Environmental



Review-Public Comment

Figure1 Limestone cliffs in proposal area

I am strongly opposed to the proposed Ocean Reef Marina Developed due to the many damaging environmental impacts that are detailed in this submission. As a general comment, I have found preparing this submission extremely difficult and time consuming, largely due to inconsistency within and between reports, lack of clarity as to the size of various components of the development, the lack of a Table of Contents or Index and difficulties accessing documents. I have endeavoured to organise this document using the headings of the PER document.

Contents

Introduction.....1

Comments on PER Executive Summary.....3

Conclusion and General Comments.....6

Solastalgia

The sense of sadness a person feels when their home environment is changed in ways they cannot control

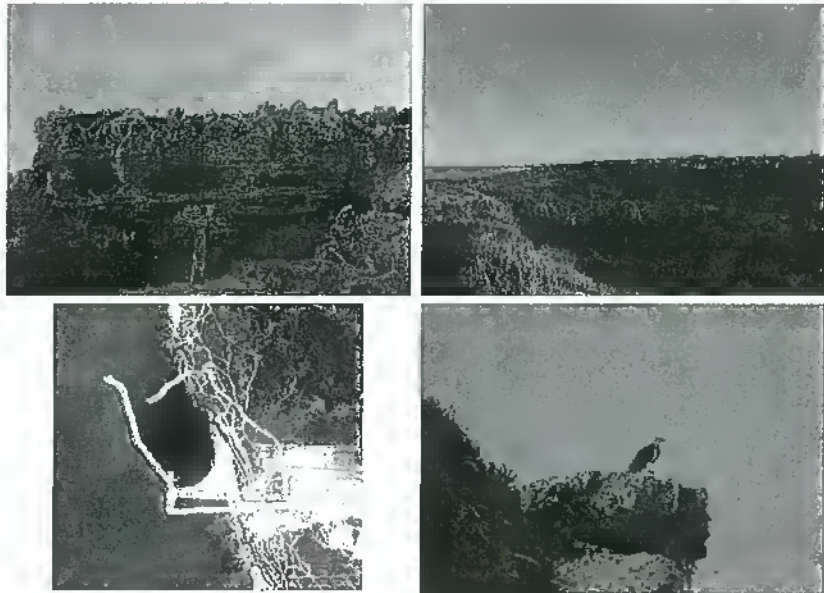


Figure 2

1. Limestone Cliffs in proposal area
2. Part of part of Proposal Area
3. Historic Aerial view
4. Osprey that will lose nesting habitat

Comments on PER Executive Summary

Introduction

Figure ES1 - The aerial photograph has been framed to avoid showing Mindarie Marina and therefore doesn't indicate the concentration of marinas in the northern portion of Marmion Marine Park. Currently the closest marina to Mindarie (11km north of Ocean Reef) is at Two Rocks, 29 km north, the closest Marina to Hillarys (9km south of Ocean Reef) is at Fremantle 31km south, noting that a private marina development is approved for Alkimos (11km north of Mindarie)

Paragraph 3 mentions a network of informal network of pedestrian paths, these sandy tracks (created by people illegally entering the dune system) are used for mating displays of the P4 species, *Synemon gratiosa* (Graceful Sun-moth). The Structure Plan indicates that these tracks would be formalised or revegetated destroying even more of their habitat than that caused by land clearing.

Figure ES2 does not show the full extent of the Structure Plan Boundary nor the demarcation between what areas are being considered as part of the marine and terrestrial components.

Figure ES3 claims the development footprint to be 13.7ha. I believe this is significantly understated as the proposal would result in the extensive dredging of 99,000 cubic metres of the ocean floor and result in destruction of habitat within the marina water body.

Description of Proposal

I believe the project is socially inequitable as the proposal would divert limited government funds to providing more facilities in the already well-resourced City of Joondalup and add to already significant road congestion in the northern suburbs. Newer suburbs are in far greater need of facilities.

Exclusions

Figure 3 indicates that this report does include portions of the terrestrial components

Benefits of the Proposal

The existing infrastructure at Ocean Reef Boatharbour was updated at considerable expense (\$850,000) during 2016, I do not understand how so much money could be spent to provide "outdated and ageing" infrastructure.

Mindarie Marina is not within Marmion Marine Park and does not appear to be near capacity e.g. most residential lots on Alexandria View remain vacant.

The Department of Transport identified want for 250 boat pens at Ocean Reef, significantly less than the 750 proposed. Demand forecasts don't appear to reflect the ageing population nor the economic downturn following the collapse of the "mining boom".

I don't believe Marine Parks and Bush Forever should be lost to increase housing supply.

Construction

I believe minimising environmental impacts should have higher priority than maintaining access to boat ramps.

I think it is crucial that efforts are made to minimise construction pollution during the building of seawalls and no work should be allowed during the period of whale migration, bird and other terrestrial fauna breeding seasons and spawning/breeding seasons of marine fauna.

The dredging of 99,000 tonnes of material will release significant quantities of litter and other pollution that would have to be contained and removed from the natural environment. This "material" is also habitat for diverse fauna and it is concerning that the document does not indicate plans as to how this fauna will be protected/relocated.

Stakeholder Consultation

I find it extremely disturbing that Strategen are advocating for no change to the Marine Park boundaries as they claim the development is a "compatible land use" (UBC briefing session)

Community comment was sought and received on a different Concept Plan that did not include the extensive northern residential development or loss of amenity of the coastal path.

Marine Environmental Quality

Benthic Communities

Marine Fauna

Paragraph 2 astounds me and leaves me questioning the accuracy of any information in the document. I am appalled that marine mammals and their conservation status have been misidentified. This large development in an area of the coast known for pinniped haul outs has a PER document that refers to Australian Fur Seals and ignores pinnipeds actually found in WA such as New Zealand Fur Seals, and the threatened species sub-Antarctic fur seal (*Arctocephalus tropicalis*), the southern elephant seal (*Mirounga leonina*) and the Australian sea lion (*Neophoca cinerea*).

If the development proceeds I believe there has to be a funding mechanism (perhaps a percentage of property rates to be used by DPaW to fund rangers) embedded in any approval to develop and implement a management plan for the increased human population caused impacts.

Coastal Processes

I believe the impacts on adjacent beaches needs to be more carefully investigated. Currently sand dredged from the boatharbour is dumped south of the breakwater, the proposed change to moving sediment to the north could impact sediment supply to Mullaloo Beach. Beaches to the north have no vehicle access to facilitate beach nourishment programs, provision of vehicle access would be extremely damaging to the fragile dune systems.

I consider the increase from 35 to 60 tonnes of sea wrack accumulation significant. The wrack that currently accumulates at the boatharbour contains large amounts of contamination from stormwater runoff and marine debris that is a hazard to marine life. There needs to be a method of collecting debris within the marina waterbody and filtering contaminants from stormwater systems.

Offsets

I find the proposed offsets to be inadequate and to be activities that should be undertaken before any development occurs and funded as part of the cost of development. Surely the research should be undertaken before the irreversible damage is done? It seems misleading for Landcorp to be claiming "The proposed development will require a partial amendment to the Marmion Marine Park boundary.... will require a suitable offset package, possibly through expansion of the current Marmion Marine Park." When the PER states this is not possible?

Conclusion and general comments

The majority of the marine component occurs in the A Class Reserve, Marmion Marine Park

This site was recognised in 1974 as being unsuitable for this type of development due to its unique scientific, educational and indigenous heritage values.

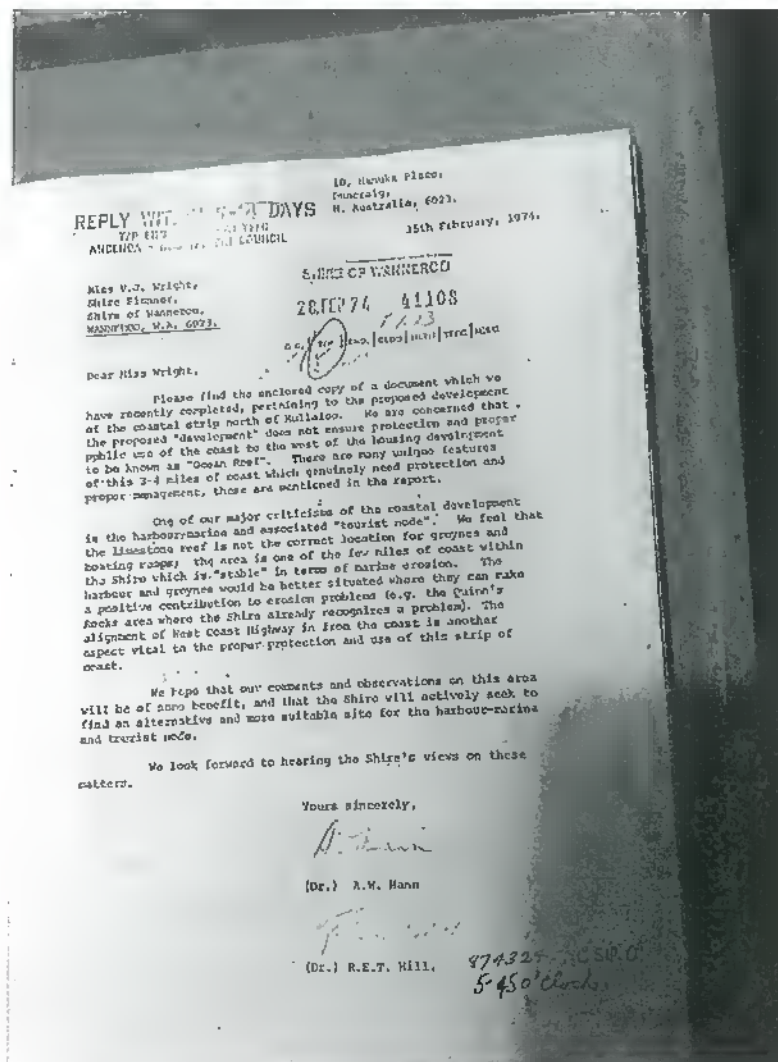


Figure 3 Covering letter to 1970's report into development of a marina at Ocean Reef

Most population increase is in the city of Wanneroo (<http://forecast.id.com.au/wanneroo>) 98.39% to 2041, City of Joondalup (<http://forecast.id.com.au/joondalup>) 9.38% to 2036

The Ocean Reef Marina Development would also produce significant social and economic costs:

- destroy the ecotourism potential and current amenity of the area that is already very popular
- concentrate boating activity in Marmion Marine Park with the resulting additional stresses for marine biodiversity
- Light pollution
- Higher population resulting in more anti-social behaviour in the remnants of Bush Forever Site 325
- A class reserves and Bush Forever sites are recognised for their conservation values and should not be sacrificed to increase housing supply and fund infrastructure

- lost employment in environmental education, ecotourism and conservation works

This development heavily favours highly consumptive, damaging users of the marine park. The proposal hasn't taken into account "Marinas require consideration of equity to all Park users, the environmental impact on natural resources and the effect of increasing subsidiary management costs of the Park" that is required by the Marmion Marine Park Management Plan.

The development would destroy 40% of the Burns Reef in direct violation of the policy principle "current and future generations of Western Australians can benefit from opportunities presented by the values and resources of the Western Australian coast"

Attachment 4

General Comments on MRS Amendment Report

There is currently no marina at Ocean Reef. There is an artificial harbour that provides boat launching facilities.

The proposal would irreversibly alter the character, amenity and biodiversity values of the northern Joondalup coastline

In my opinion it is not appropriate for conservation estate, to be sold to contribute to the financial viability of a project.

The area has long been recognised as having outstanding conservation value.

The proposal ignores the "diversity of natural resources has educative and interpretive values, particularly given their proximity to the metropolitan area" feature of Marmion Marine a park identified in its Management Plan. Shipwrecks and other cultural features along the coast are also of interest:

"Lalla 1917

Built in 1874 in Nova Scotia, Canada as a three-masted wooden barque, the 1,087-tonne Lalla was converted for use as a hulk in 1906. It was lost on August 17, 1917 while being towed away for scuttling. The tow-line parted and the hulk disappeared somewhere off Halls Bank, pushed along by a strong south westerly wind. Iron framework and a section of decking that may be from Lalla lie 20 metres off Ocean Reef Beach, 1 km north of Ocean Reef Marina. In 1913 the ship's bell was presented to the Cottesloe Surf Life Saving Club for use as a shark alarm." <http://museum.wa.gov.au/sites/default/files/Wanneroo.pdf>

The Marmion Marine Park Management Plan states "Marinas require consideration of equity to all Park users, the environmental impact on natural resources and the effect of increasing subsidiary management costs of the Park". This has not occurred for this proposal.

The development would increase all the threats to biodiversity listed in the City of Joondalup Biodiversity Action Plan (http://www.joondalup.wa.gov.au/Libraries/Documents/Biodiversity_Action_Plan_2009-2019.pdf)

Biodiversity Threats

Clearing

Clearing native vegetation is a key threat to biodiversity. It causes species loss, reduction of species abundance, habitat removal, change or degradation in vegetation structure, soil erosion, altered hydrology, displacement of native fauna and ecosystem fragmentation and genetic isolation.

Fragmentation

Fragmentation is a direct result of vegetation clearing and has the same negative effects on biodiversity. A major concern is the pressure on fauna species whose restricted movement reduces the area available for their habitat.

Uncontrolled access

Uncontrolled access into natural areas by humans and pets occurs where natural areas are in urban surroundings. This is a significant threat to biodiversity as it causes disturbance to ecosystems, soil compaction and introduces weeds and diseases into natural areas.

Environmental Weeds

Environmental weeds have many negative impacts: they out-compete the native plants for nutrients and space, thus reducing the native plant's ability to thrive and reproduce; they harbour pests and diseases which can threaten native plants; they choke natural open spaces used by fauna, e.g. reptiles, for breeding; and they may not provide adequate food and shelter to fauna compared with the native local flora they replace.

Fires

Rubbish dumping

Discharge of stormwater

Plant Diseases

The Department of Transport report identified the need for 250 pens not the 750 proposed. The proposal does not seem to have taken into account the recent downturn in economic activity and the resulting decreased demand for luxury housing and boats. Nor does it seem to have considered the possibility of decreased demand for boat ownership due to ageing of the population.

The site is already a significant natural tourist assets and very popular with local residents. The proposed development would irreversibly destroy this natural asset.

The draft NPO currently open for public comment understates and omits several impacts of the development, understates the ongoing impacts on the fragmented remnants of Bush Forever 325, ignores the loss of native vegetation in the proposal area not within Bush Forever Site 325 and ignores impacts to pinniped species and marine birds.

There are significant discrepancies between and within reports and many significant fauna (eg Australian Fur Seals included in the PER while ignoring the species that are found in WA waters) and flora species misidentified or omitted

There seems to be no mechanism for funding to implement management plans for land acquired or the remnant fragments of Bush Forever Site 325.

There is no mechanism to protect the land acquired under the NPO or the remnants of Bush Forever 325 being developed to fund future expansion/upgrades of the proposed marina or other developments

This development heavily favours highly consumptive, damaging users of the marine park. The proposal hasn't taken into account "Marinas require consideration of equity to all Park users, the environmental impact on natural resources and the effect of increasing subsidiary management costs of the Park" that is required by the Marmion Marine Park Management Plan.

The development would destroy 40% of the Burns Reef in direct violation of the policy principle "current and future generations of Western Australians can benefit from opportunities presented by the values and resources of the Western Australian coast"

The new facilities are primarily of private benefit to a few individuals, public facilities the development would provide are either already available, better suited in less environmentally sensitive areas or could be provided by upgrades of existing facilities within the existing development footprint at Ocean a Reef.

The interruption of coastal processes has the potential to have negative impact to beaches to the north and south.

It is indicated in the PER that beach nourishment will be required for the northern beaches which have no vehicle access, this would result in further vegetation losses in Bush Forever 325.

Has the waterways manager been decided?

It is unclear if requirements under this policy would be contained within the development envelope or would result in further degradation of Bush Forever 325

The City of Joondalup have advised the Joondalup Community Coastcare Forum that 29.12 hectares of native vegetation will be cleared- why does the NPO refer to 19.5ha? Many of the figures within reports are conflicting and inconsistent between reports and this has made it extremely difficult to prepare a public comment.

The widening of roads required to accommodate increased traffic would result in further losses of native vegetation and increase risks of vehicle strike to fauna. Increased traffic will also result in higher levels of hydrocarbon pollution of stormwater runoff and groundwater.

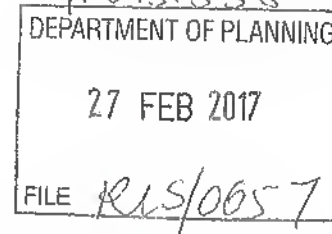
There is no reference in the reports to impacts on the P4. Species *Synemon gratiosa*, Graceful Sunmoth. Volunteer surveys, led by Dr Marjorie Apthorpe, have shown that Ocean Reef has the largest known colony of the species within the City of Joondalup. Reports to council and a verbal presentation by the CEO claim that *Synemon gratiosa* "only lives a few days" whilst in reality "The life cycle of the graceful sun-moth (egg - larva - pupa - adult moth) takes two or more years. The eggs are laid at the base of the food-plant and the larvae (caterpillars) live entirely within or alongside the underground parts of the plant. The adult moths live for only two to ten days, but at a particular site the adult moths appear over a four-six week period, between mid-February and late March".

(<https://www.dpaw.wa.gov.au/images/documents/about/science/pubs/infosheets/sdis041.pdf>) Land clearing and landscaping associated with the proposal would result in significant habitat loss, degradation and fragmentation for this species.



Your Ref: 809-2-30-17 Pt 1 (RLS/0455)
Our Ref: F-AA-15705/02 D-AA-16/86031
Enquiries: Vic Andrich (08) 9388 4978

Ms Kerrine Blenkinsop
Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6000



Dear Ms Blenkinsop

METROPOLITAN REGION SCHEME PROPOSED AMENDMENT 1270/41 – OCEAN REEF MARINA REDEVELOPMENT

Thank you for your letter of 16 November 2016 requesting comment from the Department of Health (DOH) on the above proposal. The DOH provides the following comment:

Water Supply and Wastewater Disposal

The amendment is to require that all developments are to connect to scheme water and reticulated sewerage as required by the *Government Sewerage Policy - Perth Metropolitan Region*.

Water supply, water management plan including the utilisation of recreational water and any waste water recycling is to comply with DOH guidelines and requirements which are available for download from:

<http://ww2.health.wa.gov.au/Health-for/Industry-trade-and-business/Water>
http://ww2.health.wa.gov.au/Articles/U_Z/Water-legislations-and-guidelines
http://ww2.health.wa.gov.au/Articles/A_E/Environmental-waters

The requirement for a District Water Management Strategy (DWMS) is to be a condition of the amendment. The DWMS shall address the monitoring of chemical sediments and environmental / marine / recreational water quality in addition to the management of potable water, groundwater and stormwater.

Should you have queries or require further information please contact Vic Andrich on (08) 9388 4999 or ehinfo@health.wa.gov.au

Yours sincerely

Jim Dodds
DIRECTOR
ENVIRONMENTAL HEALTH DIRECTORATE

21 February 2017

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

Submission 72

RLS/0657

Name ALASDAIR MACKERRON
(PLEASE PRINT CLEARLY)
Address 30 RESOLUTE WAY, OCEAN REEF Postcode 6027
Contact phone number 0437 589 004 Email address amackerron@btinternet.com

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

2 PAGES ATTACHED

turn over to complete your submission

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:

☒ **No, I do not wish to speak at the hearings.** (Please go to the bottom of the form and sign)

OR

☐ **Yes, I wish to speak at the hearings.** (Please complete the following details)

I will be represented by:

☐ Myself – My telephone number (business hours):

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:

☐ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

You should be aware that:

- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature *Alayla Mocham* Date *23/2/17*

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Dear Sirs,

Metropolitan Region Scheme Amendment 1270/41 -- Ocean Reef Marina Development

While I am generally supportive of the proposed marina development, I have a few concerns regarding the construction phase, the period between infrastructure and building construction and then in the operational phase.

My particular interest in the development stems from being a home owner on Resolute Way which adjoins the northern end of the proposed development.

Infrastructure Construction Phase

I understand that the first phase of this proposed development will be to establish the land and marine based infrastructure to support the delivery of the new precinct. The likely construction programme for this will be lengthy and as such, it is important that the welfare and amenity of local residents is protected during this period. The works will involve significant amounts of earth movement, and heavy vehicle movement, potentially removing huge volumes of material from the site. There will inevitably be noise and dust generated and I would request that planning conditions are placed and enforced to ensure limited working hours and dust suppression measures are maintained. In addition, any construction traffic should enter and exit the site through Hodges Drive. Construction vehicle movement through the north end of the site, and in particular up Resolute Way, would significantly impact the residential properties which generally front directly onto the affected roads.

This stretch of coast line forms part of the coastal path network and I would request that the continuity of this path be maintained throughout the construction phase in an appropriate and safe manner.

Between the infrastructure and buildings phase

The method of delivering this project is that the government funds the land based infrastructure and creation of the marine based facilities (breakwater, pontoons etc). Once these are complete, it is hoped that the private sector will then build the land based facilities. While it will probably be a few years before the buildings are in a position to be developed, there is a potential, given the current economic factors, that a developer is not found and as such a particularly large area of what is currently coastal bush land is left bare. This has the potential to blight the area, leave a dust bowl and attract anti-social behaviour. I would like to see some mitigation strategies for dealing with the situation where there is a gap of several years between developing the infrastructure and developing the buildings. Will the current bush land be left in place as much as possible?

Construction of the buildings phase

Construction traffic should be controlled and the integrity of the coastal path should be maintained as with the infrastructure phase

Operational Phase

Once the construction is complete and the marina open to the public, there will be a considerable increase in traffic volume to the area. It is relatively easy to control construction traffic movement through the construction phase by means of planning conditions. However, it is much harder to compel the general public to use certain routes. While Hodges is clearly the preferred access route to the new marina, it occurs to me that the northern entry to the marina is located at the roundabout at the bottom of Resolute Way and therefore it is likely that marina traffic exiting the north end of the site will proceed directly up Resolute Way rather than turning down the coast road and on to Hodges Drive. Resolute Way has the potential to turn onto a 'rat run' for cars often pulling boats on trailers and as this is an entirely residential street, with houses facing directly on to the road and several young families, this outcome would be a significant detriment to the quality of life for the residents. These vehicles will then continue on through the suburb before reaching Marmion Avenue.

There are a number of changes to the current proposal which would address this concern.

- Moving the junction south or north of Resolute Way would remove the temptation to drive directly up it.
- The junction could be arranged in such a way as to encourage cars to turn south towards Hodges or
- In the extreme case, the bottom of Resolute Way could be restricted to access only with traffic calming measures such as speed bumps or chicanes to deter non-local drivers.

It is worth noting that Resolute Way is a much used facility by the cycling fraternity as it provides a significant uphill stretch on a relatively quiet road. It is important to maintain this amenity in whatever happens with the marina and significant increase in traffic on Resolute Way would put cyclists at risk.

Thank you for the opportunity to submit these points, I hope they are taken into consideration and addressed appropriately. I look forward to hearing how the development progresses.

Yours faithfully
Alasdair MacKerron

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Submission 73

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS/0657

Name DORIS MARINA MACDONALD
(PLEASE PRINT CLEARLY)
Address 5 MAIR PLACE, MULLALOO, WA Postcode 6027
Contact phone number 94011707 Email address marie.mac@iinet.net.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

PLEASE FIND ATTACHED MY SUBMISSION

turn over to complete your submission

Hearing of submissions

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To be signed by person(s) making the submission

Signature Om Macdonald Date 24/2/2017

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

SUBMISSION ON MRS AMENDMENT 1270/41

From:

Doris M Macdonald
5 Mair Place
Mullaloo WA 6027

I object to the development known as Ocean Reef Marina Redevelopment for the following reasons:

Metropolitan Region Scheme Amendment Document

Page V states:

Perth has a reputation as one of the world's cleanest and greenest cities. This is largely due to good planning. It is a city anticipated to grow. As it grows, change must be well planned and well managed.

The proposal is contrary to this statement for the following reasons:

In 2008 the government made a statement regarding this area which proposed that a small 250 boat pen was suitable for this area. What is proposed is a huge marina, canal development which removes 16.79 hectares of Bush Forever land and invades the marine environment.

The City of Joondalup has been working on the proposal this for 10 years. The original proposal was for three plans to be drawn for Council. Instead the CEO brought 4 plans to be discussed. Each one growing in size. The fourth plan was similar to the plan currently proposed. Only the first plan met with the requirements of Government policy Perth Recreational Boating Facility Study – Technical report No.44.

Some of the public were allowed access to some information initially but as the process progressed most of the reports on the Marina proposal have been hidden from public view and made confidential. This meant that the reports were not available for public scrutiny as they progressed. These reports are too extensive to be read concurrently with the MRS amendment during the advertised period of two months. This could have been avoided if the City of Joondalup had been open and accountable as the process progressed. This advertising period is taking place over the holiday season which again restricts time available for scrutiny and is unreasonable. It appears ORM is resurrected at election time for political reasons. I do not believe that this development meets the criteria of a well planned development.

Purpose and Background

The scale and uses have no bearing on demand for pens. The only document which discusses demand recommended 250 pens be considered. One of the reasons why Hillarys was chosen for a marina instead of this site in the 1980's was because the water is too deep at Ocean Reef and would require granite faced breakwaters deemed too expensive.

The proposal is for a small suburb in the Bush Forever land and is a canal development. It ignores government policies aimed at preserving our coastline and natural heritage. The

report states that there is nothing there which is endangered. This is disputable. The reason for a suburb in Bush Forever is to try to recoup the cost.

Community Consultation

As mentioned previously the City has hidden the reports it has produced in order that it could continue without scrutiny. I am on my second FOI application from last November 2015. A previous one was commenced in 2009 and completed in 2011 for documents I knew to exist because I had seen them as a Councillor but was not allowed to have and/or show to anyone else. I do not believe this has been an open and accountable community consultation process.

Structure Plan

There is a Draft available on the city's website. As this is not a final document it is not worth spending time on it. A quick review has made me wonder at the accuracy of the City's data as it states that Mullaloo has 2 Restaurants and no bars.

Marmion Marine Park and "A" class Reservation

The Government pays little attention to the losses to its so called preserved areas. This is a significant marine park and any loss should not be contemplated. The loss in this proposal is significant. The Management Plan discourages marinas in the Marine Park. We should not be considering this huge destruction of the Marine Park and marine animals. The loss of abalone areas is large and unacceptable.

Scope and Content

This marina is enormous and should not be contemplated. It takes significant areas of Bush Forever land. Where along the coast could a developer get 16 hectares of prime coastal and for approximately 1.7million dollars? We do not have the Business Plan but are asked to comment on the project. We should be able to look at this project with the estimated costs of construction, the estimated cost of loss of Bush Forever and Marine environment, future costs to ratepayers and taxpayers to manage the marina, and the cost of mitigation to coastal areas to repair damage caused by the projection of this huge marina into the ocean. Without this information the amendment paper has no substance. For instance if submitters were told that there could be impact or loss of Mullaloo Beach and the costs of mitigation would be borne by future ratepayers and taxpayers they would look at this project in a different light. Perhaps those home owners who have been informed that they need to notate their property titles that the land is vulnerable to a 100 years sea surge should urgently look for lawyers. There is no mention of the costs caused by changes to coastal processes and their inevitable mitigation costs into the future as sea level rises. No mention of many marinas (probably all) along the coast that have had a negative impact on coast and ratepayer and taxpayer funds.

Strategic Context

The amendment might be consistent with the City of Joondalup's Draft Local Planning Policy. However it is inconsistent with State Government policy on building setback from the coast. It is also a Canal development and as such would be banned elsewhere in Australia because of liability issues caused by damage to current and future property along the coast, and the cost, all of which will be borne by future generations. It is my belief that this development has been driven by the current Mayor for his own political agenda. The timing for community consultation has been chosen to come before the upcoming State Election and both major parties have said they will support its construction because

they see it as a vote catcher. There was a good reason why a marina was not built at Ocean Reef Marina earlier and that the Hillarys' site chosen. Where is that report in this discussion? It is my understanding that deep water made it too expensive. Cost is not prohibitive in the current scenario because the proponent will offset the costs of the granite breakwaters by bulldozing the bushland and building houses and commercial properties until the figures balance. The State will ignore the economics of the project or at least until after the election. The proponent at this state is listed as the City of Joondalup. The State was supposed to have taken over the project from the City. There is an inconsistency here.

City of Joondalup Draft Local Planning Strategy

The amendment paper states that the strategy sets out long term direction for a future tourist site. There is a limit to the amount of development that can be accommodated in the coastal zone without the development causing irreversible to the environment and current properties. This amendment has not been properly assessed to determine future damage. For instance at a recent open meeting on the marina I asked a question about the impact of the project on Mullaloo Beach and was told that there was no impact anticipated. I asked for a guarantee and was told they do not give guarantees. Basic geography tells us that any projection into the ocean has an impact on wave pattern and therefore coastal processes. I have lived at Mullaloo for 42 years and have seen the impact of the Hillarys Marina and the Ocean Reef Boat Harbour. There have been rock falls along the section of coast between the end of Mullaloo Beach north to the current Ocean Reef Boat harbour. I cannot believe that there will be no major coastal changes from Groins projecting nearly a kilometre into the ocean. Hillarys Marina has impacted the coastline so that the coastline at Marmion is sand bagged and the beach north has lost much of its sand. I would like some assurance that any impact on Mullaloo Beach will not be mitigated by ugly groins. Future tourism may be important to the economy but it should not come at a cost to the environment and properties. Mullaloo Beach is an important tourist site.

Perth Recreational Boating Facility Study – Technical report No.44

This study did not recommend such a large boat harbour at Ocean Reef as is proposed.

Ocean Reef Boat Harbour: The City of Joondalup is currently working on a feasibility study to determine if an expansion to the Ocean Reef boat launching harbour can deliver a substantial number of boat pens. An estimated 250 pens may be possible and this number has been factored into the development options within this Study in the Long Term.

