



# Metro Outer Joint Development Assessment Panel Agenda

**Meeting Date and Time:** Wednesday, 4 May 2022; 1pm  
**Meeting Number:** MOJDAP/170  
**Meeting Venue:** Electronic Means

To connect to the meeting via your computer -  
<https://us06web.zoom.us/j/83352007666>

To connect to the meeting via teleconference dial the following phone number -  
**+61 8 7150 1149**  
Insert Meeting ID followed by the hash (#) key when prompted - **833 5200 7666**

*This DAP meeting will be conducted by electronic means (Zoom) open to the public rather than requiring attendance in person.*

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## **Attendance**

### **DAP Members**

Mr Ian Birch (Presiding Member)  
Ms Sheryl Chaffer (Deputy Presiding Member)  
Mr John Syme (A/Third Specialist Member)  
Cr Vinh Nguyen (Local Government Member, City of Wanneroo)  
Cr Frank Cvitan (Local Government Member, City of Wanneroo)

### **Officers in attendance**

Mr Greg Bowering (City of Wanneroo)  
Mr Nick de Vecchis (City of Wanneroo)  
Ms Sue Wesley (City of Wanneroo)

### **Minute Secretary**

Ms Zoe Hendry (DAP Secretariat)

### **Applicants and Submitters**

Ms Megan Gammon (Urbis)  
Mr Craig Wallace (Lavan)  
Mr Philip Griffiths (Griffiths Architects)  
Mr Michael Jorgensen (Brown Falconer)  
Mr Andrew Baranowski (Plan E)  
Ms Anne-Maria Colman  
Ms Zakaya Benkendorf  
Mr Allan Shuttleton  
Ms Marchelle Miteff  
Mr Bruce Nicholl  
Mr Warren Schafer  
Ms Aline Benkendorf  
Ms Helen Michael  
Cr Christopher Baker (City of Wanneroo)

### **Members of the Public / Media**

Nil.

#### **1. Opening of Meeting, Welcome and Acknowledgement**

The Presiding Member declares the meeting open and acknowledges the traditional owners and pay respects to Elders past and present of the land on which the meeting is being held.

In response to the COVID-19 situation, this meeting is being conducted by electronic means (Zoom) open to the public. Members are reminded to announce their name and title prior to speaking.

#### **2. Apologies**

Mr Jason Hick (Third Specialist Member)



**3. Members on Leave of Absence**

Nil.

**4. Noting of Minutes**

Signed minutes of previous meetings are available on the [DAP website](#).

**5. Declarations of Due Consideration**

Any member who is not familiar with the substance of any report or other information provided for consideration at the DAP meeting must declare that fact before the meeting considers the matter.

**6. Disclosure of Interests**

Nil

**7. Deputations and Presentations**

- 7.1** Ms Anne-Maria Colman presenting against the recommendation for the application at Item 8.1. The presentation will provide comment on the 2006 heritage assessment and provide an alternative heritage view of the subject site and surrounding areas.
- 7.2** Ms Zakaya Benkendorf presenting against the recommendation for the application at Item 8.1. The presentation will provide a young person's perspective on the proposed development proposal including environmental and sentimental/heritage value.
- 7.3** Mr Allan Shuttleton presenting against the recommendation for the application at Item 8.1. The presentation will provide comment on the consultation process, tourism aspect, public open space, traffic concerns and inadequate parking facilities.
- 7.4** Ms Marchelle Miteff presenting against the recommendation for the application at Item 8.1. The presentation will address the State Heritage Place view corridor protections.
- 7.5** Mr Bruce Nicholl presenting against the recommendation for the application at Item 8.1. The presentation will speak against the proposed development.
- 7.6** Mr Warren Schafer presenting against the recommendation for the application at Item 8.1. The presentation will provide comment and discussion on the validity of the Heritage Assessment 2006 and the Heritage Impact Statement 2021 prepared by Phillip Griffiths Architects.
- 7.7** Ms Aline Benkendorf presenting against the recommendation for the application at Item 8.1. The presentation will address the impending State Heritage Place assessment by the Heritage Council of Western Australia, tourism/resort-based economy district centre and procedural fairness.



- 7.8** Ms Helen Michael presenting against the recommendation for the application at Item 8.1. The presentation will address the community, cultural and First People's heritage and connection with the Two Rocks Town Centre Precinct.
- 7.9** Cr Christopher Baker (City of Wanneroo) presenting against the recommendation for the application at Item 8.1. The presentation will address the merits of deferring the item pending the completion of the assessment of the Heritage value/status of the King Neptune statue by the Heritage Council.
- 7.10** Mr Craig Wallace (Lavan) presenting for the recommendation for the application at Item 8.1. The presentation will address the Council resolution, discretion available to decision maker and considerations pertaining to heritage.
- 7.11** Mr Philip Griffiths (Griffiths Architects) presenting for the recommendation at Item 8.1. The presentation will address the heritage matters in relation to the proposed development.
- 7.12** Mr Michael Jorgensen Brown Falconer and Mr Andrew Baranowski (Plan E) presenting for the recommendation at Item 8.1. The presentation will address the design matters relating to the proposed development.
- 7.13** Ms Megan Gammon (Urbis) presenting for the recommendation at Item 8.1. The presentation will provide an overview of broader heritage intentions by Fini Group and the engagement undertaken with Woolworths, alignment with the planning framework and a summary of merit of the proposal.

The City of Wanneroo may be provided with the opportunity to respond to questions of the panel, as invited by the Presiding Member.

## **8. Form 1 – Responsible Authority Reports – DAP Applications**

### **8.1 Lot 9702 (No.10) Enterprise Avenue, Two Rocks**

Development Description:	Proposed Shop, Liquor Store, Restaurant & Office
Applicant:	Woolworths c/o Urbis
Owner:	Fini Group Pty Ltd
Responsible Authority:	City of Wanneroo
DAP File No:	DAP/21/02117

## **9. Form 2 – Responsible Authority Reports – DAP Amendment or Cancellation of Approval**

Nil.



## 10. State Administrative Tribunal Applications and Supreme Court Appeals

<b>Current SAT Applications</b>				
<b>File No. &amp; SAT DR No.</b>	<b>LG Name</b>	<b>Property Location</b>	<b>Application Description</b>	<b>Date Lodged</b>
DAP/21/2047 DR257/2021	City of Swan	Lots 136 (26) & 3235 (34) Asturian Drive and Lots 137 (238) & 138 (230) Henley Street, Henley Brook	Proposed education facility	03/12/2021

## 11. General Business

In accordance with Section 7.3 of the DAP Standing Orders 2020 only the Presiding Member may publicly comment on the operations or determinations of a DAP and other DAP members should not be approached to make comment.

## 12. Meeting Closure

File Ref: DA2021/1797-02 | 22/134813  
Your Ref: DAP/21/02117 | MOJDAP157  
Enquiries: Adam Wood – 9405 5823

14 April 2022

Development Assessment Panels Secretariat

Via email: [daps@dplh.wa.gov.au](mailto:daps@dplh.wa.gov.au)

Dear DAP Secretariat,

**ADDENDUM TO DAP/21/02117 –  
HERITAGE RESPONSE FROM DEPARTMENT PLANNING, LANDS AND HERITAGE**

I refer to the Metropolitan Outer Joint Development Assessment Panel (JDAP) previous considerations on 9 March 2022 regarding a proposed Shop, Liquor Store, Restaurant and Office at 10 Enterprise Avenue, Two Rocks.

At that meeting, a procedural motion was carried to defer consideration of this application until 4 May 2022, in accordance with Section 5.10.1a of the DAP Standing Orders 2020 for the following reason:

*“For the City to seek clarification from the relevant government authorities in relation to heritage matters raised concerning various state and local heritage listing in the Two Rocks precinct recorded as to be assessed.”*

Following the JDAP meeting, and pursuant to the procedural motion, the City of Wanneroo contacted heritage officers at the Department of Planning, Lands and Heritage and sought additional feedback on the proposal.

As outlined within the Responsible Authority Report (RAR) already provided to the JDAP, that comments were sought from DPLH as part of the City’s assessment (**Attachment 1**). The correspondence received at this time stated that although the heritage sites have been identified for assessment on the State Register and as they have not yet been assessed, DPLH was unable to provide any comments on the matter. Accordingly, a comprehensive review of the proposal was undertaken against the City’s own Local Heritage Survey, and requirements of the City’s Local Planning Policy 4.12 – Heritage Sites.

An additional response from the DPLH was received on 4 April 2022 (**Attachment 2**). This response expanded on the original comments provided as part of the assessment, and reiterated the point that:

*“P26470 Sun City Precinct, Two Rocks has not been scheduled by the Heritage Council for assessment for possible inclusion in the State Register. As the cultural heritage significance of Sun City Precinct has not yet been determined by the Heritage Council through a full heritage assessment, it is not possible to comment on the possible impact of the Woolworths development.”*

In addition to the above comments, further correspondence has been received by the City from the Heritage Council of Western Australia dated 14 April 2022 (**Attachment 3**). As outlined within this correspondence the Heritage Council advised that a decision has been made to advise that the *Sun City Precinct, Two Rocks* is to be assessed as a matter of priority. Advice from the DPLH Heritage Team indicates that the earliest this would be resolved would indicatively be by September 2022.

Notwithstanding the above, as there has been no change to DPLH's position, the consideration of the proposal and RAR remains valid. Further comment from the City of Wanneroo as this advice reflects and reiterates the original response.

Please feel free to contact Adam Wood on 9405 5823 or at [Adam.Wood@Wanneroo.wa.gov.au](mailto:Adam.Wood@Wanneroo.wa.gov.au) should you have any further queries on this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Coppola', written in a cursive style.

Josh Coppola  
**A/Manager, Approval Services**  
**City of Wanneroo**

**From:** Penny O'Connor [REDACTED]  
**Sent:** Monday, 20 December 2021 5:18 PM  
**To:** Wood, Adam  
**Cc:** Karina Williams; Adelyn Siew; Katrina Carrello; Karen Jackson  
**Subject:** RE: Heritage Enquiry - Two Rocks (Atlantis Marine Park)

Dear Adam

Thank you for your email and for talking to me about this over the phone last Friday.

As we discussed, Atlantis Marine Park was identified by the Heritage Council as warranting assessment for possible inclusion in the State Register in September 2020 as part of P26470 Sun City Precinct, Two Rocks, together with a number of other associated elements and features.

This decision expanded on an earlier Heritage Council decision in 2003 that the Two Rocks Shopping Centre and Tavern, and the King Neptune Statue together warranted assessment for the Register.

Thank you for alerting us to the proposed Woolworths development. As the Sun City Precinct has not yet been assessed for the State Register, we cannot provide comments on the impact the proposal may have on any State cultural heritage values.

There are currently a large number of places and precincts waiting to be assessed for the Register. Sun City Precinct has not yet been scheduled for assessment. As you noted on Friday, there is likely to be further development in the Sun City Precinct in coming years, and I will draw this to the attention of the Heritage Council when it considers the Work Program for 2022-23. To that end, it would be helpful if the City could provide us with a copy of the *Two Rocks Town Centre Precinct Heritage Assessment* (December 2006) by Philip Griffiths with Kris Bizzaca as this may provide valuable research material that would assist in accelerating the assessment of the wider Sun City Precinct.

Kind regards

Penny

**Penny O'Connor** | Director, Heritage Assessment & Registration | Heritage Services  
140 William Street, Perth WA 6000

[www.dplh.wa.gov.au](http://www.dplh.wa.gov.au)





**From:** Penny O'Connor [REDACTED]  
**Sent:** Monday, 4 April 2022 4:38 PM  
**To:** Bowering, Greg  
**Cc:** Wood, Adam  
**Subject:** RE: Two Rocks Heritage Sites - comment in response to JDAP deferral of Woolworths Shopping Centre application

Dear Greg

Thank you for your email of 14 March 2022 and I apologise for the delay in our response. We understand that the City is seeking clarification in relation the heritage listings in the Two Rocks precinct noted as "to be assessed."

In 2003, the Heritage Council determined that P16771 Two Rocks Shopping Centre and Tavern and P17935 King Neptune Statue should be assessed together for possible inclusion in the State Register of Heritage Places (RHP). They were added to the Heritage Council's Assessment Program but not scheduled for assessment.

Places on the Assessment Program are noted in the online heritage places database inHerit as: *RHP – To be assessed*. Once an assessment has begun, the status changes to: *RHP – Assessment in progress*.

When a place is added to the Assessment Program, all child places within it are also added to the Assessment Program and noted in inHerit as *To be assessed*. The following child places within P16711 Two Rocks Shopping Centre and Tavern were therefore also added to the Assessment Program in 2003 with the larger precinct (parent place):

- P17944 Two Rocks Tavern,
- P17943 Two Rocks Shopping Centre

In 2006, a place record in inHerit was created for P17395 Two Rocks Police Complex. The place was identified through a study of 20<sup>th</sup> century police stations. As it is located within the Two Rocks Shopping Centre, it was therefore automatically added to the Assessment Program as a child record and noted as *To be assessed*.

In 2020, the Heritage Council determined to expand the area for assessment for the Register to also include the following places together with other land:

- P17941 Two Rocks Marina Precinct,
- P17523 Atlantis Marine Park,
- P17941 Two Rocks Limestone Retaining Wall,
- P17939 Sun City Land Sales Office (fmr), and
- P17948 Waugal Monoliths.

This larger precinct was named P26470 Sun City Precinct, Two Rocks. The Heritage Council also resolved at that time that none of the child places/elements within Sun City Precinct warranted assessment on an individual basis, including the King Neptune Statue, but they are all noted in inHerit as *To be assessed* because they fall under the larger precinct. Information about history and significance of Sun City Precinct was added to place's entry in inHerit after the Heritage Council decision.

P26470 Sun City Precinct, Two Rocks has not been scheduled by the Heritage Council for assessment for possible inclusion in the State Register. As the cultural heritage significance of Sun City Precinct has not yet been determined

by the Heritage Council through a full heritage assessment, it is not possible to comment on the possible impact of the Woolworths development.

The Department notes that the application for the Woolworths development included a Heritage Impact Assessment (HIA) which assessed the development against a statement of significance from a 2006 heritage assessment of Two Rocks Town Centre Precinct. We understand that the assessment was prepared by Philip Griffiths Architects for Fini Group. While the HIA referred to the Statement of Significance in the heritage assessment, a full copy of the assessment was not attached. The full assessment may assist the City and the public to understand the cultural heritage significance of the wider precinct, and the impact of the development on its values. The Department does not have a copy of the full assessment.

Please do not hesitate to contact me if you require any further information or clarification.

Kind regards

Penny

**Penny O'Connor** | Director, Heritage Assessment & Registration | Heritage Services  
140 William Street, Perth WA 6000

[Redacted contact information]

[www.dplh.wa.gov.au](http://www.dplh.wa.gov.au)



The Department is responsible for planning and managing land and heritage for all Western Australians – **now and into the future**

**Keep WA COVID safe**

**Get tested if you are unwell, get vaccinated including a booster, wash hands, wear masks when required, social distance, carry your vaccination certificate and check-in at locations.**

*The Department acknowledges the Aboriginal people of Western Australia as the traditional custodians of this land and we pay our respects to their Elders, past and present.*

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YOUR REF |  
OUR REF | P26470  
ENQUIRIES | Katrina Carrello / 08 6552 4014

Daniel Simms  
Chief Executive Officer  
City of Wanneroo  
[enquiries@wanneroo.wa.gov.au](mailto:enquiries@wanneroo.wa.gov.au)

Attn: Greg Bowering, Manager Approval Services,  
[Greg.Bowering@wanneroo.wa.gov.au](mailto:Greg.Bowering@wanneroo.wa.gov.au)

Dear Mr Simms

**Heritage Assessment Scheduled  
P26470 Sun City Precinct, Two Rocks**

As you may be aware, the Heritage Council of Western Australia is responsible for the compilation of the State's Register of Heritage Places. The Register celebrates and recognises places of cultural heritage significance that are important in telling the story of Western Australia's people, history and development.

This letter is to advise you, that *Sun City Precinct, Two Rocks* has recently been identified as a place which is likely to be of State cultural heritage significance, and is to be assessed as a matter of priority. The owners have been advised of this decision and the scheduled assessment.

The assessment will be undertaken by a team of heritage professionals who will establish the cultural heritage significance of the place and evaluate its level of significance. You will be contacted when an assessment has been compiled so that you have the opportunity to provide comment. I would welcome and appreciate your assistance in this process.

I note that elements within *Sun City Precinct, Two Rocks* have been included in your Local Heritage Survey (formerly known as a Municipal Heritage Inventory or MHI).

In the meantime, the Department of Planning, Lands, and Heritage would appreciate any information you may have about *Sun City Precinct, Two Rocks*, as well as your views regarding its cultural heritage significance and possible registration.

[dplh.wa.gov.au](http://dplh.wa.gov.au)  
[info@dplh.wa.gov.au](mailto:info@dplh.wa.gov.au)

If you would like to discuss this decision or would like to provide further information, please contact Senior Heritage Officer Katrina Carrello at the Department of Planning, Lands, and Heritage on (08) 6552 4014.

Yours sincerely

A handwritten signature in blue ink, appearing to read "John Cowdell". The signature is stylized with a large initial "J" and a cursive "C".

Hon. John Cowdell AM

**Chair**

Enc.

14 April 2022

File Ref: DA2021/1797-02 | 22/142078  
Your Ref: DAP/21/02117 | MOJDAP157  
Enquiries: Adam Wood – 9405 5823

14 April 2022

Development Assessment Panels Secretariat

Via email: [daps@dplh.wa.gov.au](mailto:daps@dplh.wa.gov.au)

Dear DAP Secretariat,

**ADDENDUM TO DAP/21/02117 –  
CITY OF WANNEROO COUNCIL RESOLUTION**

I refer to JDAP application DAP/21/02117 for a proposed Shop, Liquor Store, Restaurant and Office at 10 Enterprise Avenue, Two Rocks.

At the 15 March 2022 Ordinary Council Meeting, an item of urgent business was put to Council, requesting that the Responsible Authority Report (RAR) relating to this JDAP application be presented to the 12 April 2022 Ordinary Council Meeting. The motion's intent was to allow Council to consider the matter and resolve whether to provide its own recommendation on the proposal.

The matter was discussed by Council at the Council Briefing Session held on 5 April 2022, and subsequent Ordinary Council Meeting held on 12 April 2022. An extract of the Council Meeting Agenda relevant to this item is attached. At the 12 April 2022 meeting, an alternative recommendation to that presented by Administration was resolved by Council as outlined below.

**That Council:-**

1. **NOTES** Administration's recommendation as included within the Responsible Authority Report (RAR) submitted to the Metropolitan Outer Joint Development Assessment Panel on 28 February 2022.
2. **NOTES** the additional information received from the Department of Planning, Lands and Heritage relating to the heritage matters as contained in Attachment 3 which will be provided to the Joint Development Assessment Panel as an addendum to the Responsible Authority Report.

Includes Resolution No. 3 with the Recommendation 2 as shown in italics below:

3. **RECOMMENDS** to the Metro Outer- Joint Development Assessment Panel, **REFUSAL** of the proposed Shop, Liquor Store, Restaurant and Office development at No. 10 Enterprise Avenue, Two Rocks for the following reasons:

- a) *The location of the proposal is not appropriate or compatible with the coastal marina environment and the type of development should be located to the north-east within*

*the Future Two Rocks Secondary Centre as identified by the Yanchep – Two Rocks District Structure Plan No. 43 (DSP 43).*

- b) The proposal is not compatible with the planned tourism focus and fine grain main street, town centre concept and the coastal boutique character of Two Rocks under ASP 70. The form and scale results in a proposal whose prominence will negatively impact on the amenity of the emerging Town Centre and planned coastal tourism and resort function. The proposed daily retail supermarket format is incompatible with the unique nature of Two Rocks and the current and desired future character coastal town character which arises from its setting and relationship with the coastal marina location. Accordingly, the proposal does not meet the considerations of Clause 67(2)(m) and (n) of the Deemed Provisions.*
- c) The proposal will generate a level of traffic which will impact significantly on the capacity and safe operation of the current surrounding road system. This is compounded through impacts generated by the proposed access and egress of the site, the unsuitable arrangements for loading and unloading from the proposed loading dock which is exposed on the western side, and the manoeuvring and parking of vehicles within the site due to the road network and internal design being unsafe. Accordingly, the proposal does not meet the consideration of Clause 67(2)(s) and (t) of the Deemed Provisions.*
- d) The proposal will significantly impact on the heritage importance of the area, as well as impact on adjacent heritage sites including the King Neptune Statue through inappropriate bulk, scale and interface of the development impacting on views to and from the King Neptune Statue. The proposal similarly fails to appropriately recognise and interpret the heritage value of the subject site through its design, colours and materials. Accordingly, the proposal does not meet the considerations of Clause 67(2)(k), (l) and (w) of the Deemed Provisions.*
- e) The proposal has failed to establish a fine grain main street, town centre concept development as envisioned by the Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70), which as a result impacts on the legibility of the centre, pedestrian movement and more broadly results in a proposal that does not recognise the current and intended coastal boutique nature of the centre. Accordingly, the proposal does not meet the consideration of Clause 67(2)(h) of the Deemed Provisions.*
- f) The site is not subject to a Precinct C Local Development Plan (LDP), and accordingly the proposal has failed to meet the consideration of Table 1, Clause 2.1 of the Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70) document insofar that the development is of a scale and permanence that would prejudice the design of the LDP, and the development of the surrounding area.*
- g) The proposal does not include colours and materials that are compatible with the unique coastal nature and heritage value of the Two Rocks area. Accordingly, the proposal does not meet the consideration of Clause 67(2)(zc) of the Deemed Provisions.*

Council's resolution as outlined above is provided to JDAP for its consideration. The City intends to provide confirmed minutes of the 12 April 2022 Council Meeting to JDAP once these become available.

Please feel free to contact Adam Wood on 9405 5823 or at [Adam.Wood@Wanneroo.wa.gov.au](mailto:Adam.Wood@Wanneroo.wa.gov.au) should you have any further queries on this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Josh Coppola', written in a cursive style.

Josh Coppola  
**A/Manager, Approval Services**  
**City of Wanneroo**

# COUNCIL AGENDA

## Ordinary Council Meeting

6:00pm, 12 April 2022  
Council Chamber (Level 1), Civic Centre,  
23 Dundebur Road, Wanneroo

[wanneroo.wa.gov.au](http://wanneroo.wa.gov.au)



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**PS04-04/22 Consideration of Responsible Authority Report (RAR) relating to proposed Shop, Liquor Store, Restaurant and Office at 10 Enterprise Avenue, Two Rocks**

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File Ref: DA2021/1797-02 – 22/99728  
Responsible Officer: Director Planning and Sustainability  
Attachments: 4  
Previous Items: UB01-03/22 - Urgent Business - Consideration of Responsible Authority Report (RAR) recommendation relating to proposed Shop, Liquor Store, Restaurant and Office at 10 Enterprise Avenue, Two Rocks - Ordinary Council - 15 Mar 2022 6:00pm

**Issue**

To allow Council to consider the proposal and resolve whether to provide a recommendation or amendments to the recommendation contained within the Responsible Authority Report (RAR) relating to the proposed Shop, Liquor Store, Restaurant and Office at 10 Enterprise Avenue, Two Rocks.

**Background**

At the 15 March 2022 Ordinary Council Meeting, an item of urgent business was put to Council which was carried unanimously. The resolution of Council stipulates:

*“That Council REQUEST Administration to present the Responsible Authority Report that has been submitted to JDAP for a proposed Shop, Liquor Store, Restaurant and Office at 10 Enterprise Avenue, Two Rocks to the next Ordinary Council Meeting on 12<sup>th</sup> April 2022 to allow Council to consider the matter and resolve whether to provide a recommendation or amendments on the proposal.”*

A copy of the RAR along with the finalised minutes from the JDAP Meeting held on 9 March 2022 have been included for Council’s reference and information at Attachments 1 and 2.

**Detail**

The RAR prepared and submitted by Administration recommends that the proposal be approved, subject to conditions on the basis that it is consistent with the established planning framework. The RAR sets out that the proposal has appropriately addressed all relevant considerations under the Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70) and responded to the heritage requirements for a Category 4 listed site as per the provisions of the City’s Local Heritage Survey.

During the assessment of the application the matter was referred to the Department of Planning Lands and Heritage (DPLH) for comment. A formal response was provided by DPLH stating that they had no comment on the proposal with respect to heritage matters as the site is not on the State Register of Heritage Places.

The JDAP considered the matter at its meeting held on 9 March 2022, however a procedural motion was carried to defer consideration of the application until 4 May 2022 in accordance with Section 5.10.1a of the DAP Standing Orders 2020 for the following reason:

*“For the City to seek clarification from the relevant government authorities in relation to heritage matters raised concerning various state and local heritage listing in the Two Rocks precinct recorded as; to be assessed.”*

Following the JDAP meeting Administration contacted heritage officers at the DPLH and sought additional feedback on the proposal as per the JDAP's reason for deferral of the item.

A response from the DPLH was received on 4 April 2022 (**Attachment 3**). This response expanded on the original comments provided as part of the assessment, and reiterated the point that:

*"P26470 Sun City Precinct, Two Rocks has not been scheduled by the Heritage Council for assessment for possible inclusion in the State Register. As the cultural heritage significance of Sun City Precinct has not yet been determined by the Heritage Council through a full heritage assessment, it is not possible to comment on the possible impact of the Woolworths development."*

As there has been no change to DPLH's position, the consideration of the proposal and RAR remains valid and does not require further comment as this advice reflects and reiterates the original response.

### **Consultation**

Consultation was undertaken as part of the application assessment process as outlined within the Responsible Authority Report.

No consultation has been undertaken as part of the preparation of this report.

### **Comment**

As outlined within the RAR, the proposal has undergone extensive assessment by Administration and have been determined to meet the requirements of the relevant planning frameworks including ASP 70. The subject site is located within a District Centre as identified under the Yanchep-Two Rocks District Structure Plan No 43 (DSP 43), and zoned Commercial, Mixed-Use and Public Open Space (Drainage) under ASP 70.

ASP 70 sets out a framework that encourages and anticipates a supermarket and specialty retail to be implemented in this location. Accordingly, the nature of the development is in keeping with the function and intent of the site, as well as the intended range, scale, functionality and service provision of a District Centre.

Administration understands that the primary concern, and reason for deferral is due to consideration of the heritage value and impact of the proposal. Accordingly, Administration has recommended several conditions be imposed should the JDAP choose to support the proposal which would address such concerns. Conditions 5, 7 and 8 specifically facilitate further consideration and detailing of the proposal's response to the heritage values of the area as outlined below. It is also intended through the conditions for the applicant to continue working with the City to address the concerns regarding colours, materials and landscaping being reflective of the desired 'coastal boutique' environment.

**Condition 5** – *Detailed landscaping and reticulation plans for the subject site and adjacent road verges shall be lodged for approval by the City of Wanneroo prior to the commencement of works. Planting and installation shall be in accordance with the approved landscaping and reticulation plans prior to the occupation of the development, and thereafter maintained by the landowner to the City's satisfaction.*

**Condition 7** – *The applicant is to collaborate with the City of Wanneroo with respect to the implementation of heritage items as identified within the proposal including colours and material finishes of the building. Such items are to be implemented prior to occupation and thereafter maintained to the satisfaction of the City of Wanneroo.*

**Condition 8** – *A schedule of colours and materials is to be submitted to the City of Wanneroo for consideration prior to a building permit being lodged, and thereafter maintained to the satisfaction of the City of Wanneroo.*

Whilst conditions 5 and 8 above are not uncommon for large-scale developments, condition 7 has specifically been included to ensure that the heritage elements (landscaping, statues, parks and plaques) are implemented to the City's satisfaction through further collaboration with the relevant officers.

In addition to the above, the City has received written correspondence from Mr Michael Bower (Blueport Development Management) (**Attachment 4**) on behalf of Fini Group being a landowner within the Two Rocks Town Centre area, in addition to the subject site. The correspondence highlights Fini Group's intentions for respecting and interpreting the unique heritage context of the town centre not only on the subject site, but on the additional sites which will be developed in the future. While this comment is noted it does not affect the content of the RAR.

As outlined above, the purpose of this item is to enable Council to consider the recommendation outlined within the RAR. The RAR and content within is not able to be modified as part of Council's consideration. Council may determine whether to support the current recommendation, support the current recommendation subject to amendments, or provide an alternative recommendation. Administration will subsequently, and further to the reason for deferral, seek to provide the following information to the JDAP for further consideration:

- Responsible Authority Report as prepared by Administration;
- Any comments received from the Department of Planning, Lands and Heritage; and
- Any recommendation of Council.

The above information will be considered by the JDAP at its meeting to be held on or before 4 May 2022.

### **Statutory Compliance**

Nil

### **Strategic Implications**

The proposal aligns with the following objective within the Strategic Community Plan 2021 – 2031:

*7 ~ A well governed and managed City that makes informed decisions, provides strong community leadership and valued customer focused services*

*7.1 - Clear direction and decision making*

### **Risk Management Considerations**

<b>Risk Title</b>	<b>Risk Rating</b>
ST-S23 Stakeholder Relationships	Low
<b>Accountability</b>	<b>Action Planning Option</b>
Chief Executive Officer	Manage

The above risks relating to the issue contained within this report have been identified and considered within the City's Strategic and Corporate risk registers. Action plans have been developed to manage these risks to support existing management systems.

## Policy Implications

Nil

## Financial Implications

Nil

## Voting Requirements

Simple Majority

## Recommendation

That Council:-

1. **NOTES Administration's recommendation as included within the Responsible Authority Report (RAR) submitted to the Metropolitan Outer Joint Development Assessment Panel on 28 February 2022.**
2. **NOTES the additional information received from the Department of Planning, Lands and Heritage relating to the heritage matters as contained in Attachment 3 which will be provided to the Joint Development Assessment Panel as an addendum to the Responsible Authority Report.**

### Attachments:

- |   |                                                                                                                                                       |           |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| 1 | <a href="#">↓</a> Attachment 1 - DA2021-1797 - JDAP - Form 1 - Responsible Authority Report - JDAP - Proposed Shop, Liquor Store, Restaurant & Office | 22/75630  |
| 2 | <a href="#">↓</a> Attachment 2 - Minutes of MOJDAP-157 - 9 March 2022 - City of Wanneroo                                                              | 22/96291  |
| 3 | <a href="#">↓</a> Attachment 3 - Two Rocks Heritage Sites - DPLH comment in response to JDAP deferral of Woolworths Shopping Centre application       | 22/131819 |
| 4 | <a href="#">↓</a> Attachment 4 - Fini Group - Heritage Intentions Letter                                                                              | 22/131576 |



## Presentation Request Form

[Regulation 40\(3\)](#) and [DAP Standing Orders 2020](#) cl. 3.5

**Must be submitted at least 72 hours (3 ordinary days) before the meeting**

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Please complete a separate form for each presenter and submit to [daps@dph.wa.gov.au](mailto:daps@dph.wa.gov.au)

### Presenter Details

Name	Anne-Maria Colman
Company (if applicable)	Click or tap here to enter text.
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

DAP Name	Metro Outer
Meeting Date	4 May 2022
DAP Application Number	DAP/DAP/21/02117
Property Location	10 Enterprise Avenue, Two Rocks
Agenda Item Number	8.1

### Presentation Details

I have read the contents of the report contained in the Agenda and note that my presentation content will be published as part of the Agenda:	<b>YES</b> <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>report recommendation</u> ? ( <i>contained within the Agenda</i> )	<b>SUPPORT</b> <input type="checkbox"/> <b>AGAINST</b> <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>proposed development</u> ?	<b>SUPPORT</b> <input type="checkbox"/> <b>AGAINST</b> <input checked="" type="checkbox"/>
Will the presentation require power-point facilities?	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> <b>If yes, please attach</b>



**Presentation Content\***

These details may be circulated to the local government and applicant if deemed necessary by the Presiding Member. Handouts or power points will not be accepted on the day.

Brief sentence summary for inclusion on the Agenda	<i>The presentation will address:</i> Comment on the 2006 heritage assessment that has informed the structure plan and Woolworths development application and provide alternative heritage view of the subject site and surrounding area informed by a local heritage consultant
----------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In accordance with Clause 3.5.2 of the [DAP Standing Orders](#), your presentation request must also be accompanied with a written document detailing the content of your presentation.

*Please attach detailed content of presentation or provide below:*

**DA2021/1797 HERITAGE COMMENT**

Laura Gray  
Two Rocks

This commentary is in response to the "Heritage Assessment" for *Two Rocks Town Centre Precinct* dated December 2006.

The "Heritage Assessment" does not confirm to the requirements of local or state criteria for a heritage assessment. It is a summary relying on a local government heritage inventory to develop a strategy for the future.

It does not reveal any historical or physical evidence of the 'Two Rocks Town Centre Precinct'. Perhaps there are 20 pages of information that are not included?

There is no substantiation that the 'Two Rocks Town Centre Precinct' is NOT of a high level of cultural heritage significance that is valued by the local community and recognised state wide, nationally and internationally as a tourist destination with King Neptune as the landmark.

In the first instance the assessment relies heavily on the City of Wanneroo endorsement of levels of significance at that time. (2006) Those levels of significance were not as proposed by me, as a heritage consultant and the local City of Wanneroo Councillor at the time. I was the only representative out of 15 Councillors, to promote the heritage of Two Rocks. Obviously outnumbered.

Local heritage inventories are fraught by local apathy, owner objections and general non-understanding of heritage listings and their implications. Wanneroo is no different. There were owner objections to proposed Category 2s at the time.

In my opinion, those categories do not represent the Two Rocks community's values of the place then, and certainly not now.

Relying on a 2006 Heritage Inventory to inform what is spuriously called a "Heritage Assessment" to inform a "recommended strategy" is not appropriate. Since the Heritage Act 1990 required updates every 4 years, clearly no further updates have been undertaken or relied upon.

Updates are required because places and people change, as do community values. Communities are more cognisant of their heritage particularly when confronted with misinformation.

To draw conclusions about the future development of the site based on heritage inventory categories is not appropriate. Certainly, the inferred outcomes gave no certainty what so ever about the future of the site and all



that it represents to the Two Rocks community. Yes it was only perceived locally, that is the sphere of responsibility of the local government.

A heritage assessment undertaken within the guidelines provided by the Heritage Council within the philosophy of the Burra Charter: Understand the place, as a foundation for any undertakings.

Clearly this is not the outcome of the "Heritage Assessment".

To cite examples from the "Heritage assessment" .

The Statement of Significance:

*the limestone retaining walls and statue of King Neptune have acquired landmark status in a local context and the latter in terms of the region.*

King Neptune has state, national and international recognition. It was a landmark to ships and had hundreds of thousands of visitors and tourists during its decade, of identifying Atlantis Marine Park, and since then, it is the identity of Two Rocks.

Identifying the shopping centre and tavern as:

*a noteworthy design in the context of the mid and late 1970s.*

It featured in *Construction Review* August 1975 and won the Bronze Medal 1979 Architects Award and had a 4-page spread in *The Architect* 79/2 quoted as: "*an historically noteworthy quality of architectural excellence. ... This design approach to a seaside town breaks new ground in a significant way.*"

That was even before Atlantis Marine Park was established.

From 2002, there was a concerted effort from the local community spearheaded by the Two Rocks Yanchep Residents Association. A Heritage Committee was formed and submitted an assessment to the Heritage Council for consideration of entry onto the Register of Heritage Places. It was denied.

There is no comparative in this so called "Heritage assessment" of the 'Two Rocks Town Centre Precinct.' It is a unique open mall arguably the only one in Australia, with boatels above the shopping centre- an interesting take on mixed use and included the police station and lock up cells. The police station has relocated but the cells remain.

The "Heritage assessment" report states:

*In its own estimation, the City of Wanneroo was suggesting that the significance of the study area was a local and, in our view, other than the ambition that stood behind the concept, the City's view is reflected in the findings of this heritage assessment.*

As alluded to, it was a local inventory, the local input was not accepted as submitted and only 1 councillor represented the Two Rocks and the views of the Two Rocks community. There was considerable action from the Two Rocks Resident's Association from c.2002 in recognising the significance of our town centre and King Neptune.

In Sun City marketing materials in the mid 1970s, it was stated

*"By Christmas this year (1983), 1 million people will have visited Atlantis Marine Park since its opening three years ago, ..."*

It was still operating at that level for another 6-7 years!, With tourists also visiting the tavern and open mall shopping centre.

*Yanchep Sun City: Australia's finest man-made harbour, an hours drive from Perth, is part of the biggest leisure, tourist and residential development of its type in the southern hemisphere.*

'Two Rocks Town Centre precinct' with the landmark *King Neptune* became central to that vision.



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Please complete a separate form for each presenter and submit to [daps@dph.wa.gov.au](mailto:daps@dph.wa.gov.au)

### Presenter Details

Name	Zakaya Benkendorf
Company (if applicable)	Click or tap here to enter text.
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

DAP Name	Metro Outer
Meeting Date	4 May 2022
DAP Application Number	DAP/DAP/21/02117
Property Location	10 Enterprise Avenue, Two Rocks
Agenda Item Number	8.1

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Is the presentation in support of or against the <u>report recommendation</u> ? ( <i>contained within the Agenda</i> )	<b>SUPPORT</b> <input type="checkbox"/> <b>AGAINST</b> <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>proposed development</u> ?	<b>SUPPORT</b> <input type="checkbox"/> <b>AGAINST</b> <input checked="" type="checkbox"/>
Will the presentation require power-point facilities?	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> <b>If yes, please attach</b>





**Presentation Content\***

These details may be circulated to the local government and applicant if deemed necessary by the Presiding Member. Handouts or power points will not be accepted on the day.

Brief sentence summary for inclusion on the Agenda	<i>The presentation will address:</i> A young person’s perspective on the development proposal including environmental and sentimental/heritage value
----------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------

In accordance with Clause 3.5.2 of the [DAP Standing Orders](#), your presentation request must also be accompanied with a written document detailing the content of your presentation.

*Please attach detailed content of presentation or provide below:*

Good afternoon, my name is Zakaya, I’m a resident of Two Rocks and have been since birth. I love the town of Two Rocks and the general town feeling of the place. Two rocks is a very unique place, very few places in metro area still have the feeling of town connection and togetherness. Everyone knows everyone and we all love to have a chat at the beach. I *strongly* believe this proposed development will taint this feeling of belonging and destroy this small fishing towns general aesthetic.

**Environmental issues**

As a young person, I am very mindful and careful about how my actions affect the environment. If this Woolworths was to go on the proposed site, the environmental effects on the ocean and land around would be catastrophic. Not to mention the number of animals that have already been misplaced and even slaughtered during the mindless flattening of the area. Think about the amount of rubbish and physical pollution that is found around the Yanchep shopping complex. That same amount of rubbish, if not more, would be blown directly into the ocean, marina and neighbouring parks, killing sea, beach, and wildlife.

**Sentimental value**

King Neptune and the old Atlantis marine park has been a huge part of my childhood. Me and family used to walk through the ruins and looked at the pools, slide and amphitheatres that were still there. It was a magical place, and we need to preserve that feeling of magic. Residents of two rocks and many people around of Western Australia have grown up knowing of the wonder that was the Atlantic marine park. Putting a huge monstrosity on that site would just not do it any justice. *The place was home to dolphins that jumped through hoops and seals that could juggle a ball on their nose, and people seriously are even contemplating putting a huge grey building there...*

People keep telling me that this is the future and that the younger generations want this development. I am the younger generation, and all my friends agree that putting a Woolworths on that site would be a travesty.

**I am the future and I say no to woollies at the Atlantis Marine Park site.**

Thank you.



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### Presenter Details

Name	Allan Shuttleton
Company (if applicable)	Click or tap here to enter text.
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

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Will the presentation require power-point facilities?	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> <b>If yes, please attach</b>



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Brief sentence summary for inclusion on the Agenda	<i>The presentation will address:</i> Comment on lack of consultation, tourism aspect, public open space, traffic concerns, inadequate parking facilities.
----------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------

In accordance with Clause 3.5.2 of the [DAP Standing Orders](#), your presentation request must also be accompanied with a written document detailing the content of your presentation.

*Please attach detailed content of presentation or provide below:*

**Since this campaign started we have been advised to stick to the planning criteria. What peoples views are don't come into the equation. The development has his plans submitted and those planning rules will only be taken into considerations UNDER PLANNING GUIDELINES. Which he is changing as he goes along.**

**If residence of Two Rocks have no bearing on the decisions made in there district where does that leave us.**

**In spite of what the developer has said proper consultation has never been undertaken and presented to the people of Two Rocks as previously stated by the developers.**

**My Wife and Family have resided here for nearly 30 years and as long as I can remember it has always been expected that Atlantis would always have a tourist atmosphere.**

**You can have all the private consultants you want engaged by the developers with text book ideas on what they envisage a plan should be, but it comes nowhere near what this suburb means to the people that actually live here and the potential that this precinct could do, not only for Two Rocks but the broader future for the state in the way tourism and heritage. You only have to live here to witness the amount of visitors from all over who come to view the ocean and the surroundings, Looking over the top of a Woolworths roof and a service station and a fast food outlet and squashed up housing is not the best impression of the area .**

**It appears that the only type of construction that the Fini Group specialize in are Units and Back to Back housing and cram as much in as they can to make money without consideration for the people who live here and that is what is intended for this precinct.**

**Hillary's is the only place that caters on a large scale for the tourism and family activities. Every other coastal plan has open space and grassed areas for familys.**

**Looking at the future plans for the marina in general by the government this urban plan is for the Atlantis precinct is way out of sink and we have reason to believe that the Dept of Transport the biggest land owner who are spending Millions of dollars have not been consulted.**

**If we stop thinking with our hearts and forget the passionate feeling of the people in general when making big decisions about the way we live our lives then what sort of future do we have to look forward to and what sort of legacy do we pass on to our children**



- 1) **The History and heritage stories of Two Rocks are still being told by residents and visitors, and need to be preserved and respected.**
- 2) **Commercial retail areas should be kept to shops that attract tourists ( examples Margaret River and facilities such as public open space and family activities**
- 3) **Traffic provisions are unrealistic a future round about on Charnwood, a bus stop with no provision for buses to pull of the road, a cycle way all at the end of a dangerous S bend which has already seen the 2 accidents in the last month. I am givin to understand that the cycle way was paid for by the developer to suit his own needs the council agreed because it didn't come out of their budget. It is very dangerous for children to cross with two near misses that my wife and I witnessed recently, is the developer going to take responsibility when a child doesn't make it home before or after school.**
- 4) **Finally the developer has taken away the area behind sea rescue and the yacht club which is ear marked for further development, now vehicles with their boat trailers overflow both sides of Marcon and Jordan street directly leading to the boat ramp which is intended for back to back housing. To save a lot of expense and heartache in the future this whole urban plan needs to be re examined. Pending the current heritage investigation and the minister for Lands looking at the acquisitions of the land , I respectfully request that any decision be held at bay until the out come is known and may common sense prevail .**



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### Presenter Details

Name	Marchelle Miteff
Company (if applicable)	
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements:

### Meeting Details

DAP Name	via Zoom
Meeting Date	1pm, 4 May 2022
DAP Application Number	DAP/21/02117
Property Location	Lot 9702 (No.10) Enterprise Avenue, Two Rocks
Agenda Item Number	MOJDAP/170

### Presentation Details

I have read the contents of the report contained in the Agenda and note that my presentation content will be published as part of the Agenda:	<b>YES</b> <input checked="" type="checkbox"/>
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Will the presentation require power-point facilities?	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> <b>If yes, please attach</b>



### Presentation Content\*

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Brief sentence summary for inclusion on the Agenda	<b>State Heritage Place view corridor protections</b>
----------------------------------------------------	-------------------------------------------------------

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*Please attach detailed content of presentation or provide below:*

One of the factors that needs highlighting is the view to and from the King Neptune Statue. Some state heritage places include protections on the view corridor from a prominent area in the heritage place. For example the Fremantle Prison Conservation policy includes a protection of the vistas or glimpses of the Prison from different areas within Fremantle and provides that visual links with other elements of the establishment should be retained, reinforced or re-established. The policy also provides for things such as Parking not being visible from the front terrace.

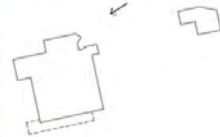
You will note that the proponent did not submit any pictures or impressions that show the reality of the current proposal. To the contrary the development application includes incorrect and misleading pictures featuring a grassy hill on the northern side of Azzura Street leading to the King Neptune Statue, and surrounding old growth established trees and extensive greenery.

I imagine that the view from King Neptune, overlooking his Kingdom (the Ocean) would also be protected under any future consideration of his heritage status, and therefore should be an important consideration when a determination is made on this development application.

DAP secretary if allowed could you please print and provide handouts to members of the attached pictures as part of my presentation. I have no training to able to present these over zoom



DA ISSUE	
NO.	DESCRIPTION
1	Issue 1 - Initial
2	Issue 2 - Revised
3	Issue 3 - Revised
4	Issue 4 - Revised
5	Issue 5 - Revised
6	Issue 6 - Revised
7	Issue 7 - Revised
8	Issue 8 - Revised
9	Issue 9 - Revised
10	Issue 10 - Revised
11	Issue 11 - Revised
12	Issue 12 - Revised
13	Issue 13 - Revised
14	Issue 14 - Revised
15	Issue 15 - Revised
16	Issue 16 - Revised
17	Issue 17 - Revised
18	Issue 18 - Revised
19	Issue 19 - Revised
20	Issue 20 - Revised
21	Issue 21 - Revised
22	Issue 22 - Revised
23	Issue 23 - Revised
24	Issue 24 - Revised
25	Issue 25 - Revised
26	Issue 26 - Revised
27	Issue 27 - Revised
28	Issue 28 - Revised
29	Issue 29 - Revised
30	Issue 30 - Revised
31	Issue 31 - Revised
32	Issue 32 - Revised
33	Issue 33 - Revised
34	Issue 34 - Revised
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37	Issue 37 - Revised
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47	Issue 47 - Revised
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51	Issue 51 - Revised
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67	Issue 67 - Revised
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71	Issue 71 - Revised
72	Issue 72 - Revised
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83	Issue 83 - Revised
84	Issue 84 - Revised
85	Issue 85 - Revised
86	Issue 86 - Revised
87	Issue 87 - Revised
88	Issue 88 - Revised
89	Issue 89 - Revised
90	Issue 90 - Revised
91	Issue 91 - Revised
92	Issue 92 - Revised
93	Issue 93 - Revised
94	Issue 94 - Revised
95	Issue 95 - Revised
96	Issue 96 - Revised
97	Issue 97 - Revised
98	Issue 98 - Revised
99	Issue 99 - Revised
100	Issue 100 - Revised



**WOOLWORTHS TWO ROCKS**

Azurra Street + Lisford Avenue, Two Rocks

Development Application  
February 2022

- 1. Cover Sheet
- 2. Site Plan
- 3. Floor Plans
- 4. Sectional Views
- 5. External Views
- 6. Landscape Architecture
- 7. Traffic and Transport
- 8. Environmental Impact
- 9. Heritage Impact
- 10. Social and Cultural Impact
- 11. Economic Impact
- 12. Visual Impact
- 13. Noise and Vibration
- 14. Air Quality
- 15. Water Quality
- 16. Wetland Values
- 17. Bushfire Risk
- 18. Flood Risk
- 19. Seismicity
- 20. Other Matters

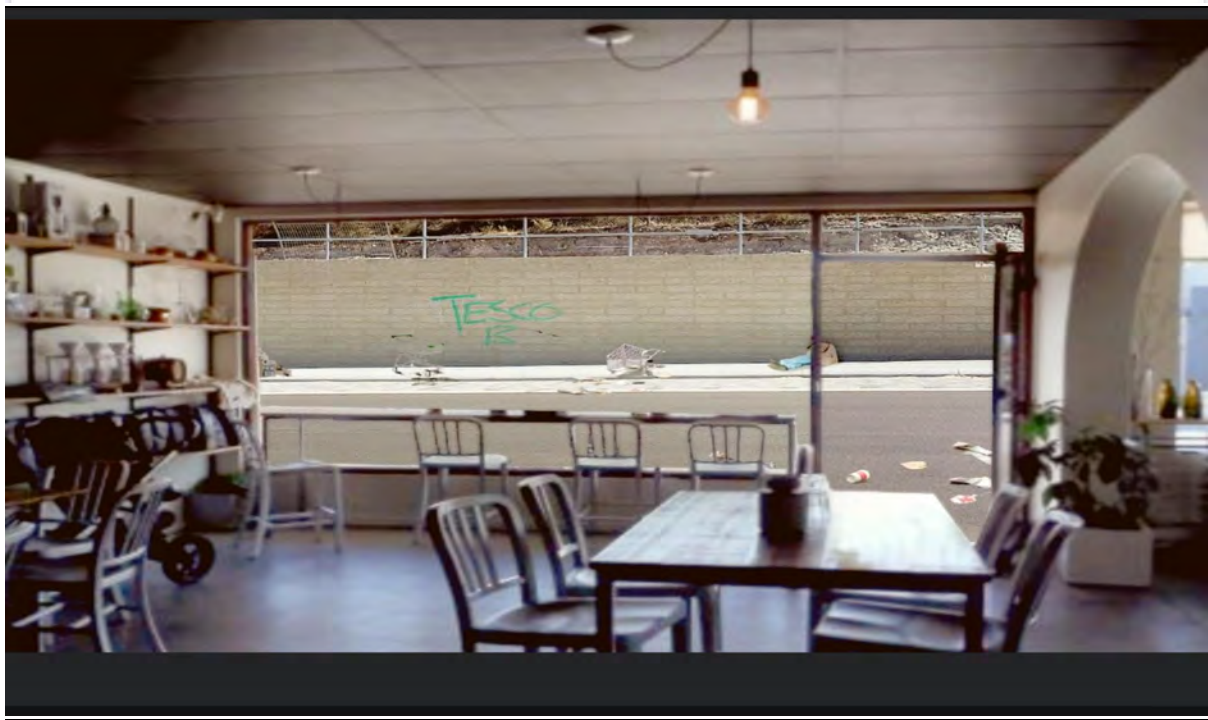
**BROOK FALCONER**  
ARCHITECTS

100/102 SOUTH BRIDGE ROAD, SUITE 101, PERTH WA 6000  
TEL: 08 9442 1000 FAX: 08 9442 1001  
WWW.BROOKFALCONER.COM.AU

PROJECT PTY LTD  
WOOLWORTHS TWO ROCKS

COVER SHEET

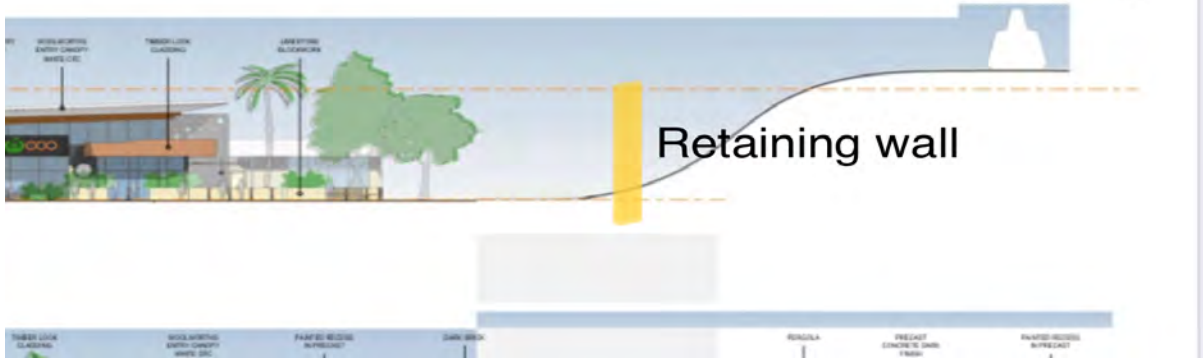
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Date: 02/2022  
Author: [Name]  
Checked: [Name]  
Drawn: [Name]  
Title: [Title]  
Project: [Project Name]





Sandstone retaining wall

DA ISSUE		
Rev	Description	Date
A	FOR INFORMATION	20/07/21
B	FOR CLIENT REVIEW	20/07/21
C	DEP PRESENTATION	20/07/21
D	DEP PRESENTATION 2	20/07/21
E	DA ISSUE	12/07/21
F	ISSUE FOR REVIEW	20/07/21
G	ISSUE FOR REVIEW	20/07/21
H	ISSUE FOR REVIEW	20/07/21



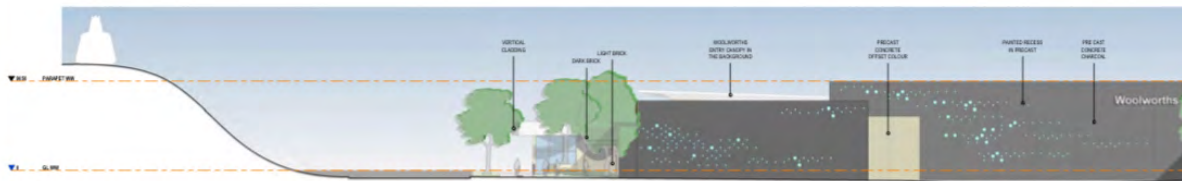
Retaining wall





2 - NORTH ELEVATION

1:200



3 - WEST ELEVATION

1:200





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### Presenter Details

Name	Bruce Nicholl
Company (if applicable)	Click or tap here to enter text.
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

DAP Name	Metro-Outer JDAP
Meeting Date	4 May 2022
DAP Application Number	DAP/21/02117
Property Location	10 Enterprise Ave Two Rocks
Agenda Item Number	8.1

### Presentation Details

I have read the contents of the report contained in the Agenda and note that my presentation content will be published as part of the Agenda:	<b>YES</b> <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>report recommendation</u> ? ( <i>contained within the Agenda</i> )	<b>SUPPORT</b> <input checked="" type="checkbox"/> <b>AGAINST</b> <input type="checkbox"/>
Is the presentation in support of or against the <u>proposed development</u> ?	<b>SUPPORT</b> <input type="checkbox"/> <b>AGAINST</b> <input checked="" type="checkbox"/>
Will the presentation require power-point facilities?	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input type="checkbox"/> <b>If yes, please attach</b>



### **Presentation Content\***

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Brief sentence summary for inclusion on the Agenda	<i>The presentation will address:</i> Click or tap here to enter text.
----------------------------------------------------	---------------------------------------------------------------------------

In accordance with Clause 3.5.2 of the [DAP Standing Orders](#), your presentation request must also be accompanied with a written document detailing the content of your presentation.

*Please attach detailed content of presentation or provide below:*

Click or tap here to enter text.