There were no huge groins in this Ocean Reef proposal. There are other bigger boat harbours mentioned. I believe that some other boat harbour projects which were contemplated are further advanced than this one. If this report were followed Ocean Reef Marina would not be so large. Boat stackers could be contemplated near existing harbours to mitigate damage to the marine environment from building new harbours. In my experience there are boat pens which are leased by people who rarely take their boats out to sea. The government should do a study of the underuse of boat pens by owners in existing harbours. Boat owners are in the minority and far outnumbered by people who use the coast and beach for the leisure. The requirement for boat pens should not drive the destruction of the coastline.

State Planning Policy 2.8- Bushland Policy for the Perth Metropolitan Region

I dispute that there are no species of fauna and flora that are worthy of protection. I am also concerned that the NPO will allow the exchange of approximately 16 hectares of land for the bushland elsewhere for 1.7million to facilitate a small suburb being constructed. There is in my opinion no land that can be considered to provide the same as that which is lost anywhere in the allowed area. This is coastal heathland. It provides connectivity for fauna which moves along the coast. We have not been told where this land will be. This development makes a mockery of government environmental policy. Within the proposed Marina there are large entry and exit roads between remaining bushland. There is nothing to indicate that the proponent will provide crossing points for fauna to move from one remnant bushland to another. Given the amount of use this marina will have it is unacceptable that movement corridors have been ignored.

State Planning Policy 2.6- State Coastal Planning Policy

The WAPC has received a Coastal Hazard and Risk Management Adaptation Plan. It is not clear whether ratepayers have seen this plan? The City has chosen to deal with its coastal policy by dividing its coastal area instead of treating it as a whole. For instance at a recent meeting with people whose homes are affected by this policy, the consultant when questioned, stated that the proposed marina had not been taken into account for the purposes of SPP2.6 and the impact it might have that 190 properties affected and that the marina's own vulnerability would be dealt with in isolation. This is unacceptable and the public should be told what impact the marina will have on the coastal vulnerable of these properties and in particular what impact it will have on Mullaloo Beach. Basic geography tells us that a projection into the ocean changes the wave pattern and sand movement. At a public meeting on this proposal another consultant stated that the beach at Mullaloo was accreting and they did not expect there to be an impact from the marina when it was built. When asked for a guarantee on this she stated that they didn't give guarantees. **Without this assurance the marina should not built.** The beach has much more recreational and tourism value than any marina could have. It is of note that at the same time we are told the beach is accreting, residents of Mullaloo adjacent to the beach, have been told that they are vulnerable under Planning Policy 2.6. I believe the City of Wanneroo's SPP2.6 coastal report takes into consideration the whole of its coastline and proposed marinas for the purposes of their policy. The City of Joondalup's does not.

Development Control Policy 1.8 – Canal Estates and Artificial Waterways

A prerequisite for rezoning from the WAPC is that the waterways manager must be known before the final decision is made on this MRS amendment. Given that currently the identified proponent is the City of Joondalup one can only assume it is the waterways manager. It is totally unclear about the involvement of the State in this project and there appears to be no commercial proponent. This demonstrates the need for the Liberal Government to get this project appearing to be moving forward for political reasons for the current election. If the City is not the true proponent, the State is not and there is no commercial contender in the wings one questions the ethics of city in spending money on this MRS process. Given the Policy and its requirements it is inconceivable that a Waterways Manager cannot be identified and that details how the policy can be implemented are not in the public arena. Surely this is contrary to due process.

State Planning Policy 3.7 – Planning in Bushfire Prone Areas

One questions why the Bushfire Management Plan has not been assessed by the Department of Fire and Emergency Services prior to this Amendment going out for public comment.

STATUTORY CONTEXT

Environment

Flora and vegetation

One questions the ethics of government departments in allowing this Amendment to move forward without the community having details of the environmental outcomes that the EPA is convinced can be met. I would like to know where coastal heathland can be found to replace that which is lost. I see no evidence that coastal heathland to replace that which is lost exists.

Terrestrial Fauna

One questions the ethics of government departments in allowing this Amendment to move forward without the community having details of the environmental outcomes that the City of Joondalup is convinced can be met. I see no evidence of this. There are no pathways to allow freedom of movement for fauna to connect between areas on the coast.

Environmental Factors Associated with the Marine Infrastructure Components

The EPA has formed a view that sufficient information is not available at this time.

Again why is this out for comment at this stage if all the information on which the public rely is not available?

Environmental Protection and Biodiversity Conservation Act 1999

Because project does not require Federal approval it does not mean that there is no adverse environmental damage to Biodiversity if this project goes ahead.

URBAN WATER SUPPLY

Water

There is no current reticulated water plan and no route identified water.

Wastewater

There is no current wastewater plan and no details of placement of a new pump station. There is no information regarding the route for the headworks. We cannot be sure that wastewater will not leach into the marina or nearby ocean.

Land Matters

There are no agreements written regarding the transfer of land. When they are written the transfer agreements may be unacceptable to the public.

General comments

The Water Corporation requires funding. There is uncertainty regarding the funding of the work and there are no detailed plans. Another example or the inadequate information in this Proposal.

Transportation

Another area which has no detail.

Boating Facilities

Another area still to be decided.

ABORIGINAL HERITAGE

Has not formally been referred to SWASLC. No information regarding aboriginal heritage in this document.

CO-ORDINATION OF LOCAL AND REGION SCHEME AMENDMENTS

This work has not been completed.

SUBSTANTIALITY

The proposed development is a "major" development which is much too large for the area. The proposal should reflect State Government Policy and revert back to 250 boat pens with no extension of groins into the deep water. This would make the marina feasible with little disruption to the coastal and marine environment. We do not need a massive hotel and canal development at this site.

SUSTAINABILITY

Nothing to date in this document indicates that the development will deliver sustainable, environmental, social or economic outcomes. One of the major omissions is the financial information. Minister John Day is on record as saying last year that he had seen no financial information that would indicate that the proposal was financially feasible. Surely there would have had to been a radical rethink subsequently. There is no evidence of major changes.

ENVIRONMENTAL PROTECTION AUTHORITY

The land component has been unsatisfactorily dealt with because the offset land is unknown and marine component needs "*funding research to understand the marine environment to gather sufficient information.*" This an outrageous statement to make when presenting a proposal that has already spent, to date, ratepayers and taxpayers money of \$5 million. There is such an absence of information.

THE AMENDMENT PROCESS

The community been presented with a document lacking in so many areas. The Amendment should not have been processed without this information. This is a waste of everybody's time just so that government politicians, for political reasons, can state, to those people who want a marina, that it is progressing.

A government who would proceed with this proposal based on the information contained within it is setting future generations up for huge debt, liability and mitigation costs.

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Submission 74

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS10657

Name MULLALOO BEACH COMMUNITY GROUP
(PLEASE PRINT CLEARLY)

Address c/- 5 MAIR PLACE MULLALOO Postcode 6027

Contact phone number 94011707 Email address m.b.c.ginc@inet.net.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

SEE ATTACHED

turn over to complete your submission



Mullaloo Beach Community Group Inc.

C/- 5 Mair Place

MULLALOO WA 6027

Metropolitan Region Scheme Amendment 1270/41 Ocean Reef Marina

Redevelopment – As a stakeholder and local community group we have been attempting to review the information provided by the proponent and find the following aspects to be totally unacceptable to what should be a fair and reasonable public review process detailed below as follows:

For instance,

1. The documents contain maps that are unclear when one wishes to closely scrutinise. The details become pixelated and unreadable when one attempts to zoom in. The proponent may argue that they have provided high definition maps in a large (Mb size) format and yet software such as Nearmap has much better clarity for similar maps.
2. There are a significant amount of documentation and reports and referenced material provided by the proponent, however review of the referenced matter is not detailed sufficiently to allow proper or reasonably review by the public. We request that the proponent is asked to provide proper professional referencing including name of reports, figures and maps referred including page numbers. See for example referencing used in Parliamentary Committee Reports such as N Finch, P Murray, J Hoy and G Baxter, "Expenditure and motivation of Australian recreational hunters", Wildlife Research, 41, 2014, p82.
3. Since the review period started, the information provided on the proponents website has altered a number of times, which in turn makes it very difficult to locate and very difficult to refer to other members of the public who wish to consider the proposal.
4. Also the proponent has provided attachment 6 that contains .gis formatted information that cannot be accessed by members of the public and have now raised some concerns about their ability to access data that is relevant to the PER.
5. The PER documentation format (pdf) is not suitable for all members of the public, including people with visual disability and we refer you to the HRC and EOC websites which offer documents available in dual formats namely pdf and word.
6. There is a general lack of required information to enable submitters to make a submission and what information is available is disjointed, and some has been replaced or superseded by less accurate information.

Bubanic, Marija

From: Mary Gray <celiagray@bigpond.com>
Sent: Friday, 24 February 2017 1:12 PM
To: mrs
Cc: 'Urban Bushland Council WA'
Subject: MRS Amendment 1270/41 Ocean Reef
Attachments: UBC submission Ocean Reef MRS Amendment 1270.41.docx



Attention: Secretary, WAPC

Submission on MRS major Amendment 1270/41: Ocean Reef marina redevelopment

Please find attached a submission by the Urban Bushland Council WA Inc. on the above MRS Amendment. Acknowledgement of receipt of this submission by email to ubc@bushlandperth.org.au and to me directly on celiagray@bigpond.com will be appreciated.

As stated in our submission, we would like to opportunity to make a presentation to the WAPC on this Amendment.

Yours sincerely
C Mary Gray
President, Urban Bushland Council WA Inc.
24 February 2017

PO Box 326 West Perth WA 6872
ubc@bushlandperth.org.au

Phone 9420 7207
www.bushlandperth.org.au



21 February 2016

mrs@planning.wa.gov.au
Secretary Kerrine Blenkinsop
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

**Submission: Metropolitan Region Scheme Amendment 1270/41 - Ocean Reef Marina
Redevelopment**

Dear Ms Blenkinsop

The Urban Bushland Council WA Inc. (UBC) is a community association of more than 75 community conservation groups. The UBC has been committed to protecting urban bushland in the Perth region since the organisation's inception in 1993. The UBC has also been committed to protecting Bush Forever Sites since the Bush Forever policy was established in 2000.

The UBC is strongly opposed to Metropolitan Region Scheme (MRS) Amendment 1270/41 - Ocean Reef Marina Redevelopment and the land clearing that is proposed under the Amendment. The UBC is strongly opposed to the clearing of any land that is a part of a Bush Forever Site. We note that this proposal was not formally assessed by the EPA and we believe this represents a significant failure in proper governance under provisions of the Environmental Protection Act. The proposal should have been formally assessed because of the very significant impacts on a conservation area (a 'critical environmental asset') which is both unique in its ecosystem and is irreplaceable. Reliance on the clearing regulations is not an adequate excuse for failure to formally assess in this case.

The redevelopment of the Ocean Reef Marina is proposed to take place on land which contains part of the Bush Forever Site 325, which is coastal bushland stretching between Burns Beach and Hillarys. MRS Amendment 1270/41 states that 25.96 ha of Site 325 will be removed. We understand that the 25.96 ha includes existing slipways and car parks at the Marina.¹ The MRS Amendment states that approximately 19.5 ha of native vegetation would be cleared², but the UBC understands that in actuality approximately 16.79 ha of remnant native vegetation will be cleared³.

The MRS Amendment states that the clearing of vegetation at Site 325 "...has the potential to impact other parts of Bush Forever Site 325 through weed invasion, hydrological changes and increased pressure from human access".²

The UBC believes that clearing of 16.79 ha of native vegetation in Site 325 for the Ocean Reef Marina redevelopment would unquestionably impact and damage the remaining bushland in numerous ways that go beyond those listed in the MRS Amendment. The four main areas of negative impacts to the remaining bushland would be:

- habitat fragmentation resulting in edge effects and the disruption of ecological linkages;
- damage to important flora species and ecological communities;
- damage to important fauna species and
- loss of the benefits natural areas provide for the local urban environment and people.

The UBC acknowledges that the Site 325 map within the Bush Forever policy document states that the Ocean Reef Marina is a “Possible Future Strategic Regional Recreation and Tourism Node”.⁴ However, the UBC does not accept that this designation justifies that a large redevelopment to the extent of the one proposed is needed. The proposed expansion of the Ocean Reef Marina and the associated land clearing to make way for residential and commercial development seems especially unnecessary when it is considered that the proposed development lies only 9 km north of Hillarys Boat Harbour and 12 km south of Mindarie Marina.

Site 325 is adjacent to the ocean on its west and adjacent to a vast extent of residential properties on its east, which can only truly be appreciated by viewing a satellite image of the area. Figure 1 shows the residential developments surrounding Ocean Reef Marina, but these developments exist along the full length of Site 325 which is not shown in the image below.



Figure 1: Satellite image of Bush Forever Site 325 next to vast area of residential properties in Ocean Reef area.

There already exists two marinas and extensive residential development close to the proposed Ocean Reef Marina redevelopment. It is expected that the proposed development would have 700 dwellings (600 apartments and 100 dwellings), creating a residential population of approximately 1,250 people. A 260 room hotel is also expected to be built, which increases the average daily population in all accommodation to be approximately 1,500 people (not including workers).⁵ This is a very large number of people for the proposed development area and this new population would have significant impact on the remaining bushland that would not be cleared.

There is only one Bush Forever Site 325. If bushland at Site 325 is cleared in accordance with the MRS Amendment, the land is gone forever and the resulting impacts on the surrounding environment, flora, fauna and people are irreversible. The Bush Forever policy was not established to clear regionally significant bushland, like Site 325, but rather to protect it, conserve it and maintain the positive effects of its existence as discussed in “The Vision” section of the Bush Forever policy document:

'Bushland conservation not only fulfills a moral obligation to protect habitats from destruction and save species from extinction, it also protects invaluable resources for education, heritage, tourism, scientific and medical research and provides waterway protection, microclimate control, biological control of pests and diseases, visual amenity, and places for quiet contemplation, relaxation and a sense of place. Every city needs its natural spaces: they are impossible to replace once lost.'⁴

The rest of this submission will discuss four main areas of negative impacts that would result from the Ocean Reef Marina Redevelopment. The UBC believes these negative impacts justify the organisation's stance that the MRS Amendment 1270/41 should be rejected.

I. Fragmentation of Perth Bushland and its Associated Problems

The bushlands of Perth are extremely special and this has been recognised by both the people of Perth and its governments. As the Bush Forever policy document states:

'Urban bushland contributes to Perth's unique character and quality of life and has often been described as the 'heart and lungs of the city'.⁴

Perth's natural environments are linked to its identity. Despite the fact that Perth's environment is what makes it unique in the world, bushland fragmentation, edge effects and the disruption of ecological linkages as the result of human interference continually destroy its environment. The proposed land clearing of Site 325 as part of the marina redevelopment is yet another example of human disturbance which would contribute to these problems. How each of these problems will result from the marina redevelopment will be discussed in turn.

Habitat Fragmentation

Habitat fragmentation (Figure 2) refers to the remnants of native vegetation that remain after land has been modified in ways that reduce it in size and disconnect pieces of it from adjoining continuous habitat. The immediate consequence of the fragmentation is that the populations of flora and fauna which occur in the remnants are divided up and exist on smaller patches of habitat, which increase their likelihood of extinction.

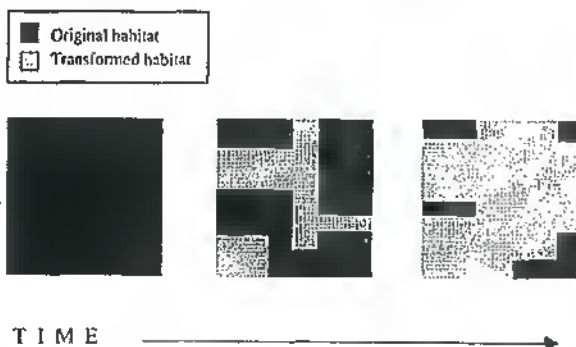


Figure 2: Diagram representing the process of habitat fragmentation over time.⁶

The proposed land clearing at Ocean Reef Marina will fragment Site 325 bushland. The initial fragmentation will occur as the result of the building of two road entrances into the marina at Hodges Drive and at Resolute Way. It is a common occurrence for the construction of roads to fragment the landscape. Not only does the building of the road itself cause fragmentation, but development normally then occurs along the road which continues to reduce the habitat area.⁶ However, at Ocean Reef Marina, the development occurs at the end of the bisecting roads and the habitat shrinking occurs from the coast inwards.

What makes Site 325 so unique is its length and width along the coast, which can be found nowhere else in the Perth region. It has been found that long linear reserves can cover a lot of floral diversity

in a landscape because a linear reserve covers more environmental gradients than a square reserve of the same size.⁷ The diversity and long linkage of flora and fauna in Site 325 would be destroyed by the implementation of MRS Amendment 1270/41. How the disruption of ecological linkages at Site 325 would occur will be discussed later in this submission.

Habitat fragmentation and its associated problems have been recognised by the Western Australian Environmental Protection Authority (EPA). Perth suffers from habitat fragmentation and its negative effects. Due to the clearing of native vegetation and habitat since Perth was first settled by Europeans, only 29% of the original extent of native vegetation on the Swan Coastal Plain remains. Multiple fauna species that existed at the time of European settlement, including 12 mammals, no longer exist and many flora species are today on the brink of extinction.⁸ Habitat fragmentation is a grave threat to biological diversity and it continues to take its toll on the Perth region's environment.⁶

Over 2,000 taxa of native vascular plants have been recorded in the Perth and Peel regions. This great flora diversity is only made up of a few families of plants, but each family has many species. These species are rare in nature, have small areas of distribution and specific habitat requirements. Therefore, Perth's increasingly fragmented landscape makes these flora species very vulnerable to extinction. The species that do remain in small remnants are subject to pressures from outside the remnants such as weed invasion, diseases and different fire regimes.⁸ The rare flora that presently occur at Site 325 at Ocean Reef and would be negatively affected by land clearing and fragmentation will be further discussed later in this submission.

Fauna are also negatively affected by habitat fragmentation. Fauna can live in disconnected remnants, but the populations are more susceptible to fire, competition, predation, and loss of genetic diversity.⁸ If the Ocean Reef Marina redevelopment were to go ahead and approximately 1,250 people were to move into the new residences, a huge number of dogs and cats would likely come with them as pets. These pets would greatly increase the amount of predators in the area and have a negative effect on the fauna living there, which would already have a weakened resistance due to their fragmented habitat. The outside pressures on flora and fauna in small remnants are greater than those on a large land area due to the phenomenon of "edge effects", which will now be discussed.

Edge Effects

Edge effects are a result of habitat fragmentation. When unbroken areas of habitat are reduced into disconnected remnants, the length of the border between fragments and the surrounding environment increases. The parts of the habitat that were once inside the continuous habitat are now exposed to outside environmental forces. For example, at the edge of a fragment there are large differences in light, moisture, temperature and wind as compared to the interior and these differences can have significant effects on the flora and fauna that occur there.

Fragment edges are also susceptible to the invasion of exotic plant species and the negative effects of human activity, especially if the remnant is in an urban or suburban area. As a large amount of people would be expected to move into the residential units in the proposed Ocean Reef Marina redevelopment, it is thus expected that more human disturbances to the bushland will occur than at present. These "edge effects" not only affect the environment at the edge of the fragment, but they also can significantly influence flora and fauna communities inside the fragment as the effects can reach tens of metres inside the fragment. Since edge effects reach a certain distance inside the fragment, this means that a smaller fragment has a higher percentage of edge habitat (Figure 3) than a larger fragment.⁶ **Therefore the small remnant is much more susceptible to the various forces acting upon it than when it was a larger area.**

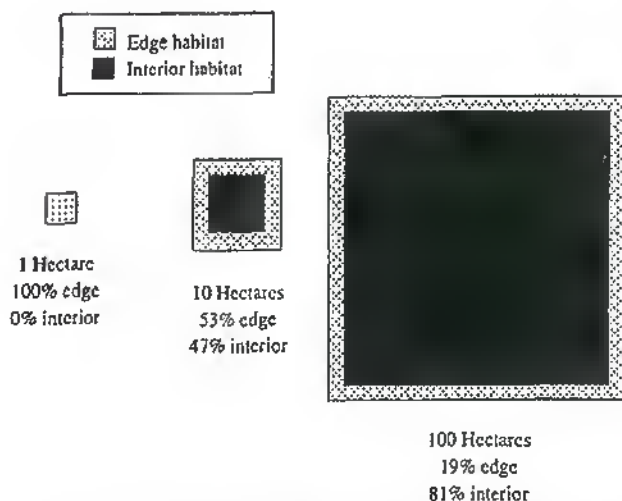


Figure 3: Diagram representing the greater proportions of edge habitat in smaller fragments as compared to larger fragments. Assumed edge width is 50 m.⁶

If MRS Amendment 1270/41 were to be implemented the number of edges that Site 325 at Ocean Reef would have with the surrounding urban environment would increase significantly. The percentage of the edge habitat would also greatly increase as fragments would be created that are reduced in size.

The area of habitat which would be expected to be affected the most is the fragment of Site 325 that would lie in between the entrance to the development at Resolute Way and the entrance at Hodges Drive. This fragment would be greatly decreased in size and would be completely cut off from the rest of the Site 325 bushland as it would be surrounded by roads and development.

The edge effects resulting from the great reduction in size of this part of the bushland and its lack of connectivity with the rest of the Site 325 bushland would lessen the likelihood of survival of the flora and fauna communities in existence there. The great importance of fragment connectivity will now be discussed.

Disruption of Ecological Linkages

Disruption of ecological linkages occurs as the result of habitat fragmentation. Since the Ocean Reef Marina redevelopment would fragment the bushland, it would also disrupt the ecological linkage that Site 325 provides. An ecological linkage can be defined as

"a series of (both contiguous and non-contiguous) patches which, by virtue of their proximity to each other, act as stepping stones of habitat which facilitate the maintenance of ecological processes and the movement of organisms within, and across, a landscape".

The existence of ecological linkages is important for the long term viability of the connected land.⁹

Site 325 is a government recognised linkage Site. The official Bush Forever site description explains that the Site 325 bushland is a linkage to an adjacent bushland to the east, part of a regionally significant fragmented bushland/wetland linkage and a part of a semi-contiguous north-south vegetated coastal strip.¹⁰ The Ocean Reef Marina Environmental Assessment recognises that there will be a linkage disruption, but only a *"partial interruption of the north south linkage values"*.³

The UBC believes that is not just a "partial interruption" as two roads will be built bisecting and fragmenting Site 325. While the UBC believes that the disruption to the north-south linkage will be most affected by the potential development, the UBC believes that the linkages with other bushlands will also be significantly affected.

The negative impacts that would be felt locally at Ocean Reef, would also extend to the other bushlands with which it has linkages. For example, Site 325 has linkages with Bush Forever Site 322, which is situated north of Site 325 and includes Tamala Park on the coast. The vegetated area

of transition between Site 325 and Site 322 provides an important coastal linkage as well as a linkage inland to Neerabup National Park and further to the state forests on the Gnangara Mound. This vegetated area is a transition between the Quindalup and Spearwood dunes and it provides an important feeding habitat for various fauna due to the seasonal diversity of the vegetation's flowering times.¹¹

The EPA has recognised that Perth suffers from all of the above discussed problems (habitat fragmentation, edge effects, disruption of ecological linkages) and action must be taken to prevent them. The EPA has stated that the management of fragmented lands is costly and the protection of continuous blocks of land is preferred because it is more cost effective due to having lower vulnerability to outside pressures. The EPA has stated that it is necessary to reduce the edge to area ratio of natural areas, restore linkages between natural areas and return habitats for threatened fauna species that have been cleared.⁸

These recommendations by the EPA speak directly to the negative results that would occur from the implementation of MRS Amendment 1270/41. The Western Australian Planning Commission (WAPC) must take the EPA's recommendations seriously. By considering developments like the Ocean Reef Marina, the WAPC is complicit in contributing to the negative environmental effects that have been continually damaging Perth's environment since the city's inception.

II. Negative Impacts on Important Flora Communities and Species

The most recent flora surveys of the Ocean Reef Marina redevelopment area have been undertaken in 2008 by Natural Area Management (NAM)¹² and in 2013 by Mattiske Consulting¹³. Both of the surveys confirm that there are no Threatened Ecological Communities (TEC) present in the redevelopment proposal area. An ecological community is *"a naturally occurring group of plants, animals and other organisms interacting in a unique habitat. The complex range of interactions between the component species provides an important level of biological diversity in addition to genetics and species"*.¹⁴

An ecological community is considered to be threatened if it is *"presumed to be totally destroyed or at risk of being totally destroyed"*.¹⁴ Possibly threatened ecological communities which do not meet survey criteria or are not well defined are put on the priority ecological community (PEC) list, which has priority levels 1, 2 and 3. The priority levels are ranked in order of priority for survey and/or definition and evaluation of conservation status so that it can be determined whether the community ought to be declared as a threatened ecological community.¹⁵

Three Priority 3 Ecological Communities have been found at the Ocean Reef Marina proposal area.

These include: SCP 24 Northern Spearwood shrublands and woodlands, SCP 29a Coastal shrublands on shallow sands, southern Swan Coastal Plain and SCP 29b Acacia shrublands on taller dunes, southern Swan Coastal Plain.

Of the entire Site 325 bushland at Ocean Reef surveyed by Mattiske, 46% of SCP 24 exists within the marina redevelopment proposal area, 67% of SCP 29a exists within the proposal area and 31% of SCP 29b exists within the proposal area.¹³ **These are very significant occurrences which must be considered for protection. They should not be cleared.**

In terms of ecological communities present at Site 325 at Ocean Reef, our greatest concern lies with the SCP 29a community, which has the largest presence in the proposed development area. Figure 4 illustrates the locations of the PECs within the proposal area as surveyed by Mattiske Consulting, **which shows the great extent that this PEC will be destroyed through clearing.**¹³

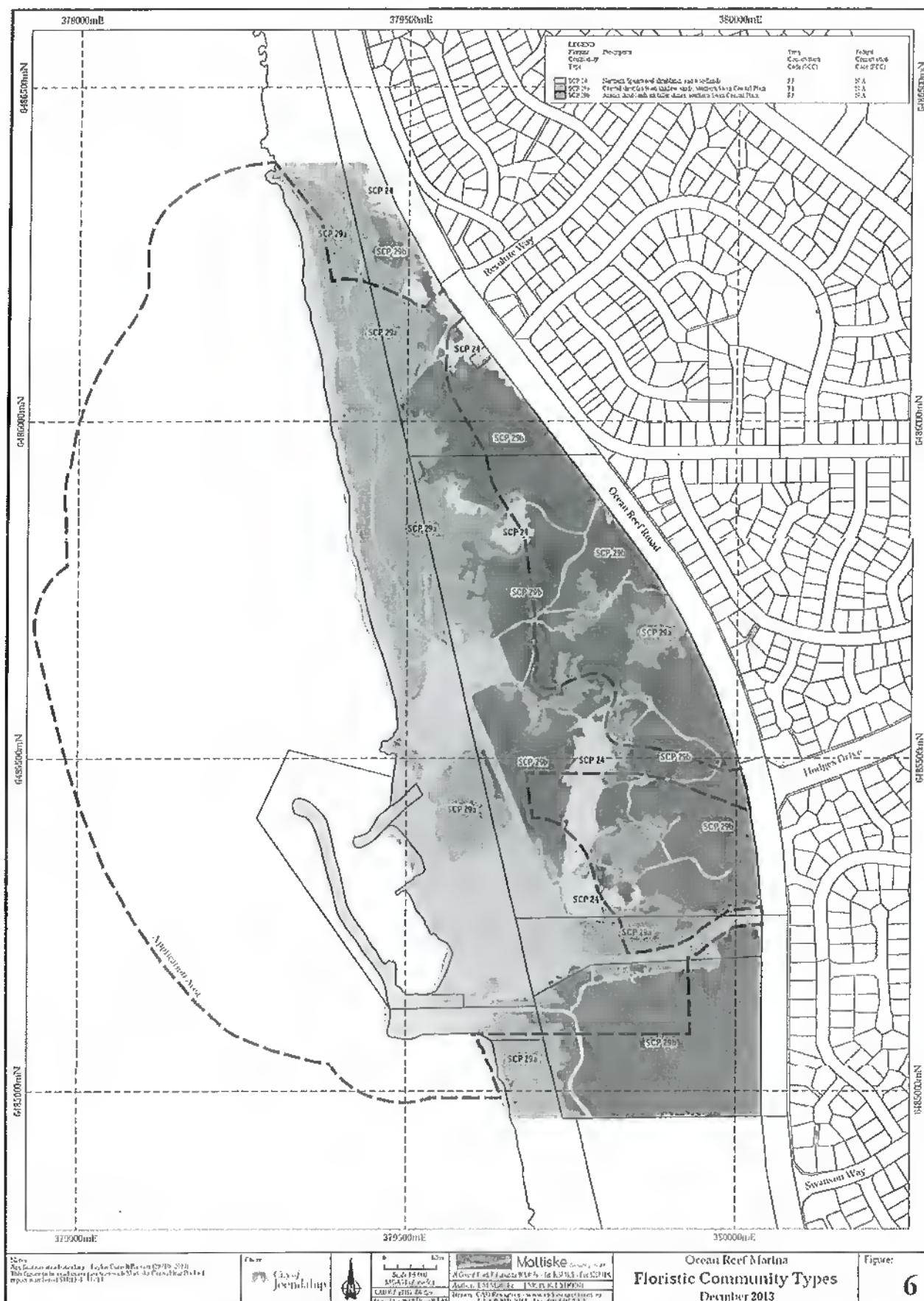


Figure 4: Map of floristic community types at Ocean Reef Marina created by Mattiske Consulting.¹³

Richard McDowell, a local Conservationist with practical field experience in the Joondalup area and considerable knowledge of local endemic flora, believes that the SCP 29a communities found

in the Ocean Reef Marina proposal area are both locally and regionally significant.¹⁶ He is also very familiar with the Ocean Reef Marina bushland because he has undertaken native seed collection there for the City of Joondalup.¹⁷ The 2013 Mattiske Report lays out criteria for how vegetation can be determined to be “significant”.¹³ McDowell points to the criteria of scarcity, unusual species, novel combination of species and a restricted distribution, as these criteria which hold true for species comprising SCP 29a at Ocean Reef Marina.¹⁶



Figure 5: Photographs of SCP 29a at Ocean Reef Marina exhibiting floral diversity (Imbergamo 2017).

A vegetation community can be “locally significant” if it: contains Priority Flora species, contains an extended range of a certain taxon outside of the normal distribution, restricted to one or two locations, occur as small isolated communities or show unusually high structural and species diversity.¹³ McDowell believes that the SCP 29a at Ocean Reef fits some of these criteria as it contains a very unique combination of species. He believes this combination does not exist in any other place in the Perth region. While the individual species which make up this SCP 29a community can be found in other locations, the grouping of the extremely diverse component species together in this location is unique.¹⁸

However, a few species that comprise the diversity of the SCP 29a have not been noted as present at Ocean Reef Marina by either the 2013 Mattiske Report or the 2008 NAM Report and these are the limestone loving species of *Scaevola globulifera*, *Solanum symonii* and *Lechenaultia linarioides*.¹⁶ It is evident that multiple flora surveys done on the proposed development area have not fully captured the diversity of the SCP 29a communities, which speaks to the extensive diversity contained within the communities present at Ocean Reef. This also speaks to the biodiversity of Site 325 at Ocean Reef Marina, which may not be fully understood yet, but the potential clearing of

these ecological communities for the marina redevelopment would permanently eliminate the opportunity for further research.

Indeed the UBC believes that these communities are regionally significant in this Bush Forever area.

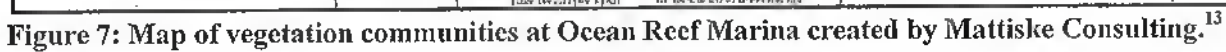
Vegetation communities are considered to be “regionally significant” where they are restricted to specific landform types, contain uncommon plant community types in the region or support threatened flora populations.¹³ In regards to the SCP 29a communities at Ocean Reef, they are found on limestone cliffs next to the ocean and this makes them regionally significant and special. The limestone cliff and coastal dune landscape features of Site 325 are an important part of its special attributes, as noted in the official Bush Forever Site 325 description. It is also stated in the official Site description that the vegetated areas south of Burns Beach are the best remaining example of a “limestone ridge forming cliffs” in the northwest corridor of the Perth metropolitan region.¹⁰ **Not only is the vegetation at Site 325 at Ocean Reef especially important due its diversity and uniqueness, but the landforms on which the vegetation exists is also unique and would be destroyed under the proposed marina redevelopment.**

Priority flora

There are two flora species present in Site 325 at Ocean Reef that are Priority level species. Individual flora species are ranked in the same way as ecological communities. These species are *Conostylis bracteata* (Priority 3) and *Grevillea sp. Ocean Reef* (Priority 1). *Conostylis bracteata* (Figure 5) is a tufted perennial with yellow flowers that can grow 0.2 to 0.45 m high¹⁹. Four locations have been found of *Conostylis bracteata* within the proposal area. Most of the locations of *Conostylis bracteata* were outside the development proposal area or on the border of the proposal area.¹³ However, some of these populations found lie directly on the boundary or within a small distance of the boundary. Figure 7, a map created by Mattiske Consulting, shows the locations of *Conostylis bracteata*.¹³ Although these plant communities will not be cleared, they will likely be largely impacted by edge effects, as discussed earlier in this submission.



Figure 6: Photograph of *Conostylis bracteata*.²⁰



The Mattiske 2013 Report also found a large population (>60 individuals) of *Grevillea sp. Ocean Reef* (Figure 8) in an area of about 50 m by 50 m in the central dunes location of the site (Figure 7).¹³ **This population is the only known location of this shrub species in the state according to the Western Australian Herbarium.**¹⁹

At the time of the Mattiske Report, the proposal boundary near Hodges Drive was situated much closer to the *Grevillea* population than the current MRS Amendment. Mattiske suggested that a greater buffer was needed as the boundary crossed through the most eastern population of the species at the site.¹³ The UBC notes that the current MRS Amendment boundary has been adjusted so that none of the *Grevillea* species are cleared as part of it. However the UBC believes that despite the larger buffer, edge effects will still impact the *Grevillea* population. Currently the area of the *Grevillea* population is degraded, as found by Strategen.3 Mattiske had also found that the area of the *Grevillea* population to be degraded.¹³ The presence of the proposed development right next to the population would only contribute to further degradation of the area and population.



Figure 8: *Grevillea sp. Ocean Reef* flower (above)²¹ and current degraded *Grevillea sp. Ocean Reef* population area (below).²²

Diplolaena angustifolia, also known as the Yanchep Rose (Figure 9), is another important shrub species that exists in the Ocean Reef Marina proposal area.¹⁹ This species is not considered to be a threatened or priority species but **the occurrences of this species at Ocean Reef are believed to be the last remaining ones in entire Joondalup coastal reserve, if not in the greater Perth metropolitan area.**²³

The Yanchep Rose exists at Ocean Reef as part of the SCP 29a ecological communities, which contributes to the uniqueness and diversity of SCP 29a.¹⁶ One particular known location of the Yanchep Rose at Ocean Reef Marina is in a SCP 29a area which would be cleared according to the

proposed MRS Amendment.¹⁸ The Yanchep Rose is not mentioned in the 2013 Mattiske Report¹³ as being present at Ocean Reef Marina and only briefly mentioned in the 2008 NAM Report.¹² **This deficiency is unacceptable and this population of the Yanchep Rose should not be cleared.**



Figure 9: Photographs of the Yanchep Rose shrub species.¹⁹

According to McDowell, the communities of standalone *Melaleuca cardiophylla* (Figure 10) on limestone capping which exist at the Ocean Reef Marina are also important flora because they add to the diversity of the site. McDowell believes these should be considered at least regionally significant because they are unique to the area.¹⁶ This species is briefly mentioned in the 2013 Mattiske Report as they are the most southern extent of the known coastal range. But Mattiske only discusses the species as being a part of a mid to tall shrubland composed of a number of species and does not discuss the presence of individual communities of *Melaleuca cardiophylla* at Ocean Reef.¹³ **This is another deficiency which understates the regional significance of the site.**

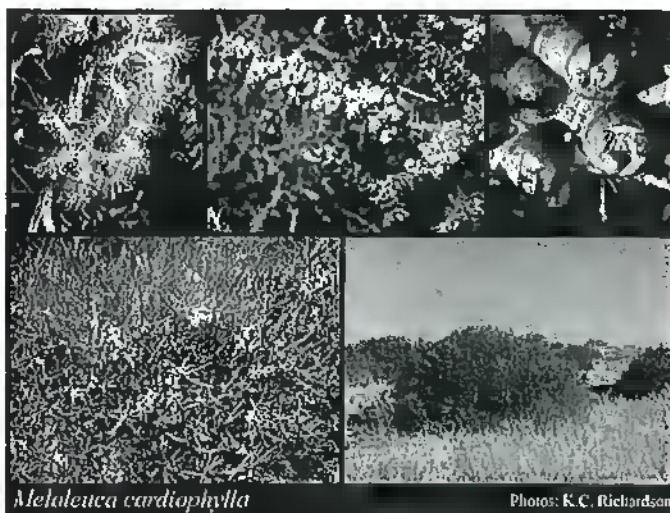


Figure 10: Photographs of the *Melaleuca cardiophylla* species.¹⁹

Also according to McDowell, the large community of *Nitraria billardiarei*, known at Nitre Bush (Figure 11), located at Ocean Reef Marina is an important flora species. The Nitre Bush community exists adjacent to the southern lower-level car park at Ocean Reef Marina and the community extends southward onto limestone capping next to the ocean.¹⁶ The location in which the community exists is included in the area that would be cleared for the marina redevelopment. The large size of the Nitre Bush community at this location makes it significant. The species also adds to the diversity of the SCP 29a ecological community²⁴ and has importance to Aboriginal

culture as it produces edible berries. Historically Aboriginal people came to the coast to collect the Nitre Bush berries.¹⁸

The UBC notes that the presence of this species at Ocean Reef Marina is not mentioned in the 2013 Mattiske Report¹³ or the 2008 NAM Report¹² and this is another deficiency in the report which understates the significance of the site. This population should not be cleared.

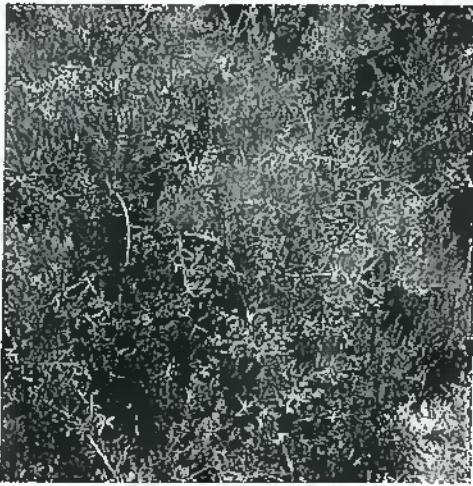


Figure 11: Photograph of *Nitraria billardierei* (Nitre Bush) species.²⁵

While the UBC has discussed what it believes to be the most important ecological communities and individual species at Ocean Reef Marina, there are also some additional flora species in existence at Ocean Reef that are very important to the existence of some fauna as a source of food and habitat. These flora species will be further discussed in the next section of this submission on important fauna species at Ocean Reef.

III. Negative Impacts on Important Fauna Species

There is a great faunal diversity at Site 325. Site 325 is a part of the Quindalup/Spearwood dune system.¹⁰ The Quindalup/Spearwood dune system is considered to have richer bird and reptile diversity than other dune systems on the Swan Coastal Plain.¹¹ This great bird and reptile diversity is found at Ocean Reef Marina and will be discussed in this section of the submission. However, many different types of animals have been observed at Site 325 by both formal surveys conducted by consulting firms and by Friends Groups. The fauna sightings by Friends Groups cannot be overlooked. These groups spend the most time on the bushland, while consultants may only spend a couple days at a site. Therefore the knowledge held by the members of Friends Groups about the bushland's fauna is important for understanding the true impact of the proposed marina redevelopment on the existing fauna populations.

While local Friends Groups have not compiled a list of fauna specifically observed at Ocean Reef Marina, much work has gone into compiling observations of species at other areas of site 325 such as Mullaloo and Iluka. The Mullaloo Beach Community Group (MBCG) has a growing list of fauna species that have been observed by members at Mullaloo. The list is currently comprised of 13 reptiles, 18 birds, 3 mammals, 11 invertebrates and 5 introduced species.²⁶ A formal survey was requested by the Friends of North Ocean Reef – Iluka Foreshore of Spineless Wonders Consultants to investigate the invertebrate species present in the northern part of Site 325 during 2015 and 2016. The findings comprised in the resulting 146 page report are extensive and they speak to the immense diversity of invertebrates that are likely present in all of Site 325.²⁷

Although Mullaloo and Iluka are located south and north respectively of the Ocean Reef Marina site, both locations are a part of Site 325 and so can provide strong indications of the type of faunal diversity that exists in the bushland at Ocean Reef Marina.

This section will begin with a discussion of most threatened fauna species found in Site 325 at Ocean Reef by both consulting firms and Friends Groups, as well as discuss the areas of greatest species diversity.

The Carnaby's Cockatoo, *Calyptorhynchus latirostris*, (Figure 12), is listed as "Endangered" both under the federal Environment Protection and Biodiversity Conservation Act (EPBC Act) and under the WA Wildlife Conservation Act 1950. Endangered species are defined as "*threatened species considered to be facing a very high risk of extinction in the wild*"²⁸.

The 2008 Western Wildlife fauna assessment of Site 325 at Ocean Reef found that Carnaby's Cockatoos were visitors for feeding purposes, rather than using the Site as breeding habitat as the Site does not have large hollow-bearing trees that would be using for nesting. However, the Site does contain Parrotbush (*Banksia sessilis*), which the species uses as a food source.²⁹

The presence of Carnaby's Cockatoos flying over the site has been confirmed by local Friends Group members who have observed the birds visiting the site.³⁰ Approximately 0.43 ha of their foraging habitat would be cleared if the proposed development were to go ahead.³ **Given that the Carnaby's Cockatoo is an iconic and cherished species of the Swan Coastal Plain that is endangered, the species cannot afford further threats to their existence.**

One of the major threats leading to their decline and endangered status is the loss of native food sources brought about by the continued clearing and urban development of the Swan Coastal Plain.³¹ Land clearing at Ocean Reef for a marina redevelopment would further contribute to loss of food sources and other threats that this species already faces and the UBC submits this is unacceptable.



Figure 12: Photograph of the Carnaby's Cockatoo.³²

In general, bird diversity at Site 325 at Ocean Reef is high. The 2008 Western Wildlife Report found that 89 species of birds had the potential to occur at the Site, while 22 were observed during a site visit. However, Western Wildlife found that a lot of the species that are seabirds and shorebirds are commonly found on urban beaches and are reasonably tolerant to disturbance. It was found that a number of bird species, while they are unlikely to use Site 325 as breeding habitat, could forage in the area.²⁹

Another important bird species that visits Site 325 at Ocean Reef is the **Rainbow Bee-eater, *Merops ornatus*,** (Figure 13), which is "Specially Protected" under the Wildlife Conservation Act 1950 as it is a migratory bird protected under an international agreement with other nations.²⁸ The Rainbow Bee-eater visits Perth in the summer where it breeds in sandy banks that can be reasonably degraded. Therefore it is a likely visitor to the Ocean Reef Marina bushland and the area that would be cleared for the marina redevelopment. The potential clearing of bushland for the marina redevelopment would cause the loss of nesting sites for the species.²⁹ Although this species is considered to be common, the impact of decreased habitat on this species should not be taken lightly. Since Rainbow Bee-eaters are migratory birds which move internationally from Australia, a

decline in the species here could have negative impacts on environmental systems internationally. **The protection of these birds' habitat here in Perth should be taken seriously so to uphold international commitments.**



Figure 13: Photograph of the Rainbow Bee-eater (Birdlife Australia n.d.).

Site 325 at Ocean Reef is also a known habitat location for the **Graceful Sun Moth, *Synemon gratiosa*** (Figure 14). SMEC Australia conducted a survey of this species at the Ocean Reef Marina in 2009.³³ The Graceful Sun Moth used to be listed under the EPBC Act, but was delisted in 2013.³⁴

The species is current listed as Priority level 4 in Western Australia.²⁸ This species relies on two types of habitat (coastal heathland on Quinadalup dunes and Banksia woodland on Spearwood and Bassendean dunes)³⁴ and these habitats provide specific flora species which the Graceful Sun Moth uses for feeding and growth. The larvae develop underground and feed on the roots of mat-rushes and grasses, such as the *Lepidosperma* and *Lomandra* species during 11 months of the year before emerging from the ground. The Graceful Sun Moth travels at most 200 metres from where they hatch during their lifetimes.³³ At Site 325 at Ocean Reef, areas of open heath are found at site, which contain *Lomandra maritima*¹³, a species used for habitat by the Graceful Sun Moth.³³ SMEC believes it observed a minimum of 16 moths over the course of its 4 field surveys. A total of 19 sun moths were observed during their 4 field surveys, but consideration was given that they saw the same moth on different days. Some of these moths were observed in areas of Site 325 which would be cleared under the MRS Amendment. Since the moths travel 200 metres from their place of birth, the proposed development at Ocean Reef Marina would cause the clearing of part of their territory.³³

The fact that the Graceful Sun Moth is not even discussed by the Ocean Reef Marina Environmental Assessment prepared by Strategen is astonishing given the threatened history of the species under the EPBC Act and its current Priority 4 listing in Western Australia.

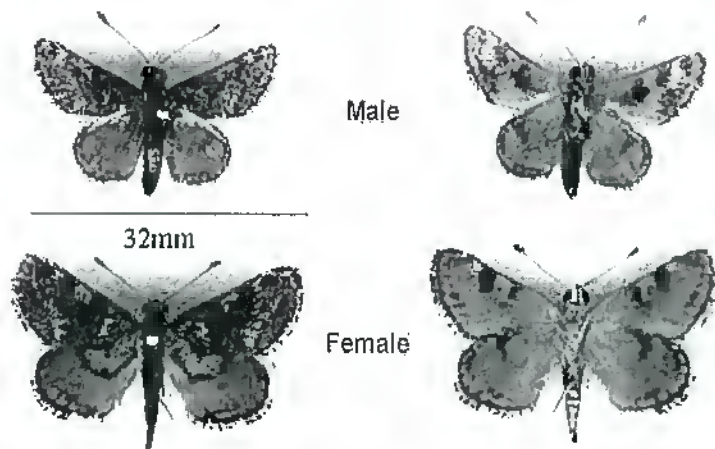


Figure 14: Photographs of the Graceful Sun Moth.³³

The Quenda, *Isodonta obesulus*, (Figure 15) is a marsupial species currently listed as Priority 4 in Western Australia that is known to occur on the Site. Western Wildlife did not find diggings at the site that are an attribute of the species at the time of its 2008 survey (Western Wildlife 2008). However, the Quenda has been sighted in the area by the Department of Parks and Wildlife²⁹. It has also been sighted by local Friends Groups members both at Site 325 at Mullaloo²⁶ and at Site 325 at Ocean Reef.³⁵ The species prefers dense understorey which characterises the vegetation at the Site.²⁹

As discussed earlier in this submission, European settlement in WA has impacted the existence of many mammals; more than 40 mammal species have declined considerably or are in jeopardy of extinction.³⁶ Western Australia's native marsupials are in particular danger, and like the Carnaby's Cockatoo, are iconic and cherished species that help make the state and Perth environment unique. The Quenda's existence on the Swan Coastal Plain is threatened by habitat clearing and fragmentation, as well as predation by cats and dogs.³⁷ As previously discussed, the proposed Ocean Reef Marina redevelopment would cause habitat fragmentation, as well as increase the population of cats and dogs in the area.



Figure 15: Photograph of a Quenda.³⁸

Species richness of Reptiles

Finally, Site 325 at Ocean Reef has a great diversity of reptiles. Western Wildlife found that there are 45 reptile species that could potentially occur on the Site. Only one reptile, a Bobtail, *Tiliqua rugosa* (Figure 15), was observed during Western Wildlife's 2008 site visit.²⁹ However, it is known by Friends Groups that a great variety of reptiles exist at Site 325 at Ocean Reef. Sharon McArthur of the MBCG and Friends of Mullaloo believes that the greatest faunal diversity found at Site 325 at

Ocean Reef is in the reptile population. The reptiles at Ocean Reef use the dunes to burrow, so McArthur believes any clearing of land would destroy their habitat.³⁵

The Black-striped snake, *Neelaps calonotos* (Figure 16), which is listed as Priority 3 in Western Australia²⁸, is expected to occur at Ocean Reef. The Black-striped Snake prefers sandy soils which certainly characterises the Site, so this species is likely to occur at the Site. Like the other animals discussed in this submissions, Black-striped Snakes are threatened by habitat loss due to the expansion of urban areas.²⁹ **Therefore the potential clearing of the habitat for the Black-striped Snake at the Site to make way for urban development is another threatening process for the species to endure and a further reduction in their available habitat.**

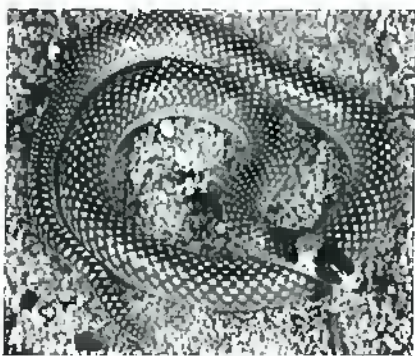


Figure 16: Photograph of a Black-striped Snake (right).³⁹

As briefly discussed previously, **13 reptiles have been observed at Site 325 in Mullaloo by the MBCG.**²⁶ It is very likely that these species could be present at the Ocean Reef section of Site 325. Of the 13 reptiles species observed at Mullaloo, 11 of these species were determined to have the potential to occur at Site 325 at Ocean Reef by Western Wildlife's 2008 report. The Dugite, *Pseudonaja affinis* (Figure 17) is a species that has the potential to occur at the Site according to Western Wildlife's 2008 Report²⁹ and has been sighted in Site 325 at Mullaloo.²⁶ A Dugite was recently observed at Site 325 at Ocean Reef in 2017¹⁸. The recent observation of a Dugite at Site 325 at Ocean Reef confirms that it is very possible that the other reptiles observed at Mullaloo are also present in Site 325 at Ocean Reef.

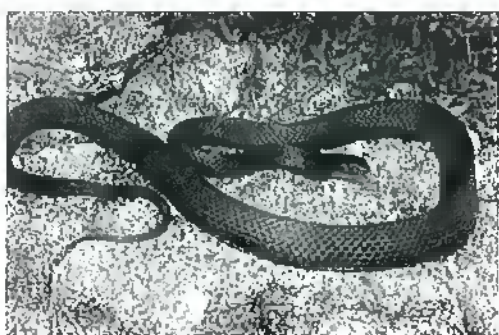


Figure 17: Photograph of a Dugite.⁴⁰

The two reptile species which were not included in Western Wildlife's Report, but have been observed at Mullaloo are the Western Blue-tongue Skink (*Tiliqua occipitalis*) and the Red-naped Snake (*Furina diadema*) (Figure 18). **The fact that these species were not captured in the Western Wildlife Report speaks to the diversity of reptile species that is likely present in Site 325. The extent of reptile diversity in Site 325 may not be fully understood yet.** The observation of a Red-naped Snake is particularly interesting as this species is known to occur in the eastern part of Australia⁴¹, so perhaps this observation at Mullaloo should be further investigated. However, **the proposed clearing of bushland at Ocean Reef Marina would damage the opportunity for**

further research of reptile species in Site 325 as these reptile species would be negatively impacted by loss of habitat.

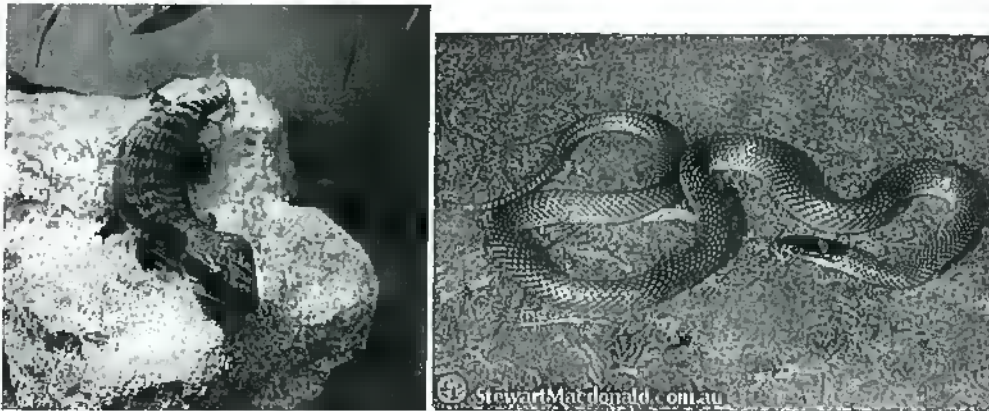


Figure 18: Photograph of a Western Blue-tongue Skink (left)⁴² and a Red-naped Snake (right).⁴¹

IV. Negative Impacts on the Local Urban Environment and People

The Bush Forever policy document states that the main theme of Bush Forever is “Keeping the Bush in the City”.⁴ **MRS Amendment 1270/41 is not consistent with this aim because it seeks to remove bushland from the Perth metropolitan region.**

Throughout the Perth metropolitan region residents are never too far away from a natural area, even in our most urban areas. The ability to reach a natural area from one’s home or workplace quickly is something very special about Perth. The Bush Forever policy document recognised the value that people take in having a natural area nearby that they can enjoy:

“The vision is the creation of a conservation estate of which Perth can be justly proud, so that everyone has their own ‘Kings Park’ within easy reach for present enjoyment and, as a legacy of the unique quality of life, to hand on to our children”.⁴

For the people of the Ocean Reef, a beautiful, untouched area of bushland and coastline is going to be permanently impacted. The people who enjoy strolling, running or biking through the bushland at Ocean Reef overlooking the coastline will never be able to do this again at Ocean Reef if the MRS Amendment were to be implemented.

Perth is one of the healthiest⁴³ and most livable⁴⁴ cities in the world. The UBC believes this is very much linked to Perth’s natural environment and the ease with which people have to interact with the environment. Between 2011 and 2012, 7 out of 10 people in Perth participated in activities in nature in the previous year. It is well known that a people’s interaction with the natural environment can improve their physical and mental health, such as by lowering a person’s stress levels.⁸ A study conducted in England found that the mental benefits from having contact with urban natural areas actually increased with an increased level of biodiversity in that natural area, which was measured by the species richness of the flora, birds and butterflies. Although people are able to receive psychological benefits from any type of natural area, this study suggested that protecting and creating urban green spaces with high levels of diversity is important for people’s health.⁴⁵ As previously discussed, Site 325 at Ocean Reef has extensive biodiversity, and if bushland were to be cleared as part of the MRS Amendment, the amount of benefits people receive from its high biodiversity receive would be decreased.

Urban natural areas not only benefit people’s well being, but they also provide important ecosystem services that counteract the negative environmental effects of urban developments. Urban natural

areas, no matter their size, provide ecosystem services.⁴⁵ **Urban environments suffer from the urban heat island effect.** This occurs when the ambient air temperature in an urban area is higher than in the surrounding rural area due to the large amount of impervious surfaces and the heat produced from vehicles and appliances. The CSIRO has projected that by 2030, the average warming will be approximately 0.5 to 1.2 degrees Celsius above 1986-2005 levels annually in southwestern Australia. It is also projected that the frequency and duration of days with extremely hot temperatures will increase.⁸ The elimination of urban bushlands and natural areas only worsens the urban heat island effect.

Urban green spaces also provide the important ecosystem service of counteracting pollution through carbon sequestration. It has been found that urban vegetation can sequester large amounts of carbon. One study conducted in California, U.S.A. found that certain urban trees could remove more carbon from the atmosphere than the same type of trees in a forested area.⁴⁵ It is therefore very essential that local and state government protect urban natural areas as our natural areas have important effects on people's health. As discussed earlier, Site 325 at Ocean Reef lies next to an extensive amount of residential area and this bushland provides ecosystem services to the people that live there.

Educational opportunities: Site 325 at Ocean Reef also provides a great opportunity for education of school children and adults about our natural environments. The Bush Forever policy document states the following:

"An important aim of Bush Forever is to foster a greater awareness and appreciation of urban bushland, and to develop a stronger sense of responsibility and belonging by the community through active management to control threatening processes".⁴

If bushland at Site 325 is cleared, then another opportunity to teach local people, especially young people, about environmental appreciation is lost. Instead of seeing their government as working to protect their local environment, young people instead would witness their government destroying the environment and going against its promises to promote community appreciation of bushland. If government does not appreciate its natural areas or take responsibility for protecting them, then why should local citizens and young people? The governments' actions in regards to the environment can strongly influence the perceptions of future generations.

If the Ocean Reef Marina redevelopment goes ahead, the image the City of Joondalup would portray of itself on environmental protection would be a dubious one. The actions that the City has performed in the past to further environmental protection would directly conflict with the potential Ocean Reef Marina redevelopment. In 2008 the City of Joondalup signed the "Durban Commitment: Local Governments for Biodiversity" alongside 20 other international local governments. By signing this commitment the local governments stated that they understood the importance of biodiversity and the ecosystem services that it provides for local communities. They also recognised the vital role and responsibility that local governments have in protecting biodiversity for current and future generations. The local governments declared their intentions to undertake and promote a number of activities which would protect biodiversity in the communities that they serve, such as developing and implementing a long-term biodiversity strategy for the management of natural areas among other things.⁴⁶

In 2009 the City of Joondalup Biodiversity Action Plan 2009-2019 (BAP) was published that laid out the City's commitments to biodiversity. **In the BAP, Site 325 is stated to be one of the City's "Biodiversity Zones" and called "The Coastal Zone".**⁴⁷ All of the biodiversity threats that are listed in the BAP are issues that would occur as a result of the implementation of the Ocean Reef Marina redevelopment. Particularly, the first four listed biodiversity threats in the BAP are problems which have already been discussed in this submission: clearing of native vegetation, habitat fragmentation, uncontrolled access into natural areas by humans and pets, as well as the

invasion of environmental weeds. The BAP also discusses the importance of habitat corridors and connectivity of the City's multiple regional ecological linkages, including its north-south linkage (which is Site 325 as discussed earlier). The BAP states that the "*protection of the viability of these linkages is critical*".⁴⁷ However, the clearing of bushland for the Ocean Reef Marina redevelopment, as previously discussed, would disrupt and negatively impact the viability of the north-south linkage not protect it.

There is a photograph (Figure 19) in the BAP of an area of the Site 325 bushland at Ocean Reef close to coastline which would be cleared under the Ocean Reef Marina redevelopment proposal. The photograph shows part of the pathway which goes through the bushland and is used by people to walk, run and bike. The presence of this photograph in the BAP is ironic. The presence of the photograph in the BAP is meant to showcase the City of Joondalup's biodiversity hotspots, but it is known that if MRS Amendment 1270/41 is accepted, this very area will be cleared.



Figure 19: Photograph of an area of Site 325 at Ocean Reef as it appears in the City of Joondalup Biodiversity Action Plan 2009-2019, which would be cleared under the proposed marina redevelopment (above). Photograph of the same area of Site 325 at Ocean Reef taken in 2017.²²

The City of Joondalup has simultaneously put forth a strong commitment to biodiversity through the Durban Commitment and the BAP, while also supporting the Ocean Reef Marina redevelopment which would oppose every commitment and goal laid out in these two documents. If the City of Joondalup were truly committed to biodiversity and honoring its international agreement, then they would not be supporting the Ocean Reef Marina project and the clearing bushland in Site 325. By the Western Australian Government supporting the City of Joondalup with the Ocean Reef redevelopment, they are implicitly stating that they sanction the actions of City of Joondalup to not fully follow through with their promises to their local community and their international agreement partners.