## JDAP Joint Administration Development Panel

4 May 2022

With the greatest of respect to the members of the Joint Development Assessment Panel I suggest that we have reached a point where the Two Rocks community has loudly and passionately expressed their opposition to this joint Woolworths, Fini Corp. application which has now evolved beyond the bounds of their development proposal. As it has now come to light that the developer has overstepped his authorisation and is proceeding to prepare land adjacent to the Woolworths site for a Service Station again in an inappropriate location which will compound the road congestion and hazards at the intersection of Lisford and Charnwood Ave's.

Despite the DAP brief I respectfully request that it is now incumbent upon the members of this panel to consider the wider cultural/historical aspect along with the heritage significance of the greater area of the old Atlantis Marine Park Precinct for the future enhancement and wellbeing of the community, considering the Heritage Council of WA has recently announced an imminent, assessment of the Atlantis (former Yanchep Sun City Corp) Precinct, I unequivocally call on you to **Reject** the Two Rocks Woolworths Proposal.

Furthermore:

While the site of this proposed development may, as suggested by the proponents;

**“That being respectful in its scale having regard for history of the area and the local coastal context”** the proposal is **STILL** entirely inappropriately located and they **can't possibly** be serious about their regard to the historical connections of the area or the coastal context given the framework of their proposal.

Likewise they suggest **“the development will contribute to the activation of the Two Rocks Marina and will be a catalytic development within the Two Rocks town centre.”** Firstly the Two Rocks Marina is owned by the State and is being redeveloped by the Department of Transport and as far as I am aware they have not been informed of this proposal by the developer.

Even as we speak because ongoing groundworks on the area behind the Yacht Club which was used previously as an overflow trailer park for fishermen, who because of Fini's ongoing works have since lost access to this area and are forced to park along each side of Jordan Street as there is no suitable available land for current or expected future trailer parking requirements

As for the suggestion **that the development will be a catalytic activator for Two Rocks,** is simply euphemistic hum drum and as I have previously pointed out the rapidly increasing population will be the only catalyst required along with the development of appropriate infrastructure for tourist and recreation aspects of the Two Rocks Atlantis Precinct

Now that more of the character of the recent dune landscape has been destroyed these levelled areas may be more appropriately used for a sports precinct for Beach Volleyball and

similar types of sports, while the area to the north east of King Neptune where the developer in his "Wisdom" has negotiated the sale of this space to the RAAF Association for a Retirement Village come Residential Care Centre which was previously the site of Atlantis Marine Park dolphin training pools where the exposed segments of the top of those pools form a natural boundary for the arena of a new entertainment amphitheatre with the surrounding dunes tiered as viewing areas and a promenade along the top of the dunes with boutique shopping , café's etc. all of which truly represents the possible reactivation of a historic and tourism connection to the past of Two Rocks coastal precinct (see Addendum III below)

I would (challenge) encourage Mr Fini, Woolworths and RAAFA to make a statement as corporate citizens by accenting to public opinion and revise their approach and abandon this development which would truly be a monumental step towards the future investment in tourism and for community outcomes'

If Mr Fini would like to arrange a public consultation on the future of this precinct around the concept I have outlined above he would be most welcome and I am sure the City of Wanneroo would cooperate in finding a more appropriate location for their developments.

Thank you for your time and attention

Kind Regards

Bruce Nicholl

Committed to the future of the Two Rocks Community

## **Addendum I**

### **Burra Charter**

Latest revision of the Burra Charter by the Australia National Committee of the 'International Council of Monuments and Sites' (ICOMOS) was on 31 October 2013.

The Burra Charter provides guidance for the conservation and management of places of cultural significance (cultural heritage places). Conservation is an integral part of the management of places of cultural significance and is an ongoing responsibility

### **What places does the Charter apply to?**

The Charter can be applied to all types of places of cultural significance including natural, Indigenous and historic places with cultural values

### **Why conserve?**

Places of cultural significance enrich people's lives, often providing a deep and inspirational sense of connection to community and landscape, to the past and to lived experiences. They are historical records that are important expressions of Australian identity and experience. Places of cultural significance reflect the diversity of our communities, telling us about who we are and the past that has formed us and the Australian landscape. They are irreplaceable and precious.

These places of cultural significance must be conserved for present and future generations in accordance with the principle of inter-generational equity.

In support of my previous submissions objecting to the Woolworths Development Proposal

## Article 1.

Definitions For the purposes of this Charter:

- 1.1 Place means a geographically defined area. It may include elements, objects, spaces and views. Place may have tangible and intangible dimensions.
- 1.2 Cultural significance means aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups.

## Addendum II:

### Heritage Council - Development Assessment Framework

The following articles from the Heritage Assessment Framework, confirm the historical and cultural aspects of the significant heritage value of the proposed destruction and redevelopment of the Sun City Corp and former Atlantic Marine Park Precinct which is connected so physically and emotionally within the Two Rocks community.

#### Broad Policies Assessing Proposed Changes P1

1. Impact on a place's cultural heritage significance is the primary issue considered by the Heritage Council when assessing a proposed change.
2. Each proposal shall be assessed on its own merit and circumstances.
3. Past changes on the heritage significance of a place should not be the reason why a new adaptation and/or development with more, similar or less impact should take place.
4. The Heritage Council adopts the Burra Charter as the principle document guiding heritage management in Western Australia.

#### Item 2.

As the historical association with the former Atlantis Marine Park must be reasonably interpreted as having considerable merit in this circumstance.

#### Item 3.

In this case the demolition of the Atlantis Marine Park facilities and structure – should not dissuade from a new and innovative adaption as in the development of a tourist centred destination which the above mentioned entertainment concept along with open type botanical park areas will most definitely accomplish, with far reaching benefits to the community and beyond.

200 years ago **Frederick Olmstead** had the vision and created America's iconic parks, Belle Island, Emerald Necklace, Central Park and the U.S. Capitol as public spaces, which are even more essential considering today's lifestyles, and while we can't replicate these grand parks we can do so in miniature with obvious positive outcomes.

#### Item 4

In its opening statement; **What places does the Charter apply to?**

“The Charter can be applied to all types of places of cultural significance including natural, Indigenous and historic places with cultural values”

I would wager as the representatives of the Two Rocks community we have demonstrated conclusively that not only the proposed Woolworths site, which stands directly within the former Atlantis Marine Park entertainment precinct but that other proposed or to be proposed future developments within the greater marine park area are also inappropriate and unnecessary and **not wanted**.

### **Addendum III:**

#### **Atlantis Precinct Redevelopment Proposal – Saving Atlantis**

The attached is a pre-emptive proposal that presupposes firstly the Woolworths supermarket in refused and or relocated and the proposed retirement village can also be relocated

Secondly that the land owner can be enticed to invest in this new proposal or that the Local and State Government purchases all or part of the precinct in question.

Lastly that funding can be secured from various sources to develop this proposal through grants, corporate grants/loans, public shares and fundraising activities

#### **1 Location**

Two Rocks Atlantis Park Precinct  
Enterprise Ave Two Rocks

#### **2 Concept**

Within the site of the original Atlantis Marine Park Precinct:

- 2.1 Create an Amphitheatre Entertainment Centre within the northern end of the original Marine Park
- 2.2 Create a Botanical Park in the central section, expanding on the existing trees and vegetation in this area
- 2.3 Create a Sports Park on the southern end (proposed Woolworths) site
- 2.4 King Neptune and park area
- 2.5 Refurbish the existing Two Rocks Shopping Centre and Tavern

##### **2.1 Amphitheatre Entertainment Centre**

1a The area north of King Neptune bounded by Lisford Ave, Sovereign Ave and Enterprise Ave which is comprised of undulating dunes, ranging from prominent sand dunes mainly around the perimeters descending to a low level arena area (previously the marine parks pools) where now the top edges of those pools are still visible

1b At the lowest level would be the Event Arena which utilising the sections of the existing visible pool outlines would make for a uniquely shaped arena (not just

round) providing for either a single large event, community participation event etc. or a number of smaller specialty events happening at the same time.

Possible events could include, Symphony recital, Concerts, demonstration sport event, festivals, markets and more.

1c The surrounding dunes would be grassed tiered sections, from 1 or 2 up to several levels depending on the various dune heights, for the viewing audience, possibly some fixed or temporary seating

1d The top level would consist of a promenade with cafes and boutique shops

## **2.2 Atlantis Botanical Park**

2a the area between King Neptune and the entertainment centre consists of a central dune high enough for a lookout platform with views over the amphitheatre, and back over King Neptune with sea views.

2b Surrounding this dune is an extensive area between Lisford and Enterprise Ave's with existing mature trees and some native vegetation, possibly significant species that lends the area to become a contemporary botanical park with native grasses and smaller grassed areas to copper squat with intertwined paths. 'A peaceful place!'

## **2.3 Atlantis Sports Complex**

3a The recently levelled area south of King Neptune would accommodate a sporting complex for minority sports requiring smaller base area for their activities such a Beach Volleyball, Lacrosse and Archery

## **2.4 King Neptune Statue**

4a Refurbish and restore landscape for access and public viewing

4b The cleared land between Neptune and Lisford Ave could become a car park for patrons of the entertainment centre and sports complex or part of the botanic park if enough parking facilities can be provided in the proposed development areas



**PROPOSED AMENDMENT  
TO RECOMMENDATION**

Received by Administration:	Date:		Time:	
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Meeting Date:	12 April 2022	Item No and Heading:	Item 4.4 – Consideration of Responsible Authority Report (RAR) relating to proposed Shop, Liquor Store, Restaurant and Office at 10 Enterprise Avenue, Two Rocks – Council Briefing – 5 April 2022 6:00pm  0 – Urgent Business – Consideration of Responsible Authority Report (RAR) recommendation relating to proposed Shop, Liquor Store, Restaurant and Office at 10 Enterprise Avenue, Two Rocks – Ordinary Council – 15 March 2022 6:00pm
Mover:	Cr Baker	Seconder:	

**AMENDMENT**

**That Council:-**

- NOTES** Administration's recommendation as included within the Responsible Authority Report (RAR) submitted to the Metropolitan Outer Joint Development Assessment Panel on 28 February 2022.
- NOTES** the additional information received from the Department of Planning, Lands and Heritage relating to the heritage matters as contained in Attachment 3 which will be provided to the Joint Development Assessment Panel as an addendum to the Responsible Authority Report.

Includes Resoultion No. 3 with the Recommendation 2 as shown in italics below:

- RECOMMENDS** to the Metro Outer- Joint Development Assessment Panel, **REFUSAL** of the proposed Shop, Liquor Store, Restaurant and Office development at No. 10 Enterprise Avenue, Two Rocks for the following reasons:
  - The location of the proposal is not appropriate or compatible with the coastal marina environment and the type of development should be located to the north-east within the Future Two Rocks Secondary Centre as identified by the Yanchep – Two Rocks District Structure Plan No. 43 (DSP 43).*
  - The proposal is not compatible with the planned tourism focus and fine grain main street, town centre concept and the coastal boutique character of Two Rocks under ASP 70. The form and scale results in a proposal whose prominence will negatively impact on the amenity of the emerging Town Centre and planned coastal tourism and resort function. The proposed daily retail supermarket format is incompatible with the unique nature of Two Rocks and the current and desired future character coastal town character which arises from its setting and*

**relationship with the coastal marina location. Accordingly, the proposal does not meet the considerations of Clause 67(2)(m) and (n) of the Deemed Provisions.**

- c) The proposal will generate a level of traffic which will impact significantly on the capacity and safe operation of the current surrounding road system. This is compounded through impacts generated by the proposed access and egress of the site, the unsuitable arrangements for loading and unloading from the proposed loading dock which is exposed on the western side, and the manoeuvring and parking of vehicles within the site due to the road network and internal design being unsafe. Accordingly, the proposal does not meet the consideration of Clause 67(2)(s) and (t) of the Deemed Provisions.**
- d) The proposal will significantly impact on the heritage importance of the area, as well as impact on adjacent heritage sites including the King Neptune Statue through inappropriate bulk, scale and interface of the development impacting on views to and from the King Neptune Statue. The proposal similarly fails to appropriately recognise and interpret the heritage value of the subject site through its design, colours and materials. Accordingly, the proposal does not meet the considerations of Clause 67(2)(k), (l) and (w) of the Deemed Provisions.**
- e) The proposal has failed to establish a fine grain main street, town centre concept development as envisioned by the Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70), which as a result impacts on the legibility of the centre, pedestrian movement and more broadly results in a proposal that does not recognise the current and intended coastal boutique nature of the centre. Accordingly, the proposal does not meet the consideration of Clause 67(2)(h) of the Deemed Provisions.**
- f) The site is not subject to a Precinct C Local Development Plan (LDP), and accordingly the proposal has failed to meet the consideration of Table 1, Clause 2.1 of the Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70) document insofar that the development is of a scale and permanence that would prejudice the design of the LDP, and the development of the surrounding area.**
- g) The proposal does not include colours and materials that are compatible with the unique coastal nature and heritage value of the Two Rocks area. Accordingly, the proposal does not meet the consideration of Clause 67(2)(zc) of the Deemed Provisions.**

**REASON FOR AMENDMENT**

The proposed development fails to demonstrate a built form and range of uses that reflect the community's expectation for development of the site as set out in Agreed Structure Plan 70 and in light of the significant feedback from the community expressing their dissatisfaction with the proposal. The development fails to have proper regard for the significant heritage elements in the area, notably the relationship of the development with the adjacent King Neptune Statue due to the bulk scale, colour and materials that have been proposed.

**ADMINISTRATION COMMENT**

Administration does not support the alternative motion recommending the JDAP refuse the proposal noting that the RAR submitted to the JDAP by Administration recommends approval be granted by the JDAP subject to conditions.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_



## Presentation Request Form

[Regulation 40\(3\)](#) and [DAP Standing Orders 2020](#) cl. 3.5

**Must be submitted at least 72 hours (3 ordinary days) before the meeting**

### Presentation Request Guidelines

Persons interested in presenting to a DAP must first consider whether their concern has been adequately addressed in the responsible authority report or other submissions. Your request will be determined by the Presiding Member based on individual merit and likely contribution to assist the DAP's consideration and determination of the application.

Presentations are not to exceed **5 minutes**. It is important to note that the presentation content will be **published on the DAP website** as part of the meeting agenda.

Please complete a separate form for each presenter and submit to [daps@dph.wa.gov.au](mailto:daps@dph.wa.gov.au)

### Presenter Details

Name	Warren Schafer
Company (if applicable)	Click or tap here to enter text.
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

DAP Name	Metro Outer
Meeting Date	4 May 2022
DAP Application Number	DAP/21/02117
Property Location	10 Enterprise Avenue, Two Rocks
Agenda Item Number	8.1

### Presentation Details

I have read the contents of the report contained in the Agenda and note that my presentation content will be published as part of the Agenda:     —	<b>YES</b> <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>report recommendation</u> ? (contained within the Agenda)	<b>SUPPORT</b> <input type="checkbox"/> <b>AGAINST</b> <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>proposed development</u> ?	<b>SUPPORT</b> <input type="checkbox"/> <b>AGAINST</b> <input checked="" type="checkbox"/>
Will the presentation require power-point facilities?	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please attach



### Presentation Content\*

These details may be circulated to the local government and applicant if deemed necessary by the Presiding Member. Handouts or power points will not be accepted on the day.

Brief sentence summary for inclusion on the Agenda	<i>The presentation will address:</i> <b>Comment and discussion on the validity of the Heritage Assessment 2006 and Heritage Impact Statement 2021 prepared by Phillip Griffiths Architects</b>
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In accordance with Clause 3.5.2 of the [DAP Standing Orders](#), your presentation request must also be accompanied with a written document detailing the content of your presentation.

*Please attach detailed content of presentation or provide below:*

### **HERITAGE ASSESSMENTS – PHILLIP GRIFFITHS ARCHITECTS**

One of the main concerns with regard to this Woolworths proposal in Two Rocks is the heritage significance of the subject site. In the absence of a heritage assessment which I understand is currently being prioritised by the Heritage Council, the development proposal is being informed by Heritage Impact Statements compiled by Phillip Griffiths Architects.

The ASP 70 structure plan was informed by a 2006 assessment by Phillip Griffiths Architects which was commissioned by the developer to support his intentions for development in the area. In my opinion, this is biased and there is a clear conflict of interest. Particularly when you become aware of the many projects where Fini Group work hand in glove together, a heritage assessment which does not support the developer in his intentions for the area would therefore not be a good business decision for a heritage consultant relying upon the developer for continued business.

In 2021 Phillip Griffiths Architects were again commissioned by the developer to prepare a heritage impact statement in relation to the current Woolworths development proposal. A document which I can, at best, call an exercise in creative writing to suit the developer. Although I acknowledge that there is a perception in the planning community that the authors of the heritage assessments are experts in the area, I believe the assessments should be closely scrutinised for accuracy and misleading information. I would like to draw attention to the following examples in this respect:

#### **Example 1 - Setting of King Neptune**

Appendix C to the 2006 Heritage Assessment includes Phillipa O'Brien's Assessment of King Neptune which states:

*"As an art historian and writer, I regard the Australian landscape as our most valuable cultural asset. Some works of art enhance our experience and understanding of the natural landscape. In the case of Neptune, **its site within the landscape has endowed the sculpture with a power that it would not otherwise have.***

Contrast that statement with the assessment of the proposed Woolworths development within the heritage impact statement prepared by Phillip Griffiths in 2021 which states that the positioning of this development directly at the foot of King Neptune has a "*minor positive impact the café facing the King Neptune Statue reinforces its landmark status*".

How can you say on one hand that *the natural landscape endows the sculpture with a power it would not otherwise have*, and on the other hand take that natural landscape away



completely? How in anyone's view is the current proposal a positive impact????????? The two statements are completely contradictory and I suggest the 2021 Heritage Impact Statement only serves to bow to the developers wants – which evidently is only concerned with financial gain.

### **Example 2 – Local Significance**

In the 2006 Heritage Assessment and the 2021 Heritage Impact Statement both reference only a local or regional heritage significance of King Neptune and the surrounding area. Atlantis Marine Park was attended by thousands of international, interstate and local visitors each week for the 10 years it was operational. To this day, until very recently busloads of tourists, mostly from Asia would regularly visit Two Rocks and King Neptune. I travel regularly up and down WA's coast, and for the last 4 months each person that I have encountered knew of Atlantis Marine Park and King Neptune – every single one of them was appalled by the current proposal.

How can the Heritage impact statement state that it is only of local significance? Clearly, it is at the very least of State significance – as the Heritage Council is urgently assessing the area for entry on the State Heritage list of places. Perhaps if the authors of the heritage assessments actually visited the site prior to making an assessment, and consulted with the public the conclusion might have been more accurate.

### **Example 3 – Remaining elements of Atlantis Marine Park**

In the 2021 Heritage Report it states that:

*“In August 2006 when the heritage assessment was prepared the Two Rocks Shopping Centre and tavern continued to serve the purpose for which it was originally built. Some landscaping elements, limestone pathways and walls, the King Neptune statue, and the former entrance marked by Mark Le Buse of a pod of dolphins were all that remained of the Atlantis Marine Park (fmr) in 2006”.*

This is an outright lie. If the authors of the Heritage Assessment in 2006 and the Heritage Impact Statement of 2021 had actually attended the site they would have seen the outlines of dolphin pools, waterfall features, lookouts, stadium limestone wall features as well as the following items which were photographed in the area in the last 5 years.





Atlantis Marine Park, Two Rocks, then and now - Abandoned Park



3:23 / 5:42

Atlantis Marine Park, Two Rocks, then and now - Abandoned Park



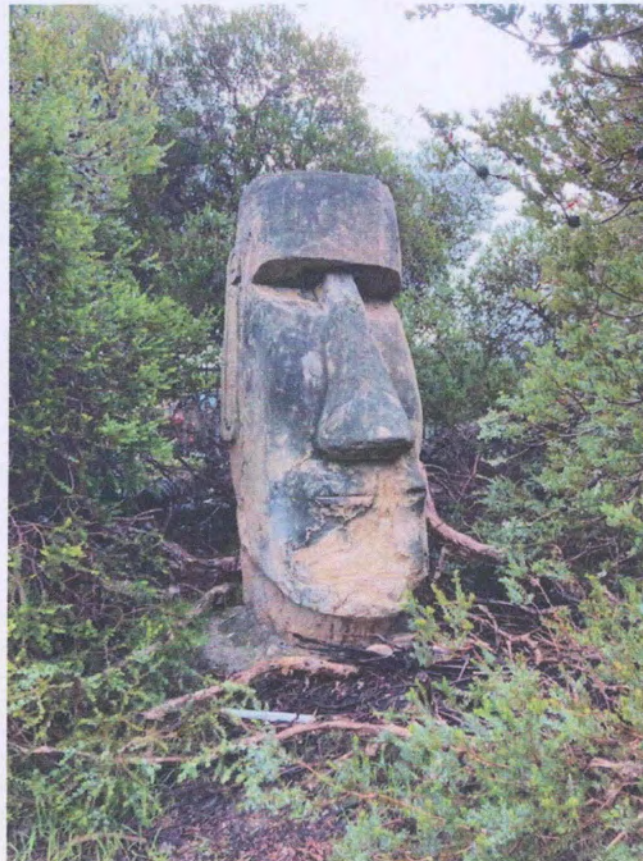
2:38 / 5:42







Atlantis Marine Park, Two Rocks, then and now - Abandoned Park





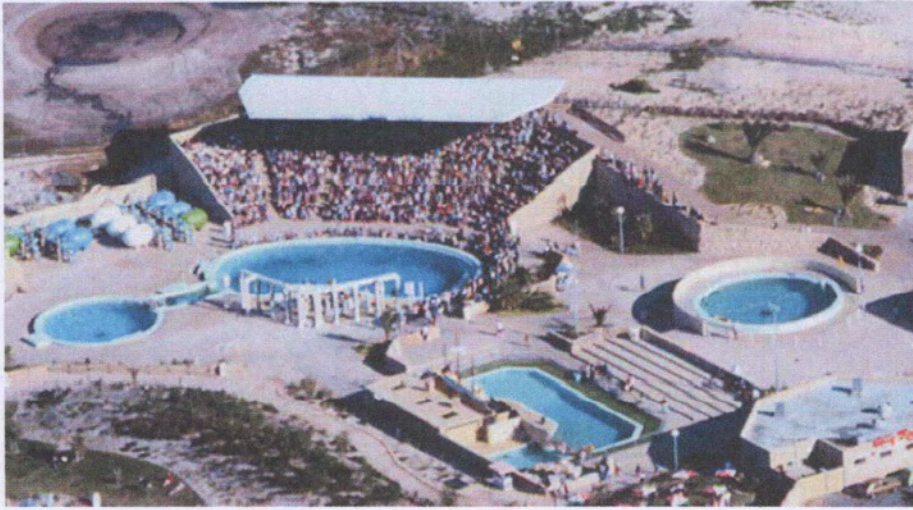
**Example 4 – This isn't the first time Phillip Griffith's have got it wrong!**

I refer to the Agenda Forum Council Meeting for the City of Swan on 30 March 2022 @ 2h24 mins where there are discussions about a proposal in relation to the proposed Demolition of a House at No 7 Fauntleroy Street in Guildford. Urbis, who are also related to the Woolworths proposal, presented a deputation. During that deputation the heritage assessment Phillip Griffiths Architects compiled in relation to the proposal was questioned by Councillor Richardson on the basis that the Phillip Griffiths Report stated that the dwelling was neglected and vacant for 15 years. The same Councillor had personal knowledge that this was in fact completely untrue as she had spoken to the previous owners 3 years ago who had lived at the property until it had been sold in 2019, as in fact had generations of the family beforehand.

<https://webcast.swan.wa.gov.au/archive/video22-0330.php>

**Conclusion**

While Phillip Griffiths Architects are renowned for their heritage work, they have clearly gotten it very wrong with respect to this proposal and the broader Atlantis Marine. In the interests of the preservation of heritage and the sustainable development of the area, I respectfully request that the panel members reject this development proposal, or at the least – defer until the heritage assessment has been undertaken by the Heritage Council.





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[Regulation 40\(3\)](#) and [DAP Standing Orders 2020](#) cl. 3.5

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### Presenter Details

Name	Aline Benkendorf
Company (if applicable)	Click or tap here to enter text.
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

DAP Name	Metro Outer
Meeting Date	4 May 2022
DAP Application Number	DAP/21/02117
Property Location	10 Enterprise Avenue, Two Rocks
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Will the presentation require power-point facilities?	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> <b>If yes, please attach</b>



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Brief sentence summary for inclusion on the Agenda	<i>The presentation will address:</i> Comment and discussion on the impending State Heritage Place assessment by the Heritage Council of Western Australia, tourism/resort based economy district centre, and procedural fairness.
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In accordance with Clause 3.5.2 of the [DAP Standing Orders](#), your presentation request must also be accompanied with a written document detailing the content of your presentation.

*Please attach detailed content of presentation or provide below:*

### **Woolworths development proposal, Two Rocks**

Two Rocks residents as a whole are not opposed to development or the introduction of a Woolworths into the town. We understand that our little coastal town is growing. The objection is based on the specific location of the development. We understand that this development ticks some boxes in terms of zoning and permitted uses – but it also misses the mark when it comes to, amongst other things, the heritage and tourism value of the area. It’s about balancing those priorities; it’s about placing the value of heritage and the sustainable development of this unique area above a developers need for an **easy cash grab**.

The site of the proposed Woolworths is **THE STATEMENT SITE** of the town centre of Two Rocks which holds great heritage significance. It will set the tone for all future developments in the Marina Zone area.

### **TOURISM AND RESORT ECONOMY**

Under the District Structure Plan the District centre of Two Rocks is identified as performing a different function than all other district centres. It is to be based on a **TOURISM AND RESORT ECONOMY**. The proposed development does not promote or encourage a tourism economy, in fact you can find a similar Woolworths shopping centre in most average suburbs in the metro area. We are told that other developments in the area, in addition to the proposed Woolworths complex, will be a retirement village, a gym, a service station and a childcare centre. None of these proposed developments encourage an economy based on tourism.

If anything, the proposed development only detracts from the tourism value of the area by restricting views and access from and to the Iconic King Neptune Statue. With no additional tourism or recreational development proposed for the area, the heritage and tourism status of King Neptune and surrounds will decline dramatically.

**THIS IS THE SITE THAT DETERMINES WHETHER TWO ROCKS IS A TOURIST DESTINATION OR JUST ANOTHER SUBURB IN THE NORTHERN SPRAWL.**



## **HERITAGE SIGNIFICANCE OF SUBJECT SITE**

The proposed development is located directly in front of the **iconic King Neptune Statue and on the former site of Atlantis Marine Park**, these places have a special place in West Australian's hearts, not just Two Rocks residents. The Heritage Assessments that have informed this development application have detailed the purported "little significance" value of the proposed site, however this is not reflected by the immense public opposition to the location of the proposed development.

A joint submission to the City of Wanneroo in opposition to this Development Application received over 1,300 signatures. A further petition which was presented to the Legislative Assembly by the Hon John Quigley outlining concerns in relation to the development application received over 1000 signatures also. There has been significant media interest in this development and further outcry on social media. One article that was run by ABC received over 3,200 reactions, over 700 comments and over 200 shares. That is a very significant reaction by the public.

Heritage Minister David Templeman has also acknowledged that King Neptune is special and said that *"The King Neptune statue is an iconic Perth landmark and is much loved by the Western Australia community,"*. *"It really captured the essence of Perth and Western Australia in the 1980s. "I remember visiting Atlantis Marine Park in the 80s and it was like nothing else I'd ever seen, and I think there are many Western Australians who look back on their time at Atlantis fondly. It is part of the Western Australia story and I am glad that the community is actively recognising that fact and getting behind its preservation."*

As you are hopefully aware of by now, due to the public concern raised in relation to this development application, the Sun City Precinct has now been prioritised for urgent assessment for heritage status by the Heritage Council of WA. It is important to get the development of this area right – **IT CANNOT BE UNDONE.**

## **PROCEDURAL FAIRNESS**

The determination of this development should incorporate the principle of 'procedural fairness' which dictates that a fair and proper process should be used by a decision-maker when exercising its power. These rules of procedural fairness require that:

- 1) The hearing is appropriate in the circumstances;
- 2) Lack of bias;
- 3) there is evidence to support a decision; and
- 4) inquiry into matters that are disputed.