V. CONCLUSION

By clearing 16.79 ha of native vegetation at Site 325, the remaining bushland would be negatively and permanently impacted. The problems of habitat fragmentation, edge effects and the disruption of ecological linkages that would result are extremely significant as these problems are suffered throughout the Perth metropolitan region. The Perth region is fortunate to have immense floral and faunal diversity, but ongoing urban development seeks to devastate the extent of this diversity. Our natural environment is unlike any other in the world. It is tied to our identity as a city and a region.

Not only does the proposed Ocean Reef Marina redevelopment have implications for the environmental health of the area, but it is a loss of an "untouched" bushland and coastline (Figure 20) that is used by many local people to stroll, run and enjoy the health benefits of urban natural areas. As the Perth metropolitan region becomes more and more developed, areas like Site 325 at Ocean Reef are becoming increasingly rare. The residents of Perth are losing the benefits of an undeveloped coastline.

Our local governments and state government are focused on improving the economy and bringing tourists to our capital city and state. However, tourists visit Perth and the state of Western Australia to visit our one of a kind natural environment, not to visit our urban landscapes. Clearing bushland at Site 325, or at any other Bush Forever site in the Perth region, is not consistent with what our communities or our tourists want.

The City of Joondalup should have recognised all these values and acted to ensure that any development plans encompass retention and management to ensure all the above values are retained and enjoyed. The City of Joondalup has not done this and thus we believe shows a failure in governance.



Figure 20: Areas of Site 325 at Ocean Reef Marina which would be cleared under the proposed marina redevelopment (Imbergamo 2017).

Based on all of the above information presented in this submission, the Urban Bushland Council strongly recommends that the Western Australian Planning Commission rejects MRS Amendment 1270/41 in the public interest on behalf of the residents, visitors and future generations of Ocean Reef and the Perth metropolitan region. It is now incumbent on the WAPC to address the failures in governance described in this submission.

Accepting the MRS Amendment 1270/41 to enable an Ocean Reef Marina redevelopment would be an irreversible mistake, negatively impacting our environment, as well as the well being of our communities and visitors far into the future.

Representatives of the UBC request the opportunity to discuss these matters with the WAPC. We may be contacted by phone at our office 9420 7207 or if unattended, direct to our Secretary on phone 9381 1287.

Yours sincerely



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Addition to Submission 75

Bubanic, Marija

From: Mary Gray <celiagray@bigpond.com>
Sent: Friday, 24 February 2017 4:53 PM
To: Joondalup City; mrs
Cc: 'Urban Bushland Council WA'
Attachments: NPO Submission by UBC Ocean Reef 22Feb2017.docx

Attention: City of Joondalup
NPO for Ocean Reef Bush Forever site with MRS Amendment

Please find attached a submission by the Urban Bushland Council WA Inc. concerning the Negotiated Planning Outcome (NPO) for the Ocean Reef MRS Amendment.

Acknowledgement of receipt of this submission by email to ubc@bushlandperth.org.au and to celiagray@bigpond.com will be appreciated.

Please note our request to discuss this matter further with you. We may be contacted at phone 9420 7207 or 9381 1287 to arrange a meeting time.

Yours sincerely
Mary Gray
President, Urban Bushland Council WA Inc.
24 February 2017



info@joondalup.wa.gov.au
Ocean Reef Marina Project
City of Joondalup
PO Box 21
Joondalup WA 6919

22 February 2016

Submission on the Negotiated Planning Outcome for Bush Forever Site 325

Submission by: Urban Bushland Council WA Inc.

Address: PO Box 326, West Perth WA 6872

Email: ubc@bushlandperth.org.au

Phone: 9420 7207 or if unattended 9381 1287

Contact person: Secretary Margaret Owen

Further contact: We wish to discuss these matters further with you. Contact Secretary to arrange time.

The Urban Bushland Council WA Inc. (UBC) presents its analysis and recommendations on the current draft of the Negotiated Planning Outcome (NPO) for Bush Forever Site 325. The UBC understands that the NPO would be formally accepted if MRS Amendment 1270/41 - Ocean Reef Marina Redevelopment is gazetted.

The UBC is a community association with more than 75 community conservation groups committed to protecting urban bushland in the Perth region. The UBC has also been committed to protecting Bush Forever Sites since the Bush Forever policy was established in 2000.

Presumption of approval

1. By WAPC of MRS Amendment: As stated in the UBC's submission on MRS Amendment 1270/41, the UBC is strongly opposed to the Redevelopment and the land clearing that is proposed under the MRS Amendment. The UBC is strongly opposed to the clearing of any land that is a part of a Bush Forever Site.

It is disturbing that, by releasing the NPO for comment concurrently with the MRS Amendment, the WAPC is effectively assuming that the MRS Amendment will be approved without modification. This is totally unacceptable and indicates that the WAPC is not taking seriously any public comment which could alter the plans.

2. By WAPC of EPA assessment: Of greater concern, the EPA is now still in the process of formally assessing (as a PER) the proposed Ocean Reef marina proposal. The MRS Amendment should not be planned nor open for public comment until this independent EIA process is completed.

So we believe we are being asked for comment on the NPO on the assumption that MRS Amendment 1270/41 is accepted without change concerning incursions into the Bush Forever site.

The UBC insists that our submission on the MRS Amendment be taken seriously. And also that the recommendations below are taken seriously and are adopted in the worst case scenario of some clearing of the site.

Summary of the UBC's main recommendations for the final NPO:

- Much greater than 10% of the offsets package should comprise of revegetation/rehabilitation activities for Site 325 to counteract the negative impacts of the adjacent development.
- Acquire bushland that is not in public ownership already and is as similar as possible to Site 325 at Ocean Reef. We are not sure that any such sites exist. Site must need an improvement of its ecological linkages and the rehabilitation of degraded areas.
- Acquire bushland site and commence rehabilitation activities on Site 325 bushland and the acquired bushland prior to any land clearing at Site 325.
- Rehabilitate the degraded areas in the Site 325 bushland which would not be cleared. Degraded areas and areas along the development boundary which coincide with important flora habitat are high priority.
- Provide a buffer zone around Site 325.
- Maintain a wildlife corridor through Site 325 by building underpasses at roads which fragment the bushland (Hodges Drive and Resolute Way).
- Fence off *all* Site 325 vegetation *before any building and construction works commence*. Perform on the ground management activities which prevent edge effects from the development, as well as unwanted access of human, pet and feral animals into the bushland.

The UBC understands that State Planning Policy 2.8 – Bushland Policy for the Perth Metropolitan Region provides the criteria for environmental offsets based on the conservation significance of the land being cleared.¹ It has been determined that Site 325 is of “High” conservation significance based on its characteristics. The Policy allows for land of High conservation significance to have an offsets package which is comprised of at least 75% land acquisition (where 1.5 times the amount of land lost in habitat hectares is gained) and a maximum of 25% comprising of revegetation. The NPO states that the ratio chosen for the offsets package is comprised of 90% land acquisition and 10% rehabilitation of certain areas of Site 325 next to the development area that are not to be cleared.

Since the land at Ocean Reef Marina to be cleared is mostly “Good” to “Very Good” condition vegetation, it is stated in the NPO that “it has been assumed that twice the minimum area (5 ha rather than 2.5 ha) should be rehabilitated to provide an appropriate conservation outcome”.² The UBC strongly agrees that at least 5 ha of land should be rehabilitated rather than 2.5 ha, so that a greater area of the remnant bushland is strengthened against the negative impacts that would occur from an adjacent development. The UBC believes that greater than 10% of the offsets package should comprise revegetation and rehabilitation since the potential marina redevelopment will cause considerable negative impacts to the adjacent bushland. The rehabilitation of the Ocean Reef Marina bushland and the land acquisition will be further discussed later in this submission.

Effectiveness of offsets questionable

This submission will first discuss the current philosophy and findings surrounding the effectiveness of environmental offsets in general, including land acquisition and on ground rehabilitation. Understanding the principles and studies of environmental offsets is important, as they inform how offsets at Ocean Reef Marina should be carried out. Then the specific challenges of land acquisition for Site 325 are discussed, with recommendations for the type of site that should be chosen. The problem of “time lag” is discussed and how it can be overcome in relation to Site 325. Finally, recommendations are given for the rehabilitation aspect of the offsets package, specifically in relation to protecting flora and fauna present at Ocean Reef Marina.

I. Current Philosophy of Environmental Offsets and Findings of their Effectiveness

Offsets do not make a bad proposal into a good proposal

As previously stated, the UBC is opposed to the redevelopment of Ocean Reef Marina and MRS Amendment 1270/41. The potential clearing of 16.79 ha of native vegetation will have irreversible impacts on the unique and important flora and fauna of Site 325 as well as on nearby bushland. As discussed in our submission on MRS Amendment 1270/41, the bushland at Ocean Reef Marina contains numerous important flora and fauna species, some of which are Priority listed in Western Australia. Site 325 is also a linkage to an adjacent bushland to the east, part of a regionally significant fragmented bushland/wetland linkage, and a part of a semi-contiguous north-south vegetated coastal strip.³ Therefore the UBC believes that MRS Amendment 1270/41 is not an acceptable proposal. If a proposal is not acceptable, then offsets cannot make it acceptable. It is unlikely for conservation outcomes to be maintained or improved when the proposal is not acceptable.

It is also believed that developments with unavoidable impacts on species with high conservation importance are not likely to be acceptable proposals. These developments cannot become acceptable through using offsets.⁴

The Bush Forever policy and plan aims to protect regionally significant bushland and important vegetation types of the Swan Coastal Plain in a CAR reserve system.⁵ Site 325 was chosen to be a Bush Forever site because it has these characteristics. In the NPO itself, it is stated that Site 325 at Ocean Reef Marina has been determined to be “high” conservation significance under State Planning Policy 2.8.1. Therefore if Site 325 is truly a bushland of high conservation significance, the MRS Amendment 1270/41 should not be accepted. The UBC believes that the Ocean Reef Marina Redevelopment should not go forth in the first instance. Offsets can never fully compensate for the net losses that would be incurred if the bushland were to be cleared because the UBC believes that Site 325 at Ocean Reef is unique.

However, reluctantly, the UBC makes this submission in the worst case that MRS Amendment 1270/41 is accepted and the NPO comes into action.

Offsets do not always produce an effective outcome

Overall it is somewhat unlikely that offsets can effectively produce their desired outcomes. A 2016 study was conducted on the effectiveness of environmental offsets in Western Australia.⁶ This study revealed that at most 39% of the offsets studied produced an outcome, 30% produced no outcome, 14% were too early to tell and 18% had an unknown outcome. It should be noted that this study did not evaluate whether the offsets were adequate or appropriate for the circumstance, it just looked at which offsets were deemed to be successful in reaching an outcome. Interestingly, the overall study found that land acquisition was the offset that most consistently delivered an outcome. The authors found that land that was acquired and then dedicated to conservation or was rehabilitated, which would have not been otherwise, created long term benefit to Western Australia. However, the authors stated that land acquisition is a “means to an end” and does not mean that land acquisition always provides an effective offset in the long term. It is important that mechanisms, such as on ground management, are used to ensure biodiversity values are maintained in the long term. The authors also believe that land acquisition was determined to be more effective in their study because offsets in the form of on ground management require fulfilling completion criteria to reach an offset outcome. On the ground management offsets are generally more difficult to show outcomes because

there are more steps and years involved to show these outcomes. Final reporting in on ground projects can occur before outcomes are reached due to budget constraints or the reporting is inadequate.⁶

UBC believes that on ground management, in the form of rehabilitation and revegetation activities, is an essential part of the NPO for Site 325 at Ocean Reef Marina. Since the potential marina redevelopment will not remove all of the bushland at Ocean Reef Marina, the remaining bushland will be subject to multiple negative impacts. **Rehabilitation and revegetation efforts will be essential to lessening the impacts caused by an adjacent development from harming the flora and fauna communities in the remnant bushland. However this work cannot qualify as an offset as it is on the site.** The land acquisition offset for Site 325 and its rehabilitation will be further discussed later in this submission.

The workability issues of the "like for like" principle

State Planning Policy 2.8 states that an appropriate land acquisition offset for high conservation significance bushland is land that has the same vegetation/habitat type ("like for like") or is of Very High significance vegetation/habitat type in the same bioregion.¹ The "like for like" principle is preferable, but it is not always very practical in the real world, nor does it always produce the best environmental outcomes.

A 2007 study which interviewed environmental practitioners in Western Australia found that slightly more of the practitioners held the belief that the "like for like" principle is not workable in practice and that it does not produce the best environmental outcome.⁷ The study also found that industry and consultants had stronger beliefs that the "like for like" principle did not create the best environmental outcomes, while government and regulators all thought that it did produce the best environmental outcomes. This split is likely because industry and consultants are on the ground and see the offsets at work, while the government and regulators are removed from the on the ground situation.⁷

The workability issues of the "like for like" principle are particularly applicable to the NPO for Site 325 as the NPO states that finding a piece of land for land acquisition that is "like for like" with Site 325 may be difficult.² The UBC agrees that finding a piece of land that is just like Site 325 is impossible as Site 325 at Ocean Reef Marina is unique. The UBC believes that all efforts would need to be taken find a piece land that is as similar as possible to Site 325.

The creation of new habitat vs. the rehabilitation of existing habitat

It is believed by some that the rehabilitation of existing habitat can be preferable to the creation of new habitat. When land is cleared, there is a "time lag" between the clearing and when the new habitat grows and matures. This time lag can negatively impact flora and fauna because the resources of the offset applied to develop the habitat have not yet become fully available and cannot compensate for the lost habitat for many years.

For example, habitat availability is reduced during the time lag and many types of fauna species require old growth vegetation or types of habitat, like tree hollows, which can take many years to centuries to form. Therefore, the improvement of existing habitat can be achieved more quickly than the creation of new habitat.⁸ For the offset (creation of new habitat or rehabilitation of existing habitat) to be successful, it is necessary for the habitat to be used for the same purposes as the habitat that was lost: *"The offset will be negligible if the resources provided by the offset are not equivalent to the resources lost..."*⁸

For example, if the habitat cleared was used for nesting and the habitat offset is used for feeding habitat, then this outcome has not been effective in offsetting habitat loss.⁸ Therefore, it is generally

believed that restored or rehabilitated existing habitat is favoured over the creation of new habitat because rehabilitating existing habitat has a better chance of meeting the “like for like” principle.⁷ The WA EPA also has similar views to these in regards to rehabilitating existing habitat as an environmental offset:

“While acquisition of bushland as a trade-off for vegetation clearing offers immediate value and certainty, it does not achieve a net environmental gain in the long term. Re-creation or improvement of habitat and environmental values provides the opportunity to achieve a net benefit for the environment. While there is risk that improvement actions will not always be successful, it allows for the development of knowledge and techniques in rehabilitation and restoration.”⁹

These thoughts by the EPA suggest that the offset of land acquisition should involve obtaining land that is need of rehabilitation to create environmental value. The EPA’s statement leads into the following discussion of the specifics of the land acquisition proposed in the NPO and the UBC’s recommendations.

II. Land Acquisition and Site Selection for Site 325 at Ocean Reef Marina

The NPO states that finding a piece of land that is “like for like” with Site 325 at Ocean Reef Marina will be difficult for numerous reasons. The NPO states that there are a limited number of coastal sites available for purchase.² The UBC agrees with the difficulty of finding a truly “like for like” piece of land. The NPO states that one of the minimum site selection criteria is that the site should be located within 10 km of the coast.² But a site location which is 10 km from the coast is not “like for like” with Site 325 at Ocean Reef. Landforms and thus vegetation communities 10km or even 5km inland are different.

For example, SCP 29a ecological community at Ocean Reef are made up of a unique combination of diverse flora species. Richard McDowell, a local Conservationist with practical field experience in the Joondalup area and considerable knowledge of local endemic flora, believes that the SCP 29a communities are both locally and regionally significant.¹⁰ He believes that the combination of species found within the SCP 29a communities at Ocean Reef would be found nowhere else in the Perth region.¹¹ The limestone cliff and coastal dune landscape features of Site 325 are an important part of its special attributes, as noted in the official Bush Forever Site 325 description. It is also stated in the official Site description that the vegetated areas south of Burns Beach are the best remaining example of a “limestone ridge forming cliffs” in the northwest corridor of the Perth metropolitan region.³ The SCP 29a communities and dune and limestone cliff landforms found at Ocean Reef simply do not exist 10 km inland from the coast.

The UBC believes that in the first instance the City of Joondalup and the relevant agencies (Department of Planning (DoP), Department of Parks and Wildlife (DPAW), EPA) should make all efforts to find a site for acquisition which is most closely related to Site 325 at Ocean Reef Marina. However, since Site 325 is unique, a direct equivalent will not be found. In the case that an extremely similar site cannot be found, we believe that a piece of land should be chosen that is somewhat similar and in great need of rehabilitation and protection.

The NPO provides four examples of how the land acquisition fund for Site 325 could be used. The UBC believes that the best option is the following:

“purchase of a lower value site (e.g. \$1M) that still meets the minimum criteria above with the use of the remaining funds for rehabilitation and management – potentially in area where ecological linkages can be improved through the protection of existing Very Good to Excellent condition vegetation and rehabilitation of degraded land”.²

The UBC believes that the above is the best land acquisition option because it could create new environmental value after rehabilitation.

As discussed earlier, a 2007 study of environmental practitioners in WA found that most of those interviewed did not think the “like for like” principle provided for the best environmental outcome.⁷ The main reason provided for their beliefs was that certain habitats that are negatively impacted may be well represented in the conservation estate or suitable land is not available for acquisition. So it may be better to protect a more rare or threatened ecosystem rather than one that is directly equivalent. Some environmental practitioners believe that there should be some geographic flexibility when it comes to selecting land for acquisition, so that land can be chosen that has a more likely outcome of successful conservation in the long term.⁷ State Planning Policy 2.8 states that the land to be acquired can be “the same vegetation/habitat type or a Very High significance vegetation/habitat in the same Bioregion”.¹ Therefore, the land acquisition for Site 325 could be a site that has flora and fauna that are more greatly threatened than those presently at Ocean Reef Marina.

The UBC also believes that the land acquisition option listed above is the best choice because it would involve the improvement of ecological linkages and the rehabilitation of degraded land. When offsets only protect existing high quality vegetation, instead of improving degraded natural areas, a net loss of biodiversity occurs.⁴ It is believed by some that “...offsets that provide a measurable benefit to the impacted biodiversity value, that is greater than or equal to the loss, by restoring or creating new ecosystems, should be preferred over those that only involve the protection of existing ecological assets”.⁴ It is suggested that it is important that the site acquired requires rehabilitation of degraded land, as this process could create additional environmental value. The improvement of ecological linkages at the site acquired would also be particularly important because the clearing that would occur for an Ocean Reef Marina Redevelopment would disrupt ecological linkages. The potential building of roads across the bushland at Hodges Drive and Resolute Way for the marina redevelopment would disrupt the pathways of flora and fauna through the entire length of Site 325 and to further connected bushland.

III. Time Lag Associated with Land Acquisition

A difficulty with land acquisition as an environmental offset is the time lag that occurs because land cannot be purchased prior to project approval. The NPO states that if MRS Amendment 1270/41 is gazetted, then DPAW would provide a Land Acquisition Proposal to the Department of Planning and the EPA within 12 months.

The NPO for Site 325 recognises that time lag is a problem because it states that the land acquisition is intended to happen *before the clearing of Site 325*.² However, this statement of intent does not guarantee that the clearing will not take place before the land is acquired. State Planning Policy 2.8 states that for a site of any level of conservation significance that the “*offsets are to be initiated prior to the loss*”.¹

All efforts must be made by the relevant government agencies and the City of Joondalup to ensure that there is as little time lag as possible. The site would need to be chosen and rehabilitation activities in progress *before the clearing* has begun, to prevent the effects of time lag.

This is an application of the precautionary principle against the temporal loss of environmental value. The negative impacts of a project, like clearing, cause immediate and permanent losses to an ecosystem, while the environmental gains from the offset are not certain.¹²

As discussed earlier, recreating an ecosystem can sometimes take many years,⁷ as some habitat features can take many years to develop.⁸ The clearing of the bushland at Site 325 and the building

of a new development at Ocean Reef has an immediate destructive impact on the flora and fauna present there. However, the rehabilitation of degraded land obtained through the site acquisition will take some years before the ecosystem is healthy and stable.⁷

Therefore it is very important that a site is chosen for acquisition and rehabilitation activities have begun prior to the clearing of the bushland at Site 325.

IV. Recommendations for the Rehabilitation and Management of Site 325 at Ocean Reef

Completion of the City of Joondalup's Biodiversity Action Plan and Durban Commitment

In 2008 the City of Joondalup signed the "Durban Commitment: Local Governments for Biodiversity" alongside 20 other international local governments. By signing this commitment, the local governments stated that they understood the importance of biodiversity and the ecosystem services that it provides for local communities. They also recognised the vital role and responsibility that local governments have in protecting biodiversity for current and future generations. The local governments declared their intentions to undertake and promote a number of activities which would protect biodiversity in the communities that they serve, such as developing and implementing a long-term biodiversity strategy for the management of natural areas among other things.¹³

In 2009 the City of Joondalup Biodiversity Action Plan 2009-2019 (BAP) was published that laid out the City's commitments to biodiversity.¹⁴

In the BAP, Site 325 is stated to be one of the City's "Biodiversity Zones" and called "The Coastal Zone". All the biodiversity threats that are listed in the BAP are issues that would occur as a result of the implementation of the Ocean Reef Marina redevelopment. Particularly, the first four listed biodiversity threats in the BAP are problems which would occur as a result of a marina redevelopment at Ocean Reef: clearing of native vegetation, habitat fragmentation, uncontrolled access into natural areas by humans and pets, as well as the invasion of environmental weeds.

The BAP also discusses the importance of habitat corridors and connectivity of the City's multiple regional ecological linkages, including its north-south linkage (which is Site 325). The BAP states that the "*protection of the viability of these linkages is critical*".¹⁴ However, the clearing of bushland for the Ocean Reef Marina redevelopment, as previously discussed, would disrupt and negatively impact the viability of the north-south linkage not protect it. **Thus this proposal is contrary to the City's own policies and it is recommended that the City reconsiders this destructive proposal so that Bush Forever site 325 is fully maintained.**

The actions that the City has performed in the past to further environmental protection would directly conflict with the potential Ocean Reef Marina redevelopment. If the City wishes to still follow through with the commitments they have made in the BAP and the Durban Commitment to the best of their ability, the City must take strong action to rehabilitate the bushland at Ocean Reef Marina which would not be cleared under the Amendment. It is essential that the rehabilitation fund laid out in the NPO is effectively used by the City of Joondalup and relevant government agencies to improve the remaining bushland and prevent the negative impacts associated with habitat fragmentation, uncontrolled access and edge effects, as discussed in the BAP. The NPO states that rehabilitation work, aside from seed collection and initial weed control, will occur in the same calendar year as the land clearing.² However, the UBC believes that it is important that the rehabilitation works begin as soon as possible, prior to land clearing, to prevent time lag because when the clearing occurs the impacts would be immediately felt. If the marina redevelopment goes

ahead, it also seems necessary that the BAP should be amended to account for the land lost at Site 325 and to include the new responsibilities of the City according to the NPO.

The following two sections discuss the UBC's recommendations for rehabilitation and care of the flora and fauna at the remnant bushland if the clearing at Site 325 were to take place.

Recommendations for the Rehabilitation and Protection of Flora

It is stated in the NPO that the actual locations to be rehabilitated at Ocean Reef would be determined following detailed site assessment and rehabilitation planning.² It is stated in the NPO that based on the 2013 Mattiske Vegetation and Flora Survey, 44% of the Site 325 bushland outside the MRS Amendment boundaries is in "Degraded", "Degraded to Good" or "Good" condition. The NPO states that these areas would be possible locations for rehabilitation.² The "degraded" areas should be targeted first for rehabilitation activities. A few of the "Degraded" areas coincide with habitat for important flora and fauna species found in Site 325 at Ocean Reef and so these areas should be high priority for rehabilitation.

Rare Grevillea species

A large population (>60 individuals) of *Grevillea sp. Ocean Reef* (Figure 1) exists in an area of about 50 m by 50 m in the central dunes location of the Site.¹⁵ **This population is the only known location of this shrub species in the state according to the Western Australian Herbarium.** The species is listed as Priority 1 in Western Australia.¹⁶ The population at Ocean Reef is located close to the boundary of the proposed development. Currently the area of the *Grevillea* population is degraded, as found by Mattiske¹⁵ and Strategen¹⁷. The development would only contribute to further degradation of the area and population.

Since *Grevillea sp. Ocean Reef* is the only known location of the species, it is in a degraded area and is located so close to the proposed development, the performance of activities to rehabilitate and protect this species must be high priority in the final version of the NPO.



Figure 1: Photograph of the currently degraded *Grevillea sp. Ocean Reef* population area.¹⁸

Graceful Sun Moth

The known habitat and travel range of the Graceful Sun Moth (*Synemon gratiosa*) coincides with two degraded areas at Site 325 which would not be cleared under MRS Amendment 1270/41. The Graceful Sun Moth used to be listed under the EPBC Act, but was delisted in 2013.¹⁹ The species is currently listed as Priority level 4 in Western Australia.²⁰

SMEC Australia conducted a survey of this species at the Ocean Reef Marina in 2009.²¹ The locations in which SMEC found Graceful Sun Moths in its survey and their potential travel range from these locations (200 m), coincide with two degraded areas on the Site.²¹ One location is where the *Grevillea sp. Ocean Reef* exists. Another degraded location (Figure 2) is in the middle of the bushland and adjacent to Ocean Reef Road.¹⁵ The Graceful Sun Moth larvae develop underground and feed on the roots of mat-rushes and grasses, such as the *Lepidosperma* and *Lomandra* species during 11 months of the year before emerging from the ground.²¹ The Graceful Sun Moth is thus very reliant on the vegetation in these areas for survival.

Therefore, the UBC recommends that the performance of activities to rehabilitate and protect the vegetation in which this species develops should be high priority in the final version of the NPO.



Figure 2: Photograph of the Site 325 bushland at Ocean Reef Marina¹⁸ from a path that is known to contain Graceful Sun Moth habitat.²¹

Conostylis bracteata P3

Conostylis bracteata is a Priority 3 listed flora species in Western Australia¹⁶ and is present at Site 325 at Ocean Reef.¹⁵ The UBC recommends that rehabilitation efforts should be taken to ensure the quality of this species is maintained due to its priority listing.

According to the 2013 Mattiske Report, there is an area of degraded vegetation in the Site that is perpendicular to Resolute Way. Two populations of *Conostylis bracteata* were found by Mattiske near the boundary of the MRS Amendment and within or on the border of the degraded area.¹⁵ These populations of the species are likely struggling due to their presence in or near degraded vegetation. With the added pressures of having a potential development right next to them, their likelihood of survival will decrease. **For this reason, rehabilitation activities in the final version of the NPO should be designed to protect the populations of *Conostylis bracteata* in this degraded location.**

Additionally, there are multiple other populations of this species found throughout the area of the bushland that would not be cleared.¹⁵ Most of these locations are very close to the MRS Amendment boundary, meaning that they would be impacted by edge effects from the potential development.

The UBC recommends that rehabilitation activities must also be dedicated in the final version of the NPO to protect these populations and ensure they would not be degraded by edge effects.

FCT SCP 29a threatened community

As discussed earlier in this submission, the SCP 29a ecological communities found at Ocean Reef are very diverse and highly unique. Of the entire Site 325 bushland at Ocean Reef surveyed by Mattiske, 67% of SCP 29a exists within the proposal area.¹⁵ Therefore under MRS Amendment 1270/41, 67% of SCP 29a present in the entire Site 325 bushland at Ocean Reef would be cleared. In comparison to the other ecological communities present at Ocean Reef, SCP 29a has the largest percentage present in the MRS Amendment area. The MRS Amendment boundary does go through some areas of SCP 29a in the northern section of the bushland surrounding the proposal area, as well as in the southern section.¹⁵ **Given that such a large of SCP 29a would be cleared, it is very important that the remaining communities that exist outside the MRS Amendment boundary are protected from edge effects.** Some of these SCP 29a communities fall into the range of "Degraded", "Degraded to Good" and "Good" vegetation quality according to Mattiske,¹⁵ which makes them a target for rehabilitation according to the current NPO.² The SCP 29a ecological communities bring strong biodiversity values to Site 325 at Ocean Reef, so it is essential that the remaining biodiversity values in these communities are maintained, despite a potential loss of most of the communities through clearing.

Overall, the shape of MRS Amendment 1270/41 creates many edges with the remaining Site 325 bushland at Ocean Reef. This unacceptable boundary with multiple edges of the potential development and roads adjacent to the remnant bushland would lead to strong edge effects, as a large amount of edge habitat would develop due to the creation of habitat fragments. Edge effects not only affect the environment at the edge of the fragment, but they also can significantly influence flora and fauna communities inside the fragment as the effects can reach tens of metres inside the fragment.²²

It is therefore recommended as essential that a large buffer is included within the development envelope both to help prevent negative pressures from entering the bushland through the edges development and roads. In this buffer area, it is important to control for invasive weed entry into the bushland and provide fencing and signage to prevent entry of feral animals and undesired human access. It is also essential that any firebreaks created during the potential marina redevelopment are not created in Site 325 bushland. Rather they should be created in the development envelope to prevent disruption to flora and fauna as well as to prevent the creation of further habitat fragmentation.

Recommendations for Maintaining and Protecting Fauna Habitat

The main feature that is missing from the NPO in regards to caring for the fauna species present in the bushland is creating a wildlife corridor. MRS Amendment 1270/41 fragments the bushland, since it is intended that roads (extensions of Hodges Drive and Resolute Way) would bisect the bushland. These roads would provide a hindrance to the movement of fauna through the length of Site 325. **A unique aspect of Site 325 is that it provides a long and wide ecological linkage along the coast, but the NPO makes no mention of somehow retaining a corridor if the bushland is to be cleared. Therefore, the UBC recommends that it is essential that underpasses are built at the bisecting roads to maintain some connectivity for the fauna in the bushland.**

Since ecological linkages are important for the health of ecological processes, it is important that fragmented patches of habitat are still connected in some way. Vegetated corridors (Figure 3)

between separated remnants can lessen the negative effects of habitat fragmentation through maintaining some degree of connectivity. A corridor is defined as “a linear landscape element composed of native vegetation which links patches of similar, native vegetation”.²² Vegetated corridors can assist the movement of flora and fauna between habitat fragments. This movement between fragments means that more species and populations have a better chance of survival than when the fragments are isolated.²²

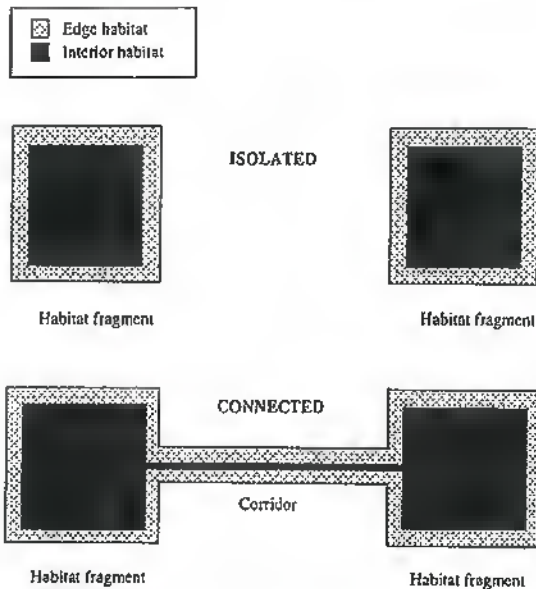


Figure 3: Diagram illustrating the concept of a corridor between habitat fragments.²²

Generally, it is considered that wider corridors are best because it reduces the amount of edge habitat present in the corridor. However, it has been found that narrow corridors can have significant conservation values. Wider corridors do not necessarily assist movement any more so than narrower ones, if the corridors are not so narrow that they were avoided as movement pathways altogether. This finding does not suggest that reducing corridor width is advantageous.²³ This finding suggests that it is possible that fauna at Ocean Reef would still be able to move through the bushland after the clearing at Ocean Reef provided they have assistance through the creation of underpasses at the roads which fragment the land. In addition to creating underpasses, measures must still be taken to address edge effects and disruption from human, pet and feral animal access into the bushland. Fauna will need time to adjust to moving through a narrower corridor, so these activities would help remove some of the other pressures that inhibit their movement through the bushland.

The potential redevelopment of Ocean Reef Marina would bring with it a huge new population of people. It is expected that the proposed development would have 700 dwellings (600 apartments and 100 dwellings), creating a residential population of approximately 1,250 people. A 260 room hotel is also expected to be built, which increases the average daily population in all accommodation to be approximately 1,500 people (not including workers).²⁴

This is a very large number of people for the proposed development area and this new population would have significant impact on the remaining bushland that would not be cleared. The permanent residents of the development would likely bring many dogs and cats with them as pets. These pets would greatly increase the number of predators in the area and have a negative effect on the fauna living there, which would already have a weakened resistance due to their fragmented habitat.

Therefore it is recommended that cats and dogs be prohibited from this new housing area.

Also, a great influx of people into the area would naturally cause increased waste and rubbish production, which could attract more feral animals such as foxes to the area. The feral animals would further increase the number of predators in the area and would increase the pressures on the fauna living in the bushland. The greater presence of humans living in the development also poses a threat to the fauna's habitat as it is likely that residents will be curious and enter the bushland, which can disrupt and destroy habitat.

The current NPO accounts for the potential negative impacts of feral animals and uncontrolled human access and lays out actions to counteract them.²

The UBC recommends emphasis be placed on management actions that monitor and control feral animal activity and uncontrolled human and pet access, with fences, bold signs and cameras. While vegetation and habitat are being rehabilitated, especially degraded areas, it is very important that these areas are not disturbed. It is essential that all efforts would be made to protect these areas from intrusion.

V. CONCLUSION

The UBC believes that it is NOT POSSIBLE for a site "like for like" to Site 325 at Ocean Reef Marina is to be found since the bushland is unique within the Perth Metropolitan Region. In that case the UBC believes that finding a similar site that is need of rehabilitation, improved ecological linkages and protection of significant species should be focused on. The area should be at least twice the area of Bush Forever 325 before its fragmentation.

If land clearing occurs, the impacts of the clearing are immediate. Thus, all efforts should be made to avoid time lag. By acquiring land and beginning rehabilitation activities *prior to land clearing*, the negative effects of time lag can be moderated a little. The City of Joondalup must do all that is possible to fulfill its obligations in the Durban Commitment and BAP, since clearing of native vegetation at Ocean Reef Marina would oppose the obligations made by the City in these documents.

If an Ocean Reef Marina redevelopment occurs, rehabilitating degraded areas of the site are high priority. These degraded areas coincide with habitat areas of the important flora and fauna species of *Grevillea sp. Ocean Reef* (Priority 1), *Conostylis bracteata* (Priority 3) and the Graceful Sun Moth (Priority 4). The priority ecological communities of SCP 29a at Ocean Reef that are not cleared must be protected as it is regionally significant and provides a great amount of biodiversity value to the Site.

The UBC recommends that underpasses are created at all roads which fragment the bushland, to help maintain a wildlife corridor through the bushland.

The UBC also recommends that large buffers are created at the development's boundaries to prevent edge effects and actions are taken to hinder the undesired access of humans, pets and feral animals into the bushland.

The UBC strongly recommends that the City of Joondalup and the relevant government agencies (DoP, DPAW, EPA) take all the information and recommendations presented by the UBC in this submission seriously and include them in the final draft of the NPO if the MRS Amendment 1270/41 is gazetted. **Please remember that the UBC does not support the MRS Amendment 1270/41 and believes it should not be accepted.** However, if the MRS Amendment is accepted, the UBC wishes for the NPO to be as strong as possible in its ability to create new environmental value and reduce the negative impacts of the marina redevelopment on the remnant bushland.

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C Mary Gray

President, Urban Bushland Council WA Inc.

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

A8939307
DEPARTMENT OF PLANNING
23 FEB 2017
FILE RLS/0657

Submission
Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

Submission 76

RLS/0657

Name TERRANCE (TERRY) B PARKER
(PLEASE PRINT CLEARLY)
Address 28 RESOLUTE WAY, OCEAN REEF Postcode 6027
Contact phone number 93005494 Email address TerryP@iinet.net.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

See attached 3 pages -

turn over to complete your submission

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:

☐ **No**, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR

☒ **Yes**, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:

☒ Myself – My telephone number (business hours): 9300 5494

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:

☒ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend).

You should be aware that:

- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature  Date 22/2/2017

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Attachment to MRS Amendment 1270/41 Submission
Ocean Reef Marina Redevelopment

20th February 2017.

Firstly, I commend the Ocean Reef Redevelopment concept and totally support it in principal. However, I am – together with all of the people I have spoken to in our street - very much concerned about vehicular access to and exit from, the planned development. In particular, I refer to Resolute Way in Ocean Reef, which is located at the northern end of the Marina project and immediately across the small roundabout and from where predictably most vehicles will exit the Marina development.

This matter was raised at City of Joondalup Council (COJ) public forum meetings in December but dismissed along the lines –

- “No changes under consideration”.
- “Will be tested after completion and after time”.
- “Focus is on Hodges as the main point and also Shenton” – It is interesting to observe here, that Resolute Way and Ocean Reef Rd (from Hodges Drive through and past the northern Marina access/exit point opposite Resolute Way) through to Shenton Ave – and the western end of Shenton Ave from Marmion Ave to the coast – are not even shown on the Redevelopment map (as “Other Regional Roads” – ie, main traffic flow) at the start of the MRS Scheme Amendment 1270/41 document dated November 2016.
- Same out of hand dismissal was given to Swanson, which is also not shown on the map, but which does not have the same entry and exit issues that will be created at the juncture of Resolute Way, Ocean Reef Rd and the Marina northern exit / entry.
- Closure to these questions by the COJ Mayor and CEO was – “the need will be looked at down the track on a needs basis”

To me, the clear issues that will surface in relation to vehicular traffic in Resolute Way were disappointingly considered insignificant and dismissed out of hand.

As an aside, and while mentioning the accuracy of the Amendment document, it is interesting to see that the diagram of the redevelopment attached to “Figure – Proposal 1” shows that Southern Cross Circle is to be opened for the several hundred metres it runs parallel to Ocean Reef Road (not even a fence planned?). Clearly this cannot be correct, but this (second) error does indicate the lack of thought and accuracy and thus credibility of those driving this proposal.

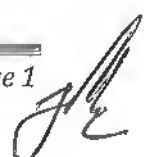
Resolute Way is a (two) single lane road in a fully developed residential area, clearly not designed to cope with significantly increased vehicle traffic that will come with the Marina development.

Page 10 of the MRS Amendment 1270/41 document clearly states, under the heading “Transportation” –

“The Do T liaised with the PTA and Main Roads WA and – . . . A Transport Assessment should be undertaken in the subsequent more detailed planning stages, as follows (and in part - -)

- **The number of heavy vehicles servicing this development and its impact to the local traffic, including entry and Exit strategies**

Assumably, this Assessment has yet to be undertaken? In that case, I (and all residents in Resolute Way will be approached for support if required) ask that I / we be included in all stages of such assessment and our real historical experiences and input be sought.



Of major concern is that the above (underlined) two lines is the only reference under the heading of "Transportation", to the whole spectrum of issues that will arise from the increased vehicular traffic that will flow from the development.

And further, if such a study did find conclusively that huge increases in passenger vehicles created real issues, wouldn't it be better to incorporate such changes deemed necessary, within the basic development scheme planning – ie now?

- The focus of the planned Assessment seems to be (only) on "The number of heavy vehicles servicing - - - etc".

And so I raise the question of why there is no specific consideration of the impact of ordinary vehicular traffic? Why is there no reference at all to the already tabled matter of markedly increased vehicles generally in link roads like Resolute Way? Of course "heavy vehicles" are a prime issue, but so too are high levels of passenger vehicles – and those towing large boats - in a fully residential street.

Clearly the numbers of (non heavy) vehicles will be huge, way beyond what present roads provide for.

Again I focus on Resolute Way –

- The road is single lane both ways, with (hopelessly inefficient) "traffic calming" trees planted in cement islands at several points in the middle.
- The number of speeding vehicles is already excessive (as shown in very infrequent traffic number monitoring).
- There are many young children living in the street & parents already have a real concern for their safety.
- Housing – every house in the street fronts onto the street, unlike Hodges and Shenton where there are NIL houses directly fronting those roads.
- Existing noise levels are already concerning – increased traffic volume will markedly increase this problem, especially from higher numbers of "heavy vehicles" entering and exiting the development.
- There is no way vehicles – both heavy and passenger – can be "guided" to use Hodges and / or Shenton given present and planned infrastructure. If, as was reinforced at the December meetings, the main entry point will be (encouraged to be) Hodges, then those vehicles will invariably continue through the development in a northerly direction and exit opposite Resolute Way presenting a "straight through" easy option.

Boats & trailers –

- Are also large and very much slower than cars. While impacting on Resolute Way both ways, they will travel very much slower going up the hill. Already we see cars and (esp) trade vehicles pull onto the wrong side of the road to pass slower moving units. Frequently. And at speed - -!

Cyclists -

- Big numbers of cyclists use Resolute Way as part of their training programme, generally as part of group sessions, it seems. Individuals are numerous too, of course, both as part of training and as a thoroughfare. Again, and very frequently, vehicles cross to the opposite side of the road to get past the slow moving cyclists and may travel for 100 metres + in this manner. We see this almost daily and the



risks created – including vehicles trying to exit/enter side streets like Fleetwood Hts, are significant.

Vehicle numbers -

- Monitoring of traffic flow in Resolute Way has been undertaken on several occasions over recent years. Whilst I don't have current access to vehicle numbers, I do recall seeing such results in the past and that I was staggered by the huge increases shown.
- Of even greater concern was the huge number of vehicles breaking the speed limit – significantly – in this fully residential street. This suggests the COJ "traffic calming" endeavours have not been successful and to which all residents will attest.
- This issue and residents concern has been raised many times in the past, both as an independent speed concern matter and also with specific reference to the planned Marina development. Such concerns are based on personal experiences and tabled with genuine apprehension and concern. Repeatedly – from even before the Community Forum of 26th August 2013 to and including the recent December 2016 Forums – the COJ has dismissed the concerns almost out of hand, stating on each occasion that "the primary focus will be on entry from, and exit to, Hodges Drive".
- Whilst the current traffic flow data may exist, I haven't seen it and I have not been successful with my endeavours to obtain historical data. The Ocean Reef Marina MRS Amendment Request of 7th July 2013 stated, in part (at Item 7.2) – "whilst no data is available directly adjacent to the subject site - -". There is still no evidence of research and hard data on this matter within the current Ocean Reef Marina Redevelopment Amendment Report (ie the MRS Amendment 1270/41 dated November 2016).

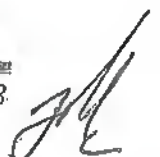
Summary and Resolution

This submission is not intended to provide resolutions, rather to flag what we, the residents of a street which will be materially and adversely affected from the outcomes of the Marina development, see as real and concerning issues that clearly are not being addressed "up front".

We do not profess to have all the answers to the issues tabled. We are not "experts" in this area of focus. But of interest, a few thoughts have come from neighbours in Resolute Way -

- Close off Resolute Way (as it once was) at its juncture with Ocean Reef Road.
- Place bollards between the two islands in Ocean Reef Road, north & south of the round-a-bout, allowing traffic coming down Resolute to exit south only. Vehicle travelling south from Shenton Road will be able to turn left up Resolute Way or carry on south on Ocean Reef Road.
- Move the Marina's northern exit / entry point 100 metres north or south of Resolute Way. By adding another round-a-bout at that point, traffic flow in every direction will be smooth and overcome the clear threat to Resolute Way.
- Move the Marina's northern exit / entry point to align with Shenton where it joins Ocean Reef Road. Ideal option, not unlike a similar and very successful structure they have at Hillarys.
- Widen Shenton to 4 lanes to make it more "attractive" to vehicular traffic.
- Add proper and effective "Speed Bumps" (that won't stop Emergency vehicles!!!)

And in summary, it is earnestly requested that the MRS Amendment 1270/41 take these aforementioned genuine concerns into account when progressing the development plans. The matter of traffic in Resolute Way is very real and critical – both at present and will be increasingly more so as the project develops.



22 Courageous Place
Ocean Reef W.A 6027

The Secretary
W.A. Planning Commission
Perth. W.A

DEPARTMENT OF PLANNING
23 FEB 2017
FILE RLS 0657

Phone: 93005620

OCEAN REEF MARINA MRS MAJOR AMENDMENT 1270/41

The current marina has 8 launching ramps, 6 new jetties and ample parking with no queues or traffic congestion. There are areas for boats for dry storage and the Sea Rescue boat has immediate, unobstructed access to the ocean.

The Sea Sports Club overlooks the ocean and caters for many aquatic and marine activities as well as providing an excellent restaurant and venue for entertainment, weddings and various recreational and community activities. Secluded beaches and areas for fishing, surfing, canoeing, swimming, walking, cycling and observing nature abound. There is a BBQ area with a children's play area plus toilet and shower facilities.

Ocean Reef and most suburbs have their own small shopping centres, fast food outlets and restaurants.

Currumbin has a cinema complex, expansive shopping and commercial area, while Connally has a world class golf course and resort suitable for weddings, conferences and tourists. Whitford City Shopping Centre and cinemas are also only 5 minutes away.

Toondalup offers huge commercial and retail outlets as well as night clubs, pubs, hotels, apartments, cinemas,

restaurants, medical, justice, educational, library and government centres.

Sporting facilities at the Toondahup Arena include indoor and outdoor activities and caters for a variety of entertainment.

Gaigie leisure centre provides many forms of recreational activities including exercises and swimming.

Suburban community centres and libraries are available for various activities and many sporting clubs use the local parks.

With so many varied facilities already provided within the Toondahup council area there is no need to destroy a unique Bush For Ever site such as exists in Ocean Reef. It would be unnecessary environmental vandalism and duplication of services and facilities.

Therefore I am totally against any changes which will affect the current reserves and Bush For Ever site 325 in order to facilitate the redevelopment of the existing Ocean Reef Marina Boat Harbour

Yours faithfully

J Axford

(MRS. JANE AXFORD)

20 February 2017

Ocean Reef Marina - MRS

Executive overview

This submission is made as both a City of Joondalup ratepayer and interested local community member having concerns regarding the relevance and validity of the existing proposals for the Ocean reef marina. Although I am not resisting change and progress I am simply presenting the case for more diligence and analysis regarding the real requirements for the near, medium and long term for this area.

There is no question that in the early days when this marine was conceived we were enjoying record levels of employment and earnings leading to significant levels of disposable income for recreational pursuits such as boating and associated pursuits. Indeed, the predictions that informed the 750 pen development for ORM came from a 2008 Department of Transport recreational boating forecast paper that clearly articulated strong growth in boat sales in the northern corridor. The hard reality is that record unemployment from the resources downturn has meant that disposable income for recreational pursuits has significantly declined. With this considered, surely the following questions should be posed:

- Why wasn't a more recent survey conducted on socio-economic conditions in the northern corridor?
- Why wasn't a postcode-related study undertaken to ascertain boat ownership statistics in the northern suburbs (identifying pen-based and trailer boats)?

Answering these questions and factoring the high number of available boat pens in the Mindarie marina would at least provide some idea of how many fixed pens are required a Ocean reef for the near, medium and long term futures. It's also important to consider the traffic pressures presented on Rottnest moorings which is the main destination point from all metropolitan marinas (particularly given the planning for the Mangles marina at Rockingham). One might question why time-lapse studies weren't conducted across the two major marinas in the City of Joondalup to investigate traffic profile characteristics over an elongated time period?

Issues arising

Large penned vessels

Do we need 750 pens for vessels over 7.5 metres and what would the uptake be?

(This would of course influence the return on investment for pen rental fees and hence the overall business case that should be shared with the public).

If 750 pens are constructed and low tenancy rates are experienced what will the additional costs be for the following:

- Additional security services for the smaller number of vessels penned (given critical mass isn't available for full time facilities)?
- Costs to constantly anti-foul empty pens and keep them clean and usable?
- Attraction for marine related services companies that may not otherwise locate to ORM in the absence of a high number of penned vessels providing ongoing business.

Arrangements made for "Super yachts" will involve significant civil engineering works and costs, on what basis and research was this planned for?

Are the specific reasons and evidence that dictate that "Super yachts" would ever want to moor in a suburban marina complex?

Trailer vessels – Launch/Retrieve

It is acknowledged that at this point in time, trailer-based smaller recreational boats continue to grow in popularity and even in a curtailed financial environment the sheer growth in population means that more small boats are taking to the water. Department of transport data will easily map postcode by boat registration to provide a sound predictor of boat ramp usage across Hillarys and Ocean reef.

At present the traffic and parking volumes evident at both City of Joondalup boat ramp facilities indicate that something MUST be done quickly to reduce congestion and improve safety and efficiency.

The existing concept plan indicates that there will be NO growth in the number of launch/retrieve ramps even though the plan for construction to commence isn't until 2020! Surely this is quite ridiculous, already we need more launch/retrieve capacity, the plan for the future in THREE years time, only indicates the SAME.

Surely, to predict small vessel capacity and movement requirements the following should have been conducted as a minimum:

- Analyse DoT boat registration by postcode and cross match with potential launch/retrieve locations.
- Undertake seasonal time-lapse vessel movement profiles to and from both Hillarys and Ocean reef marinas.

Trailer vessels – Parking

It is also acknowledged that on busy days and at peak periods trailer parking in the 175 bay trailer park is severely limited often leading to illegal verge parking. The existing area covers 1.5 ha, the new area 47 that resides on the Water corporation easement area claims to deliver 374 bays that would obviously offer more than double the parking presently available. The area highlighted for zone 47 is stated as being 4.38ha which allows for 85.7m² per trailer bay. From Google earth it is clear that conservatively measured the Water corporation easement strip amounts to approx. 50 meters x 400 meters – 20,000 square metres = 2 Hectares

The area quoted as available for trailer parking is in fact 4.38 hectares which would amount to a total contiguous land area of 43,800 square metres! It is difficult to determine from any of the plans where this land area is positioned.

All of this considered, the City of Joondalup and surrounding communities require more ramps and trailer parking now (not sometime after 2020) when there is still a question about the number of ramps and where the additional parking will actually reside.

Overall

The Ocean reef marina has existed and survived for many years primarily as a pure "Utility" with the Ocean reef sea sports club being a community-based amenity and Whitfords' Sea Rescue a public service.

There is no question that given the development and population growth in the surrounding area there is real potential to develop and exploit this area in the right way. Past thinking was always Bold and Brash, "Build and they will come" was often the mantra. Unfortunately, the Mindarie marina was an example of how things could go wrong and how Bold and brash sometimes needs to be tempered. Even to this day (although things have improved) Mindarie marina doesn't enjoy anywhere near full tenancy of boat pens and facilities which begs some questions around supply and demand.

Although Hillarys pens are at near capacity, we are starting to see a trend of some larger boats being sold and pens becoming available. Western suburbs and adjacent areas will always see "Old" wealth meaning that river-based marinas will maintain occupancy. Unfortunately, the outer fringe suburbs is often where hard financial times bite meaning that ownership of larger penned vessels will be reduced.

With this concerned, shouldn't the planners re-calibrate by assessing socio-economic trends and forecasts as well as analysing DoT datas? By doing this the projected number of pens could be better assessed and planned. After all this will have a significant impact on the infrastructure footprint and capital works costs.

If the project ever eventuated in the form that it is presently planned, here are the likely outcomes in a worst-case scenario (that must be considered):

- The delay and ongoing crisis with trailer boats will just get worse and even before anything happens pressure will be placed on council to make improvements.
- If and when the works are undertaken if the number of ramps remains the same the situation will get far worse.
- If the trailer can't be increased to more than double as stipulated this will present a major problem to recreational boaters.
- If 750 pens are built and occupancy is nowhere near capacity there will be major issues arising around security, vandalism, further uptake of pens because of these concerns and the likelihood that supporting infrastructure and trades won't invest in the area.
- Given the footprint of the phase 1 enclosed area and the possible likelihood of under-utilisation the facility will look like a large empty ship yard and it might be questionable as to whether commercial cafes and supporting trades as well as residential developers will even be attracted to a potential "Ghost port".
- The timing of this development is also important as following the first phase, the take up of land for future development will influence the environment as a potential amenity. In other words a large partially empty marine port isn't actually aesthetically pleasing.
- If the full project ever eventuated, although traffic surveys have been conducted, it's hard to see based on the two points of ingress and egress how the significant levels of traffic both visitors and residents will be accommodated.
- Finally, although employment is touted as a major draw card, even though it is acknowledged that hospitality-based commerce will arise most of these jobs are typically casual and part-time.

What do we really need?

There is no question that Ocean reef marina is in need of an uplift and some relevant development to increase it's utility capacity as well as enhancing it's amenity facility.

To provide what's needed for both local City of Joondalup rate payers and visitors there are many enhancements and developments that could be made that would amount to far less than \$100 million. Following are some of the key improvements that should and could be made:

- Increase the number of trailer boat ramps
- Increase trailer parking capacity and provide cashless parking facilities
- Provide a small number of pens for the use of Ocean reef sea sports club and provide direct ramp facilities from their compound area.
- Enhance the club building and Whitfords sea rescue and combine to form a community centre facility for local functions leveraging the panoramic location.
- Provide a café and restaurant precinct in and around the ORSSC integrated with the existing footpath and cycle way.
- Improve access to the southern seawall and provide disabled fishing platform facilities.
- Provide extensive CCTV and security monitoring in and around the car park area to reduce hoon activities.

Conclusion

An upgrade and revamp to the Ocean reef marina is long-overdue, unfortunately the expensive and ongoing planning activities that have taken place have been predicated on earlier financial times when investment funding was more plentiful (no massive state debt) and disposable income of Perth residents meant that large recreational boats needing local moorings were a possible indulgence.

Fast forward to 2017 when we see an insurmountable and growing state debt and increasing unemployment. Making such a major investment into an amenity that is focussed around almost 1,000 penned large recreational vessels and support infrastructures should surely be questioned. It's not difficult to re-calibrate and ascertain the near, medium and long term projections for pen needs.

Furthermore, given the significant investments in consultant studies over the last decade, it's likely that the costs would have been incurred by City of Joondalup ratepayers. Surely the question would be given Landcorp are now the custodian of the project what is the consideration back to the City for the pre-work undertaken and inherent value to the project?

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

Submission 79

RLS/0657

Name NICK AND WENDY SCAFIDAS
(PLEASE PRINT CLEARLY)
Address 14 RESOLUTE WAY, OCEAN REEF Postcode 6027
Contact phone number (08) 9300 8445 Email address braig@inet.net.au

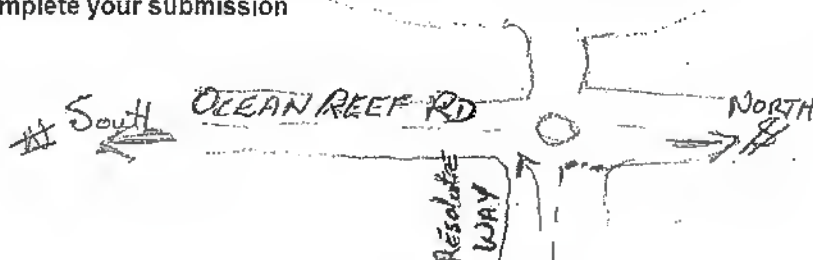
Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

With regard to the Ocean Reef Marina we have some concerns regarding the traffic on Resolute Way. Resolute Way is not a main thoroughfare or bus route and has residential drive ways on it. The commercial and residential facilities planned for this Marina will increase the volume of traffic immensely and taking into consideration of that Geraldton Shire has taken the trouble of issuing stickers for our WheelyBins for motorists to consider the safety of our children - this increase in traffic will be a problem!

A possible solution would be closing access to Resolute Way for motorists travelling in a ^{SOUTHERLY} northerly direction along Ocean Reef Road by placing bollards to block the access into Resolute Way but still allowing cyclists and pedestrians access; and also enabling residents to exit Resolute Way into Ocean Reef Road. Hope this could be considered for the safety of our residents and their children.

OCEAN REEF MARINA

turn over to complete your submission



Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:

☒ **No**, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR

<input type="checkbox"/> Yes , I wish to speak at the hearings. (Please complete the following details)
I will be represented by:
<input type="checkbox"/> Myself – My telephone-number (business hours):
or
<input type="checkbox"/> A spokesperson
Name of spokesperson:
Contact telephone number (business hours):
Postal address:
I would prefer my hearing to be conducted in:
<input type="checkbox"/> Public (members from the general public may attend your presentation)
OR
<input type="checkbox"/> Private (only the people nominated by you or the hearings committee will be permitted to attend)

You should be aware that:

- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature  Date 24/02/2017

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Submitted to MRS Amendment 1270/41 - Ocean Reef Marina Development
Submitted on 2017-02-21 10:32:55

Introduction

1 What is your name?

Name:
Dave Blackburn

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
djblack76@hotmail.com

4 What is your contact phone number?

Phone number:
93092557

5 What is your postal address?

Postal address:
15 Celina Cr
Kingsley 6026

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

1.The addition of an extra 750 boat pens for relatively wealthy individuals is not sufficient justification for the destruction of 25.96ha of the bush forever site 325. The wider community should be taken into account not just the privileged few. It is the relative valuation of the destruction of rare flora and wildlife habitat to enable the expansion of a luxury pastime. Bush Forever site 325 should not be further degraded beyond the 8ha already affected by the existing marina.

2.If extra luxury residential accommodation is cited as justification then the existing marina land footprint could be developed. Also why not develop the Hillarys marina land footprint further instead? There is more than enough room for coastal luxury apartment buildings without consuming more scarce remnant coastal bushland.

3.The sediment transport modelling is subject to many variables so it can never be precise. The construction of a huge marina so much bigger than Hillarys will have a major effect that the models are unable to reliably predict. Hillarys has had a major sediment effect with groynes having to be built south of the marina and the area to the north undergoing scouring periodically. What will a bigger new marina do to the coastal beaches?

4.The turbidity during construction will probably result in the elimination of marine life in the vicinity.

Under the environmental precautionary principle it would be judicious, considering the unknowns and unreliable modelling, to not proceed with the Amendment.

I would prefer a redevelopment of the existing site and the retention of the balance of bush forever site 325. Ocean Reef marina should remain a minor marina with some added residential accommodation.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-657C-6

Submitted to MRS Amendment 1270/41 - Ocean Reef Marina Development
Submitted on 2017-02-21 13:34:41

Introduction

1 What is your name?

Name:
Phil Poulter

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
aprilphil@primus.com.au

4 What is your contact phone number?

Phone number:
0478917345

5 What is your postal address?

Postal address:
18 Resolute Way , Oceanreef , 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

This would seem to be more of a highrise housing project with a mix of some leisure facilities. We need to preserve coastal land in Perth maybe a smaller version of Hillarys development would be a better option , with out high rise development .