As the panel is now aware, there is a heritage assessment pending that will likely affect this development application – the evidence that is therefore required to make a decision is not yet available which violates one of the aforementioned principles of procedural fairness.

The 15 year old heritage assessments that have, up until now, been presented in relation to this development application have been commissioned by the developer to support his intentions for the area. This indicates a bias, another violation of the principles of procedural fairness. Furthermore, to comply with the principles of procedural fairness – an inquiry should be made into matters that are disputed, in



particular I reference the pending urgent heritage assessment of the area which would go some way into informing the dispute with regard to heritage.

Therefore, in the interests of procedural fairness, the panel should at the very least, delay the determination of this matter until a heritage assessment has been completed by the Heritage Council. We ask panel members that if they are of the mind to proceed without waiting for the outcome of the heritage assessment, to not only rely upon the ill-informed Heritage Assessments provided by Phillip Griffiths Architects but on the many extrinsic materials available to them.

### **STATE HERITAGE PLACE - HERITAGE ACT 2018 (WA)**

Perhaps instead of relying upon these ill-informed heritage impact statements, there should be some onus to make some independent inquiries and conclusions on the matter. A good place to start would be the *Heritage Act 2018 (WA)*. What makes a State Heritage Register Place? And if a place is registered, what kind of considerations are taken into account when a new development is proposed for the place?

In order for a place to entered into the State Register, the heritage council must determine that the place has cultural heritage significance.<sup>1</sup> In determining this the Council has regard to a number of factors<sup>2</sup> including—

- a. *its importance in demonstrating the evolution or pattern of Western Australia's history;*
- b. *its importance in demonstrating rare, uncommon or endangered aspects of Western Australia's heritage;*
- c. *its potential to yield information that will contribute to an understanding of Western Australia's history;*
- d. *its importance in demonstrating the characteristics of a broader class of places;*
- e. *any strong or special meaning it may have for any group or community because of social, cultural or spiritual associations;*
- f. *its importance in exhibiting particular aesthetic characteristics valued by any group or community;*
- g. *any special association it may have with the life or work of a person, group or organisation of importance in Western Australia's history;*
- h. *its importance in demonstrating a high degree of creative or technical achievement;*

**And importantly the Heritage Act also provides that.....**

*(2)A place may have cultural heritage significance despite lacking physical material that substantially contributes to its cultural heritage significance.*

Many of the factors that I just listed would, in my opinion and I'm sure you would agree, be relevant to not only the King Neptune Statue but also the former site of Atlantis Marine Park and the broader marina area in Two Rocks. I do not think there is any doubt that various places in the Sun City Precinct will be assessed as having State Heritage Value.

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<sup>1</sup> Section 37 Heritage Act 2018 (WA)

<sup>2</sup> Section 38 Heritage Act 2018 (WA)



Atlantis Marine Park conjures memories of a very prosperous time for Western Australia. For most though, like Minister Templeman, it represents vivid family memories of happiness and excitement, it was a tourist attraction for local, interstate and international visitors alike – it was nothing that had ever been before and nothing that has been since in Western Australia.

Most places on the State Register of Heritage Places represent places with dark histories attached, prisons, churches, childrens' homes. Western Australians also deserve to conserve places that have happy memories attached and any development in this area should conserve and protect the heritage of the area. Something which a café in a Woolworths complex with glimpses of the King Neptune Statue does not achieve.

### **Heritage Impact Assessments for State Heritage Places**

It is also important to note that the pro-forma Heritage Impact Statement that is required to be provided for development proposed which will affect a state heritage place includes consideration of the following factors:

- 1) How is the impact of the new development on the heritage significance of the place or area to be minimised?
- 2) Why is the new development required to be adjacent to a heritage place?
- 3) How does the new development affect views to, and from, the heritage place? What has been done to minimise negative effects?
- 4) Is the new development sympathetic to the heritage place? In what way (e.g. form, siting, proportions, design, materials)?
- 5) Will the new building(s) visually dominate the heritage place? How has this been minimised?
- 6) Will the public and users of the place, still be able to view and appreciate its significance?

In our view, these considerations have not been addressed adequately by the proponents in the Heritage Impact Statement, and therefore the development proposal should not be approved by the Joint Development Assessment Panel this afternoon.

**In summary, this town is a unique place of historical significance, do not be an instrument of its destruction, do not let this be the mark you leave on the Western Australian landscape. Instead make this a decision to provide for future generations and the preservation of heritage. THIS DECISION CANNOT BE UNDONE.**





## Presentation Request Form

[Regulation 40\(3\)](#) and [DAP Standing Orders 2020](#) cl. 3.5

**Must be submitted at least 72 hours (3 ordinary days) before the meeting**

### Presentation Request Guidelines

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Please complete a separate form for each presenter and submit to [daps@dph.wa.gov.au](mailto:daps@dph.wa.gov.au)

### Presenter Details

Name	Helen Michael
Company (if applicable)	Click or tap here to enter text.
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

DAP Name	Metro Outer
Meeting Date	4/5/2022
DAP Application Number	DAP/21/02117
Property Location	10 Enterprise Avenue Two Rocks
Agenda Item Number	8.1

### Presentation Details

I have read the contents of the report contained in the Agenda and note that my presentation content will be published as part of the Agenda:	<b>YES</b> <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>report recommendation</u> ? ( <i>contained within the Agenda</i> )	<b>SUPPORT</b> <input type="checkbox"/> <b>AGAINST</b> <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>proposed development</u> ?	<b>SUPPORT</b> <input type="checkbox"/> <b>AGAINST</b> <input checked="" type="checkbox"/>
Will the presentation require power-point facilities?	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> <b>If yes, please attach</b>



**Presentation Content\***

These details may be circulated to the local government and applicant if deemed necessary by the Presiding Member. Handouts or power points will not be accepted on the day.

<p>Brief sentence summary for inclusion on the Agenda</p>	<p><i>The presentation will address:</i> The community, cultural, and First Peoples’ heritage and connection with the Two Rocks Town Centre Precinct and the need for a better suited treatment and development in order to conform to the expectation of maintaining our place as a tourism destination for all to enjoy.</p>
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In accordance with Clause 3.5.2 of the [DAP Standing Orders](#), your presentation request must also be accompanied with a written document detailing the content of your presentation.

*Please attach detailed content of presentation or provide below:*

The very thought of our town being dominated by a Woolworths big grey box building and a service station right at the statement entrance location sends a shiver down the spine of all of us.

There has been no community consultation and despite the mention in the 2006 Heritage assessment report by Griffiths Architects that informed the Structure Plan which said that it would be prudent to consult with ‘aboriginal interest’ to my knowledge this has not been done. It is inappropriate for me or anyone other than a designated elder to speak of such matters, but after speaking to some people I have become aware that there are Traditional Owners’ dreamtime stories about the Two Rocks and only a few kilometres away at the Breakwater Estate there is a registered Traditional Owner site (Site 17597) known as Emu Cave. In my opinion the Department of Planning, Lands, and Heritage should include ALL heritage aspects when they assess an area and especially as there is now ‘an urgency’ to provide a heritage assessment of the Two Rocks town!

We, the locals, visitors, and of course the TOs have a sense of wonderment at the beauty of Two Rocks and have revelled in the natural landscape and the manmade Atlantis Marine Park when it was operating. It is a fun place, and this aspect needs to be preserved. It is the last coastal fishing suburb left in the metro area. I have a DVD from the Wanneroo Library depicting the stories and memories of those associated with and/or visiting Atlantis and there are a couple of publications in the Wanneroo Museum. Two Rocks needs its own museum as there is so much history here to preserve.

The area was home to fishermen and their shacks for many years in the 50s and 60s along what is now Marcon Street between the north and south rocks. Then along came the Bond Corporation in the late 60s with all the vision to develop the area which he marketed overseas in Britain and America as a holiday/retirement destination. All the streets in the Yachting Village Precinct to the north of the town are named after famous racing yachts. They built the marina and the shed which housed the Australia 2. (By the way this shed is currently being demolished to make way for new buildings on the marina.)

The State and now the Federal Government have been approached to purchase all or



some of the Two Rocks Town Precinct in order to preserve and continue the fun ocean culture of our place. The town needs a Foreshore! Look at places like Rockingham. This has a well used and well thought out town foreshore area with boutique shopping and eateries that all people can flock to and enjoy. The same with Sorrento and the Hillarys Boat Harbour. None of these places have a big corporation like Woolworths dominating the foreshore and it is too close to pristine waters and beaches for a service station. There is another commercial precinct on the Structure Plan just to the east of the marina precinct which should house all this sort of commercialisation.

Two Rocks could and should become a playground place given its natural beauty and prior usage. The population is burgeoning and I implore the planners to have some forethought to create a place for the people, a place for enjoyment, a place that will enhance the overall wellbeing of us all.

It will be ruined forever if the big grey Woolworths is allowed to be constructed.



## Presentation Request Form

Regulation 40(3) and DAP Standing Orders 2020 cl. 3.5

**Must be submitted at least 72 hours (3 ordinary days) before the meeting**

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Please complete a separate form for each presenter and submit to [daps@dplh.wa.gov.au](mailto:daps@dplh.wa.gov.au)

### Presenter Details

Name	Cr. Christopher John Baker
Company (if applicable)	N / A
Please identify if you have any special requirements:	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

DAP Name	Woolworths
Meeting Date	4 May 2022
DAP Application Number	DAP/ 21 02117
Property Location	10 Enterprise Avenue , Two Rocks
Agenda Item Number	8

### Presentation Details

I have read the contents of the report contained in the Agenda and note that my presentation content will be published as part of the Agenda:	YES <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>report recommendation</u> ? ( <i>contained within the Agenda</i> )	SUPPORT <input type="checkbox"/> AGAINST <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>proposed development</u> ?	SUPPORT <input type="checkbox"/> AGAINST <input checked="" type="checkbox"/>
Will the presentation require power-point facilities?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If yes, please attach



### Presentation Content\*

These details may be circulated to the local government and applicant if deemed necessary by the Presiding Member. Handouts or power points will not be accepted on the day.

Brief sentence summary for inclusion on the Agenda	<i>The presentation will address:</i> The merits of further adjourning this agenda item pending the completion of the assessment of the Heritage value / status of the King Neptune Statue , by the Heritage Commission and its resultant decision , which process is currently underway , and the possible compulsory acquisition of the D.A. site , by the Minister for Lands .
----------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In accordance with Clause 3.5.2 of the DAP Standing Orders, your presentation request must also be accompanied with a written document detailing the content of your presentation.

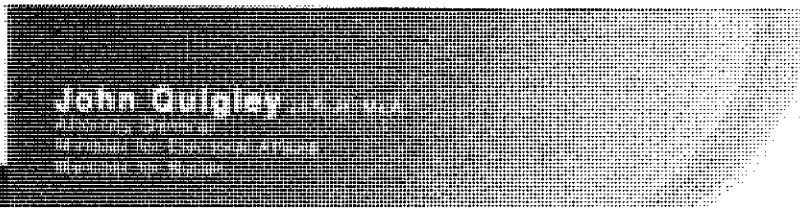
*Please attach detailed content of presentation or provide below:*

1. The Chair of the Heritage Commission the Hon . Mr. John Cowdell , has recently written to the Director of Planning of the City of Wanneroo , confirming that the heritage assessment of the King Neptune Statue located adjacent to the site of this D.A. , is currently underway and is being prioritised . It is anticipated that the assessment process currently underway , and the Heritage Commission's decision as to the inclusion of this iconic statue on the register , will be completed in approximately 12 weeks . When this D.A. was last before the JDAP , the JDAP resolved to defer this agenda item pending the provision of information from that Commission as to the status of the said assessment . The City of Wanneroo representative / Planning Officer , Mr. Greg Bowering , will tender to the JDAP at its 4 May 2022 , a true copy of that said letter . Given the comparatively short intervening period of time between now and the Heritage Commission's said pending formal Decision and the significant impact of this statue's listing on the heritage register , the interests of the opponents to the site of this D.A. and the Statue's impact upon the appropriate town planning considerations , will be irreparably prejudiced , in the event that this JDAP proceeds to make a formal determination of this D.A. at its 4 May 2022 meeting .
2. Further , on 22 February 2022 , the Local MLA for the District of Two Rocks and the State Electorate of Butler , the Hon . John Quigley , wrote to the Minister for Lands , the Hon John Carey , formally requesting that the Minister's said Department compulsorily acquire the site of this D.A. , from its owner , the Fini Group Pty Ltd , for the purposes of cultural / recreational Public Open space . I understand that Minister Mr. Carey has responded in writing to that request , advising that the D.A.'s site is being considered for a formal compulsory acquisition . I am in the process of seeking to obtain a copy of that letter for confirmation purposes .

rejed.  
Mr. Chris [Signature]



## ROCKS.



**Proposed Two Rocks Land Purchase**  
22/02/2022

Hon John Carey MLA  
Minister for Lands

Dear Minister,

I write to you at the request of Two Rocks residents who propose that the government purchase strategic oceanside land for public use by future generations.

Currently, the area (marked in red on the attached map) is subject to a development application to construct a supermarket complex and car park on the site. The IDAP is scheduled to decide the matter on the 4<sup>th</sup> of May 2022.

In opposition to the location of the development, around 1100 residents signed a petition which I tabled in parliament. This resulted in the entire Historic Atlantis Manse Park site being put on the priority list for consideration for being added to the state list of heritage places. This includes the proposed development site.

The community regards the preservation of the public open space at the entry point to Two Rocks as highly desirable in maintaining the area's overall oceanside character.

The Two Rocks community requests that you consider the purchase of this land for and on behalf of the community.

Yours faithfully

John Quigley MLA  
Member for Butler



Write a com...





## Presentation Request Form

[Regulation 40\(3\)](#) and [DAP Standing Orders 2020](#) cl. 3.5

**Must be submitted at least 72 hours (3 ordinary days) before the meeting**

### Presentation Request Guidelines

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Please complete a separate form for each presenter and submit to [daps@dph.wa.gov.au](mailto:daps@dph.wa.gov.au)

### Presenter Details

Name	Craig Wallace
Company (if applicable)	Lavan
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

DAP Name	Metro Outer Joint Development Assessment Panel
Meeting Date	4 May 2022
DAP Application Number	DAP/21/20117
Property Location	Lot 9702 (No.10) Enterprise Avenue, Two Rocks
Agenda Item Number	8.1

### Presentation Details

I have read the contents of the report contained in the Agenda and note that my presentation content will be published as part of the Agenda:	<b>YES</b> <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>report recommendation</u> ? ( <i>contained within the Agenda</i> )	<b>SUPPORT</b> <input checked="" type="checkbox"/> <b>AGAINST</b> <input type="checkbox"/>
Is the presentation in support of or against the <u>proposed development</u> ?	<b>SUPPORT</b> <input checked="" type="checkbox"/> <b>AGAINST</b> <input type="checkbox"/>
Will the presentation require power-point facilities?	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> <b>If yes, please attach</b>



### **Presentation Content\***

These details may be circulated to the local government and applicant if deemed necessary by the Presiding Member. Handouts or power points will not be accepted on the day.

Brief sentence summary for inclusion on the Agenda	<p><i>The presentation will address:</i></p> <ul style="list-style-type: none"><li>• <b>Statement about the weight to be applied to council resolution to adopt alternative recommendation.</b></li><li>• <b>The nature of discretion available to a decision maker in context of the proposed development, including a review of the key terms "due regard" and identifying relevant considerations in the deemed provisions.</b></li><li>• <b>Clarifying considerations pertaining to heritage; including:</b><ul style="list-style-type: none"><li>a. <b>heritage as a relevant consideration in the deemed provisions;</b></li><li>b. <b>specific considerations relevant to the application that should be taken into account;</b></li><li>c. <b>relevance of s76 of the Heritage Act.</b></li></ul></li><li>• <b>Brief comments on the "precautionary principle".</b></li></ul>
----------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In accordance with Clause 3.5.2 of the [DAP Standing Orders](#), your presentation request must also be accompanied with a written document detailing the content of your presentation.

*Please attach detailed content of presentation or provide below:*

**Refer attached.**



Our ref: 1172302  
Contact: Veronica Bunculet  
Direct Line: (61)8 9288 6921  
Email: [Veronica.Bunculet@lavan.com.au](mailto:Veronica.Bunculet@lavan.com.au)

Partner: Craig Wallace  
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29 April 2022

Mr Ian Birch  
Presiding Member  
Metro Outer Joint Development Assessment Panel  
C/O DAP Secretariat  
140 William Street  
Perth  
WA 6000

120

Representing  
Western Australians  
for more than 120 years

By email: [daps@dplh.wa.gov.au](mailto:daps@dplh.wa.gov.au)

Dear Mr Birch

**Number 10 (Lot 9702) Enterprise Avenue, Two Rocks – Proposed Shop, Liquor Store, Restaurant and Office (DAP 21/02117)**

Lavan acts for the Woolworths Group (**Applicant/Client**) in respect of the proposed development of a liquor store, restaurant and office on the land at No. 10 (Lot 9702) Enterprise Avenue, Two Rocks (**Proposed Development**).

I provide this legal submission to the Metro Outer Joint Development Assessment Panel (**MOJDAP**) on behalf of my client in support of the agenda item considering the application for the Proposed Development at the meeting scheduled for the 4<sup>th</sup> of May 2022.

**Background**

This submission is made in respect of the procedural motion carried at the last MOJDAP meeting on 9 March 2022 pertaining to matters of heritage. In particular, at the meeting on March 2022, the MOJDAP resolved for the consideration of the Proposed Development to be deferred to allow the City of Wanneroo (**City**) to seek clarification from the relevant government authorities in relation to heritage matters raised concerning various state local heritage listings in the Two Rocks precinct recorded as “to be assessed”.

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Planning & Environment  
Private Wealth  
Property & Leasing  
Wills & Estates

**Our values:**

Commitment  
Integrity

Lavan respectfully acknowledges the traditional owners of the land on which we live and work.

3474-7586-4346\_1172302, v.1

Relevantly, the Responsible Authority Report (**RAR**) prepared for the MOJDAP included reference to a referral/consultation with the Department of Planning Lands and Heritage (**DPLH**) regarding heritage and included the following comment;

1. The Atlantis Marine Park was identified by the Heritage Council as warranting assessment for possible inclusion in the State Register in September 2020 as part of the Sun City Precinct, Two Rocks, together with a number of other associated elements and features. This decision expanded on an earlier Heritage Council decision in 2003 that the Two Rocks Shopping Centre and Tavern, and the King Neptune Statue together warranted assessment for the register. As the Sun City Precinct has not yet been assessed for the State Register, DPLH was unable to provide comments on the impact the proposal may have on any state, cultural heritage values.

Following deferral by MOJDAP, DPLH have now confirmed that the Heritage Council has decided at its meeting on 8 April 2022 that a full heritage assessment of the Sun City Precinct, Two Rocks should be undertaken as quickly as possible.

Accordingly, the purpose of my submission is to provide some clarity in relation to the Applicant's understanding of the implications of that assessment to the Proposed Development and to clarify at the discretion available to the MOJDAP at its meeting.

### **Discretion**

It is well understood that in the exercise of planning discretion, a planning authority (such as the JDAP) is only entitled to have regard to relevant planning considerations.

The question of whether a consideration is a relevant planning consideration or otherwise is invariably addressed by having regard to the planning framework applicable to the proposed development. Clause 67(2) of the deemed provisions set out in Schedule 2 of the Planning and Development (Local Planning Scheme) Regulations 2018 (**Deemed Provisions**) assists in clearly setting out a range of matters that arise for consideration in the exercise of planning discretion.

Relevantly, clause 67 of the Deemed Provisions requires a decision-making authority to have "due regard" to those relevant considerations.

The requirement to have "due regard" has been interpreted by the Supreme Court in *Marshall v Metropolitan Redevelopment Authority [2015] WASC 226* at [115 and 116] to mean a requirement to give:-

1. active and positive consideration; or
2. proper, genuine or realistic consideration to the policy in question.

That concept was expanded upon in *Bestry Property Group Pty Limited and Western Australian Planning Commission [2019] WASAT 15*. At [99] the Tribunal stated:-

*In the exercise of planning discretion, the Tribunal is guided by the planning principles defined expression in the policies forming the planning framework but will depart from*

*the application of those planning principles where there is a cogent reason to do so in the circumstances of the case.*

The Applicant accordingly submits that the MOJDAP has discretion to consider the application for the Proposed Development taking into account all relevant considerations pertaining to this matter (as set out in the RAR).

## **Heritage**

Relevantly considerations pertaining to heritage are also set out in that list of relevant considerations in the deemed provisions as follows:-

1. The built heritage conservation of any place that is of cultural significance;
2. The effect of the proposal on the cultural heritage the significance of the area in which the development is located.

The obvious concern of the MOJDAP in the context of this matter is the progress of an assessment of heritage significance by the Heritage Council in relation to the Two Rocks Precinct and its impact on discretion.

It is accordingly important to understand the relevance of the relevant provisions as they apply to any application for development approval.

The Deemed Provisions when introduced made significant amendments to the manner in which development applications were to be presented and assessed, particularly with reference to a built heritage.

By way of summary, the deemed provisions deal with the following key elements:-

1. heritage protected places – including places that are entered into the State Register or under consideration for entry into the State Register as key definitions in application of exemptions available under the deemed provisions form the need to obtain development approval at clause 61 and 62;
2. heritage protection – Part three of the deemed provisions provides for the establishment and maintenance of a heritage list, the designation of heritage areas, the requirement to enter into a heritage agreement the requirement for a heritage assessment and enforcement via the issuing of a heritage conservation notice;
3. Clause 67 - relevant considerations to the assessment of development approval applications to consider:-
  - 3.1 built heritage conservation (as defined in Section 4 of the Heritage Act 2018)
  - 3.2 cultural heritage significance as defined in Section 5 (1) of the Heritage Act 2018.

It is important to note the specific definitions of heritage and the particular roles that those terms play in the Deemed Provisions as they have potential to cause some confusion. For the purposes of this submission I propose to deal with only clause 67 and relevant considerations pertaining to heritage.

Importantly, it is the Applicant's submission that the relevance of a "heritage – protected place" (as including a place under consideration for entry into the State Register) is not relevant to

material consideration as outlined in clause 67 and is only relevant to the application of the exemptions in clause 61 and 62 of the deemed provisions. Relevantly, the definitions used in clause 67 (and elsewhere in the Deemed Provisions) do not include reference to sites under assessment by the Heritage Council.

The reason for that in my view is that separate legislation, namely the *Heritage Act 2018* (**Heritage Act**) more explicitly provides for the conservation of places of cultural heritage significance. Relevantly “cultural heritage significance” is defined in the Heritage Act as “aesthetic, historic, scientific, social or spiritual value for individuals or groups within Western Australia”. That same definition is used to define built heritage significance in the Deemed Provisions.

The Heritage Act also establishes a State Register of heritage places with the objective that the register will make an important contribution to the understanding of heritage in Western Australia. The Heritage Act does not setup a separate approval regime for places listed on the heritage register but requires decision making authorities to refer planning applications and other proposals to the Heritage Council for advice prior to determining the application. A corresponding requirement for referral for that comment is also contained in the Deemed Provisions.

Relevantly, the Heritage Act also requires a decision-making authority to determine the application before in a way that is consistent with Heritage Council advice, unless it finds that there is no feasible or prudent alternative to make that determination.

That very circumstance now presents itself to the MOJDAP, but instead of a recommendation for refusal, the comment is only that an ongoing assessment of a heritage significance by the Heritage Council is being undertaken.

This scenario is not an uncommon one and does not in and of itself preclude the ability of the MOJDAP to make or to exercise discretion in making a decision consistent with the recommendation in the RAR. This circumstance is dealt with by the operation of Section 76 of the Heritage Act which states:-

*If, at the time that a place becomes a registered place, a decision to approve, implement or act upon a prescribed proposal that has been made by a decision maker but has not been substantially implemented or acted upon, the Council may direct in writing that the operation of the decision is suspended for a period determined in accordance with the regulations.*

By way of further comfort the MOJDAP has the benefit of both a historical and an updated heritage impact assessment prepared by Griffith Architects confirming the position with regard to impact of the Proposed Development on elements of heritage significance within the locality of the land.

It is the expressed opinion of the technical experts employed by the Applicant that the proposal acknowledges the heritage significance of King Neptune’s statue and concludes that the development has been designed in a manner that allows that landmark value to be retained context of the proposed development.

In summary neither the ongoing assessment of heritage significance or subsequent registration of a site on the State Heritage Register would not preclude development and does

not constrain your ability to exercise discretion in accordance with clause 67 of the Deemed Provisions.

On behalf of the Applicant, I am instructed to request that the MOJDAP consider those technical reports provided in the context assessment against the relevant considerations in making its assessment of the Proposed Development.

### **Alternative recommendation**

I note in the context of this matter that the Council of the City have at its latest council meeting purported to amend the recommendation in the RAR to one of a refusal on a number of grounds.

As is clear from the *Development Assessment Panel Practice notes: Making Good Planning Decisions (March 2021)* at page 66, the views of council may be relevant to be incorporated into the appropriate section of the RAR to the MOJDAP. However, it is improper for council to influence the Planning Officer's professional opinion on the assessment.

Accordingly, the Applicants admits that, at best, the alternative recommendation provided by the Council of the City should be received as a statement as opposed to an amendment to the recommendation in the RAR.

I will be present at the MOJDAP meeting for the purposes of an oral deputation and will be pleased to answer any questions you have in relation to any aspect of this submission.

Yours sincerely,



Craig Wallace  
Partner  
Encl

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Please notify us if this communication has been sent to you by mistake. If it has been, any privilege between solicitor and client is not waived or lost and you are not entitled to use it in any way.

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[Regulation 40\(3\)](#) and [DAP Standing Orders 2020](#) cl. 3.5

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### Presenter Details

Name	Philip Griffiths LFRAIA, RIBA, M.ICOMOS
Company (if applicable)	Griffiths Architects
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

DAP Name	Metro Outer Joint Development Assessment Panel
Meeting Date	4 May 2022
DAP Application Number	DAP/21/20117
Property Location	Lot 9702 (No.10) Enterprise Avenue, Two Rocks
Agenda Item Number	8.1

### Presentation Details

I have read the contents of the report contained in the Agenda and note that my presentation content will be published as part of the Agenda:	<b>YES</b> <input checked="" type="checkbox"/>
Is the presentation in support of or against the <u>report recommendation</u> ? ( <i>contained within the Agenda</i> )	<b>SUPPORT</b> <input checked="" type="checkbox"/> <b>AGAINST</b> <input type="checkbox"/>
Is the presentation in support of or against the <u>proposed development</u> ?	<b>SUPPORT</b> <input checked="" type="checkbox"/> <b>AGAINST</b> <input type="checkbox"/>
Will the presentation require power-point facilities?	<b>YES</b> <input checked="" type="checkbox"/> <b>NO</b> <input type="checkbox"/> <b>If yes, please attach</b>



### **Presentation Content\***

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Brief sentence summary for inclusion on the Agenda	<i>The presentation will address:</i>  <b>Heritage matters in relation to the application</b>
----------------------------------------------------	-----------------------------------------------------------------------------------------------------

In accordance with Clause 3.5.2 of the [DAP Standing Orders](#), your presentation request must also be accompanied with a written document detailing the content of your presentation.