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-6574-Q

Submitted to MRS Amendment 1270/41 - Ocean Reef Marina Development
Submitted on 2017-02-21 14:04:50

Introduction

1 What is your name?

Name:
Russel Speak

2 What is your organisation?

Organisation:
none

3 What is your email address?

Email:
dynolimewa@bigpond.com

4 What is your contact phone number?

Phone number:
0407773338

5 What is your postal address?

Postal address:
1 Convallis Vista
The Vines 6069

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:
I feel the area is long overdue for a development of this type

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-657F-9

Submitted to MRS Amendment 1270/41 - Ocean Reef Marina Development
Submitted on 2017-02-22 15:05:56

Introduction

1 What is your name?

Name:
Phil Michelides

2 What is your organisation?

Organisation:
Private citizen and resident

3 What is your email address?

Email:
michelides@iinet.net.au

4 What is your contact phone number?

Phone number:
0412922515

5 What is your postal address?

Postal address:
P O Box 211 Buddina Qld 4575

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:
Desperate shortage of affordable marina berths for yachties in northern suburbs

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-6573-P

Submitted to MRS Amendment 1270/41 - Ocean Reef Marina Development
Submitted on 2017-02-22 17:30:14

Introduction

1 What is your name?

Name:
Brian Macauley

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
brianjmacauley@gmail.com

4 What is your contact phone number?

Phone number:
0409988228

5 What is your postal address?

Postal address:
Po Box 3013
Joondalup
WA 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

I strongly support MRS Amendment 1270/41, for the following reasons:

- the requirement for a marina development of a modern, high standard, has been well known for many years. Hillarys Boat Harbor has been unable to fulfil community demand for wet pens, boat launch ramps and dry stacking facilities for some time, and the proper development of Ocean reef Marina will assist in providing such capacity for the medium-long term. Frankly, I believe the amendment ought to be supported from the perspective of the Perth boating community alone.
- further to the boating community's need, the development of the Ocean Reef Marina will provide for other community facilities, including much-needed beachside food and drink retail, recreation and picnic space.
- The inclusion of freehold residential sites is necessary to develop the marina with the appropriate amenity, and of course is a strong contributor to its financial viability. Whilst there are views against the inclusion of freehold residential, it is surely an essential component of a modern, state of the art marina development.
- the study shows the site is highly suitable to such a development.

I would hope that adequate space, facility and support be given for the use of community organisations and clubs. Certainly WVSRG and ORSSC will be impacted, and one would imagine both would require increased capacity of a significantly increased local boating community. Further to these organisations, the development would provide a great opportunity for youth organisations such as SLS, Cadets, ScoutsWA etc to have access to water-based activities, and consideration should be given to their needs, including storage and facilities, also.

I wish the project well, and look forward to enjoying the outcome of it in the future, as do, I'm sure, many thousands of others.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-6577-T

Submitted to MRS Amendment 1270/41 - Ocean Reef Marina Development
Submitted on 2017-02-23 10:55:20

Introduction

1 What is your name?

Name:
Dale Page

2 What is your organisation?

Organisation:
City of Joondalup

3 What is your email address?

Email:
dale.page@joondalup.wa.gov.au

4 What is your contact phone number?

Phone number:
94004445

5 What is your postal address?

Postal address:
90 Boas Avenue
Joondalup
WA 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

The proposed amendment is supported as it will facilitate the zoning of the land to accommodate development of the Ocean Reef Marina into an activity node for maritime and harbour uses, retail, commercial and residential uses. The development will result in economic and social benefits to the community in terms of employment opportunities and services and also be an attraction for tourists.

The City has commenced the process of amending the local government and district planning scheme boundaries in line with amendment.

The City believes the relevant environmental assessments, management plans and agreements that have been prepared to support the MRS Amendment will ensure that environmental impacts are minimised.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-657U-R

Submitted to MRS Amendment 1270/41 - Ocean Reef Marina Development
Submitted on 2017-02-23 22:03:54

Introduction

1 What is your name?

Name:
Linda Tilbrook

2 What is your organisation?

Organisation:

3 What is your email address?

Email:
squindalou@gmail.com

4 What is your contact phone number?

Phone number:
0407879574

5 What is your postal address?

Postal address:
41 Ballantine Rd Warwick

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

As a resident of the northern coastal corridor and avid beach goer for over 40 years, I am absolutely opposed to the construction of yet another marina on this incredibly beautiful section of our coast. We already sustain TWO marinas within 20kms of each other at Sorrento and Mindarie so the proposed addition of another marina almost directly in between the two existing ones is nothing short of incomprehensible.

I also do not understand how we can claim to afford this at either a state or local government level in these times of increased debt and uncertain future revenue streams.

This intended marina is entirely unlikely to produce new income of any real significance, especially not when compared to the unforeseeable immediate and future costs to our environment and community.

More and more are seeking out nature-based tourism experiences and placing greater value on pristine environs as they have rapidly disappeared from our landscapes. Therefore, we should be protecting our natural coastline from such intrusive developments like this marina and treating our coastline as the irreplaceable, long-term asset that it is. This inherent value has already been recognised when establishing the Marmion Marine Park. We should unequivocally respect the current Marmion Marine Park Management Plan and NOT construct a marina within these boundaries.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-6572-N

Submitted to MRS Amendment 1270/41 - Ocean Reef Marina Development

Submitted on 2017-02-24 08:28:42

Introduction

1 What is your name?

Name:

G Shaw

2 What is your organisation?

Organisation:

Private

3 What is your email address?

Email:

glenn.shaw3004@gmail.com

4 What is your contact phone number?

Phone number:

041 9938840

5 What is your postal address?

Postal address:

4 Thor Court

Ocean Reef, WA 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

The current MRS is appropriate and provides significant protection for the Marine Park boundary and therefore marine environment.

Changes to the MRS will remove this protection for the area in the vicinity of the Ocean Reef coastline as part of the future marina development if it was to proceed.

The impact of the marina under its current proposal would require the removal of approximately 500m of pristine inner foreshore reef structures.

The environmental impact on wildlife and the marine ecosystem including bird life will be considerable and therefore must be preserved for future generations.

The 500m stretch of coast includes a limestone reef that not only supports a diverse marine system, also provides recreation activities including fishing, snorkelling, surfing etc.

The 500m stretch of coast if lost to the development would represent a significant portion of the total existing foreshore reef system in the metropolitan area and once removed it is removed forever.

On this basis, it is critically important that the marina development footprint should be reduced to limit the negative impact on the coastal reef marine system.

Thank you

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Private

Response ID ANON-5S6C-657G-A

Submitted to MRS Amendment 1270/41 - Ocean Reef Marina Development
Submitted on 2017-02-24 11:47:19

Introduction

1 What is your name?

Name:
Dr Marjorie Apthorpe

2 What is your organisation?

Organisation:
Friends of North Ocean Reef - Iluka Foreshore

3 What is your email address?

Email:
aptpal@ozemail.com.au

4 What is your contact phone number?

Phone number:
08 9300 8573

5 What is your postal address?

Postal address:
69 Bacchante Circle,
Ocean Reef WA 6027

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?

Nature of Support/Opposition:

Comments on Ocean Reef Marina: Metropolitan Region Scheme Amendment No 1270/41
Dr Marjorie Apthorpe
Former Co-ordinator, Friends of North Ocean Reef – Iluka Foreshore
69 Bacchante Circle, Ocean Reef WA 6027
23rd February 2017

The proposal has evolved over the last 10 years from a marina with café and restaurant facilities, to the present proposal that is a housing estate and employment provider. This is incompatible with the objectives of SPP 2.6 to "protect, conserve and enhance coastal values", and SPP 2.8, to conserve Perth's remnant bushland.

I support the enhancement of the existing cleared areas, as the carparks and boat parking area are a mess, but re-development of the existing boat harbour into a marina could and should be accomplished without the proposed extensive clearing of vegetation in Bush Forever 325.

The clearing proposed will fragment BF 325 with additional entry roads that will remove locally and regionally significant vegetation, and will directly destroy on-site fauna, and produce additional fauna barriers to movement through BF 325. This is incompatible with the EPA's objective to "maintain representation, diversity, viability and ecological function at the species, population and community level."

The Structure Plan fails to take into account the high conservation qualities of the bushland (BF 325), which for some years was rated as the City of Joondalup's No. 1 priority site for conservation and protection (David Pike, author, City of Joondalup documents prepared for the Perth Biodiversity Project, [Walgla] 2004). See the attached comments on the NPO for further comment.

The Structure plan fails to take into account the significant amount of clearing (1.6 ha) of the endangered Carnaby's Black Cockatoo feeding area. Proposed offsets by rehabilitation or purchase of other bushland will still result in a net loss of feeding habitat for the present, declining population of this species.

The offsets proposed cannot provide "better condition/less disturbance" than the parts of BF 325 proposed for clearing, because much of these are already in "very good" and "excellent" condition. The vegetation communities present at the impacted sites have not been fully assessed (see NPO comments attached), therefore proposed replacement offsets cannot match the vegetation communities destroyed.

Attachment: Comments on the Negotiated Planning Outcome.

Comments on Ocean Reef Marina – Negotiated Planning Outcome
Dr Marjorie Apthorpe
Former Co-ordinator, Friends of North Ocean Reef – Iluka Foreshore
69 Bacchante Circle, Ocean Reef WA 6027
23rd February 2017

The document contains many omissions, and factual errors. It cannot be considered to give an accurate appraisal of the environmental values of the site, and therefore should be rejected as the basis of a Negotiated Planning Outcome.

The following points are raised:

Endangered species not recognised. The failure to accurately map the observed feeding grounds of the endangered Carnaby's Black Cockatoo. Known feeding areas that will be cleared within the Development Envelope comprise 1 ha of vegetation immediately north of the boat-parking yard opposite the Sea Sports Club; and 0.6 ha of S2 and H1 vegetation bordering the eastern side of the existing car park, a total of 1.6 ha to be cleared. Carnaby's Cockatoo has been observed feeding in both areas, which contain mature *Banksia sessilis*. The NPO and associated documents speculate that Carnaby's "may" use the area for feeding, but do not attempt to verify this.

Failure to recognise the presence of the P3 (Priority 3) species *Hibbertia spicata* var. *leptotheca* that will be cleared by the extension of Hodges Drive. This species was not recognised in the Mattiske (2013) vegetation survey. This clearing will remove most of the specimens at the marina site.

Failure to recognise the significant local vegetation species *Diplolaena angustifolia* and its hybrids that will be cleared in the Development Envelope. This is the only recorded occurrence of this species in the City of Joondalup (see Perth Biodiversity Survey, 2004).

Comment: This species should be conserved, by translocation of young plants if possible, and by systematic collection of seed.

Failure to recognise the significance of the *Melaleuca cardiophylla* monospecific closed shrubland that will be cleared by the extension of Hodges Drive. This is the southernmost occurrence of this unusual vegetation type, and was classified by the City of Joondalup as "significant vegetation" (Bush Forever, 2004). It is an extension of the species range, as well as forming magnificent bird habitat. In the NPO document it is lumped together with vegetation type S4.

Failure to recognise that most of the vegetation within the Development Envelope falls within the limestone Cottesloe Central to South vegetation complex (for example the *Melaleuca cardiophylla* occurrences), not the Quindalup System. Similarly, the geology has been misinterpreted from broad regional mapping, without considering the specifics of the site. Most of the mapped site contains outcropping Tamala Limestone, overlain by dark silty and sandy soils typical of the weathering developed on the Tamala Limestone surface. Sands developed over the ridges are consolidated pale grey to indurated sands typical of the Spearwood Dune System. Holocene Quindalup Sand occurs as a thin veneer only over the coastal cliff zone, and on three dune ridges near Resolute Way. The soil type influences the vegetation associations developed on it. A very complex mosaic of vegetation is developed on this variable substrate, and there has been no real attempt to survey it adequately. The Mattiske (2013) vegetation survey upon which the NPO relies for data was a superficial survey conducted over only three days. In that time, 65 quadrats of 10 square metres each were surveyed "adequately" (Mattiske, 2013) and were described as being representative of all vegetation types in the Proposal Area, based on aerial photography. Each of these 10 metre quadrats was therefore reached on foot, marked out, and surveyed in 20 minutes or less. Given the species richness of the site, an adequate assessment of the flora does not seem possible in so short a survey time. Of particular concern is the frequent reference to "exotics" (weeds) as comprising the ground cover. Observations over a number of years indicate that away from tracks, weed cover is greatly reduced; and that when surveyed from a distance, the native species of *Lomandra maritima* and *Lepidosperma* spp. under shrubs can be mistaken for weeds. These species are important and often dominant components of the ground layer in the central and eastern part of the site, but receive little mention. Away from tracks, vegetation density increases and access through dense bushland is extremely slow and difficult. Such areas do not contain much, if any weed invasion. Dense bushland does not appear to have been included in the quadrats, possibly due to difficulty of access. A total of only 88 native species were recognised in the survey (versus the 104 recognised in a local Friends Group walk through the area).

Comment: The surveying was inadequate, considering the richness and complexity of the vegetation at the site.

Failure to survey the fauna at the site.

The omission of faunal surveying of either vertebrates or invertebrates is unacceptable. The NPO speculates as to what animals "might" be present but no surveying was carried out. The following species are not mentioned in the NPO.

From recent observations from Friends Group members and the public, it is clear that the site supports significant fauna. These include:

Southern Brown Bandicoot *Isodon obesulus* recorded within 2 km both north and south of the site;
Echidna tachyglossus aculeatus;
Ospreys *Pandion haliaetus* (that nest at the northern end of the site);
Carnaby's Black Cockatoo *Calyptrorhynchus latirostris* (classified as Endangered) that feeds at the site;

Graceful Sun Moth *Synemon grata* (classified as "Vulnerable"); colonies of these moths occur on the high points of the central Spearwood sand ridges. These ridges have been targeted as suitable places for lookouts and platforms.

One known location of breeding Sun Moths is scheduled to be cleared by the development. This proposal would result in the disturbance or local destruction of the Sun Moth colonies, which is contrary to DpaW directives as to how these colonies should be conserved.

Australian Sea Lion *Neophoca cinerea* (classified as "Vulnerable"); one of the world's rarest pinnipeds; uses the inshore waters for feeding, and the beaches at Ocean Reef as haul-out locations.

Numerous reptiles; the site has attracted the attention of illegal reptile trapping.

Offsets. A discussion of possible offsets is not possible when the values of the site have not been properly assessed. At the least, offsets should be "like for like"; therefore any site chosen as an offset should contain the following characteristics:

- Be within one kilometre of the coast;
- Have a limestone substrate and contain both Cottesloe Central and South, and Quindalup vegetation associations;

- Contain at least 100 native plant species from these associations;
- Contain the listed P1 species *Grevillea* sp. Ocean Reef and P3 species *Conostylis bracteata* and *Hibbertia spicata* var *leptotheca*;
- Be in good to excellent vegetation condition;
- Contain areas of *Banksia sessilis* to support Carnaby's Cockatoo;
- Contain native fauna, such as Quenda and Echidnas;
- Contain areas of *Lomandra maritima* large enough to permit translocation of Graceful Sun Moths;
- Be secured for conservation purposes.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Response ID ANON-5S6C-657V-S

Submitted to MRS Amendment 1270/41 - Ocean Reef Marina Development
Submitted on 2017-02-24 16:16:58

Introduction**1 What is your name?**

Name:
Janet Richards

2 What is your organisation?

Organisation:
Friends of Cadogan Park

3 What is your email address?

Email:
friendsofcadoganpark@hotmail.com.au

4 What is your contact phone number?

Phone number:
0409885574

5 What is your postal address?

Postal address:
31 Tandina Way, Kingsley, 6026

6 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

7 What are the reasons for your support/opposition for the proposed Metropolitan Region Scheme amendment?**Nature of Support/Opposition:**

I am strongly opposed to the proposed development due to many damaging environmental and social impacts. In my opinion the proposed development is far larger than anything required and would cause irreversible damage to the conservation and social values of Bush Forever Site 325 and Marmion Marine Park.

There would be irreversible loss of recreational amenity and opportunities for a number of groups including walkers and bike riders, surfers, abalone fishers, bird watchers, photographers, and other nature lovers who currently value this much-loved stretch of coastline. The social benefit of Natural Areas and time spent with Nature is well documented. It is being shown to benefit those suffering from depression, to provide an exercise outlet for children and adults. Assisting in our sedentary urban life by providing space to exercise and relaxation.

BF 325 represents a linkage between adjacent bushland to the east and is recognised as part of a regionally significant fragmented bushland/wetland linkage. Bush Forever Site 325 is an urban coastal reserve and has unique ecological processes and educational, conservation and heritage values. Bush Forever Site 325 with its diverse fauna and coastal landscape in such close proximity to urban areas and educational institutions of all kinds (childcare centres through to universities) provides a unique opportunity for people of all ages to interact with, learn about and care for their natural environment.

The enormous size of the project means it will dominate the coast and realise the community's fear for the area of over-development that was identified in community consultation undertaken in the development of the Perth Coastal Planning Strategy.

A large urban development in the widest section of the coastal reserve would significantly increase risks to biodiversity caused by weed invasion, light pollution, predation by pets and feral animals, inappropriate human activities, introduction of nutrients and pathogens from private gardens and public open spaces, increased litter pollution posing threats to human health and terrestrial and marine fauna, and increased fire risk.

Fragmentation of the Bush Forever Site 325 reduces its conservation value and habitat value for resident fauna, including The Black-striped Snake, a priority 3 listed species, and the Quenda. Use of exotic vegetation in landscaping within the proposed Marina development will result in incursions by weeds and further reduce the integrity of the remaining natural vegetation.

The criteria that need to be met to achieve the MRS are very difficult to achieve and the maintenance and rehabilitation of the degrading 'edge effects' on the remaining vegetation complex of the BF 325 once the Marina is built will be a financial burden on the City far outweighing any benefit.

The needs of the boating community are already being met with the existing marinas at Hillarys Boat Harbour and Mindarie Marina.

The impact on the Marmion Marine Park with the extra recreational fishers cannot be overstated. Fish stocks of our iconic demersal fish are already under pressure. The mitigation of potential marine pollution entering the Marine Park from the expanded Ocean Reef Marina has not been discussed.

The purchase of alternative land sites to offset the reduction in Bush Forever Site 325 is not certain. Sites have been discussed to date with Parks and Wildlife, including a site adjacent to the Yanchep National Park and other sites north of Seabird. These sites are far removed from the proposed Marina site. Soil types are different and associated vegetation communities are not the same as that vegetation to be removed. The money allocated to purchase the land, if and when it becomes available, is inadequate in this economic environment.

Rehabilitation work as outlined in the Bush Forever Negotiated Planning Outcome prepared by Stralegen (pg 15) and available online state - (Maintenance of) BF 325 is currently undertaken by the City and is detailed in the Coastal Foreshore Management Plan 2014-2024 (Natural Area Consulting 2014). Funding constraints limit the extent of works that are possible within BF 325 to maintenance level activities, rather than large-scale enhancement works. The areas to be rehabilitated after the proposal are likely to be increased rather than reduced. Is funding for the works to be increased in line with this?

The work done by volunteer organisations such as the local Coastcare Groups is underestimated in this report. These will need extra funding and support. Will this be forthcoming from the city of Joondalup?

BF 325 is subject to considerable threatening processes due to its high perimeter to area ratio, fragmentation and proximity to urban development. Environmental threats include weeds, plant diseases, fire, non-native fauna species, human access and Infrastructure.

Current management of BF 325 by the City is outlined in the Stralegen report. The report states 'Rehabilitation success will be monitored against these criteria annually for five years, or until completion criteria are met'. Who will fund this monitoring and rehabilitation? Will these funds be taken from the monies to be used for maintenance, already stated in the report as constrained? The rehabilitation could take much longer than 5 years. Funds will be further constrained.

From the report "Contingency actions will be initiated if monitoring indicates that management actions detailed for NPO rehabilitation areas have not been successful or effective." All of the contingency triggers outlined in the report Table 9 have a high likelihood of occurrence, most especially weed incursion, fire, increase in feral animal activity, and insufficient seeds of plants of local provenance.

Will the actions to ensure the successful rehabilitation of BF 325 be funded through to the end of the legally binding agreement that the report states is to be prepared before the MRS amendment is gazetted? Monitoring and contingency actions will need continue to be implemented until such time as the completion criteria in Table 6 of the report are met.

This could be many years more than the 5 mentioned.

I oppose the development of the Marina at Ocean Reef. It will destroy a valuable and irreplaceable natural area and provide duplicate facilities already adequately provided for by close by developments.

8 Do you require a hearing? (A hearing is the opportunity to have your say in person).

No

9 If yes, do you wish your hearing to be public or private?

Public

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission
Metropolitan Region Scheme Amendment 1270/41
Ocean Reef Marina Redevelopment

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

Submission 90

RLS/0657

Name Sylvia Tetlow
(PLEASE PRINT CLEARLY)
Address 52 Adelaide Circle, CRAIGIE Postcode 6025
Contact phone number 08 9402 4394 Email address sylvia17@westnet.com.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

I object to the clearing and destruction of 17 ha of Bush Forever vegetation (site 325) at Ocean Reef.
Bush Forever vegetation must not be cleared. Instead, the Bush Forever site at Ocean Reef should be
looked after to sustain the habitat it provides for birds and other animals and for the ecosystem service
and aesthetic quality it provides to the people of Western Australia.

I object to swapping 17 ha of Bush Forever site 325 for an offset site because this is not a fair swap.
The offset land is not in the same locality; the offset land is of much poorer quality.

The offset will not provide the same habitat and ecosystem for native animals that Bush Forever site 325 provides.

I object to the clearing of Bush Forever site 325 because this will destroy the plants and animals native to the area
and this will reduce my quality of life because I enjoy the native plants and animals.

I object to the Department of Planning's attitude towards Bush Forever sites - treating them as sacrificial land
- to be cleared and built over with concrete.

We already have Hillarys and Mindarie marinas so instead of building another marina, the money should be
spent on enhancing the native bushland to preserve what is left of the natural environment.

At Hillarys marina shops are closing all the time because they cannot afford to pay the rent - this will also
happen if Ocean Reef marina is built - it will become a white elephant with shops not able to afford the rent.

The idea of building a marina at Ocean Reef is ridiculous because the ocean rapidly falls away to a great
depth and will take vast amounts of time and money just to build an ocean wall to enclose the marina. This is why
it wasn't built years ago. It was not a good idea then and not now.

turn over to complete your submission

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:

☒ **No**, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR

☐ **Yes**, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:

☐ Myself – My telephone number (business hours):

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:

☐ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

You should be aware that:

- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature  Date 24/02/2017

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Submission 91

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS/0657

Name M SIDELG
(PLEASE PRINT CLEARLY)
Address 12 PAGE DRIVE Postcode
Contact phone number 0479441130 Email address M.TSIDELG@bigpond.com

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

SEE ATTACHED.

turn over to complete your submission

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

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OR

☒ **Yes**, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:

☒ Myself – My telephone number (business hours): 0417 944 1130

or

☐ A spokesperson *I HAVE A VISUAL DISABILITY AND*

Name of spokesperson: *MAY REQUIRE ASSISTANCE*

Contact telephone number (business hours):

Postal address: *UP*

I would prefer my hearing to be conducted in:

☐ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

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To be signed by person(s) making the submission

Signature *[Signature]* Date *23/2/17*

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Submission Metropolitan Region Scheme Amendment 1270/41 Ocean
Reef Marina Redevelopment

Submitted By M Sideris Mullaloo

In this submission, I question and comment on a number of aspects of the Scheme Amendment, and question the validity of the information contained within the scant information provided by the applicant, the City of Joondalup.

A simple review of the proposal shows a lack of Amendment supporting documents; statements within the documentation contains numerous and selective omissions; and skewed inaccuracies, in what can only be considered to be an unprofessional and bias the Amendment proposal.

The areas of comments within this submission are:-

The Need and the Perth Recreational Boating Facilities Study Question

Is this proposal a Canal Estate Development

The Community Consultation (and Findings) Aboriginal
Heritage

The Business Plan / Cost Benefit analysis

The long term Legal Liability associated with the proposed Development
Risk Assessment

The Need for Perth Recreational Boating Facilities Study

Comment

The Perth Recreational Boating Facilities Study (the Study), a Study by the Department for Planning and Infrastructure New Coastal Assets Branch Coastal Infrastructure Business Unit, examines the recreational boating facility needs of the Perth metropolitan area to 2025 and proposes a schedule of development options to meet the growing demand.

This Boating Facilities Study is still the current State Government position and I refer to

The following are extracts from that DPI Study

8.1 Boating Facility Development Options to 2025

With the current and projected shortfall of 'supply versus demand' for moorings, pens and ramps, it is clear that there is a need to:

- *Encourage the progressive expansion of existing facilities to their full potential.*
- *Have the confirmed facility proposals as listed in the previous section brought to fruition in the near future; and,*
- *Have new initiatives planned and progressively delivered over the next two decades.*

A program to deliver additional facilities is provided in Table 14. This program lists

projects which DPI's Maritime Facility Planners consider feasible. Most of the listed projects are well located, with access to semi-sheltered ocean water bodies, and have the capacity to provide recreational boating facilities for a large part of the boating community. These sites are also well distributed across the Metropolitan Area.

The following table summarises a potential schedule of development options designed to address the predicted demand to 2025 as outlined in this Study. Some of these proposals are yet to be approved and the list is not necessarily exhaustive. Proposals for expansion at Swan River yacht clubs have been combined due to the large number of relatively small additions. Refer to Appendix 2 for individual Yacht Club assessments.

Table 14. Boating Facility Development Strategy

Site	New Pens	New Moorings (includes 50% stackers)	New Ramp Lanes	Notes
Existing Sites - Planned Expansion				
Jervoise Bay (Woodman Point) boat launching harbour		150	4	50% of boats in Stacks are mooring equivalent. i.e. over 7.5 metres
Hillarys Boat Harbour (DPI & Yacht Club)	21		-	Space exists for some further minor pen expansion
Fremantle Fishing Boat Harbour	100	141	-	50% of boats in Stacks are mooring equivalent. i.e. over 7.5 metres
Mindarie Marina	256		-	246 marina pens + 10 residential berths. Protected water area is available for an increase in the number of pens. Parking for the extra ramps will need to be resolved.
Swan River Yacht Clubs (Combined)	317		-	Combined expansion
Ascot Waters Marina	62		-	Further stages of development
Sub-total	756	291	4	

Table 14, Contd.

Site	New Pens	New Moorings	New Ramp Lanes	Notes
Recognised Sites with Development Potential				
Fremantle Sailing Club	500		-	Current Planning
Point Peron boat launching harbour	-		2	Space exists to increase the existing 4 ramps to 6.
Port Coogee Boat Harbour	360		-	300 marina pens + 60 canal berths provided by the developer of Port Coogee in two stages.

Two Rocks Boat Harbour	250		2	Protected water area is available for an increase in the number of pens. Parking for the extra ramps will need to be resolved.
Port Kennedy boat ramp	-		2	Provided by the developer of Kennedy Bay.
Eglinton Marina (Pipidinny Road)	200		2	Planned marina, part of Alkimos Eglinton land development.
Sub-total	1310		8	

The corresponding predicted increase in demand for facilities for the period 2006 - 2025 under the projected Growth scenario is 4,583 pens/moorings and 34 ramp lanes. The table of all proposed development options (above) plus items installed since 2006 (Table 13) is designed to meet the demand requirements to 2025 as described in Appendix 4.

In considering development timeframes an indicative schedule has been prepared that breaks down the planning horizon of 2025 into three terms - Short Term (to 2012), Medium Term (to 2015) and Long Term (to 2025).

8.1 Additional Facilities Required (the Gap)

The current demand for recreational boating facilities, based on the preferred projection scenario as outlined in this report, establishes a current requirement for an additional 4,612 boat pens and an additional 34 boat ramp lanes to be provided across Perth by the year 2025. When the capacity of Perth's existing facilities is examined along with the potential provided by the planned facilities as detailed above, there is clearly a shortfall. This shortfall is described as being the "Gap". The Table 15 illustrates this statement.

Table 15. Recreational Boating Facilities Required By 2025

	Required Boat Moorings (Pens+ Swing Moorings)	Required Boat Ramp Lanes
<i>Planned Expansion at Existing Sites (from Table 14)</i>	1,047	4
<i>Potential for Recognised Sites to Provide Facilities (from Table 14)</i>	1,310	8
Totals	2,357	12
Facility target by 2025 (from Tables 12 and 13)	4,612	34
The 'GAP' <i>(New initiatives beyond those already progressing, required to meet the shortfall to 2025)</i>	2,255	22

Table 16 shows potential new facilities that are currently under consideration by the private sector and Government to bridge the "Gap". Again, these proposals are yet to be approved and the list is not necessarily exhaustive.

Table 16. New Initiatives Proposed To Address "The Gap"

Site	New Pens	New Moorings	New Ramp Lanes	Notes
"Bridging The Gap" : Potential New Facility Proposals				
<i>Fremantle area: Coastal Public Boat Launching Facility</i>	-		8	<i>A Government commitment. Site options are currently being investigated</i>
<i>New Marina in Mangles Bay</i>	500		-	<i>Net increase in moorings. Total pens provided 500, but 200 existing boats on moorings and hardstand assumed to relocate when built</i>
	250		-	<i>The City of Joondalup is investigating the feasibility to expand the existing boat launching harbour to include pens</i>
<i>North Metropolitan Boat Harbour near Alkimos Town Centre</i>	800		8	<i>Proposed public boat harbour near the Alkimos Town</i>
<i>Fremantle Harbour Policy</i>	500	150 (stacker)		<i>500 pens + 50% of a 300 boat stacker as part of the initial expansion project in the long term</i>
Total	2050	150	16	

Comment

A review of this Study, by the Department for Planning and Infrastructure, and the content of the proposed Amendment documentation provided, clearly shows that the proponent's proposal has misrepresented the facts, the recommendations of the DPI study, the strategic development initiative and deliberately ignored the Short to Long term Initiatives.

The Amendment documentation also fails to recognise that the Northern Suburbs already has a proposed NEW Marina development for the Alkimos area, identified in the DPI Medium Initiative above, and the fact that this State government LandCorp development already has the necessary legislative and statutory approvals, being MRS and Environmental approvals, to proceed.

The proponent documentation also fails to acknowledge that this development has also been signed off to proceed by the approving local government, the City of Wanneroo.

Comment

At Table 16, the DPI study identified that the Ocean Reef

The recommendation is 250 pens and the feasibility to expand the existing launching harbour to include pens.

The proponent did prepare Concept Plan1, copy submitted as attachment, which meet all these requirements, including the pen number and only required a minor extension of the south breakwater and the construction of a new northern breakwater.

All of these modifications were low cost, low impact to the Marmion Marine park, no expansion into deeper ocean waters, low impact to the land component, and just as important no impact to the adjoin coastline beaches north and south, Mullafoo Beach.

There is no evidence that at the time this concept plan was presented to the elected members, they were made aware of the DPI Study and the fact that this Plan satisfied all the necessary requirements of the proposed Study Initiatives.

A copy of Concept Pan 1 is submitted for consideration.

Question

When the WAPC considers the approval of this MRS Scheme Amendment, will the WAPC ensure that proposal is scaled back to the recommended 250 boat pens.

If not, will the WAPC call for objective evidence that all elected members were advised of the study and the Strategy Initiates proposed.

Question

When the WAPC considers the approval of this MRS Scheme Amendment, will the WAPC ensure that all the boating facility initiative recommended in Table 14 are developed and in progress Prior to approving the propped Amendment.

Question

When the WAPC considers the approval of this MRS Scheme Amendment, will the WAPC ensure that the Approved proposed Marina development for Alkimos is under construction Prior to approving this development.

Is this MRS Amendment proposal a Canal Estate Development

At page 6, The Amendment proposal to *Development Control Policy 1.8 – Canal Estates and Artificial Waterways* (DC 1.8),

Comment

I refer to the Definitions contained within the Policy

"Canal Estate means a development or subdivision that adjoins or directly influences an existing or proposed artificial waterway. For planning purposes, any development where the titles to the subdivided lots extend into, abut or are proximate to an artificial waterway shall be deemed to be part of a canal estate unless the WAPC determines otherwise."

This local government has publically stated and argued that this proposal is Not a Canal Estate development, see Petition No 64 response dated 9 December 2014 to the State Parliamentary Standing Committee on Environment and Public Affairs

1. *Legislate to ban canal estate development in WA in line with New South Wales and Victoria.*

Comment: *Development Control Policy 1.8 Canal Estates and Artificial Waterway Developments* (Western Australian Planning Commission, 2012) applies general principles and guidelines for marinas and boat harbours. The petitioners' request to ban canal estate development in Western Australia will not have a bearing on the Ocean Reef Marina project as it is not a canal estate based project.

Comment

The proponent makes no further statement nor does it provide any supporting reasoning to support this statement to Parliament.

Comment

When one considers the proponents Amendment documents and the comments related to *Development Control Policy 1.8 – Canal Estates and Artificial Waterways* (DC 1.8), namely *DC 1.8 states that the identification of a waterways manager would occur prior to the local planning scheme amendment being finalised. However, the WAPC has resolved that confirmation of a waterways manager for this marina is required, prior to a final decision being made on the amendment.*

Comment

Contrary the parliamentary submission, it is clear that this local government cannot and has not refuted the fact that the Policy definitions provided in the *Development Control Policy 1.8 – Canal Estates and Artificial Waterways* (DC 1.8), confirm that this is a canal Estate Development proposal.

Question

If the WAPC approves this MRS Scheme Amendment, will the WAPC ensure that the stated policy definition of a Canal Estate *Any development where the titles to the subdivided lot...or are proximate to an artificial waterway shall be deemed to be part of a canal estate* is used and enforced by the proponent.

Comment

I refer to the Definitions contained within the Policy

"Canal Estate means a development or subdivision that adjoins or directly influences an existing or proposed artificial waterway. For planning purposes, any development where the titles to the subdivided lots extend into, abut or are proximate to an artificial waterway shall be deemed to be part of a canal estate unless the WAPC determines otherwise."

Question

Can the WAPC determine whether or not the Ocean Reef is a 'Canal Estate Development'?

- If yes, the proponent the City of Joondalup is clearly misleading their ratepayers..
- If no, when will the WAPC amend the definition in its own policy *Development Control Policy 1.8 Canal Estates and Artificial Waterway Developments*

Community Consultation PAGE 12

The proposal states that

The City of Joondalup advises that consultation has been undertaken with the community,

Comment

Although the proponent's documentation seems to present an argument that it has been in full and open consultation with the community, nothing could be further from the facts.

This local government established a working Committee that held progressive meetings, and then in order to circumvent the provisions of the Local Government that requires it to Report to Council (and the Ratepayers), simply adjourned those meetings.

The public were denied their rights to engage in the process of government!

Comment

When these Committee meetings finally made it to the (public) Council Meeting Agenda, the attachment to the Committee meeting Reports could be accessed by the public, and again the public were denied their rights to engage in the process of government!

Public response to Community Consultation

Comment

The proponent makes statements that it consulted with the community on various occasions, including 2007 and 2009, and then characterises the results into overwhelming community support and demand for 'world class' tourist centre etc.

A review of these 2 consultation processes is a little more down to earth and low key.

Note Access to these details had to be obtained by a protracted Freedom of Information process or through a community briefing process held in January/February 2017.

Open accountable and transparent – No!

Aspects of this consultation outcome not published or commented on by the proponent, is the fact that the respondents stated

Referring to the Minutes of Ocean Reef Marina Committee dated 12.12.2007, and specifically Attachment 2 - Analysis of community information – What people would NOT like

The items that respondents would not like to see were also analysed (Attachment 2). A predominant theme concerned fears that the boats harbour would lose its unique identity as a boating haven and become "...another shopping centre by the sea."

The following are some extracts from that report:-

"Any non-essential removal of existing native vegetation."

*"NO HOUSING!! The whole marina to be set aside for public use ...
no sections to be sold off to developers for private housing and accommodation."*

"A trashy tourist precinct as has happened at Sorrento Quay.

*"Retail shops, commercial development. The marina should stay dedicated
to marine recreation"*

*"I would not like to see the marina developed into a commercial shopping precinct.
With the proximity of Hillarys and Mindarie being so close, and the history in relation to
the commercial success of these ventures being questionable, I do not believe Ocean Reef
needs this."*

*"[No]...commercial or entertainment facilities which attract large crowds and
make manoeuvring of boats, trailers or on the water dangerous."*

The items that respondents would not like to see were also analysed (Attachment 2). A predominant theme concerned fears that the boat harbour would lose its unique identity as a boating haven and become "...another shopping centre by the sea."

I attach the results of the 2007

I attach a copy of the 2009 question that was sent to all residents of the City of Joondalup that went out for comment.

The City claimed the survey showed overwhelming support, however, when one considers the survey questionnaire, copy submitted, it is clear that the survey would only produce this outcome.

As mentioned previously the City, by deliberately only adjourning its committee meeting, denied the ratepayers the right to scrutinise the reports and survey results.

I do not believe this has been an open and accountable process.

A review of the Minutes of the Ocean Reef Marina Meeting held 03.09.2009, it clearly indicates that the survey **DETAILS**

The survey was designed to obtain feedback on the following matters:

- *The extent of support for developing the site*
- *The extent of support for the various features within the concept plan*
- *General comments concerning the concept plan*
- *Any features that have been missed and could be included in an updated concept plan*
- *The extent of support for the concept plan overall*

Comment

There was no capacity or desire to seek negatives or 'Not wanted' from the broader community, in other words, the process was deliberately skewed to avoid any negatives, and also of equal importance raise or share the negatives that the 2007 consultation process had identified.

A flawed process, with a flawed and predictable outcome.

This Report indicates

This report to the committee also states

During the consultation process comments were received from special interest groups, Government agencies and individuals that were not included in the findings as the comments were not completed on the survey form and therefore did not conform to the notified consultation process.

Question

Does the WAPC accept that this consultation process was an inclusive?

Comment

This same Report indicates that even though Sustainability of the proposal should have been considered by Committee, in fact this Report shows otherwise;

Sustainability implications:

The survey used for the consultation did not explore matters associated with local sustainability although some inferences could be drawn from the qualitative feedback provided, given a longer reporting time frame.

Question

Was this a reliable and proper consultation process that demonstrates sustainable marina and/or boat harbour developments

Does this Advocate for open, honest and accountable processes
and does it Provide accurate up to date information to the community;

Question

If the consultation process is flawed, can it be or should it be accepted by the WAPC as a valid and valid public consultation process for this Amendment process.

If yes, how does the WAPC justify the reliance on a flawed consultation process.

If No, will the WAPC direct the proponent to undertake further consultation – without the skewed and bias, and the include key aspects raised previously by the community and other relevant costing information.

Question

If the WAPC approves this MRS Scheme Amendment, will the WAPC ensure that the public consultation concerns are Fully understood and satisfied, namely

Aboriginal Heritage page 10

The amendment proposal makes scant reference to the assessment of Aboriginal Heritage

"in recognising the importance of having reliable Aboriginal information on land and the values attached to it, " however, this well funded Scheme Amendment fails to recognise or even mention the existence of the *Perth Coastal Planning Strategy "Community Engagement Program -Nyungar Forum Summary Report"*

An extract from the Perth Coastal Planning Strategy "Community Engagement Program -Nyungar Forum Summary Report" indicates;

This Perth coastal planning strategy project is:

- *funded by the Western Australian Planning Commission (WAPC),*
- *steered by the Coastal Planning and Coordination Council (CPCC) and the Perth Coastal Planning Strategy Steering Committee, and*
- *coordinated by the Department for Planning and Infrastructure (DPI) as part of the coastal planning program of the WAPC.*

And states -

Heritage issues of concern:

Some of the earlier developments along the coast had not taken into consideration the unpredictable effects of the ocean and climate. The Elders emphasised that there had been insufficient coastal setback allowed for previously, especially in the southern sector of the coastline.

They highlighted a concern that the coast should not be developed because of the unpredictable effects of the ocean and reminded the forum that the coastline itself develops protective barriers to the land in the form of substantial sand dunes. One of the Elders said "it's only a matter of time before a tsunami hits the coast of Western Australia. If we take away the sand dunes, there will be no protection and we will be flooded like in New Orleans." The Elders stated that they did not want the coast developed as it would destroy their heritage sites and spiritual dreaming. According to the groups consulted, the coastal dunal system which extending from Two Rocks to Augusta is spiritually significant to them as it represents the dreaming track of the Waugal (Wagyl, Wagyle).

As one of the Elders stated with reference to the destruction of the coast by development in the Mandurah/ Rockingham area, that his dreams have now become nightmares as far as preserving the coast was concerned. This was not only referring to the spiritual significance of the coast but also the environmental destruction that he perceived.

Another important factor that came out of the group discussion was that the natural landscape is an integral part of indigenous cultural heritage. The Aboriginal people derived their food, medicine and mythology from the natural environment.

Land has always been considered by Aboriginal people to have an intrinsic spiritual meaning especially that land which they regard as their 'own country'. One cannot extricate Aboriginal heritage from the surrounding natural environment as Aboriginal cultural heritage and history is written in the landscape. To destroy that landscape is tantamount to destroying their cultural heritage and history.

It was pointed out by an Elder that the mythology did not stop at the edge of the land but continued out past the continental shelf, and that even though Nyungar people did not have boats, their beliefs went deep into the ocean which at a previous time had been dry land and part of their hunting grounds. As stated by the Elder "This was the place where our ancestors once lived, hunted and had ceremonies. This was our Land."

With the rapid development of the Perth metropolitan coastal strip, indigenous people feel a sense of loss, powerlessness and anger. This is a common reaction when indigenous people view remnant bushland and coastal heath about to be destroyed by development. Nyungar perceptions can be generalised in terms of the loss of natural bushland, coastal dunal systems, limestone features and water sources, being equated with a loss of culture.

When there is a proposal to destroy coastal heath, shrubland and its related dunal system, or natural bushland containing mature trees, Nyungars invariably react with a mixture of hostility and anxiety, claiming that white people have not only tried to destroy their people, culture and spirituality, but now they intend to finish them off by destroying the last remaining tangible symbols of their traditional culture - the remnant bushscape and in coastal regions, the remnant dunescape.

The Elders who attended the Nyungar forum kept reiterating that they had little faith in the government's ability to manage the coastal environment.

Extract from *Nyungar Forum Summary Report*.

Comment

The WAPC is well aware of this Coastal Planning Study and the heritage values that the *Nyungar Forum Summary Report* placed on the land and adjoining ocean waters.

The fact that the Amendment documents do not identify and comment on the recognised Aboriginal site just south of the proposed development, only proves that the applicant has little or no regard for the Heritage values.

Question

Will the WAPC fully consider and respect those established Nyungar Heritage views as outlined in the Perth Coastal Planning Strategy "Community Engagement Program -*Nyungar Forum Summary Report*" Direct the Lead Proponent to fully and properly consider the Aboriginal Heritage issues and values, and not allow them to be simply dismissed as outlined by this Amendment proposal; It is not just a box to be ticked.

Other considerations not identified in the proponents MRS Amendment document

The Business Plan / Cost Benefit Analysis

At the AGM of Electors (of the City of Joondalup) held 2.12.2014 the Ratepayers moved and carried 2 Motions

that the 2014 Annual Electors Meeting of the City of Joondalup calls on the City Council to give the residents of Joondalup a clear and unequivocal undertaking that there will be no attempt to rezone the "Bushland Forever" site in Ocean Reef until the City has released full and comprehensive costings of the proposed marina, valuations for the land proposed to be sold to fund the marina, a comprehensive explanation of how any shortfall will be funded and an estimate of on-going maintenance costs and how it is proposed to fund such costs.

And

that given some \$5,000,000 has been spent or currently budgeted for the Ocean Reef redevelopment, we the ratepayers request that the business plan/cost benefit analysis be made available by the end of May 2015.

Comment

Although there was a desire by the ratepayers to access the financial costings and long term viability of the redevelopment, NONE have been forthcoming, even though it is clear that this information is known to some members of the City of Joondalup.

Question

If the WAPC approves this MRS Scheme Amendment, will the WAPC provide and fully disclose the Business Plan / Cost Benefit Analysis, PRIOR TO finalising the Scheme Amendment, in order to justify further progressing with the approval process.

Legal Liability

At the AGM of Electors held 6 DECEMBER 2016.

The following motion was carried

that the City of Joondalup PROCEEDS no further with the Ocean Reef Marina redevelopment until reports state that there will be no damage to the coast line from the impact of the Ocean Reef Marina.

And

that the City of Joondalup obtains an exemption from the State Government for all liability arising from property damage or infrastructure damage caused by the Ocean Reef Marina redevelopment.

The response to this motion by the City stated that

"The impacts of the Ocean Reef Marina are expected to have little effect on the coastal hazard allowances on adjacent sections of the shorelines.

Risk to property and infrastructure resulting from the development of the Ocean Reef Marina is considered to be very low."

Further clarification from the City was sought at the recent Council meeting dated last Tuesday 21.02.2017

QUESTION

If the Council adopts the Officers recommendation to NOT SUPPORT obtaining exemption from the State Government for all liability arising from property damage or infrastructure damage caused by the Ocean Reef Marina redevelopment:

Q2 Advise who will then carry that liability.

Q3 Will this decision be binding on all future Councils?

Q4 Will ratepayers that are affected, be able to seek legal remedy from this Council and administration officers?

Response A2-4 These questions will be taken on notice.

Comment

As Approval of this proposed MRS Amendment is the responsibility of the WAPC, then it is my understanding that any legal liability issues should be borne by the State

This is further supported by the fact that the City of Joondalup is insisting that the State, and in particular, LandCorp, become the lead proponent for the redevelopment of the Ocean Reef Marina, wharfs and all!

Question

If the WAPC approves this MRS Scheme Amendment, will this allow those affected property owners be able to seek legal remedy from the WAPC?

Question

What legal entity [who] is legally liable from damage to and from this development caused by extreme weather events.

Risk Assessment

The proponent has not provided or disclosed a technical Risk Assessment that does identify any element of the proposed project that ensures the proposal has the 'Lowest Risk As Possible'

This Risk Assessment should provide a detailed assessment of the entire foreseeable life of the development.

The public has right to know what elements were considered, if any, for the process of building the infrastructure, the operation, as well the short to long term strategy for maintain the infrastructure.

The identified elements expected include the various tasks, their identified risk element, the cause of the identified Risk, the Consequences of that Risk element, their Controls, the associated Action Plans, together with any legislative or regulatory impacts, to name some Risk elements expected.

The Public and the ratepayers have a right to know what risks are involved and the outcome of that Risk.

Question

Will the WAPC direct the proponent to provide a full Risk Assessment that is made available for public assessment, prior to the WAPC approval.

Ocean Reef Marina – Community Consultation – Analysis of Feedback

What residents of Ocean Reef would NOT like to see

Individual comments	Requirement	Quotations
50	<p>Nothing that would 'cheapen', 'downgrade' or 'lower the tone' of the existing appeal of the area including:</p> <ul style="list-style-type: none"> • Fast food outlets • Amusement arcades • 'Tacky' / low end tourist shops • Fairground type attractions • Gambling outlets 	<p>"Rubbish fast food outlets that attract similar minded people..."</p> <p>"Snooker room, nightclub, timezone, tattoo or piercing parlour."</p>
32	<p>No high rise development which would block the views of Ocean Reef residents.</p>	<p>"I am for progress as long as there is no high rise as I live directly behind this area and would hate to lose my view."</p>
30	<p>Places, which it was felt, would attract anti-social behaviour or activities into the area, including:</p> <ul style="list-style-type: none"> • Nightclubs • Discos • Large pubs • Large parking areas 	<p>"I would NOT like to see a night club or a Pot Black or similar at the Marina as I would hate to see it become a place where drunk people hang around causing problems in the car park, resulting in it becoming a place where you don't feel safe or comfortable taking your family."</p>
10	<p>No consideration given to the potential for negative impacts on the local environment.</p>	<p>"Any non-essential removal of existing native vegetation. Most of the people I have spoken to in the harbour area and on the track, consider this green corridor as one of the most attractive/peaceful/relaxing they have available to them. A few weeks ago we noted some visiting kangaroos; the first since many, many years ago."</p>

Ocean Reef Marina – Community Consultation – Analysis of Feedback

What residents of Iluka, Mullaloo, Heathridge, Connolly and Currambine would NOT like to see

Individual comments	Requirement	Direct Quotations
18	<p>Nothing that would 'cheapen', 'downgrade' or 'lower the tone' of the existing appeal of the area including:</p> <ul style="list-style-type: none"> • Fast food outlets • Amusement arcades • 'Tacky' / low end tourist shops • Gambling outlets • Pool halls 	<p>"Skimpy pubs – a definite no-no!"</p> <p>"No cheap weekend markets etc - a stringent code ...[for]... ensuring quality retailers."</p>
27	<p>No high rise or residential development on the site that will restrict access/views to the ocean.</p>	<p>"NO HOUSING!! The whole marina to be set aside for public use ... no sections to be sold off to developers for private housing and accommodation."</p>
24	<p>Places, which it was felt, would attract anti-social behaviour or activities into the area, including:</p> <ul style="list-style-type: none"> • Nightclubs • Discos • Large pubs • Large parking areas 	<p>"A NIGHTCLUB!! As with any other nightspot that has a nightclub this is where the fighting starts. Part of the reason people don't like going to Scarborough etc is due to drag racing and lots of drunken 17 - 18 year olds. I feel that the Ocean Reef Marina should be made into a fun stylish place to be, in keeping the people who live in the area. No pubs - I think this encourages anti-social behaviour and discourages families from frequenting the area."</p>

Ocean Reef Marina – Community Consultation – Analysis of Feedback

What residents of the North West Corridor would NOT like to see

Individual comments	Requirement	Direct Quotations
<p>54</p>	<p>No overwhelming commercial theme which would detract from the ambience of the site as a place for marine activities.</p> <p>A number of responses recommend a 'village' theme rather than a "shopping centre by the sea."</p>	<p>"A trashy tourist precinct as has happened at Sorrento Quay. No shops selling tacky boomerangs, koalas or t-shirts."</p> <p>"No takeaway or drive-thru liquor outlets of any description. No pinball or fun parlours where teenagers may congregate. No multistorey building development. No large residential development areas. No developments which may/will have an impact on the amenity of surrounding suburbs."</p> <p>"Retail shops, commercial development. The marina should stay dedicated to marine recreation, Hillarys is a tourism/retail marina and there is no need for another."</p> <p>"I would not like to see the marina developed into a commercial shopping precinct. With the proximity of Hillarys and Mindarie being so close, and the history in relation to the commercial success of these ventures being questionable, I do not believe Ocean Reef needs this."</p>

Ocean Reef Marina – Community Consultation – Analysis of Feedback

What residents of other suburbs would NOT like to see

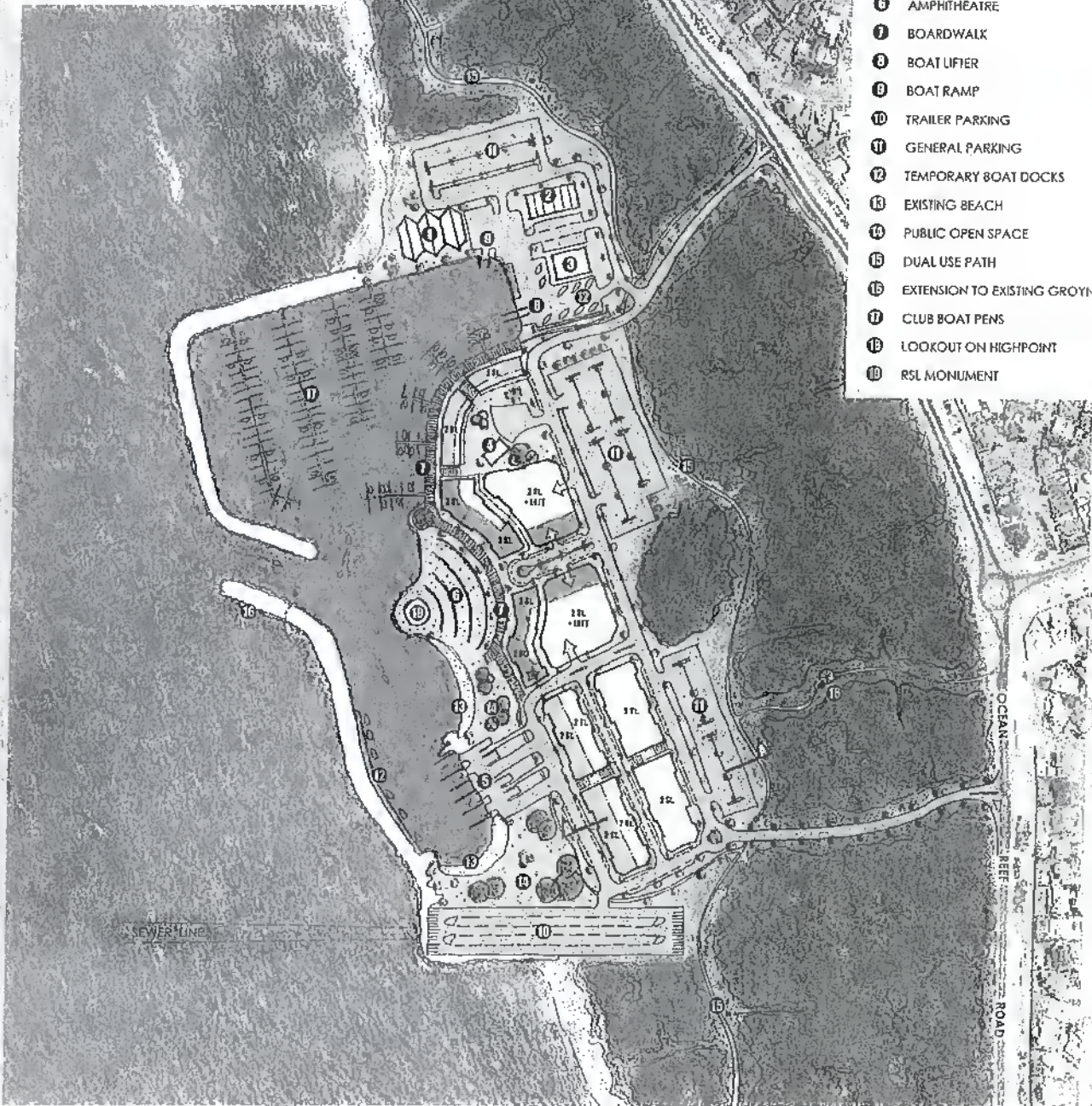
Individual comments	Requirement	Direct Quotations
29	No overwhelming commercial theme which would detract from the ambience of the site as a place for marine activities. A number of responses recommend a 'village' theme rather than a "shopping centre by the sea."	<p>"No more coffee shops please... we [have] got one Hillarys already, would like theme to be more nautical and aimed at the boating side of the community. No candy shops, no more stuffed kangaroos for sale and places selling swords and junk. No games arcades, no junk food stores side by side!!!!"</p> <p>"[No]...commercial or entertainment facilities which attract large crowds and make manoeuvring of boats, trailers or on the water dangerous."</p>

LAND USE YIELDS AND AREAS (APPROX)

- 199 RESIDENTIAL DWELLINGS (R60 CODING)
- 1500m² GROSS RETAIL FLOOR AREA
- 3000m² GROSS COMMERCIAL FLOOR AREA
- 4500m² GROSS ADAPTABLE COMMERCIAL / RESIDENTIAL FLOOR AREA

LEGEND

- 1 CLUBHOUSE
- 2 STACKER
- 3 CHANDLERY
- 4 SEA RESCUE
- 5 EXISTING BOAT RAMPS
- 6 AMPHITHEATRE
- 7 BOARDWALK
- 8 BOAT LIFTER
- 9 BOAT RAMP
- 10 TRAILER PARKING
- 11 GENERAL PARKING
- 12 TEMPORARY BOAT DOCKS
- 13 EXISTING BEACH
- 14 PUBLIC OPEN SPACE
- 15 DUAL USE PATH
- 16 EXTENSION TO EXISTING GROVNE
- 17 CLUB BOAT PENS
- 18 LOOKOUT ON HIGHPOINT
- 19 RSL MONUMENT



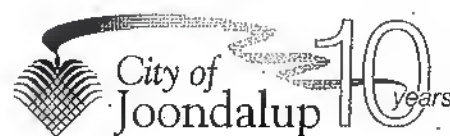
- RESIDENTIAL
- RETAIL
- COMMERCIAL
- ADAPTABLE COMMERCIAL/RESIDENTIAL
- ★ COMMUNITY (LOW COST RENTAL SPACE)

LAND USES (BUILT FORM)



SECTION AA (1:500 @ A1)

Ocean Reef Marina Concept Plan



focussing on the future

The purpose of this survey is to identify levels of community support for the Concept Plan for the proposed Ocean Reef Marina development.

Many of the features you can see in the Concept Plan were identified during the previous consultation in 2007. We would like to know what you think about them now that they have been included in the plan.

Please note we are not seeking input on ALL the features in the plan as some of them are not negotiable and HAVE to be incorporated. One very good example would be the provision of the Whitfords Volunteer Sea Rescue facility.

1. Do you feel that a marina **SHOULD** be developed on the present Ocean Reef Boat Harbour site?
(Please tick your response)

Yes ☐¹ No ☐² Unsure ☐³

If you answered 'yes' or 'unsure', please complete the remainder of the survey.

2. Please tell us what you think of the following design features in the Concept Plan
(Please tick the box that best indicates your response)

	Strongly approve	Approve	Neutral	Disapprove	Strongly disapprove
Recreation & Leisure					
Ocean Pool	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water Park and Playground	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Active Play area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Internal Beaches	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dual use path	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks & Gardens					
Amphitheatre	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Memorial park	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Open Space	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Grassed terraces	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Natural Areas					
Retention of natural bushland	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fauna underpass	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Boardwalk	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Iconic Features					
Central Pier	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lookout	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Floating Jetty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Markets and Stalls	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Museum/Arts & Crafts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Height of buildings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marine Services					
Boat pens	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Boat stacker	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Boat ramps / launching facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Boat Trailer Parking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Helipad	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Strongly approve	Approve	Neutral	Disapprove	Strongly disapprove
Services					
Food and Beverage outlets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waterfront retail	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hotel / short stay apartments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Commercial space	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Residential apartments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CAT Bus from Joondalup CBD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. Any other comments on the Concept Plan?

4. Do you feel anything is missing?

5. Having reviewed the concept plan in more detail, please let us know what you think about it overall.
(Please tick the box that best indicates your response).

I strongly support the current concept plan ☐ I strongly reject the current concept plan ☐ I am undecided ☐
 I support the current concept plan ☐ I reject the current concept plan ☐

To help us gauge levels of community and stakeholder response to this consultation, please tell us about yourself.

6. I am: ☐ Male ☐ Female

7. I own property or live: (Please tick the box that applies to you)

Adjacent to Ocean Reef Road ☐ In the suburb of Ocean Reef ☐
 Beldon ☐ Burns Beach ☐ Connolly ☐ Craigie ☐ Currambine ☐ Duncraig ☐
 Edgewater ☐ Greenwood ☐ Heathridge ☐ Hillarys ☐ Iluka ☐ Joondalup ☐
 Kallaroo ☐ Kingsley ☐ Kinross ☐ Marmion ☐ Mullaloo ☐ Ocean Reef ☐
 Padbury ☐ Sorrento ☐ Warwick ☐ Woodvale ☐ Outside the City of Joondalup ☐

8. I am aged between:

18 – 23 ☐ 36 – 41 ☐ 54 – 59 ☐ 72 – 77 ☐
 24 – 29 ☐ 42 – 47 ☐ 60 – 65 ☐ 78 + ☐
 30 – 35 ☐ 48 – 53 ☐ 66 – 71 ☐

For a submission to be valid, the name and address fields below need to be filled out:

Name: _____

Address: _____

Email: _____

Telephone Number: _____

Thank you for your Feedback. One survey per person or community group

P. 1 of 3

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Submission 92

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

RLS/0857

Name Donald Paynton for Joondalup Community Coast Care Forum Inc.
(PLEASE PRINT CLEARLY)
Address cf 32 Princeville Ter, Connolly Postcode WA 6027 (JCCCF)
Contact phone number 0419 460 301 Email address d.paynton@iinet.net.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

The JCCCF does not support MRS amendment 1270/41 as it would result in the destruction of approx. 26 ha of a Bush Forever site with no guarantee the conservation estate will be added to in a timely manner.

While the WAPC requires that the NPO be agreed by the DoF, DPaw and DEPA prior to a final decision being made on the amendment, this appears to relate to only an agreement, not a physical purchase.

Furthermore the NPO states "It is intended that the acquisition of the site ^{should} occur prior to clearing of BP325." This does not guarantee a purchase prior to clearing and given the difficulties stated in finding an area containing "conservation significant species and communities of similar value and priority for protection" outlined in the NPO, a short term purchase does not seem likely.