*Please attach detailed content of presentation or provide below:*

**Refer attached memo/advice.**



## Memorandum

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Project Name: Two Rocks Woolworths Development

---

Project number: 21169

---

Griffiths Architects  
ABN 91 277 671 706  
Suite 1 315 Rokeby Road, Subiaco  
Western Australia 6008  
Telephone 08 9381 1666  
Facsimile 08 9381 1566  
mail@griffithsarchitects.com.au  
www.griffithsarchitects.com.au

### Heritage Assessments

Considine and Griffiths prepared a heritage assessment for Fini Group in 2006 upon their acquisition of a number of sites at Two Rocks.

This assessment concluded:

*Two Rocks Town Centre Precinct*, comprising retained dunes, limestone retaining walls, a concrete block construction shopping centre and tavern in the Late Twentieth Century Perth Regional style (1974) and limestone figures, together with the remains of Atlantis (1981) and concrete construction King Neptune statue (1981), has cultural heritage significance for the following reasons:

the place is integral to the history of the development of Yanchep Sun City from the early 1970s, one of the most significant residential, commercial and recreational investment projects undertaken by a private owner/company in this post World War Two period;

the limestone retaining walls and statue of King Neptune have acquired landmark status in a local context and the latter in terms of the region;

the place has social and historical significance to the local community for its contribution to the understanding of the development of Two Rocks and Yanchep, and also for the central role it has and still plays in the everyday lives of residents;

the place contributes to an understanding of the importance of Yanchep as a holiday and tourist destination in concert with the Yanchep caves and National Park, the beach and original shack and fishing settlements along the coast, the Two Rocks marina and town centre as well as Atlantis Marine Park (fmr), the first marine park and oceanarium to be established in Western Australia in 1981;

Two Rocks Shopping Centre and Tavern was a noteworthy design in the context of the mid and late 1970s; and, the place has associations with former owner Alan Bond, the Japanese company Tokyu Corporation, which has owned and managed the Yanchep Sun City project for over 30 years, and Anthony Brand then of Forbes and Fitzhardinge, designer of the Two Rocks Shopping Centre and Tavern.

The carved limestone artworks, or Waugal Monolith Sculptures (*now removed*) have no intrinsic artistic value and have little cultural heritage significance in relation to the shopping centre complex, while carved limestone figures that remain in the ruins of Atlantis contribute to an understanding of the facility (*now removed*).



The car parking, shopping centre service elements, chainlink fences, shop fittings, together with the remains of substations, pump works, and the like have no cultural heritage significance.

Note that the Sun City Yacht Club and marina area together with the second shopping centre to the north of the original town centre precinct is not included in this assessment.

This assessment clearly indicates that most of the values relate to social and historic aspects of the study area with the exception of King Neptune, the limestone retaining walls and to a lesser extent the shopping centre.

It is important to note that the development site has no remaining features.

The Heritage Council's assessment will include a wider area than the study to extend to the marina and so on.

In my long experience as a heritage councillor, I believe it is more than likely that the Heritage Council will concur with the study we prepared and identify the marina, retaining walls, town centre and King Neptune as significant.

Should Heritage Registration proceed, maps will be produced to describe the area that is included in the Registration and the degrees of significance of the elements within the curtilage. The development site will appear as little or no significance on those maps as it has been as it has been cleared and levelled for development. Even if a precinct curtilage were defined to include the development site, this would in no way impact on the proposal as submitted.

### **King Neptune**

In both heritage assessment and development of the scheme King Neptune's significance was acknowledged, notwithstanding that Neptune had now been ascribed any State Heritage value. The heritage impact statement prepared by Griffiths Architects concludes that the development allows King Neptune's landmark value to be retained and that the activation facing it in the form of a café enhances its appreciation and importance.

Should State Registration proceed, it is likely that King Neptune will be identified as one of the more important features. Even if this were the case, it would have no bearing on the heritage impact of the proposed development.

It should be noted that some megaliths will be brought back to site in the landscape proposal and there will be interpretation of Atlantis around the site. Since the development application was lodged, Plan E has prepared specific proposals to indicate how interpretation would be included and how the megaliths can be relocated to the site and given an integral role with the development and to respond to the King Neptune Statue.

### **Effect of Registration**

Registration does not preclude development. The fact that a place is being assessed by the Heritage Council has no impact on development. HCWA has no statutory role to play until a place is included on the Register. A Heritage Impact Statement would need to be prepared and it would not differ from the one prepared by Griffiths Architects to accompany this development application.

The register document will make the relative significance of elements clear and it is likely, should registration occur, King Neptune would be attributed a degree of significance.

The development site would be attributed low or no significance. Development of the site in an appropriate manner would be supported with the only question to be considered by the Council would be the impact on King Neptune. Given the modest scale of development, the heritage impact, and quality of design, it is highly unlikely that the Heritage Council would object to this development.

### **Design Quality**

In our Heritage Impact Statement we made the following comments

*The materials palette of the new development is sympathetic to the existing shopping centre and existing landscape. The form and scale of the project is significantly larger than the existing shopping centre, but the facades are broken up with speciality shops and café to reduce the overall massing. The café facing the King Neptune Statue ensures it retains its landmark qualities.*

The design quality is commensurate with the significance of the King Neptune statue and its setting.

# Woolworths Two Rocks

Heritage Matters

JDAP Presentation – 4 May 2022

# Heritage Assessments

- Considine and Griffiths prepared a Heritage Assessment (2006)
- City of Wanneroo Local Heritage Treatment –
  - Local significance Level 3, prior to study, Level 4 post-study

# HCWA Assessment

- Includes a wider area than the study to extend to the marina
- Likely HWCA will identify marina, retaining walls, town centre and King Neptune as significant
- Subject to Minister determination

# King Neptune Statue

- Significance acknowledged
- HIS for Woolworths development concludes that ***‘King Neptune’s landmark value to be retained and that the activation facing it in the form of a café enhances its appreciation and importance’***
- Should State registration proceed, it will have no bearing on conclusions within HIS

# Effective of Registration

- **Registration does not preclude development**
- The development site would be attributed low or no significance
- A Heritage Impact Statement would need to be prepared and it would not differ from the one prepared

# Design Quality

- HIS states:

*The materials palette of the new development is sympathetic to the existing shopping centre and existing landscape. The form and scale of the project is significantly larger than the existing shopping centre, but the facades are broken up with speciality shops and café to reduce the overall massing. The café facing the King Neptune Statue ensures it retains its landmark qualities.*

- The design quality is commensurate with the significance of the King Neptune statue and its setting





## Presentation Request Form

[Regulation 40\(3\)](#) and [DAP Standing Orders 2020](#) cl. 3.5

**Must be submitted at least 72 hours (3 ordinary days) before the meeting**

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Please complete a separate form for each presenter and submit to [daps@dplh.wa.gov.au](mailto:daps@dplh.wa.gov.au)

### Presenter Details

Name	Michael Jorgensen and Andrew Baranowski (joint presentation)
Company (if applicable)	Brown Falconer and Plan E
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

### Meeting Details

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Will the presentation require power-point facilities?	<b>YES</b> <input checked="" type="checkbox"/> <b>NO</b> <input type="checkbox"/> <b>If yes, please attach</b>



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*Please attach detailed content of presentation or provide below:*

**Brown Falconer, Urbis, Fabcot and Plan E have spent considerable time consulting with the City of Wanneroo through their officers and the Design Review Process.**

**The focus of the presentation from Brown Falconer and Plan E will concentrate on work done since the JDAP deferral, predominantly around:**

- **The respect and celebration of King Neptune as a significant component of the wider heritage context. We will show images outlining how we have focussed areas of dwelling and respite within the centre development that herald and highlight their attention through regular visual interaction and permanent views to King Neptune.**
- **We will show King Neptune in the context of the wider area and show that the development will not have significant impact on the presence and grandeur of King Neptune.**
- **We will show that the proposed development is contextually relevant in scale, position and colour reference.**
- **The landscaping and heritage references will be clearly outlined by Plan E and form an integrated part of the architectural solution.**

**King Neptune sits in a prominent elevated position looking out to the ocean and it should not be underestimated how much those ocean views are the focus of attention when scaling King Neptune.**

**As clarified at the previous JDAP presentation, the proposed development sits below the level of the base of King Neptune. We consider the scale and position, whilst in close proximity given the location of the site, does not detract from the western focus of views.**

**We have facilitated protected external dwelling spaces through our planning and discussions with the City and the DRP to highlight the importance of the location directly adjacent King Neptune and the Azzurra Street entry helping to focus attention on KN every time someone exits the centre.**

**The Café and Public dwelling space also facilitates excellent contemplative views of King Neptune and the surrounding elevated POS.**

**The Structure Plan for the wider area clearly promotes dense development to the West of our site and more notably to the direct west of King Neptune. The scale of permitted development and the potential to build density in the surrounding area shows the scale of the proposed Woolworths sits very respectfully within and at the lower end of those development parameters.**



Whilst it was addressed through our presentation previously and through questions in the previous JDAP, I would like to briefly touch on the current colour palette and throw extra light onto its development and historical background. The coastal context was ever present in the development of the palette and the DRP highlighted the positive aspects of the light colour palette and directed some contextual modifications in early discussions around the local Town Centre material use. We embraced these and have duly considered the colour references with relationship to not only the light colours, but the equally relevant dark colour references and their benefit in providing excellent contrast and highlight to the lighter colour palette.

Finally, I would just like to touch on a clarification of a previous question regarding sustainability through a previous reference to solar. I can confirm that Woolworths take renewable energy seriously and will be implementing a significant 100kw solar array on the roof of the development that will cover over 600m<sup>2</sup> in area.

It should be noted that we have undertaken a clean roof design philosophy, limiting exposed penetrations, proudly displaying our renewable energy initiative and fully screening any mechanical plant, leaving a predominantly simple clean roof design.




# Woolworths Two Rocks

**JDAP**

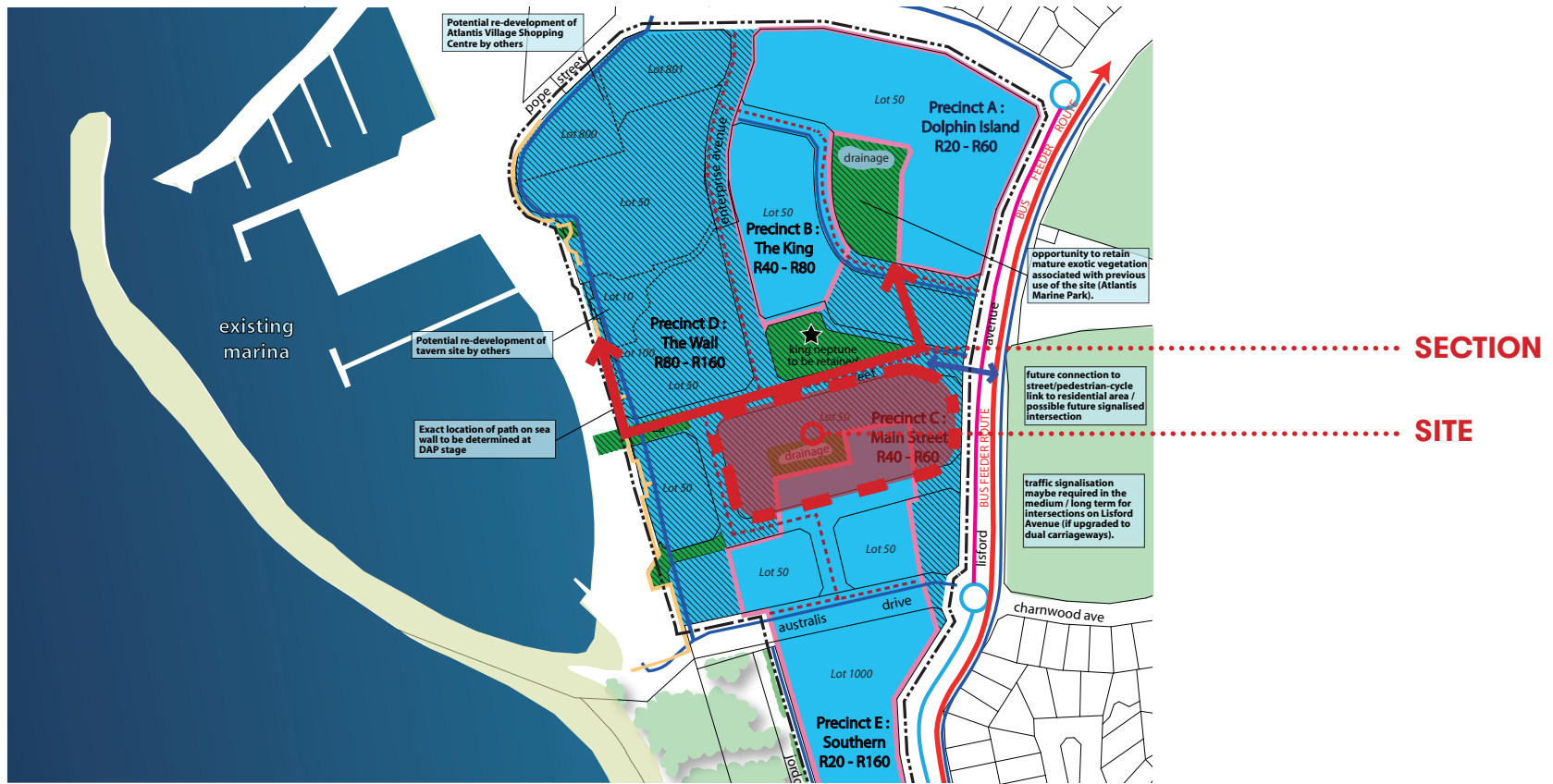
APRIL 2022

WOOLWORTHS GROUP



 **LANDSCAPE ARCHITECTS**  
414 ROKEBY RD SUBIACO WA 6008  
T: (08) 9388 9566 E: mail@plane.com.au

**BROWN  
FALCONER**



Development Potential



SCALE OF PROPOSED DEVELOPMENT

Section Through Main Street - 2014 Two Rocks Structure Plan

# Site Plan

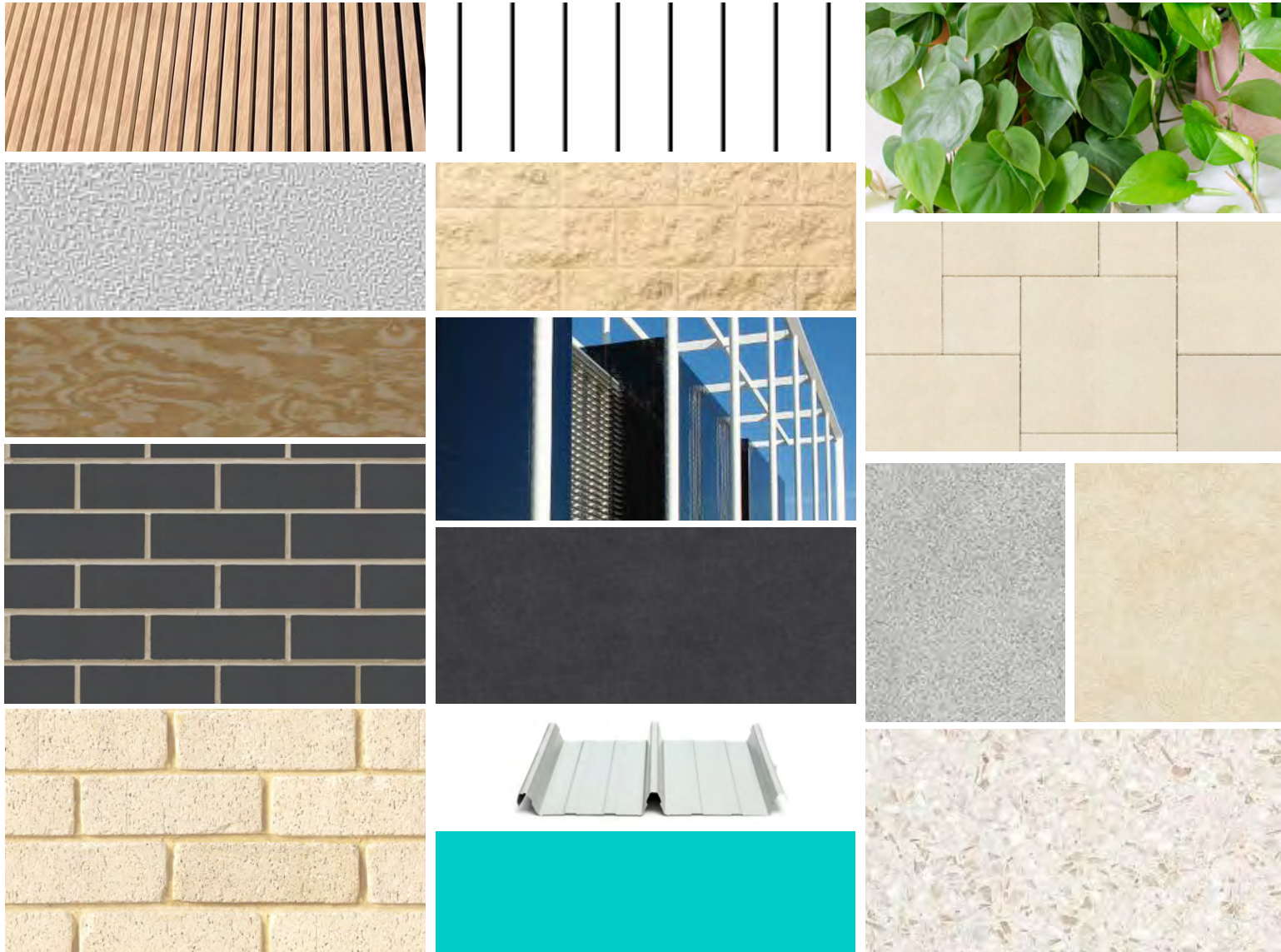




Image Credit Viewport



Image Credit Viewport





# Colour Palette References



Surf & Sand



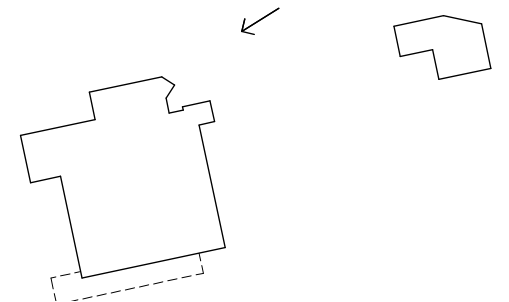
Aqua Highlights



Rock/Greys/Blacks/  
Yellows







Town Centre  
Material Reference



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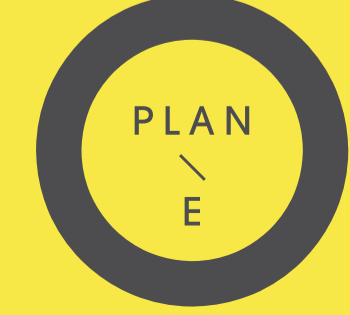
**Landscape/  
Heritage**

**LEGEND**

-  **HERITAGE WALK :**  
SERIES OF RELIC SCULPTURES FROM HISTORIC ATLANTIS SITE
-  PEDESTRIAN NETWORK
-  MAIN VIEWS TO COAST
-  PROPOSED LOCATION OF SCULPTURES



**ARTWORKS**





**ARTWOKS**



**LEGEND**

- 01 NATIVE SHADE TREES IE. AGONIS FLEXUOSA
- 02 FEATURE FLOWERING GROUNDCOVER SPECIES IE. SCAEVOLA SP.
- 03 CURVED LIMESTONE SEATING WALL WITH TIMBER TOP
- 04 RELIC ARTWORK ON PLINTH WITH CRUSHED LIMESTONE SURROUNDS
- 05 COMPOSITE DECK TO GATHERING NODE
- 06 TALLER NATIVE SHRUB SPECIES & GRAPHIC SCREENING TO SCREEN OFF CARPARK & SOUTH-WEST WINDS & PROVIDE ENGAGING BACKDROP TO SPACE
- 07 TERRACED LIMESTONE BLOCK WALLS & SLOPING TURF PROVIDING SEATING/LOUNGING OPPORTUNITIES & PASSIVE RECREATION SPACE
- 08 TRANSPLANTED WASHINGTONIA PALMS FROM HISTORIC SITE
- 09 CASCADING NATIVE SHRUB AND GROUNDCOVER PLANTINGS TO MOUNDED GARDEN BEDS
- 10 SHADE TREE IN TURF IE. AGONIS FLEXUOSA
- 11 EXPOSED AGGREGATE CONCRETE 'WAVE' PATTERNS
- 12 SHADE TREE TO CARPARK (IE. CUPANIOPSIS SP) WITH STRATA CELL
- 13 SERIES OF RAISED PLANTERS, COMBINED WITH BOLLARDS AS INTEGRATED PEDESTRIAN SAFETY BARRIERS TO CARPARK

 REFER PERSPECTIVE VIEWS C3.104

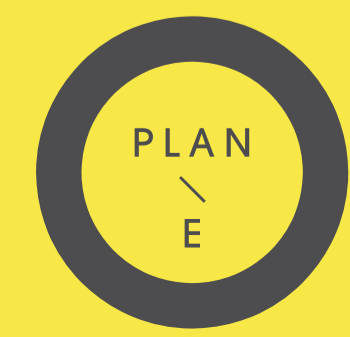
**WOOLWORTHS, TWO ROCKS**

HERITAGE PARKLET - PLAN  
APRIL 2022

JOB NO. 2100101  
1:50 @ A1

C1.103  
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REV A

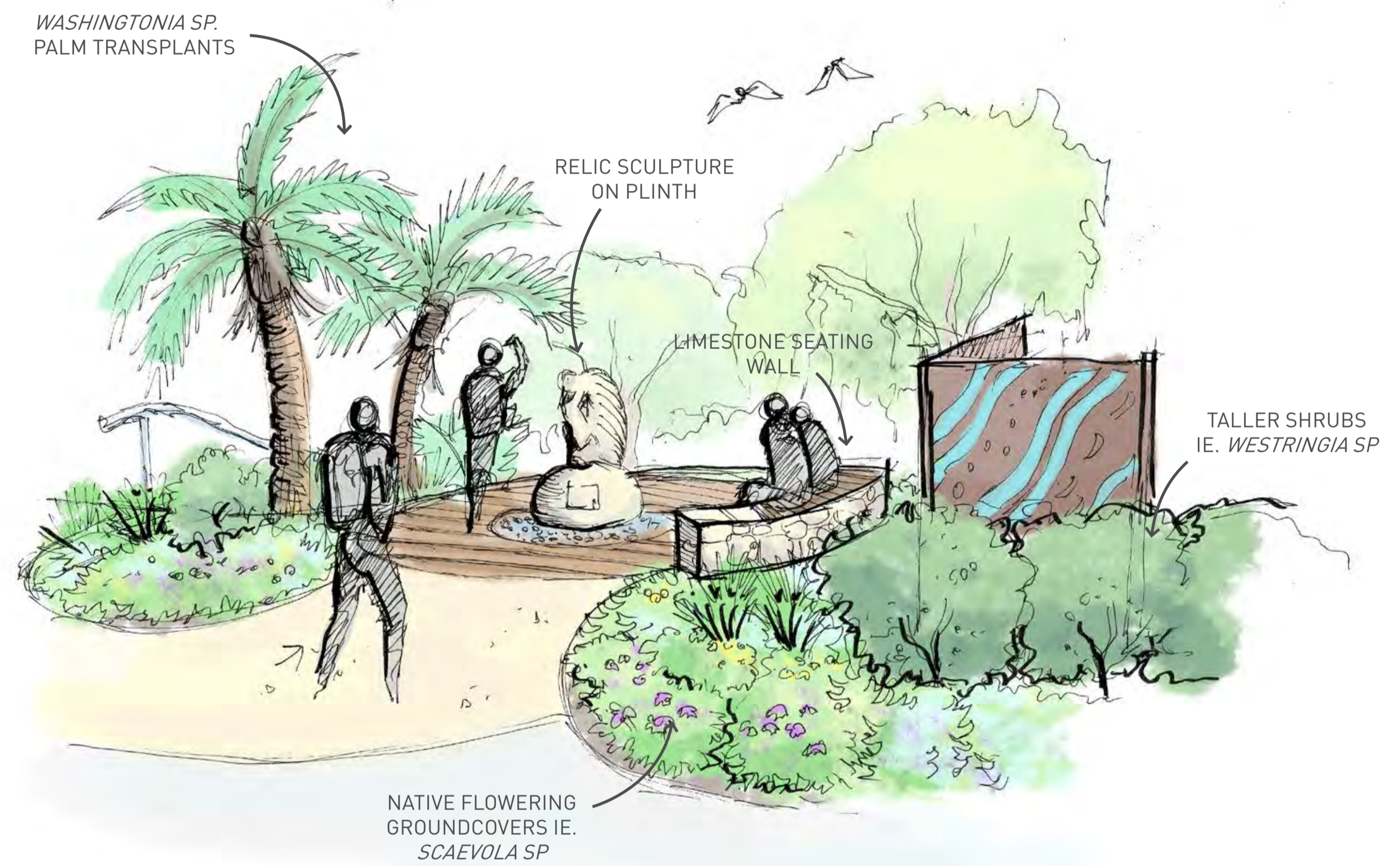
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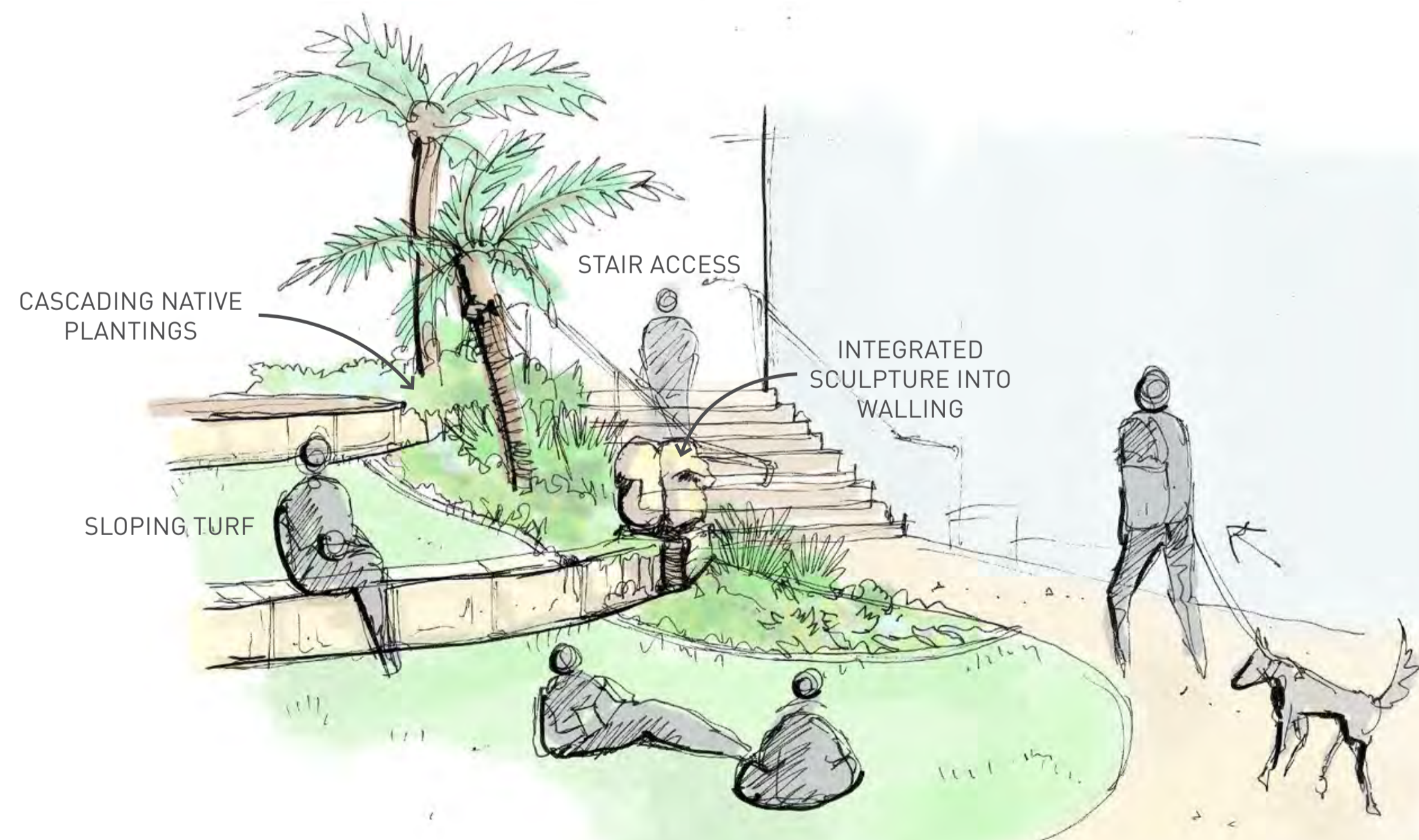
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PERSPECTIVE 1



PERSPECTIVE 2



PERSPECTIVE 3

**WOOLWORTHS, TWO ROCKS**

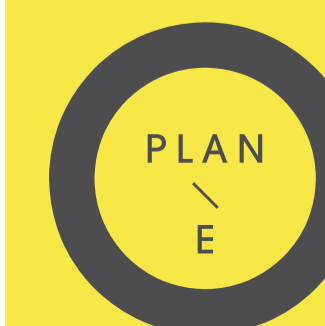
HERITAGE PARKLET - PERSPECTIVE VIEWS  
APRIL 2022

JOB NO. 2100101

C3.104

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### Presenter Details

Name	Megan Gammon
Company (if applicable)	Urbis
Please identify if you have any special requirements:	<b>YES</b> <input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> If yes, please state any accessibility or special requirements: Click or tap here to enter text.

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<p>Brief sentence summary for inclusion on the Agenda</p>	<p><i>The presentation will address:</i></p> <p><b>Overview of broader heritage intentions by Fini Group and engagement undertaken with Woolworths.</b></p> <p><b>Alignment with planning framework.</b></p> <p><b>Summary of merit of proposal.</b></p>
-----------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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*Please attach detailed content of presentation or provide below:*

**Broader Town Centre Heritage - History and context**

It is important for Panel members to understand the broader heritage processes and commitments which have been made by Fini Group (as parent landowner of the Two Rocks Town Centre) at every stage and level of planning within the area over the past decade. Specifically, heritage advice and community consultation informed the spatial layout and configuration of uses within the town centre under the Two Rocks Town Centre Structure Plan (ASP 70) and other planning documents.

Since of the closure of the Atlantis Marine Park in 1990 and acquisition by Fini Group, a majority of the Marine Park was demolished. The exception to this is the King Neptune statue and retention of various statues forming the ‘Celebrity Clock’. Some statues are located in Charnley Reserve, with several also stored by Fini Group for future use within public realm areas. ASP 70 was then prepared by the City and approved by the WA Planning Commission in 2014, which earmarks the town centre for significant urban development.

Since this time, the planning for the initial stages of the town centre has evolved. This includes the preparation of Local Development Plan No.1 (LDP No.1) which covers the area comprising the proposed RAAFA Retirement Village and King Neptune statue (extract below). Consideration of the preservation and integrity of the King Neptune statue was the subject of a two-year community consultation process culminating in LDP No.1 being approved by Council in 2018.

Specifically, LDP No.1 incorporates the creation of a ~1.0ha public open space (POS) area encompassing the King Neptune statue as shown above. The POS is located and configured in this location to ensure the protection (and access to) the King Neptune statue.

The intent is that a number of the former statues which once formed part of the ‘Celebrity Clock’ will be utilised as part of a heritage trail (or reconfigured into a new ‘Celebrity Clock’ in the same location it was originally located, east of the statue) to provide a strong reference back to the history of the area. This will then be extended south to the Woolworths site and connect directly with the proposed heritage parklet.

This 1.0ha POS area has been ceded by the Fini Group to the Crown (under the management of the City of Wanneroo) and involved a \$400,000.00 bond paid to the City of Wanneroo including obligations to complete landscaping to the public realm. This bond was formalised through a Replacement Deed between RAAFA (as owners of the broader LDP No.1 land) and the City of Wanneroo. A concept plan was also prepared to depict the design of this POS area



The concept plan enables sweeping vistas of the King Neptune statue as well as substantial amenity to the community. The intent at the time was that this concept plan was prepared at a high level only with detail to be provided at a later date following further community engagement and technical advice.

As redevelopment progresses within the town centre, additional opportunities to incorporate cultural heritage elements will be advanced by Fini Group in various public open space locations. This includes the intent to display and celebrate the Waugal Monolith statues in the plaza public open space (located at the west end of Azzurra Road creating a connection from the King Neptune POS to the Marina) or an alternative location determined in consultation with the community and stakeholders.

Overall, the above demonstrates that the protection, enhancement and connection to King Neptune statue has been a consideration (as if it were State Heritage listed) for a considerable period of time. There have been several commitments made by Fini Group, RAAFA and the City to deliver a public realm area around the statue to recognise its importance.

It is within this context that Woolworths has engaged closely with Fini Group to ensure its site is integrated with the proposed POS and heritage trail. The provision and location of the heritage parklet on the Woolworths site directly responds to this, as does the proposed provision of megaliths to ensure the continuation of this unique storytelling and wayfinding feature.

#### Alignment with Planning Framework

There is no question the proposal is directly aligned with the planning framework, most notably ASP 70. This is evident by the City's assessment within its RAR and well as previous information and presentations provided by Urbis. In summary:

- The site is appropriately zoned under the relevant planning framework.
- All uses can be accommodated. No issues have been raised within the RAR with respect to zoning and land use.
- All relevant technical matters were sufficiently investigated and provided as part of the development application and assessment process. This includes a Heritage Impact Statement which concluded that the proposed development is entirely suitable. Griffiths Architects has confirmed that recent events have not changed this position.
- The form and scale of development represents an outcome which is of a far lesser bulk and scale than what could be accommodated under ASP 70. Under ACP 70, the site allows for residential densities between R40 and R60 which could deliver development up to three storeys.
- Critically however, residential densities to the immediate west of the King Neptune statue allow for development up to a density of R160. This would enable a high density development outcome which would be in complete obstruction of views to and from the marina to the statue – an outcome which would have a far greater impact on the heritage value of the statue than the Woolworths development.
- Further, LDP No.1 (extract at Figure 1) illustrates the proposal to deliver R80 development immediately north of the statue. Again, while we do not consider this to be a poor outcome in the context of a town centre, again we highlight that this would result in a far more detrimental impact from a bulk and scale perspective than the Woolworths development.

Overall, there is no planning basis to refuse (or further defer this application). Heritage matters have been considered at all stages of the planning process since ASP 70 was prepared over a decade ago. ASP 70 has a strong emphasis on recognising the importance of King Neptune and because of this, these matters were appropriately addressed in the original development application and have positively evolved over time.

Heritage matters have been appropriately dealt with to the satisfaction of a highly experienced and reputable Heritage Architect, Griffiths Architects, and the City of Wanneroo.





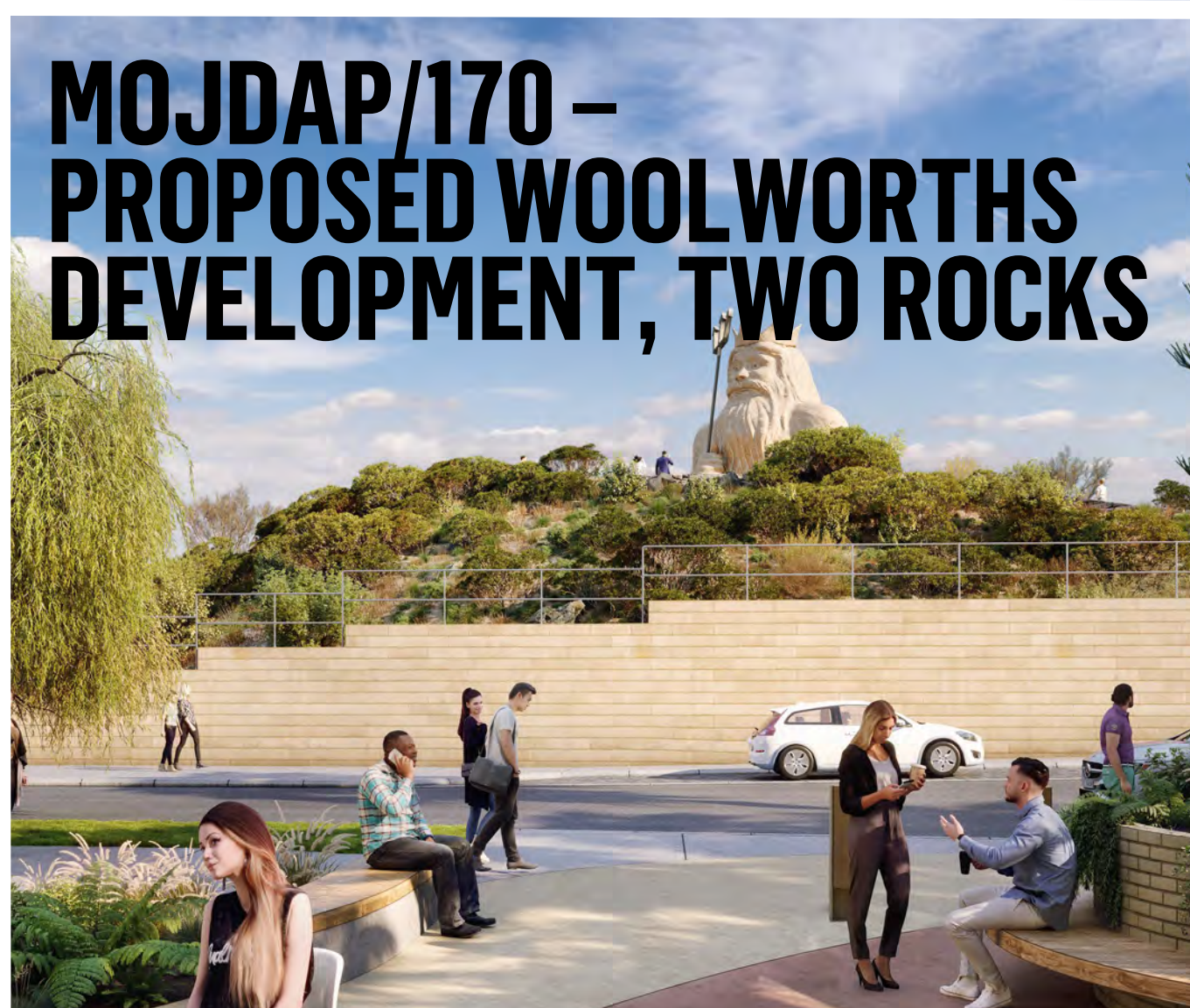
The proposal will have a positive impact on the King Neptune statue and heritage context of the area. Delivering sensitive development in the form of an activated café, specialty and convenience amenities is a positive outcome for the area and will encourage visitation and tourist activity.

### **Summary of Merit of Proposal**

We are of the firm view that these series of events do not impact the ability of the proposal to be favourably determined at this point in time. In summary, this is based on the following:

- The site is cleared, levelled and serviced ready for development.
- The site is zoned suitably for the uses proposed. No issue has been raised in the Responsible Authority Report with respect to zoning and land use. Further, the events that have occurred have not changed the City of Wanneroo's recommendation.
- Implementation of a broader heritage strategy by Fini Group (which includes consideration of the King Neptune statue) has been a significant consideration by parent landowner, Fini Group, at all stages of planning over the past decade. This includes provision of a 1.0ha public open space area directly east of the statue, which has been secured through a deed and bond payment.
- Woolworths has liaised closely with Fini Group since the projects inception to ensure integration with this broader heritage strategy. The proposal therefore provides a high quality heritage parklet comprising megalith statues and informative signage and integration with a broader heritage walk. These areas form part of a concept design package prepared by Plan E.
- **The commencement of the Heritage Council's assessment of the Sun City Precinct does not preclude development.** The subject site has no heritage significance therefore the only matter for consideration is the level of impact on the King Neptune statue. In this regard, heritage advice categorically concludes that if the King Neptune is registered as a result of the assessment process, it will not alter the view that the development is entirely appropriate in terms of its interface with and impact on the statue.
- The design of the Woolworths including materials, colours and treatment of the built form interface to Azzurra Street has had considerable regard for the presence of the King Neptune statue both now and in the future as well as the town centre and coastal context of the area. Woolworths is committed to working directly with the City (including its Design Review Panel) in order to satisfy Condition 7 and 8.

# MOJDAP/170 – PROPOSED WOOLWORTHS DEVELOPMENT, TWO ROCKS



# BROADER TOWN CENTRE HERITAGE STRATEGY

- Heritage advice informed ASP 70 and planning processes over past decade
- LDP No.1 Prepared
- ~1.0ha POS designated – secured through Replacement Deed and bond
- Protection of King Neptune statue a consideration for some time

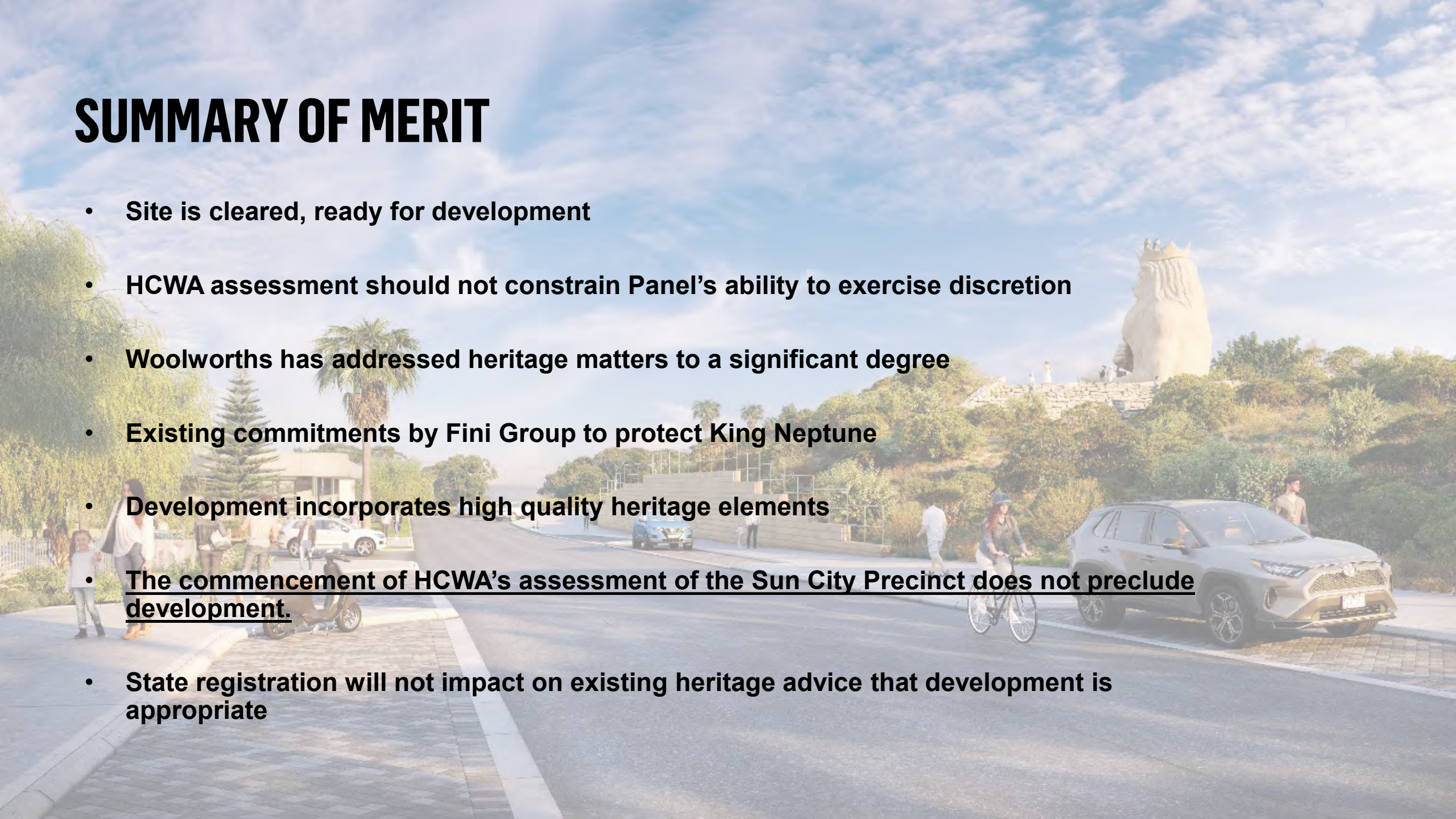


# ALIGNMENT WITH PLANNING FRAMEWORK

- Site appropriately zoned
- All uses can be accommodated
- Form and scale appropriate
- ASP 70 allows for up to three stories on site (R60), and 5+ stories to west of statue (R160)
- LDP No.1 anticipates densities up to R80 (4 stories) north of King Neptune
- No planning basis to refuse (or further defer) application

# SUMMARY OF MERIT

- Site is cleared, ready for development
- HCWA assessment should not constrain Panel's ability to exercise discretion
- Woolworths has addressed heritage matters to a significant degree
- Existing commitments by Fini Group to protect King Neptune
- Development incorporates high quality heritage elements
- The commencement of HCWA's assessment of the Sun City Precinct does not preclude development.
- State registration will not impact on existing heritage advice that development is appropriate





## MEMO

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To: Metropolitan Outer Joint Development Assessment Panel

Cc: Mr Greg Bowering, Mr Adam Wood & Mr Nick de Vecchis – City of Wanneroo

From: Megan Gammon - Urbis c/o Woolworths (Fabcot Pty Ltd)

Email: [mgammon@urbis.com.au](mailto:mgammon@urbis.com.au)

Date: 29 April 2022

**Subject: DAP/21/02117 – Lot 9702 (No.10) Enterprise Avenue, Two Rocks**

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Dear Panel Members,

We refer to the abovementioned application, which was deferred at the Metro-Outer Joint Development Assessment Panel meeting on the 9<sup>th</sup> of March 2022. This deferral decision was on the basis of a request by Panel members to seek further advice from the Department of Planning, Lands and Heritage (DPLH) regarding heritage matters within the Two Rocks (Sun City) Precinct.

Since this deferral decision, we acknowledge there has been several events which have occurred including the re-referral response from DPLH, the City of Wanneroo Council's alternative recommendation and Heritage Council of WA's (HCWA) decision to commence assessment of the Sun City Precinct.

**We are of the firm view that these series of events do not impact the ability of the proposal to be favourably determined at this point in time. In summary, this is based on the following:**

- The site is cleared, levelled and serviced ready for development.
- The site is zoned suitably for the uses proposed. No issue has been raised in the City's Responsible Authority Report (RAR) with respect to zoning and land use. Further, the events that have occurred (including HCWA assessment) have not changed the City of Wanneroo's Officer recommendation.
- The Panel has discretion to consider the application in accordance with clause 67 of the deemed provisions.
- Neither the ongoing HCWA assessment of heritage significance or potential future registration should preclude development and does not constrain the Panel's ability to exercise discretion in accordance with clause 67 of the deemed provisions.
- Woolworths has addressed heritage matters well beyond the extent of their landholding and has adopted a conservative approach to significance (at a level that is not required by the current listing and would be similar to a conservative listing on the State Register).
- Implementation of a broader heritage strategy by Fini Group (which includes consideration of the King Neptune statue) has been a significant consideration by parent landowner, Fini Group, at all stages of planning over the past decade. This includes provision of a 1.0ha public open space area directly east of the statue, which has been secured through a deed and bond payment.
- The proposal incorporates a high quality heritage parklet comprising megalith statues and informative signage, and integration with a broader heritage walk proposed to the north, by Fini Group. These areas form part of a concept design package prepared by Plan E.
- **The commencement of HCWA's assessment of the Sun City Precinct does not preclude development.** The subject site has no heritage significance therefore the only matter for consideration is the level of impact on the King Neptune statue.

In this regard, heritage advice categorically concludes that if the King Neptune is registered as a result of the assessment process, it will not alter the view that the development is entirely appropriate in terms of its interface with and impact on the statue.

- **The design of the Woolworths including materials, colours and treatment of the built form interface to Azzurra Street has had considerable regard for the presence of the King Neptune statue both now and in the future as well as the town centre and coastal context of the area. Woolworths is committed to working directly with the City (including its Design Review Panel) in order to satisfy Conditions 7 and 8.**

This memo provides important information for the Panel's consideration, to assist in its deliberations.

## **SITE CONTEXT**

Firstly, it needs to be highlighted that the subject site has been cleared, levelled, stabilised and serviced ready for future development, in accordance with subdivision approvals (WAPC Ref: 158390, 155078 and 161195). This was consistent with ASP 70 and created Azzurra Way and the entire Woolworths development site (as depicted by the NearMap image below, dated 29 January 2022). The site directly east of the statue has also been cleared ready for development (a public open space reserve).

This site context should be central to the Panel's decision-making as it is clear that the site has been deemed appropriate for development through every stage of the planning process over many years.

Figure 1 - Aerial Plan



## **BROADER TOWN CENTRE HERITAGE - HISTORY AND CONTEXT**

It is important for Panel members to understand the broader heritage processes and commitments which have been made by Fini Group (as parent landowner of the Two Rocks Town Centre) at every stage and level of planning within the area over the past decade. Specifically, heritage advice and community consultation informed the spatial layout and configuration of uses within the town centre under the Two Rocks Town Centre Structure Plan (ASP 70) and other planning documents.

Since the closure of the Atlantis Marine Park in 1990 and acquisition by Fini Group, a majority of the Marine Park was demolished. The exception to this is the King Neptune statue and retention of various statues forming the 'Celebrity Clock'. Some statues are located in Charnley Reserve, with several also stored by Fini Group for future use within public realm areas. ASP 70 was then prepared by the City and approved by the WA Planning Commission in 2014, which earmarks the town centre for significant urban development.

Since this time, the planning for the initial stages of the town centre has evolved. This includes the preparation of Local Development Plan No.1 (LDP No.1) which covers the area comprising the proposed RAAFA Retirement Village and King Neptune statue (**extract below at Figure 2**). Consideration of the preservation and integrity of the King Neptune statue was the subject of a two-year community consultation process culminating in LDP No.1 being approved by Council in 2018.

Figure 2 - Local Development Plan No.1 Extract



Specifically, LDP No.1 incorporates the creation of a ~1.0ha public open space (POS) area encompassing the King Neptune statue as shown above. The POS is located and configured in this location to ensure the protection (and access to) the King Neptune statue.



The intent is that a number of the former statues which once formed part of the 'Celebrity Clock' will be utilised as part of a heritage trail (or reconfigured into a new 'Celebrity Clock' in the same location it was originally located, east of the statue) to provide a strong reference back to the history of the area. This will then be extended south to the Woolworths site and connect directly with the proposed heritage parklet.

This 1.0ha POS area has been ceded by the Fini Group to the Crown (under the management of the City of Wanneroo) and involved a \$400,000.00 bond paid to the City of Wanneroo including obligations to complete landscaping to the public realm. This bond was formalised through a Replacement Deed between RAAFA (as owners of the broader LDP No.1 land) and the City of Wanneroo. A concept plan was also prepared to depict the design of this POS area (extract below at Figure 3).

Figure 3 - King Neptune Public Open Space Concept Plan



The concept plan enables sweeping vistas of the King Neptune statue as well as substantial amenity to the community. The intent at the time was that this concept plan was prepared at a high level only with detail to be provided at a later date following further community engagement and technical advice.

As redevelopment progresses within the town centre, additional opportunities to incorporate cultural heritage elements will be advanced by Fini Group in various public open space locations. This includes the intent to display and celebrate the Waugal Monolith statues in the plaza public open space (located at the west end of Azzurra Road creating a connection from the King Neptune POS to the Marina) or an alternative location determined in consultation with the community and stakeholders.

**Overall, this demonstrates that the protection, enhancement and connection to King Neptune statue has been a consideration (as if it were State Heritage listed) for a considerable period of time. There have been several commitments made by Fini Group, RAAFA and the City to deliver a public realm area around the statue to recognise its importance.**

**It is within this context that Woolworths has engaged closely with Fini Group to ensure its site is integrated with the proposed POS and heritage trail. The provision and location of the heritage parklet on the Woolworths site directly responds to this, as does the proposed provision of megaliths to ensure the continuation of this unique storytelling and wayfinding feature.**

A more detailed overview of Fini Groups heritage intentions issued to City of Wanneroo Councillors on 1 April 2022 (sent on behalf of Fini's property consultant, Blueport Development Management) is contained at **Attachment A**.

## **CURRENT HERITAGE ASSESSMENT**

As the Panel is aware, in early April 2022, the Heritage Council of WA (HCWA) resolved to commence its assessment of the Sun City Precinct for inclusion on the State Heritage Register. The assessment is now in its very early stages.

The assessment will investigate remaining site features as well as the considerable heritage work undertaken over the past decade, primarily led by Phil Griffiths (of Griffiths Architects). Specifically, Mr Griffiths' assessment undertaken in 2006 (for the City of Wanneroo) to support ASP 70 concluded that, within the broader Sun City Precinct, it is specifically the marina, retaining walls, town centre and King Neptune which should be considered significant.

**It is important to highlight that the undertaking of this current assessment does not preclude development.** Assessments by HCWA are common and often take place concurrently with development.

In light of HCWA's decision to proceed with the assessment, Griffiths Architects has provided further advice regarding the suitability of the proposal in the context of King Neptune potentially being State Heritage listed. A memo prepared by Griffiths Architects is attached at **Attachment B**, with key advice summarised below:

- The Woolworths site has no remaining features (heritage or otherwise, as shown previously in **Figure 1**).
- Mr Griffiths highlighted that in his long experience as a respected Heritage Councillor, it is more than likely the assessment will concur with his 2006 assessment that within the Sun City Precinct, it is the marina, retaining walls, existing town centre and King Neptune that should be considered significant.
- There is low possibility the precinct curtilage will be defined to include the Woolworths site however even if it were to be included (or partially), this would in no way impact on the Woolworths proposal as submitted (ie. curtilage does not preclude suitable development aligned with the planning framework). Further, it is important to highlight that the Woolworths development is located in excess of 50.0m from the King Neptune state – a significant curtilage in itself.
- Given this context, the key area for consideration is therefore limited to the impact of the proposed development on the adjoining King Neptune statue. On this matter, the proposal has clearly had regard for this potential impact (notwithstanding the recent assessment) evidenced by the fact a Heritage Impact Statement (HIS) was prepared to support the development application.
- The HIS prepared by Mr Griffiths fully acknowledges the significance of the King Neptune statue, notwithstanding it does not exist as a State Heritage listed site.
- The HIS concludes that the proposed development allows King Neptune's landmark value to be retained and that the activation facing it in the form of a café enhances its appreciation and importance. Critically, Mr Griffiths notes that if State Heritage registration proceeds, this would have absolutely no bearing on the conclusions made in the original HIS in terms of the impact of the proposal on the statue and heritage context of the area.
- Mr Griffiths further acknowledges the considerable work undertaken on the Woolworths site from a heritage perspective, including a proposal to bring some megaliths back to site within a heritage landscape proposal and link with the proposed King Neptune statue heritage walk and public open space area to the north (being undertaken by the City and RAAFA).