Cont'd p2.

turn over to complete your submission

Planning and Development Act 2005
Section 41 Amendment (Substantial)
 Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

To: Secretary
 Western Australian Planning Commission
 Locked Bag 2506
 Perth WA 6001

OFFICE USE ONLY

SUBMISSION NUMBER

RL6/0657

Name Donald Poynton for Joondalup Community Coast Care Forum
(PLEASE PRINT CLEARLY)
 Address 4-32 Princeville Ter, Connolly Postcode WA 6027 (JCCCF)
 Contact phone number 0819 460 301 Email address d.poynton@icinet.net.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

In addition, JCCCF has concluded the Draft NPO requires to address the following issues before it is presented for consideration as part of the MRS amendment process.

1. the land covered by BF325 has not been adequately evaluated by the surveys (outdate, inadequate or non-existent) used to compile the NPO, and

2. the remnant portion of BF325 is not adequately protected by the proposed measures under SPP 2.8.

Further support for our conclusions are set out in JCCCF's Comments on the Draft Bush Forever Negotiated Planning Outcome (Attachment 1).

turn over to complete your submission

P.3 of 3.

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:

☐ **No, I do not wish to speak at the hearings.** (Please go to the bottom of the form and sign)

OR

☒ **Yes, I wish to speak at the hearings.** (Please complete the following details)

I will be represented by:

☐ Myself – My telephone number (business hours): 0419 460 301

or

☐ A spokesperson

Name of spokesperson:

Contact telephone number (business hours):

Postal address:

I would prefer my hearing to be conducted in:

☒ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

You should be aware that:

- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature



Date

24/2/2017.

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.

Contacts: Telephone - (08) 6551 9000; Fax - (08) 6551 9001; Email - mrs@planning.wa.gov.au; Website - <http://www.planning.wa.gov.au>

Attachment 1. Ocean Reef Marina

Comments on the Draft Bush Forever Negotiated Planning Outcome

By the Joondalup Community Coast Care Forum Inc

Introduction

This submission is made on behalf of the Joondalup Community Coast Care Forum Inc (JCCCF) an incorporated organisation formed in 2000 at the behest of the City of Joondalup (City).

The objects of the organisation are:

- (a) To act as a community reference group for monitoring issues and initiating action relating to the Joondalup Coastal strip, particularly in relation to conservation, recreation, development, education and culture.*
- (b) To integrate and establish communications between other related organisations.*
- (c) Provide a contact point for information and education.*
- (d) Instigate initiatives relating to the best interests of the Joondalup Coastal strip.*

Volunteers from JCCCF's three working groups (Friends of North Ocean Reef Iluka Foreshore, Mullaloo Beach Community Group and Friends of Sorrento-Marmion Foreshore) have spent thousands of hours working in Bush Forever site 325 (BF 325), including the area to be cleared for the Ocean Reef Marina (ORM) development and the remnant area proposed for rehabilitation.

JCCCF has compiled its own flora list from year-round surveys and has for many years conducted annual Graceful Sun Moth surveys.

The organisations considers itself well qualified to comment on the Negotiated Planning Outcome (NPO).

JCCCF is opposed to the Proposal because:

1. it fails to protect the existing BF 325,
2. it does not guarantee a suitable offset can be purchased, and
3. the rehabilitation area is inadequate.

However, JCCCF recognises the ORM development may go ahead at some time in the future. Consequently our comments are aimed at obtaining the best outcome for the remaining portion of BF 325.

3. Environment values of the Proposal area

3.1.4 Flora

Mattiske was engaged to undertake a level 2 flora and vegetation survey of the proposed ORM survey area in 2013.

Comment: The flora survey undertaken by Mattiske is considered to be inadequate, failed to fully meet any of the “Objectives” listed on page 10 of the report, and needs to be updated.

- The Mattiske report records only 88 native species whereas JCCCF's list contains a minimum of 105 native species on the site.
- The Mattiske report lists only 2 priority species (*Grevillea* sp. Ocean Reef and *Conostylis bracteata*) whereas JCCCF's list has also identified numerous plants of *Hibbertia spicata* subsp. *leptotheca*, a P3 species.
- The Mattiske report does not include the occurrence of *Eucalyptus Gomphocephala* (Tuart). This stand of trees opposite the Resolute Way roundabout is the only occurrence of this species in BF 325 north of Ocean Reef and possibly the only one north of Whitfords Nodes. Surveys in the area show it to have a high reptile population (Spineless Wonders pers.com.).
- The survey was carried out over only 3 days, and could not have achieved the required level of due diligence in so short a time. Much of the vegetation mapping is “extrapolated”.
- Mattiske and the current consultants, Stratagen, maintain that the 65 x 10-sq metre quadrats provide an adequate assessment of the vegetation. The absence of key species and the absence of several recognised vegetation associations in the Mattiske survey indicates that the assessment is not adequate or accurate. 20 quadrats per day cannot be adequately assessed where species richness is present, as at Ocean Reef.
- Many plants of *diplolaena angustifolium* (Yanchep Rose) occur within the area to be cleared. This species was not listed by Mattiske and should have been discussed in Section 5.2.12 *Regional and Local Extent of vegetation*, as according to Florabase it has not been recorded in the Joondalup LGA making the plants at the ORM one of the southernmost known occurrences and certainly the southernmost one to occur on the coast.
- The proposed route of the main access road from Hodges Drive appears to clear most plants of the Priority 3 species, *Hibbertia spicata* var. *leptotheca*. This road configuration also would clear a large tract of *Melaleuca cardiophylla*, significant for its distribution, being the southern limit of the species en masse.

3.1.5 Fauna

Comment: The lack of adequate and recent field surveying is unsatisfactory.

- The fauna assessment quoted is outdated (Western Wildlife 2008) and did not include the northernmost 400m of the current proposal (approx. 12.5ha).

- The assessment is a Level 1 desktop study and a single visit consisting mainly of speculation as to what fauna "is likely" to occur. It needs to be Level 2 as a minimum to match the significance of the flora survey.
- The NPO understates the amount of foraging habitat for Carnaby's Black Cockatoo to be cleared. Approximately 1.7 ha of actual foraging area known to be used by Carnaby's Cockatoo will be cleared, compared to the stated 0.43 ha of "suitable" habitat claimed in the NPO.
- The NPO misrepresents the condition of the foraging habitat to be cleared, which includes a large proportion of vegetation in very good to excellent condition.
- Carnaby's Cockatoo has also been recorded foraging in areas shown as "degraded to good".
- As Carnaby's Cockatoo is a tree and shrub forager, the presence of invasive grasses at ground level is not, of itself, sufficient to downgrade the feeding habitat.
- The NPO states that Quenda "may occur" at the site, whereas in actuality, Quenda are regularly sighted both north and south of the marina site.
- Echindas have been seen (as recently as February 2017) on the DUP in the area to be cleared. While not classified as endangered they are not common in the metropolitan area so the removal of their habitat is likely to lead to a further decrease in numbers.
- The NPO makes no mention of the presence of the categorised as "Vulnerable" Graceful Sun Moth at the site. An area known to be inhabited by the Graceful Sun Moth will be cleared along one path, and adjacent habitat of *Lomandra maritima* will be cleared, seriously depleting the amount of habitat available for one colony of this very localised species. Planned landscaping features and formalisation of sandy tracks, used for mating displays would further degrade and fragment their essential habitat.
- No survey of the reptile fauna of the ORM area has been conducted. The reptile fauna appears to be diverse, from the numerous trackways seen, and the fauna is suspected to have attracted the attention of illegal reptile hunters. EPA Bulletin 880 identified that Spearwood/Quindalup Dunes have the highest diversity of birds and reptiles of any dune system on the Swan Coastal Plain.
- No survey of the invertebrate fauna of the ORM area has been conducted. Many species of invertebrates are responsible for pollination of native flora. Short term surveys elsewhere in BF 325 have recorded over 350 species.

4. Evaluation of impacts

4.1 Avoidance and minimisation of impacts

The development at Burns Beach Estate has seen the clearing by the developer of vast areas of bush to provide land for residential and public open space. For the last few years no further progress has been made and the area is now subject to severe wind erosion, regrowth and weed invasion.

Comment: It is imperative the situation at Burns Beach not be repeated at ORM.

- Clearing of land should be done in stages and restricted to only that land which is immediately needed.
- Clearing of land adjacent to the area of BF 325 to be retained should not commence until the need for this land is essential.

4.2 Overview of residual impacts

Comment: This section of the NPO understates the residual impacts.

- Clearing of 16.79 ha of vegetation, almost all (83%) of which is actually in the category of "Good" to "Excellent" ("varying condition from Degraded to Excellent" in the NPO understates the reality).
- Removal of Priority 3 flora species *Conostylis bracteata* and *Hibbertia spicata* var. *leptotheca*, and locally significant species *Diplolaena angustifolia*.
- Removal of stands of *Melaleuca cardiophylla* tall closed heath.
- Removal of the only stand of *Eucalyptus gomphocephala* (Tuart) in the northern portion of BF 325 for a major access road leading off the roundabout at Resolute way.
- Clearing of vegetation in association with actual PECs.
- Total interruption of north – south linkage due to three substantial road crossings, with no provision for faunal corridors.
- Loss of substantial habitat for Endangered and Vulnerable fauna species.
- "Potential for indirect impacts" should read "actual direct impacts" through introduction and spread of weeds, dust generation, light pollution, increased human activities and increased incidence and frequency of fire.

Comment: The proposal fails to mention the loss of a public amenity

- Hundreds of pedestrians and cyclists per day will no longer have access to approximately 750 m of Shared Use Path (SUP) (630m along the coast, 120 m along Resolute path) which is bordered on both sides by BF 325 and for most part has ocean views.
- The proposed replacement (is both dangerous for pedestrians and cyclists and non-aesthetic and does not match the path it will replace.
- The proposed replacement SUP

- crosses 3 road intersections two of which are roundabouts and the other a dual carriageway,
- Runs through a boat parking area,
- Runs behind residential areas,
- Does not provide any views of the ocean.

The SUP (or at least a path for pedestrians) needs to be redesigned to remain a public amenity, to remove hazards, to be more direct (closer to coast) and to be more aesthetically appealing.

5. Mitigation of residual impacts

SPP 2.8 states that for an area of High conservation significance, at least 75% of the mitigation package should be land acquisition with a maximum of 25% comprising revegetation.

The proposed components of the NPO are:

- *approximately 90% (minimum 22.7 ha) of the NPO requirements to be met through direct acquisition of property, to be transferred to conservation estate,*
- *approximately 10% of the NPO requirements to be met through rehabilitation of (5 ha) BF 325 in areas adjacent to the Proposal area.*

5.1.4 Process for land acquisition

It is intended that the acquisition of the site, sites or part of a site should occur prior to clearing of BF 325.

Comment: This wording is not strong enough or binding.

- The NPO and any consequent agreements should make the acquisition of land prior to the clearing of BF 325 mandatory. Otherwise it could be years before the objective of SPP2.8 is achieved.

Comment: The City of Joondalup should transfer the remnant areas of Lot 1029 and Lot 1032 to the Conservation Estate.

- Currently the City has freehold title to Lots 1029 and 1032.
- The City has verbally confirmed (meeting with JCCCF 9 Feb 2017) there are no caveats on the land and it is free to sell it at any time. (Author's note e.g. for an extension of the residential area in the ORM).
- The Mayor has verbally stated (Community meeting 15 Feb 2017) the remnant land will stay as BF 325 (Author's note, this response was incorrect as only Lot 1029 is designated BF 325).
- In order to protect the remnant bushland the City should be required to transfer the remainder of Lots 1029 and 1032 outside the ORM development to the State for inclusion in the conservation estate.

- The area transferred could be reduced from the area required under the offset requirements.

5.2 Bush Forever Site 325 rehabilitation

Comment: The 90:10 ratio should be altered to maximize the benefits to Joondalup rate payers.

- Total Degraded to Good is 13.7 ha but proposal is to rehabilitate only 5 ha.
- Sufficient funds should be allocated to rehabilitate a minimum of 13.7 ha.
- Areas designated for rehabilitation should exclude any area disturbed during the development e.g. road verges, boundary lines etc which should all be restored by the proponent as a separate action but under the supervision of the City to ensure only plants that will not invade BF 325 are used.
- Consideration should be given to rehabilitating other areas of BF 325 to ensure the ecological linkage from north to south is optimised.

... fencing the boundary of Bush Forever 325 along the eastern side of the Proposal and providing fenced pedestrian access tracks through BF 325 (within existing cleared areas).

Comment: Feral animal control needs to be enforced

- 900 residences will increase the cat and dog population adjacent to BF 325.
- Fencing that minimizes cats and dogs from entering BFE 325 should be installed.
- Adherence to the *Cat Act 2011* and the *Dog Act 1976* should be enforced vigorously.

5.2.1 NPO Rehabilitation Area

The rehabilitation component of the NPO within BF 325 will be undertaken by the Proponent between the Proposal area and Ocean Reef Road to ensure a local ecological benefit and maximise the north-south linkage values of the vegetation to be retained.

Comment: Proponent needs to provide effective guarantee for minimum seven years

- The Proponent will be responsible for conducting, monitoring and reporting on rehabilitation for a programme spread out over seven years.

- What input and control will the City have? (Refer also to next section)
- Will this include a trust account to ensure the work is carried out?
- Penalties for failure to comply need to be sufficiently severe to act as a deterrent.

5.2.2. Current management of Bush Forever Site 325

BFE 325 is under the management of the City and in particular its Natural Areas team. The City admits *Funding constraints limit the extent of works that are possible within BF 325 to maintenance level activities, rather than large-scale enhancement works.*

Comment: Additional funding of Natural Areas team required.

- Supervision of the rehabilitation will add extra work to the already underfunded and understaffed team.
- The City should budget for additional funding of the Natural Areas team to ensure the work is carried out as per the Rehabilitation Plan.

5.2.3 NPO Rehabilitation Strategy

A detailed Rehabilitation Plan will be prepared following environmental approval and gazettal of the MRS amendment and submitted to the Responsible Authority for approval.

Comment: Clarification required

- This should state who will prepare the plan – the City or the Proponent?
- It is not clear who is the Responsible Authority. Given the City owns the area to be rehabilitated and BFE has no legal standing, will it be the City's responsibility to produce the plan and the Proponent to carry out the work as per 5.2.1? Clarification is required.

Table 7 Baseline survey of remnant Very Good to Excellent vegetation in control sites (to establish species lists and completion criteria).

Record data within control sites in each vegetation type relevant to the area to be rehabilitated, to inform monitoring against completion criteria.

Comment: Baseline surveys should be conducted on all vegetation types.

- If baseline surveys were conducted on all remnant Very Good to Excellent vegetation types (not just those to be rehabilitated adjacent to the ORM development) these could be used elsewhere in BF 325 where rehabilitation is occurring or could occur.

Table 7 Seed Collection

States seed collection shall take place *September to April prior to clearing of proposal area.*

Comment: More detail is required on seed collection and storage

- Seed collection should be done over more than one year in case season is unfavourable for flowering.
- Experience shows weak seedlings in adjacent parts of BF 325 will not survive the hot summer weather without regular watering, therefore propagation of seedlings should commence well in advance of restoration to ensure strong seedlings- possibly plant 1 year old plants.
- No mention of who will hold seed.
- No mention of how seed will be stored.
- No mention of how specific species that cannot be grown in nurseries, either from seed or cuttings, will be made available for rehabilitation areas. Such species include *Leucopogon insularis*, *Leucopogon parviflorus* and *Hibbertia spicata* var. *leptotheca*.
- No mention of how orchids will be propagated to replace cleared species.

Bubanic, Marija

From: Don Poynton <dpoynton@iinet.net.au>
Sent: Friday, 24 February 2017 4:04 PM
To: mrs
Cc: 'Don Poynton'; 'Michael Norman'
Subject: MRS Amendment 1270/41
Attachments: JCCCF ORM Submission _MRS .pdf; JCCCF ORM Submission _MRS_Attach1..pdf

Please find attached a submission on MRS Amendment 1270/41 prepared by the Joondalup Community Coast Care Forum Inc.

The submission consists of two parts:

Submission Form (3 pages)

Attachment 1 (8 pages)

Regards

Don Poynton
32 Princeville Tor
Connolly WA 6027
Mob: 0419 460 301



Government of Western Australia
Department of Environment Regulation

Your ref: 809-2-30-17 (RLS/0455)
Our ref: CEO5152/16
Enquiries: Teresa Gepp
Phone: 6467 5383
Email: advice.coordinator@der.wa.gov.au

Ms Kerrine Blenkinsop
Secretary
Western Australian Planning Commission
via email: mrs@planning.wa.gov.au

Attention: Anthony Muscara

Dear Ms Blenkinsop

**PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1270/41 – OCEAN REEF
MARINA REDEVELOPMENT**

I refer to correspondence dated 16 November 2016 inviting comment from the Department of Environment Regulation (DER) on the above proposed Metropolitan Region Scheme Amendment.

DER has no comment on the proposed Scheme Amendment in reference to the Department's regulatory responsibilities under the *Environmental Protection Act 1986* and the *Contaminated Sites Act 2003*.

Yours sincerely



Dan Volaric
ACTING DIRECTOR GENERAL

27 February 2017

Planning and Development Act 2005
Section 41 Amendment (Substantial)
Form 41

Submission

Metropolitan Region Scheme Amendment 1270/41

Ocean Reef Marina Redevelopment

Department of Planning,
Lands and Heritage
Received

23 JAN 2018

Scanned

Attachments

Scan QA

Doc No.

File No.

A 955622

RLS/0657

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OFFICE USE ONLY

Late Submission
94

RLS/0657

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
Perth WA 6001

Name Erin Nolan, A/Manager Metro South, LandCorp

(PLEASE PRINT CLEARLY)

Address Locked Bag 5, Perth Business Centre WA Postcode 6849

Contact phone number 08 9482 7537 Email address matt.read@landcorp.com.au

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

Please refer to LandCorp's submission on the MRS Amendment 1270/41, contained overleaf.

turn over to complete your submission

Hearing of submissions

Anyone who has made a written submission on the amendment has the opportunity to personally present the basis of their submission to a sub-committee of the WAPC. **You do not have to attend a hearing.** The comments presented by you in this written submission will be considered in determining the recommendation for the proposed amendment.

For information about the submission and hearings process, please refer to the amendment report and in particular appendix D.

Please choose one of the following:

☐ **No**, I do not wish to speak at the hearings. (Please go to the bottom of the form and sign)

OR

☒ **Yes**, I wish to speak at the hearings. (Please complete the following details)

I will be represented by:

☐ Myself – My telephone number (business hours):

or

☒ A spokesperson

Name of spokesperson: Lex Barnett, Taylor Burrell Barnett Town Planning and Design

Contact telephone number (business hours): 08 9226 4276

Postal address: PO Box 7130, Cloisters Square WA 6850

I would prefer my hearing to be conducted in:

☒ Public (members from the general public may attend your presentation)

OR

☐ Private (only the people nominated by you or the hearings committee will be permitted to attend)

You should be aware that:

- The WAPC is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.
- All hearings are recorded and transcribed. The transcripts of all hearings, along with all written submissions, are tabled in Parliament and published as public records should the Governor approve the proposed amendment. The WAPC recommendations are similarly published in a report on submissions and tabled in Parliament.

To be signed by person(s) making the submission

Signature

B. Dean

Date

17/01/18

Note: Submissions MUST be received by the advertised closing date, being close of business (5pm) on 24 February 2017. Late submissions will NOT be considered.



LANDCORP

Your Ref: 1270/41
Our Ref: A1562340
Enquiries: Carl Williams 9482 7548
Date: 18 January 2018

Anthony Muscara
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

Dear Anthony

MRS AMENDMENT 1270/41 – OCEAN REEF MARINA REDEVELOPMENT

We refer to MRS Amendment 1270/41 Ocean Reef Marina Redevelopment, advertised from 22 November 2016 until 24 February 2017. As you are aware, LandCorp has recently assumed control of the above project, on behalf of the State. Having assessed the background and rationale behind the MRS zoning amendment, we have identified some aspects upon which we would like to offer comment. We would, therefore, appreciate the opportunity to make comment on the amendment, albeit that the formal submission period has concluded.

In September 2017, the State Government announced that LandCorp would be lead agency responsible for delivering the Ocean Reef Marina Redevelopment project. LandCorp has since been working with the City of Joondalup, Western Australian Planning Commission (WAPC), Office of the Environmental Protection Authority (OEPA), Department of Transport (DoT) and the respective government agencies, in reviewing the background to the project.

We respectfully request that this submission be considered in support of MRS Amendment 1270/41, with modifications proposed. As per the Form 41, LandCorp requests to have a spokesperson provide a deputation at the Hearings for the Amendment.

BACKGROUND TO OCEAN REEF MARINA

A key focus area of LandCorp is to realise the potential of land and infrastructure for all Western Australians, to promote resource efficiency and encourage lifestyle opportunities that are integrated into the surrounding community and natural environment.

The Ocean Reef Marina Redevelopment is recognised through its project vision as a world class recreational, residential, boating and tourist development. The Redevelopment seeks to convert an existing boat ramp facility and surrounding State and Local Government-owned land into an iconic waterfront precinct, to deliver retail/commercial floorspace, dwellings, boat pens and associated boat-stacking and marine commercial facilities.

Ocean Reef Marina will capitalise on the strong desire for local housing choice, high-quality tourist destinations and employment opportunities within the Northern region, and LandCorp is committed to demonstrating high quality design and sustainability initiatives in the development vision.

LANDCORP'S ROLE AS LEAD AGENCY

In September 2017, the State Government announced that LandCorp would be working with the City of Joondalup (City) to finalise planning requirements relating to the MRS Amendment 1270/41 and the Public Environmental Review (PER). A Memorandum of Understanding (MoU) will be executed between LandCorp and the City of Joondalup to confirm LandCorp's role as the lead agency on the project and acknowledges that the City will continue to lead on appropriate community consultation processes in relation to the MRS Amendment and the PER processes.

The finalisation of the MRS Amendment 1270/41 is also linked to the:

- Negotiated Planning Outcome (NPO);
- Coastal Hazard Risk Management and Adaptation Plan (CHRMAP);
- Identification of Waterways Manager; and
- Bushfire Management Plan (BMP).

The approval processes in relation to the above are being undertaken in close consultation between the Department of Planning, Lands and Heritage, OEPA, the City of Joondalup, and LandCorp.

The governance structure, established by the City of Joondalup, will be generally retained, and LandCorp will continue to engage with government and local stakeholders through the Government Steering Committee, Project Steering Group, Technical Officer Group, and consultation with key community groups and stakeholders.

Planning and research for the project has already substantially progressed, prior to LandCorp assuming lead agency status, and the stakeholder engagement to date has established some important expectations. The challenge is to now bring the project to fruition, while ensuring that the expectations of all key stakeholders, including decision-makers, are carried forward through the MRS Amendment, PER, and subsequent planning processes. This will be managed through ongoing stakeholder engagement and coordination with government agencies and community groups at appropriate levels.

MRS AMENDMENT 1270/41 ZONES AND RESERVES

The Amendment proposes to rezone various lots and reserves in the vicinity of the existing Ocean Reef boat ramps, boat harbour and clubs. It will rezone coastal land and part of the ocean with an 'Urban' zone to facilitate future development of the Ocean Reef Marina; provide coastal access and facilities through the 'Parks and Recreation' reserve; and remove the Bush Forever layer corresponding to the development proposal.

An important consideration is to ensure that a level of flexibility is permitted and accommodated for in setting up the proposed zones and reserves. Best practice development will be followed throughout the project to ensure impacts are minimised and managed and broader community benefits are optimised. Having flexibility embedded into the planning framework early will enable project planning to evolve as the project progresses. As such, LandCorp is advocating for less specifically defined boundaries of zones in order for the detailed design of the project to progress allowing the breakwaters and waterfront edges to be more accurately defined at the Subdivision and Development Application stage when more detail is known. This flexibility will not fundamentally nor materially change the development proposal but will allow minor changes to the current Concept Plan to occur at the technical design stage while maintaining the integrity of the development principles and without delaying amendment to the MRS.

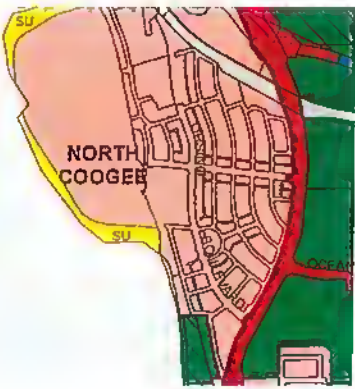
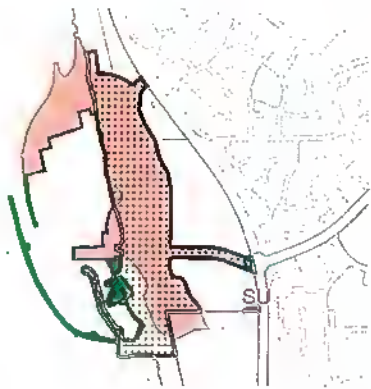
We note that the proposed zoning configuration is closely aligned with the City's preferred concept plan. In particular, the dimensions and shape of the zones and reserves closely reflect the proposed breakwaters, claimed land for marine services and club services, and internal marina waterbody. However, it does not recognise that the City's proposed plan is still quite conceptual, and is likely to be subject to some variations as the design is further analysed and fine-tuned. While the rationale behind this zoning approach is understood, it potentially locks in 'design features' into the region scheme, which are likely to impede further design refinement as the project progresses into more detailed design analysis. This level of specificity is unusual and premature for optimum design outcomes at the MRS zoning stage.

In the coming months, LandCorp is intending to undertake a concept design review in collaboration with the Government Steering Committee and Project Steering Group. This review will examine the City of Joondalup's preferred Concept Plan, and ensure that its content and arrangement of land uses and development is robust and capable of being feasibly delivered. Completion of the concept design review is targeted to be around March 2018. Through the concept design review, a number of development scenarios may be tested and improvements to the design may be identified, these may include refinements to the breakwaters and internal waterbody. In this regard it would be more logical that a less specific zoning approach be adopted at MRS stage; a broader 'Urban' zoning could allow design efficiencies to be implemented without needing to incur future MRS zoning changes.

This submission is intended to offer constructive comment on the MRS amendment to ensure that it will not unreasonably hinder the timely and cost-effective delivery of the Ocean Reef Marina. It is, however, important to emphasise that LandCorp also values the importance of maintaining the current momentum of the planning framework and does not wish to delay the progress of the MRS Amendment. Through the Department's consideration of this submission and LandCorp's attendance at the Hearings, it is hoped that the merits of flexibility at MRS Amendment stage can be explained to facilitate optimal design outcomes, while avoiding any action that might trigger re-advertising or re-referral.

A More Flexible Approach for Consideration

To afford improved flexibility, one option for MRS 1270/41 could be to zone the whole of the project area inside the breakwaters as 'Urban' as a similar approach to Port Coogee (refer below). This does not construe that the whole internal water body area will be reclaimed as developable land; more that it removes impediments to making design changes that will not materially impact on the outcomes of the project. The circumstances for the Port Coogee project were quite comparable, in that the 'blanket' zone was considered the best approach to enable detailed design to evolve, after the MRS zoning was in place, on the basis that the more specific zoning controls would occur at the local zoning stage. Importantly, however, while this is a more desirable zoning approach, we would not advocate for it at this stage if it would trigger re-advertising of the Amendment in order to not delay this Government priority project.

	
<p>Extract of Metropolitan Region Scheme showing an 'Urban' zone for Port Coogee (not to scale)</p>	<p>Advertised version of Ocean Reef Marina MRS Amendment 1270/41 (not to scale)</p>

CONCLUSION

The proposed Ocean Reef Marina Redevelopment has a considerable history, with various proposals over the past 30 years. Primarily driven by the City of Joondalup, the announcement of LandCorp's ongoing role should recognise the commitment by Government to deliver a quality development that provides many benefits to the broader community. The MRS Amendment should allow for some embedded flexibility into the dimensions and shapes of the zones and reserves to facilitate optimal design outcomes.

LandCorp advocates for the appropriate adjustment of boundaries to the proposed zones and reserves, primarily in relation to the defined extent of the breakwaters and the internal waterbody. This is on the basis that adjustments can be achieved without requiring further advertising of the MRS Amendment.

Whilst still unknown, the concept design review could identify adjustments for consideration during the finalisation of the Amendment. Adjustments will be considered in the context of what could reasonably be accepted by the WAPC, without the need to re-advertise the Amendment. LandCorp intends to work collaboratively with the Department of Planning, Lands and Heritage and the City of Joondalup to ensure that flexibility is incorporated while maintaining the integrity of the development principles, within the general scope of the MRS Amendment and PER processes.

LandCorp respectfully requests the WAPC's due consideration of this submission and looks forward to the opportunity to present at the Hearings.

Yours sincerely



Erin Nolan
A/Manager Metro South



Government of **Western Australia**
Department of **Transport**
Coastal Infrastructure Business Unit

Mr Mat Selby
Director – Metro Planning North
Department of Planning, Lands & Heritage
Gordon Stephenson House
2/140 William Street
PERTH WA 6000

Dear Mat

OCEAN REEF MARINA – MARINA MANAGER

The Ocean Reef Marina Government Steering Committee was established with the purpose to facilitate the co-ordination and resolution of common issues, to assist timely implementation of the Ocean Reef Marina Project.

As you are aware the Department of Transport (DoT) has been working closely with LandCorp and its consultant team, the Department of Planning; Lands & Heritage and other key stakeholders to ensure a design outcome which supports our long term management needs. These needs are being addressed through recent concept design review process with significant design changes incorporated in the current draft preferred concept.

The Committee discussed at the meeting of 11 July 2018 the need to nominate an asset owner/marina operator of Ocean Reef Marina to progress the MRS amendment process. As this is a government funded project ownership and management should be with a state government agency. DoT has significant experience in boat harbour management and is prepared to be nominated as the owner/operator to progress the MRS amendment.

DoT will continue to work with LandCorp and the consultant team to refine the operation model and budget. This work will allow the ongoing liaison within Government to ensure the financial implications of the DoT's management are understood and incorporated in the business case and Cabinet approval for this project to proceed.

Yours sincerely



Steve Jenkins
General Manager – Coastal Infrastructure