**Overall, Panel members should have a high degree of comfort from Mr Griffiths advice that the heritage significance of the King Neptune statue has been considered at every stage of planning, from ASP 70, LDP No.1 and now the Woolworths development.**

**Registration of the statue would have absolutely no bearing on the conclusions outlined within the HIS submitted with the application, in that the development allows King Neptune's landmark value to be retained and that in fact, the activation facing it in the form of a café enhances its appreciation and importance.**

## **SITE RESPONSIVE DESIGN**

The design of the Woolworths development has considered the heritage context of the King Neptune statue, broader Sun City Precinct and coastal location since the project's inception. While we note the reason for deferral relates to heritage advice matters only, we do appreciate that the building design is inextricably linked to this matter.

In particular, we note the inclusion of recommended Conditions 7 and 8 which require Woolworths to engage with the City further to refine both the colours and materials of the building as well as develop the heritage strategy on site. The Project Team has advanced both, with a summary of the progress made provided in the following sections.

### Building Colours and Materials and Roof Treatment

In terms of the building colours and materials and other detailed design considerations, the Project Team has continued developing the design to address matters raised. It is however important to highlight that in relation to colours, the City's Design Review Panel (DRP) concluded at the meeting of 22 July 2021 that *'the lighter coastal style of the Woolworths building as represented by the 3D renders are supported, this palette should evolve as the design progresses'*.

In this context and in order to respond to Condition 8, Brown Falconer is undertaking refinement to the colours and materials palette to ensure it addresses the City's considerations. With respect to the roof treatment, particular focus will be achieving a simple, clean roof design which will fully screen all mechanical services.

It will also integrate a 100kw solar array, predominantly on the northern exposure – a design feature that highlights the development of renewable resources and their integration into contemporary design and outlines Woolworths' commitment to sustainability within their developments.

**Importantly, Woolworths has provided a commitment to the City of Wanneroo that it is willing to liaise with the City's Design Review Panel on these matters in order to provide an appropriate forum for resolution. On this basis, we would support an amendment to the condition to specifically reference this process, to provide some certainty that a considered process will be undertaken.**

### Landscape Concept for Heritage Parklet and Walk

In order to advance the heritage strategy on site and demonstrate the considerable thought and work that has (and will continue to be given) to the connection with the broader area, landscape architect, Plan E, has developed a concept package for the heritage walk from King Neptune through to the heritage park. The concept package is included at **Attachment C**.

Note that Plan E prepared the original landscape plan for the Woolworths development and also has historically been involved in the concept design for the King Neptune POS area to the north, therefore has a detailed knowledge of the town centre and matters at play.

As shown in the concept, the Heritage Walk comprises the King Neptune Lookout site, public open space east of the statue and proposed parklet within the Woolworths site. The design is intended to showcase a series of selected relics from the Atlantis Theme Park as a way to express the cultural history of the area and connect the development to its context. A key component of the Heritage Walk is the proposed parklet located within the Woolworths site, which will include:

- A series of Atlantis Park relic sculptures, art wall, shade trees, turf space and seating areas, provides a strong focus for the local community.
- WA native shade trees such as WA Peppermints (*Agonis flexuosa*) and flowering groundcover such as Fan Flower, Coastal Rosemary.
- A series of curved limestone seating wall with timber-top and relic artwork on plinths with crushed limestone surrounds, together with composite deck to gathering node, terraced limestone block walls and sloping turf providing seating/lounging opportunities and passive recreation spaces.
- The planting palette is further reinforced with transplanted Cotton Palms from the site, Tuckeroo accent trees, together with cascading native shrub and groundcover plantings to mounded garden beds.
- Exposed aggregate concrete paving laid in a 'wave' pattern expresses the coastal aesthetic and feature bollards define circulation and offer pedestrians a safe walk path and act as barriers to carpark.
- Plantings of taller native shrub species and screening with bold graphics help screen the carpark and assist in ameliorating the southwest winds, as well as providing an engaging backdrop to the parklet.

## **ALIGNMENT WITH PLANNING FRAMEWORK**

There is no question the proposal is directly aligned with the planning framework, most notably ASP 70. This is evident by the City's assessment within its RAR and well as previous information and presentations provided by Urbis. In summary:

- The site is appropriately zoned under the relevant planning framework.
- All uses can be accommodated. No issues have been raised within the RAR with respect to zoning and land use.
- All relevant technical matters were sufficiently investigated and provided as part of the development application and assessment process. This includes a Heritage Impact Statement which concluded that the proposed development is entirely suitable. Griffiths Architects has confirmed that recent events have not changed this position.
- The form and scale of development represents an outcome which is of a far lesser bulk and scale than what could be accommodated under ASP 70. Under ASP 70, the site allows for residential densities between R40 and R60 which could deliver development up to three storeys.
- Critically however, residential densities to the immediate west of the King Neptune statue allow for development up to a density of R160 (5+ storeys). This would enable a high density development outcome which would be in complete obstruction of views to and from the marina to the statue – an outcome which would have a far greater impact on the heritage value of the statue than the Woolworths development.
- Further, LDP No.1 (within the RAAFA site, extract at **Figure 1**) illustrates a proposal to deliver R80 development immediately north of the statue. Again, while we do not consider this to be a poor outcome in the context of a town centre, we highlight that this would result in a far more detrimental impact from a bulk and scale perspective than the Woolworths development to the south.

Overall, there is no planning basis to refuse (or further defer) this application. Heritage matters have been considered at all stages of the planning process since ASP 70 was prepared over a decade ago. ASP 70 has a strong emphasis on recognising the importance of King Neptune and because of this, these matters were appropriately addressed in the original development application and have positively evolved over time. Heritage matters have been appropriately dealt with to the satisfaction of a highly experienced and reputable Heritage Architect, Griffiths Architects, and the City of Wanneroo.

To demonstrate the suitability of the proposal in the context of the King Neptune, a series of additional renders have been prepared and are included below. These renders clearly illustrate the low scale of the Woolworths development and significant separation from the statue (including the existing retaining wall). The second render below illustrates that the proposed location and design of the café in fact celebrates the statue and creates a node of activity which will have significant benefit for visitors and the broader town centre.

Figure 4 - Development Render (View Looking West down Azzurra Street)



Figure 5 - View Looking North from Woolworths Development site to King Neptune Statue



## ABILITY FOR THE MATTER TO BE DETERMINED

Lavan has prepared a legal submission in support of the proposal (provided at **Attachment D**). The purpose of this submission is to provide clarity of the implications of the HCWA assessment as well as clarify the discretion available to the Panel in determining the application.

In summary, the submission concludes:

- The Panel has discretion to consider the application in accordance with clause 67 of the deemed provisions.
- Neither the ongoing HCWA assessment of heritage significance or potential future registration should preclude development and does not constrain the Panel's ability to exercise discretion in accordance with clause 67 of the deemed provisions.
- The Applicant has addressed heritage matters to a significant extent and has adopted a conservative approach to significance (at a level that is not required by its current listing and would be similar to a conservative listing on the State Register).
- The alternative recommendation by the Council of the City of Wanneroo is noted. This alternative recommendation should be received as a statement as opposed to any form of amendment to the recommendation in the RAR, which has remained consistent.

## CONCLUSION

We trust the above provides the Panel with a high degree of comfort that the matter can be favourably determined at this point in time, and that all relevant matters (particularly heritage) have been considered.

Representatives from the Project Team will be present at the JDAP meeting to present the key items above and respond to any questions the Panel may have. This includes:

- Craig Wallace – Partner, Lavan
- Phil Griffiths – Heritage Consultant, Griffiths Architects
- Michael Jorgensen – Project Architect, Brown Falconer
- Andrew Baranowski – Landscape Architect, Plan E
- Megan Gammon – Planner, Urbis

Regards,



Megan Gammon  
Associate Director  
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**ATTACHMENT A – LETTER FROM BLUEPORT DEVELOPMENT MANAGEMENT (ON BEHALF OF FINI GROUP) TO CITY OF WANNEROO COUNCILLORS REGARDING HERITAGE INTENTIONS (DATED 1 APRIL 2022)**



1 April 2022

Councillor Chris Baker

**Via email - [chris.baker@wanneroo.wa.gov.au](mailto:chris.baker@wanneroo.wa.gov.au)**

**CC -** [tracey.roberts@wanneroo.wa.gov.au](mailto:tracey.roberts@wanneroo.wa.gov.au); [linda.aitken@wanneroo.wa.gov.au](mailto:linda.aitken@wanneroo.wa.gov.au); [helen.berry@wanneroo.wa.gov.au](mailto:helen.berry@wanneroo.wa.gov.au); [Sonet.Coetzee@wanneroo.wa.gov.au](mailto:Sonet.Coetzee@wanneroo.wa.gov.au); [frank.cvitan@wanneroo.wa.gov.au](mailto:frank.cvitan@wanneroo.wa.gov.au); [natalie.herridge@wanneroo.wa.gov.au](mailto:natalie.herridge@wanneroo.wa.gov.au); [jacqui.huntley@wanneroo.wa.gov.au](mailto:jacqui.huntley@wanneroo.wa.gov.au); [Paul.Miles@wanneroo.wa.gov.au](mailto:Paul.Miles@wanneroo.wa.gov.au); [vinh.nguyen@wanneroo.wa.gov.au](mailto:vinh.nguyen@wanneroo.wa.gov.au); [glynis.parker@wanneroo.wa.gov.au](mailto:glynis.parker@wanneroo.wa.gov.au); [james.rowe@wanneroo.wa.gov.au](mailto:james.rowe@wanneroo.wa.gov.au); [natalie.sangalli@wanneroo.wa.gov.au](mailto:natalie.sangalli@wanneroo.wa.gov.au); [brett.treby@wanneroo.wa.gov.au](mailto:brett.treby@wanneroo.wa.gov.au); [jordan.wright@wanneroo.wa.gov.au](mailto:jordan.wright@wanneroo.wa.gov.au); [mark.dickson@wanneroo.wa.gov.au](mailto:mark.dickson@wanneroo.wa.gov.au); [Greg.Bowering@wanneroo.wa.gov.au](mailto:Greg.Bowering@wanneroo.wa.gov.au)

Dear Councillor Baker

## **HERITAGE INTENTIONS FOR TWO ROCKS TOWN CENTRE INCLUDING PROPOSED WOOLWORTHS SITE**

Further to our discussion, I write in my capacity as consultant to Fini Group - the parent landowner of the Two Rocks Town Centre. Specifically, I seek to address the Woolworths proposal which was deferred at the Metropolitan Outer Joint Development Assessment Panel (JDAP) meeting on the 9 March 2022.

As Council is aware, the item was deferred to enable the City to 're-refer' the application to the Heritage team of the Department of Planning, Lands and Heritage. The purpose of this is to seek further courtesy advice regarding the pending assessment of the former Atlantis Marine Park for inclusion on the State Heritage Register.

We further understand there was a procedural motion passed at the Council Meeting of 15 March 2022 to present the Responsible Authority Report to allow Council an opportunity to consider the matter and resolve whether to provide a recommendation or amendments on the proposal. We note this matter is scheduled to be considered at the Briefing Session on 5 April and Council Meeting on 12 April, with the interest in the matter primarily due to heritage reasons.

Given this context, this letter clarifies the heritage context of the Two Rocks Town Centre area. It outlines Fini Groups broader intentions for respecting and interpreting the unique heritage context of the town centre as part of its gradual redevelopment, including specific strategies which will be integrated within and reflected by the proposed Woolworths site.

### **Woolworths Proposal**

Urbis on behalf of Fabcot Pty Ltd (Woolworths) lodged an application for development approval with the City of Wanneroo in October 2021. The application proposes a supermarket-based retail and commercial development. The 1.7ha subject site is located on the corner of Lisford Avenue and Azzurra Street in Two Rocks and comprises a cleared, levelled and stabilised site ready for development consistent with relevant subdivision approvals (facilitated by Fini Group).

**The Woolworths site is located on land which is appropriately zoned for retail and commercial uses. Importantly, the site does not include the King Neptune statue. The statue is located to the north of the site (outside of the proposed application area) and is proposed to be retained in accordance with broader planning for the town centre (incorporated within Local Development No.1 which was approved by Council in 2018).**



**The design of Woolworths including materials, colours and treatment of the built form interface to Azzurra Street has had considerable regard for the presence of the King Neptune statue both now and in the future.**

### **Heritage Context**

From a heritage perspective, the former Atlantis Marine Park (which contains the Woolworths site) is listed on the City of Wanneroo Local Heritage List as a Category 4 site (Little Significance). For Category 4 sites, the City's Policy framework outlines they are sites without built features and recommends recognising and interpreting sites through reflection in design and plaques. Importantly, it suggests the retention of the King Neptune statue – which is the intent.

In 2020, the Heritage Council identified the Atlantis Marine Park as warranting assessment for possible inclusion on the State Register as part of the Sun City Precinct, however this assessment process has not yet commenced, nor has it been placed in a formal programme for assessment. It is further noted that the precinct has been identified for assessment since 2003, with no listing progressed to date.

It is important to note that the pending assessment of the broader precinct for inclusion of the State Heritage Register should have no bearing on the ability for the Woolworths (and other) proposals to be determined. **Further, the referral of the Woolworths application to DPLH was undertaken out of courtesy given the context above, not out of statutory necessity.**

Heritage considerations regarding the Atlantis Marine Park and King Neptune statue have been considered at every stage and level of planning over the past decade. Specifically, heritage advice and community consultation informed the spatial layout and configuration of uses within the town centre under the Two Rocks Town Centre Structure Plan (ASP 70) and other planning documents. This is described in greater detail below.

### **Proposed Heritage Strategies for Two Rocks Town Centre**

As Councillors will be aware, since the closure of the Atlantis Marine Park in 1990 and acquisition by Fini Group, a majority of the Marine Park was demolished. The exception to this is the King Neptune statue and retention of various statues forming the 'Celebrity Clock'. Several statues forming the original 'Celebrity Clock' are located in Charnley Reserve, with several also stored by Fini Group for future use within future public realm areas. ASP 70 was then prepared by the City and approved by the WA Planning Commission in 2014, which earmarks the town centre for significant urban development.

Since this time, the planning for the initial stages of the town centre has evolved. This includes the preparation of Local Development Plan No.1 (LDP No.1) which covers the area including the proposed RAAFA Retirement Village and King Neptune statue (extract at Attachment A). Consideration of the preservation and integrity of the King Neptune statue was the subject of a two-year community consultation process culminating in LDP No.1 being approved by Council in 2018.

Specifically, LDP No.1 incorporates the creation of a ~1.0ha public open space area encompassing the King Neptune statue. The POS is located and configured in this location to ensure the protection (and access to) the King Neptune statue. The intent is that a number of the former statues which once formed part of the 'Celebrity Clock' will be utilised as part of a heritage trail (or reconfigured into a new 'Celebrity Clock' in the same location it was originally located (east of the statue) to provide a strong reference back to the history of the area.

This 1.0ha POS area has been ceded by the Fini Group to the Crown (under the management of the City of Wanneroo) and involved a \$400,000.00 bond to the City of Wanneroo including obligations to complete landscaping to the public realm. This bond was formalised through a Replacement Deed between RAAFA (as owners of the broader LDP No.1 land) and the City of Wanneroo.

To support this (in particularly the POS bond), a concept plan was prepared depicting the potential design of this public open space area (extract included at Attachment B). The concept enables sweeping vistas of the King Neptune statue as well as substantial amenity to the community. The intent at the time was that this concept plan was prepared at a high level only with detail to be provided at a later date following further community engagement and technical advice.

As redevelopment progresses within the town centre, additional opportunities to incorporate cultural heritage elements will be advanced by Fini Group in various public open space locations. This includes the intent to display and celebrate the Waugal Monolith statues in the plaza public open space (located at the west end of Azzurra Road creating a connection from the King Neptune POS to the Marina) or an alternative location determined in consultation with the community and stakeholders.

Further, Fini Group intend to incorporate various plaques and displays within public open space (including within the Woolworths site, as described below) to celebrate the historical Atlantis Marine Park.

### **Proposed Heritage Strategies for Woolworths Development**

The Woolworths development has considered the unique heritage context of the site and broader area since the projects inception. Specifically, the built form response to Azzurra Street balances the City's vision for an active main street with heritage advice sought from Griffiths Architects, which recommends the façade is 'broken up' to reduce overall massing and impact on the King Neptune statue. Key heritage strategies proposed include:

- Reflection in built form design, incorporating soft colours and materials to reflect the 'coastal boutique' context of Two Rocks.
- Signage located within the landscaped area at the north of the site adjacent to the café and specialty retail display information pertaining to the history of the area.
- The café itself proposes an open alfresco area and key public realm node which allows full view to the north towards the King Neptune statue.
- The proposal has also incorporated the use of three statues along Azzurra Street which were historically used as part of the former Atlantis Beach Marine Park development and intended to form part of a 'heritage trail' which will link to adjoining sites and King Neptune statue to the north.
- Incorporation of a number of Washington Robusta, which whilst not native to the area were utilised within the former Marine Park and have been incorporated through the broader landscaping of the site.

An extract of the Woolworths development is provided at **Attachment C**.

In order to further refine both the built form design and heritage strategies, the City Officers (within the RAR) has incorporated recommended conditions relating to the implementation of heritage items (above) as well as provision of a detailed schedule of colours and materials prior to a building permit being lodged.

## Conclusion

Overall, the following can be confirmed and should be considered by Council in its deliberations:

- There is a clear intent by landowner Fini Group to develop a respectful and well-considered heritage strategy throughout the entire town centre.
- The King Neptune statue is proposed to be retained and respected through allocation of an extensive (~1.0ha) public open space area. This has been confirmed through LDP No.1 (approved by Council in 2018) and a Replacement Deed and Bond payment between RAAFA and the City of Wanneroo.
- The Woolworths site is located on land which is appropriately zoned for retail and commercial uses. Importantly, the site does not include the King Neptune statue.
- The pending assessment of the Sun City Precinct by the Heritage Council of WA should not hold up consideration of any application within the town centre, including the Woolworths development. Consideration of the heritage value of the area, including preservation and integrity of the King Neptune statue, was the subject of a two-year community consultation process culminating in LDP No.1 being approved by Council in 2018.
- Fini Group has engaged closely with Woolworths with respect to heritage matters on its site to ensure it aligned with Fini Groups broader strategy and heritage advice. This includes reflection in built form design as well as integration with a broader heritage trail (involving use of numerous statues and interpretive signage). Woolworths will continue to develop this in consultation with the City.

We trust this letter clearly outlines the heritage intentions for the area, including the broader town centre and proposed Woolworths site. If you have any queries regarding Fini Groups intentions, please do not hesitate to contact me on the below details.

Yours sincerely,



Michael Bower

Blueport Development Management (on behalf of Fini Group)



[mikebower@blueport.net.au](mailto:mikebower@blueport.net.au)

0409 368 474

ATTACHMENT A – LOCAL DEVELOPMENT PLAN NO.1 EXTRACT



ATTACHMENT B – KING NEPTUNE/PUBLIC OPEN SPACE CONCEPT PLAN



TWO ROCKS TOWN CENTRE  
PREPARED FOR ROBERTS DAY GROUP  
LANDSCAPE CONCEPT PLAN

JOB NO. 1707701  
1:250 @ A1  
CL 101  
REV A  
JUL 2017

LANDSCAPE ARCHITECTS  
118 ROBERTS DAY GROUP  
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ATTACHMENT C – EXTRACT OF WOOLWORTHS DEVELOPMENT



**ATTACHMENT B - HERITAGE ADVICE (GRIFFITHS ARCHITECTS)**



## Memorandum

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Project Name: Two Rocks Woolworths Development

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Project number: 21169

---

Griffiths Architects  
ABN 91 277 671 706  
Suite 1 315 Rokeby Road, Subiaco  
Western Australia 6008  
Telephone 08 9381 1666  
Facsimile 08 9381 1566  
mail@griffithsarchitects.com.au  
www.griffithsarchitects.com.au

### Heritage Assessments

Considine and Griffiths prepared a heritage assessment for Fini Group in 2006 upon their acquisition of a number of sites at Two Rocks.

This assessment concluded:

*Two Rocks Town Centre Precinct*, comprising retained dunes, limestone retaining walls, a concrete block construction shopping centre and tavern in the Late Twentieth Century Perth Regional style (1974) and limestone figures, together with the remains of Atlantis (1981) and concrete construction King Neptune statue (1981), has cultural heritage significance for the following reasons:

the place is integral to the history of the development of Yanchep Sun City from the early 1970s, one of the most significant residential, commercial and recreational investment projects undertaken by a private owner/company in this post World War Two period;

the limestone retaining walls and statue of King Neptune have acquired landmark status in a local context and the latter in terms of the region;

the place has social and historical significance to the local community for its contribution to the understanding of the development of Two Rocks and Yanchep, and also for the central role it has and still plays in the everyday lives of residents;

the place contributes to an understanding of the importance of Yanchep as a holiday and tourist destination in concert with the Yanchep caves and National Park, the beach and original shack and fishing settlements along the coast, the Two Rocks marina and town centre as well as Atlantis Marine Park (fmr), the first marine park and oceanarium to be established in Western Australia in 1981;

Two Rocks Shopping Centre and Tavern was a noteworthy design in the context of the mid and late 1970s; and, the place has associations with former owner Alan Bond, the Japanese company Tokyu Corporation, which has owned and managed the Yanchep Sun City project for over 30 years, and Anthony Brand then of Forbes and Fitzhardinge, designer of the Two Rocks Shopping Centre and Tavern.

The carved limestone artworks, or Waugal Monolith Sculptures (*now removed*) have no intrinsic artistic value and have little cultural heritage significance in relation to the shopping centre complex, while carved limestone figures that remain in the ruins of Atlantis contribute to an understanding of the facility (*now removed*).



The car parking, shopping centre service elements, chainlink fences, shop fittings, together with the remains of substations, pump works, and the like have no cultural heritage significance.

Note that the Sun City Yacht Club and marina area together with the second shopping centre to the north of the original town centre precinct is not included in this assessment.

This assessment clearly indicates that most of the values relate to social and historic aspects of the study area with the exception of King Neptune, the limestone retaining walls and to a lesser extent the shopping centre.

It is important to note that the development site has no remaining features.

The Heritage Council's assessment will include a wider area than the study to extend to the marina and so on.

In my long experience as a heritage councillor, I believe it is more than likely that the Heritage Council will concur with the study we prepared and identify the marina, retaining walls, town centre and King Neptune as significant.

Should Heritage Registration proceed, maps will be produced to describe the area that is included in the Registration and the degrees of significance of the elements within the curtilage. The development site will appear as little or no significance on those maps as it has been as it has been cleared and levelled for development. Even if a precinct curtilage were defined to include the development site, this would in no way impact on the proposal as submitted.

### **King Neptune**

In both heritage assessment and development of the scheme King Neptune's significance was acknowledged, notwithstanding that Neptune had now been ascribed any State Heritage value. The heritage impact statement prepared by Griffiths Architects concludes that the development allows King Neptune's landmark value to be retained and that the activation facing it in the form of a café enhances its appreciation and importance.

Should State Registration proceed, it is likely that King Neptune will be identified as one of the more important features. Even if this were the case, it would have no bearing on the heritage impact of the proposed development.

It should be noted that some megaliths will be brought back to site in the landscape proposal and there will be interpretation of Atlantis around the site. Since the development application was lodged, Plan E has prepared specific proposals to indicate how interpretation would be included and how the megaliths can be relocated to the site and given an integral role with the development and to respond to the King Neptune Statue.

### **Effect of Registration**

Registration does not preclude development. The fact that a place is being assessed by the Heritage Council has no impact on development. HCWA has no statutory role to play until a place is included on the Register. A Heritage Impact Statement would need to be prepared and it would not differ from the one prepared by Griffiths Architects to accompany this development application.

The register document will make the relative significance of elements clear and it is likely, should registration occur, King Neptune would be attributed a degree of significance.

The development site would be attributed low or no significance. Development of the site in an appropriate manner would be supported with the only question to be considered by the Council would be the impact on King Neptune. Given the modest scale of development, the heritage impact, and quality of design, it is highly unlikely that the Heritage Council would object to this development.

### **Design Quality**





In our Heritage Impact Statement we made the following comments

*The materials palette of the new development is sympathetic to the existing shopping centre and existing landscape. The form and scale of the project is significantly larger than the existing shopping centre, but the facades are broken up with speciality shops and café to reduce the overall massing. The café facing the King Neptune Statue ensures it retains its landmark qualities.*

The design quality is commensurate with the significance of the King Neptune statue and its setting.

**ATTACHMENT C – LANDSCAPE CONCEPT PACKAGE FOR HERITAGE PARK AND WALK  
(PLAN E)**

**LEGEND**

-  **HERITAGE WALK :**  
SERIES OF RELIC SCULPTURES FROM HISTORIC ATLANTIS SITE
-  PEDESTRIAN NETWORK
-  MAIN VIEWS TO COAST
-  PROPOSED LOCATION OF SCULPTURES



**ARTWORKS**



**WOOLWORTHS, TWO ROCKS**

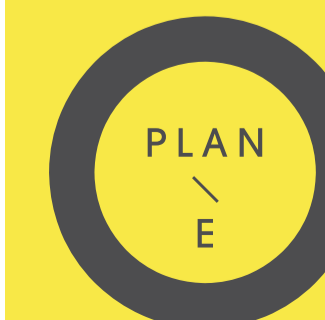
SITE CONTEXT PLAN - HERITAGE WALK  
APRIL 2022

JOB NO. 2100101  
1:600 @ A1

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**LANDSCAPE ARCHITECTS**

414 ROKEBY RD SUBIACO WA 6008  
T: (08) 9388 9566 E: mail@plane.com.au



**ARTWOKS**



**LEGEND**

- 01 NATIVE SHADE TREES IE. AGONIS FLEXUOSA
- 02 FEATURE FLOWERING GROUNDCOVER SPECIES IE. SCAEVOLA SP.
- 03 CURVED LIMESTONE SEATING WALL WITH TIMBER TOP
- 04 RELIC ARTWORK ON PLINTH WITH CRUSHED LIMESTONE SURROUNDS
- 05 COMPOSITE DECK TO GATHERING NODE
- 06 TALLER NATIVE SHRUB SPECIES & GRAPHIC SCREENING TO SCREEN OFF CARPARK & SOUTH-WEST WINDS & PROVIDE ENGAGING BACKDROP TO SPACE
- 07 TERRACED LIMESTONE BLOCK WALLS & SLOPING TURF PROVIDING SEATING/LOUNGING OPPORTUNITIES & PASSIVE RECREATION SPACE
- 08 TRANSPLANTED WASHINGTONIA PALMS FROM HISTORIC SITE
- 09 CASCADING NATIVE SHRUB AND GROUNDCOVER PLANTINGS TO MOUNDED GARDEN BEDS
- 10 SHADE TREE IN TURF IE. AGONIS FLEXUOSA
- 11 EXPOSED AGGREGATE CONCRETE 'WAVE' PATTERNS
- 12 SHADE TREE TO CARPARK (IE. CUPANIOPSIS SP) WITH STRATA CELL
- 13 SERIES OF RAISED PLANTERS, COMBINED WITH BOLLARDS AS INTEGRATED PEDESTRIAN SAFETY BARRIERS TO CARPARK

 REFER PERSPECTIVE VIEWS C3.104

**WOOLWORTHS, TWO ROCKS**

HERITAGE PARKLET - PLAN  
APRIL 2022

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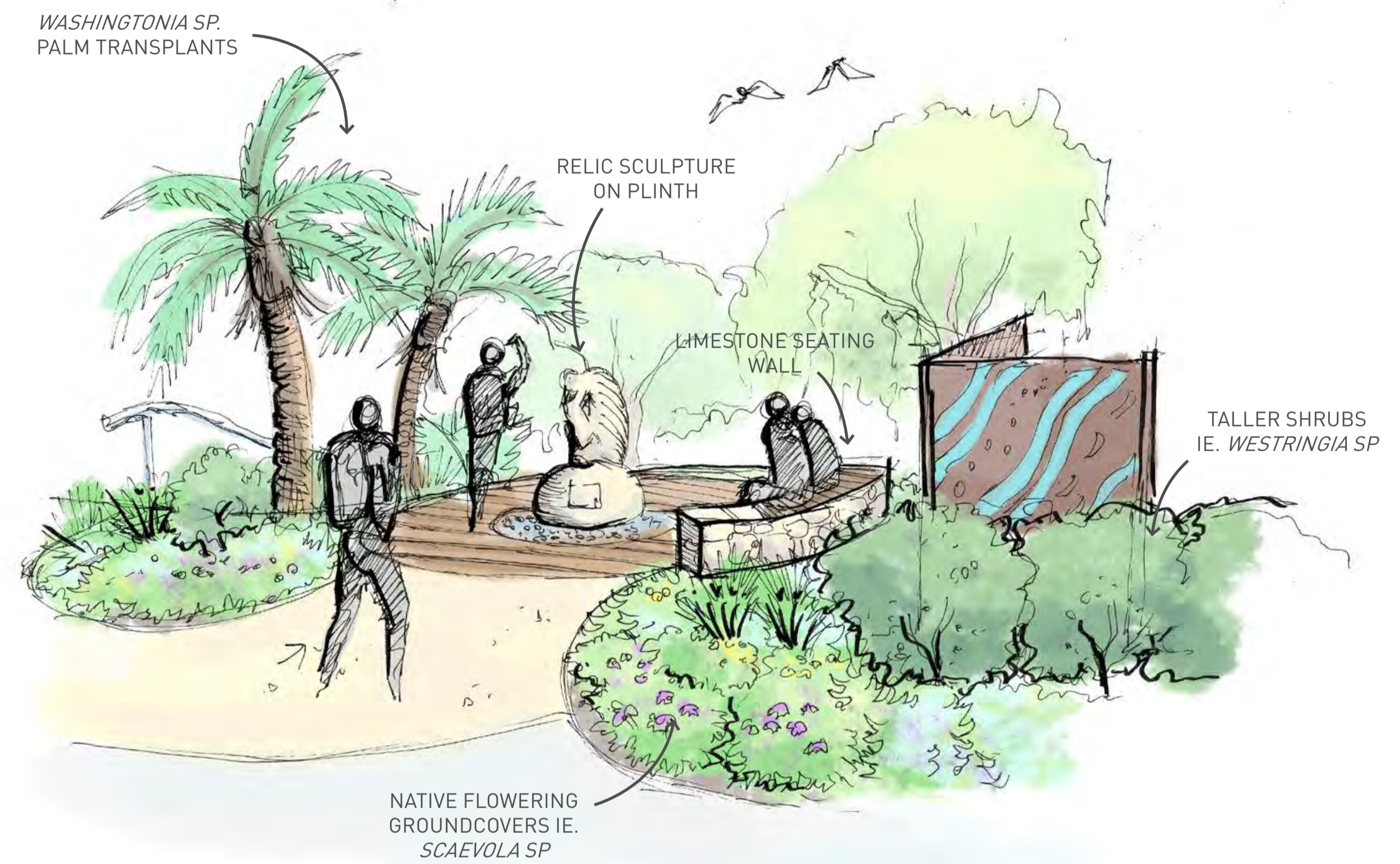


**LANDSCAPE ARCHITECTS**

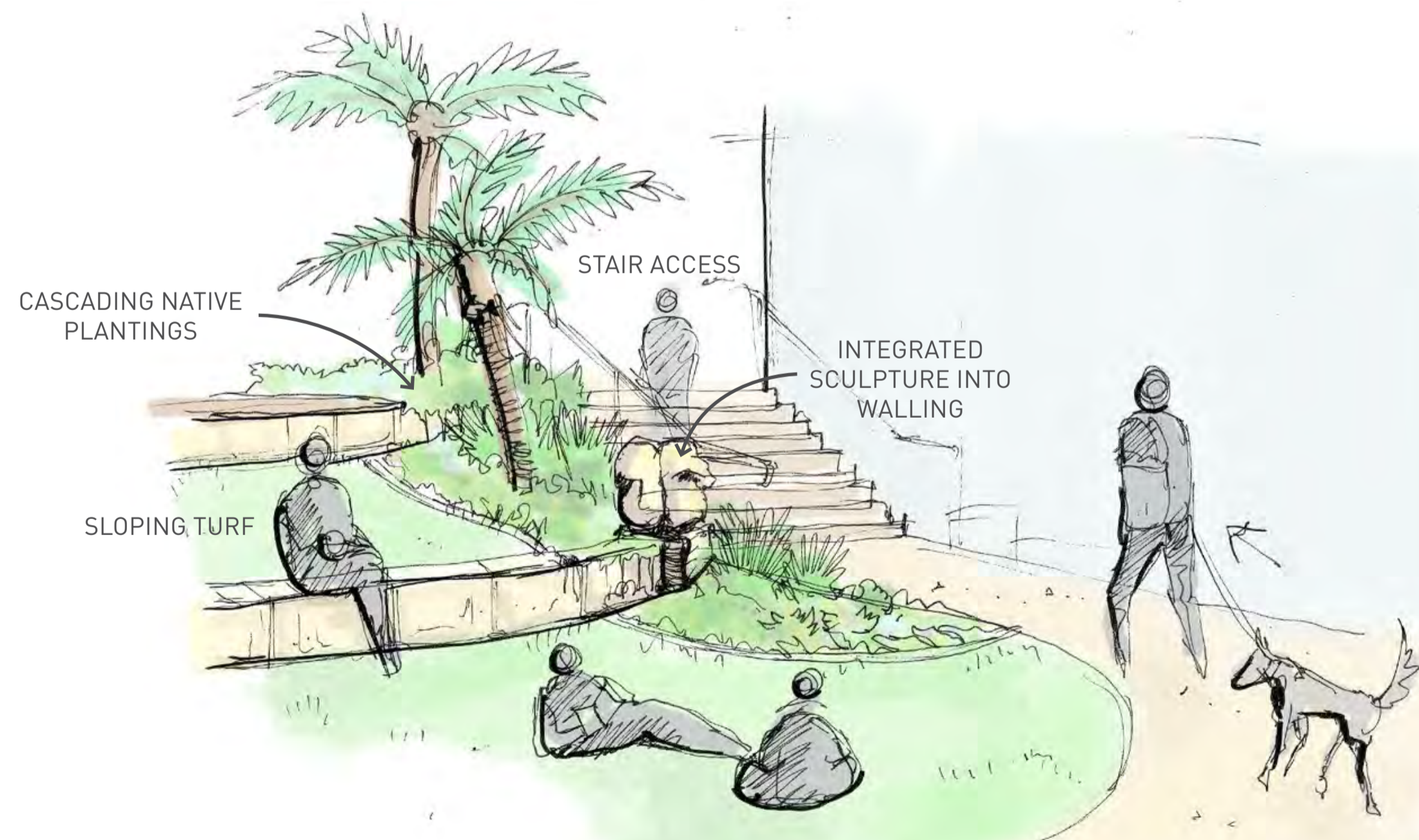
414 ROKEBY RD SUBIACO WA 6008  
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PERSPECTIVE 1



PERSPECTIVE 2



PERSPECTIVE 3

**WOOLWORTHS, TWO ROCKS**

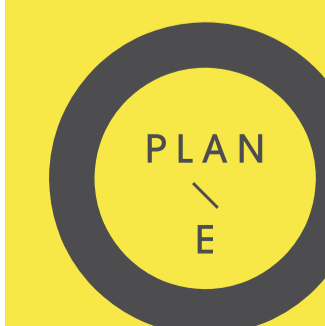
HERITAGE PARKLET - PERSPECTIVE VIEWS  
APRIL 2022

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**ATTACHMENT D – LEGAL SUBMISSION (LAVAN)**

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Partner: Craig Wallace  
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29 April 2022

Mr Ian Birch  
Presiding Member  
Metro Outer Joint Development Assessment Panel  
C/O DAP Secretariat  
140 William Street  
Perth  
WA 6000

120

Representing  
Western Australians  
for more than 120 years

By email: [daps@dplh.wa.gov.au](mailto:daps@dplh.wa.gov.au)

Dear Mr Birch

**Number 10 (Lot 9702) Enterprise Avenue, Two Rocks – Proposed Shop, Liquor Store, Restaurant and Office (DAP 21/02117)**

Lavan acts for the Woolworths Group (**Applicant/Client**) in respect of the proposed development of a liquor store, restaurant and office on the land at No. 10 (Lot 9702) Enterprise Avenue, Two Rocks (**Proposed Development**).

I provide this legal submission to the Metro Outer Joint Development Assessment Panel (**MOJDAP**) on behalf of my client in support of the agenda item considering the application for the Proposed Development at the meeting scheduled for the 4<sup>th</sup> of May 2022.

**Background**

This submission is made in respect of the procedural motion carried at the last MOJDAP meeting on 9 March 2022 pertaining to matters of heritage. In particular, at the meeting on March 2022, the MOJDAP resolved for the consideration of the Proposed Development to be deferred to allow the City of Wanneroo (**City**) to seek clarification from the relevant government authorities in relation to heritage matters raised concerning various state local heritage listings in the Two Rocks precinct recorded as “to be assessed”.

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Wills & Estates

**Our values:**

Commitment  
Integrity

Lavan respectfully acknowledges the traditional owners of the land on which we live and work.

3474-7586-4346\_1172302, v.1



Relevantly, the Responsible Authority Report (**RAR**) prepared for the MOJDAP included reference to a referral/consultation with the Department of Planning Lands and Heritage (**DPLH**) regarding heritage and included the following comment;

1. The Atlantis Marine Park was identified by the Heritage Council as warranting assessment for possible inclusion in the State Register in September 2020 as part of the Sun City Precinct, Two Rocks, together with a number of other associated elements and features. This decision expanded on an earlier Heritage Council decision in 2003 that the Two Rocks Shopping Centre and Tavern, and the King Neptune Statue together warranted assessment for the register. As the Sun City Precinct has not yet been assessed for the State Register, DPLH was unable to provide comments on the impact the proposal may have on any state, cultural heritage values.

Following deferral by MOJDAP, DPLH have now confirmed that the Heritage Council has decided at its meeting on 8 April 2022 that a full heritage assessment of the Sun City Precinct, Two Rocks should be undertaken as quickly as possible.

Accordingly, the purpose of my submission is to provide some clarity in relation to the Applicant's understanding of the implications of that assessment to the Proposed Development and to clarify at the discretion available to the MOJDAP at its meeting.

### **Discretion**

It is well understood that in the exercise of planning discretion, a planning authority (such as the JDAP) is only entitled to have regard to relevant planning considerations.

The question of whether a consideration is a relevant planning consideration or otherwise is invariably addressed by having regard to the planning framework applicable to the proposed development. Clause 67(2) of the deemed provisions set out in Schedule 2 of the Planning and Development (Local Planning Scheme) Regulations 2018 (**Deemed Provisions**) assists in clearly setting out a range of matters that arise for consideration in the exercise of planning discretion.

Relevantly, clause 67 of the Deemed Provisions requires a decision-making authority to have "due regard" to those relevant considerations.

The requirement to have "due regard" has been interpreted by the Supreme Court in *Marshall v Metropolitan Redevelopment Authority [2015] WASC 226* at [115 and 116] to mean a requirement to give:-

1. active and positive consideration; or
2. proper, genuine or realistic consideration to the policy in question.

That concept was expanded upon in *Bestry Property Group Pty Limited and Western Australian Planning Commission [2019] WASAT 15*. At [99] the Tribunal stated:-

*In the exercise of planning discretion, the Tribunal is guided by the planning principles defined expression in the policies forming the planning framework but will depart from*

*the application of those planning principles where there is a cogent reason to do so in the circumstances of the case.*

The Applicant accordingly submits that the MOJDAP has discretion to consider the application for the Proposed Development taking into account all relevant considerations pertaining to this matter (as set out in the RAR).

## **Heritage**

Relevantly considerations pertaining to heritage are also set out in that list of relevant considerations in the deemed provisions as follows:-

1. The built heritage conservation of any place that is of cultural significance;
2. The effect of the proposal on the cultural heritage the significance of the area in which the development is located.

The obvious concern of the MOJDAP in the context of this matter is the progress of an assessment of heritage significance by the Heritage Council in relation to the Two Rocks Precinct and its impact on discretion.

It is accordingly important to understand the relevance of the relevant provisions as they apply to any application for development approval.

The Deemed Provisions when introduced made significant amendments to the manner in which development applications were to be presented and assessed, particularly with reference to a built heritage.

By way of summary, the deemed provisions deal with the following key elements:-

1. heritage protected places – including places that are entered into the State Register or under consideration for entry into the State Register as key definitions in application of exemptions available under the deemed provisions form the need to obtain development approval at clause 61 and 62;
2. heritage protection – Part three of the deemed provisions provides for the establishment and maintenance of a heritage list, the designation of heritage areas, the requirement to enter into a heritage agreement the requirement for a heritage assessment and enforcement via the issuing of a heritage conservation notice;
3. Clause 67 - relevant considerations to the assessment of development approval applications to consider:-
  - 3.1 built heritage conservation (as defined in Section 4 of the Heritage Act 2018)
  - 3.2 cultural heritage significance as defined in Section 5 (1) of the Heritage Act 2018.

It is important to note the specific definitions of heritage and the particular roles that those terms play in the Deemed Provisions as they have potential to cause some confusion. For the purposes of this submission I propose to deal with only clause 67 and relevant considerations pertaining to heritage.

Importantly, it is the Applicant's submission that the relevance of a "heritage – protected place" (as including a place under consideration for entry into the State Register) is not relevant to

material consideration as outlined in clause 67 and is only relevant to the application of the exemptions in clause 61 and 62 of the deemed provisions. Relevantly, the definitions used in clause 67 (and elsewhere in the Deemed Provisions) do not include reference to sites under assessment by the Heritage Council.

The reason for that in my view is that separate legislation, namely the *Heritage Act 2018* (**Heritage Act**) more explicitly provides for the conservation of places of cultural heritage significance. Relevantly “cultural heritage significance” is defined in the Heritage Act as “aesthetic, historic, scientific, social or spiritual value for individuals or groups within Western Australia”. That same definition is used to define built heritage significance in the Deemed Provisions.

The Heritage Act also establishes a State Register of heritage places with the objective that the register will make an important contribution to the understanding of heritage in Western Australia. The Heritage Act does not setup a separate approval regime for places listed on the heritage register but requires decision making authorities to refer planning applications and other proposals to the Heritage Council for advice prior to determining the application. A corresponding requirement for referral for that comment is also contained in the Deemed Provisions.

Relevantly, the Heritage Act also requires a decision-making authority to determine the application before in a way that is consistent with Heritage Council advice, unless it finds that there is no feasible or prudent alternative to make that determination.

That very circumstance now presents itself to the MOJDAP, but instead of a recommendation for refusal, the comment is only that an ongoing assessment of a heritage significance by the Heritage Council is being undertaken.

This scenario is not an uncommon one and does not in and of itself preclude the ability of the MOJDAP to make or to exercise discretion in making a decision consistent with the recommendation in the RAR. This circumstance is dealt with by the operation of Section 76 of the Heritage Act which states:-

*If, at the time that a place becomes a registered place, a decision to approve, implement or act upon a prescribed proposal that has been made by a decision maker but has not been substantially implemented or acted upon, the Council may direct in writing that the operation of the decision is suspended for a period determined in accordance with the regulations.*

By way of further comfort the MOJDAP has the benefit of both a historical and an updated heritage impact assessment prepared by Griffith Architects confirming the position with regard to impact of the Proposed Development on elements of heritage significance within the locality of the land.

It is the expressed opinion of the technical experts employed by the Applicant that the proposal acknowledges the heritage significance of King Neptune’s statue and concludes that the development has been designed in a manner that allows that landmark value to be retained context of the proposed development.

In summary neither the ongoing assessment of heritage significance or subsequent registration of a site on the State Heritage Register would not preclude development and does

not constrain your ability to exercise discretion in accordance with clause 67 of the Deemed Provisions.

On behalf of the Applicant, I am instructed to request that the MOJDAP consider those technical reports provided in the context assessment against the relevant considerations in making its assessment of the Proposed Development.

### **Alternative recommendation**

I note in the context of this matter that the Council of the City have at its latest council meeting purported to amend the recommendation in the RAR to one of a refusal on a number of grounds.

As is clear from the *Development Assessment Panel Practice notes: Making Good Planning Decisions (March 2021)* at page 66, the views of council may be relevant to be incorporated into the appropriate section of the RAR to the MOJDAP. However, it is improper for council to influence the Planning Officer's professional opinion on the assessment.

Accordingly, the Applicants admits that, at best, the alternative recommendation provided by the Council of the City should be received as a statement as opposed to an amendment to the recommendation in the RAR.

I will be present at the MOJDAP meeting for the purposes of an oral deputation and will be pleased to answer any questions you have in relation to any aspect of this submission.

Yours sincerely,



Craig Wallace  
Partner  
Encl

---

Please notify us if this communication has been sent to you by mistake. If it has been, any privilege between solicitor and client is not waived or lost and you are not entitled to use it in any way.

---



## NO.10 (LOT 9702) ENTERPRISE AVENUE, TWO ROCKS – PROPOSED SHOP, LIQUOR STORE, RESTAURANT & OFFICE

### Form 1 – Responsible Authority Report (Regulation 12)

<b>DAP Name:</b>	Metro Outer JDAP	
<b>Local Government Area:</b>	City of Wanneroo	
<b>Applicant:</b>	Woolworths C/- Urbis	
<b>Owner:</b>	Fini Group Pty Ltd	
<b>Value of Development:</b>	\$16 million <input checked="" type="checkbox"/> Mandatory (Regulation 5) <input type="checkbox"/> Opt In (Regulation 6)	
<b>Responsible Authority:</b>	City of Wanneroo	
<b>Authorising Officer:</b>	Gregory Bowering – Manager Approval Services	
<b>LG Reference:</b>	DA2021/1797	
<b>DAP File No:</b>	DAP/21/02117	
<b>Application Received Date:</b>	2 November 2021	
<b>Report Due Date:</b>	28 February 2022	
<b>Application Statutory Process Timeframe:</b>	90 Days	
<b>Attachment(s):</b>	Attachment 1: Location Plan Attachment 2: Development Plans Attachment 3: Schedule of Submissions Attachment 4: Heritage Impact Statement Attachment 5: Traffic Impact Assessment Attachment 6: Acoustic Assessment Attachment 7: Bushfire Management Plan Attachment 8: Waste Management Plan Attachment 9: Design Review Panel Responses Attachment 10: Subdivision Approval Attachment 11: Local Heritage Survey Sites Attachment 12: Original Design Review Panel Plans	
<b>Is the Responsible Authority Recommendation the same as the Officer Recommendation?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A	Complete Responsible Authority Recommendation section
	<input type="checkbox"/> No	Complete Responsible Authority and Officer Recommendation sections



## Responsible Authority Recommendation

1. **Approve** DAP Application reference DAP/21/02117 and accompanying plans (3353-02 Rev Y, 3353-03 Rev H and 3353-04 Rev F) and supporting technical documents in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015*, and the provisions of the City of Wanneroo District Planning Scheme No. 2, and the Metropolitan Region Scheme, subject to the following conditions as follows:

### Conditions

1. Pursuant to clause 26 of the Metropolitan Region Scheme, this approval is deemed to be an approval under clause 24(1) of the Metropolitan Region Scheme.
2. The use of the premises is to be **'Shop'**, **'Liquor Store'**, **'Restaurant'** and **'Office'** as defined by the City of Wanneroo's District Planning Scheme No. 2 as follows:

**Shop:** means a premises where goods are kept exposed or offered for sale by retail. This interpretation excludes restricted premises, but may include a bakery.

**Liquor Store:** means any land or buildings the subject of a liquor store licence granted under the provisions of the Liquor Licensing Act 1988.

**Restaurant:** means any premises where the predominant use is the preparation of food for sale and consumption within the building or portion thereof. The expression may include the sale of food for consumption off the premises, where Council is of the opinion that it is incidental to the business. The term may include an outdoor eating area which shall be treated as being within the building of the Restaurant. The expression excludes Drive-Through Food Outlets.

**Office:** means any premises used for the administration of clerical, technical, professional or other like business activities but does not include administration facilities which are required in association with a predominant use on site, and does not include consulting rooms or medical centres.

A change of use from that outlined above may require further development approval from the City.

3. The development is to be implemented in accordance with the Bushfire Management Plan dated 6 October 2021 prepared by Bushfire Prone Planning.
4. The development is to comply at all times with the Herring Storer Acoustics Environmental Noise Assessment dated September 2021.
5. Detailed landscaping and reticulation plans for the subject site and adjacent road verges shall be lodged for approval by the City of Wanneroo prior to the commencement of works. Planting and installation shall be in accordance with the approved landscaping and reticulation plans prior to the occupation of the development, and thereafter maintained by the landowner to the City's satisfaction.



6. Detailed civil engineering drawings and specifications for works within the public road reserve (earthworks, parking, footpath, roads and drainage) shall be lodged for approval by the City of Wanneroo prior to commencement of construction works. Construction works are to be undertaken in accordance with the approved development application, engineering drawings and specifications and Construction Management Plan to the satisfaction of the City of Wanneroo.
7. The applicant is to collaborate with the City of Wanneroo with respect to the implementation of heritage items as identified within the proposal including colours and material finishes of the building. Such items are to be implemented prior to occupation and thereafter maintained to the satisfaction of the City of Wanneroo.
8. A schedule of colours and materials is to be submitted to the City of Wanneroo for consideration prior to a building permit being lodged, and thereafter maintained to the satisfaction of the City of Wanneroo.
9. The applicant/owner shall ensure that all illuminated signage shall have any boxing or casing in which it is enclosed constructed of incombustible materials, shall not comprise of flashing, pulsating, chasing or running lights and shall not have such intensity as to cause annoyance to the public or illuminate beyond the extent of the lot boundaries.
10. Lighting shall be installed to pathways and car parking areas, be designed in accordance with the Australian Standards for the Control of Obtrusive Effects of Outdoor Lighting (AS4282) and shall be internally directed to prevent overspill into nearby lots.
11. Parking areas, driveways and points of ingress and egress shall be designed in accordance with the Australian Standard for off-street car parking (AS2890) and shall be drained, sealed, marked and thereafter maintained to the satisfaction of the City of Wanneroo.
12. The proposed crossovers shall be designed and constructed in concrete in accordance with the commercial specifications of the City's Engineering Development Standards TS07-11 and WD11 to the satisfaction of the City of Wanneroo.
13. The parking areas and associated access depicted on the approved plans shall not be used for the purpose of storage or obstructed in any way at any time.
14. Stormwater and any other water run-off from buildings or paved areas shall be collected and retained on site. An onsite stormwater drainage system, sufficient to contain a 1:100 year storm event (over 24 hours) must be provided.
15. All piped and wired services, mechanical plant, equipment and service and storage areas are to be screened from public view to the satisfaction of the City of Wanneroo.
16. All refuse shall be stored within the designated bin enclosures and shall be collected from the site at the cost of the landowner between 7am and 7pm, Monday to Saturday.



17. Any graffiti applied to the external surfaces of the building shall be removed within seven (7) days of it being applied, to the satisfaction of the City of Wanneroo.
18. A Construction Management Plan shall be provided to the City of Wanneroo detailing how the construction of the development will be managed in order to limit the impact on the users of the surrounding area. The plan will need to ensure that:
  - a) Adequate space is provided within the development site for the parking of construction vehicles and for the storage of building materials so as to minimise the need to utilise the surrounding road network;
  - b) Adequate provision is made for the parking of workers' vehicles;
  - c) Pedestrian and vehicular access around the site is maintained;
  - d) Undertake adequate measures during construction to minimise any adverse impacts caused by sand drift and dust from the site;
  - e) The delivery of goods and materials does not adversely impact on the amenity of the surrounding properties; and
  - f) The hours of construction are limited to ensure that there is no adverse impact on the amenity of the surrounding properties.

The Construction Management Plan is to be submitted to and approved by the City of Wanneroo prior to the commencement of any development.

#### **Advice Notes**

1. This decision constitutes planning approval only and is valid for a period of four (4) years from the date of approval. If the subject development is not substantially commenced within the specified period, the approval shall lapse and be of no further effect.
2. If an applicant or owner is aggrieved by this determination there is a right of review by the State Administrative Tribunal in accordance with the *Planning and Development Act 2005* Part 14. An application must be made within 28 days of the determination.
3. With regard to Condition 6, the engineering plans should also consider the requirement for the design and upgrading of the Lisford Avenue shoulder to allow for driver vehicle swept path movements. This may also include the requirement to modify the existing pedestrian footpath adjoining this location.
4. In regards to managing dust and sand drift in accordance with the Construction Management Plan condition, adequate measures to minimise any impacts of dust and sand drift from the site include all requirements as stipulated within the Department of Water and Environmental Regulation's 'A guideline for managing the impacts of dust and associated contaminants from land development sites, contaminated sites remediation and other related activities'.
5. Where an approval has so lapsed, no development shall be carried out without further approval having first been sought and obtained, unless the applicant has applied and obtained Development Assessment Panel approval to extend the approval term under regulation 17(1)(a) of the *Planning and Development (Development Assessment Panels) Regulations 2011*.





**Details:**

Region Scheme	Metropolitan Region Scheme (MRS)
Region Scheme - Zone/Reserve	Urban
Local Planning Scheme	City of Wanneroo District Planning Scheme No.2 (DPS 2)
Local Planning Scheme - Zone/Reserve	Marina
Structure Plan/Precinct Plan	Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70)
Structure Plan/Precinct Plan - Land Use Designation	Commercial/ Mixed Use/ Public Open Space (Drainage)
Use Class and permissibility:	Shop – P Liquor Store – A Restaurant – P Office – P
Lot Size:	7.8ha total site area (1.6860 ha development site)
Existing Land Use:	Vacant Land
State Heritage Register	No
Local Heritage	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Heritage List <input checked="" type="checkbox"/> Heritage Area
Design Review	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Local Design Review Panel <input type="checkbox"/> State Design Review Panel <input type="checkbox"/> Other
Bushfire Prone Area	Yes
Swan River Trust Area	No

**Proposal:**

The application proposes the following components:

- 3,298m<sup>2</sup> NLA of ‘Shop’ comprising of:
  - 2,942m<sup>2</sup> NLA Woolworths supermarket (Shop) including a customer drive-through collection facility; and
  - Five specialty retail tenancies totalling 356m<sup>2</sup> NLA;
- 200m<sup>2</sup> NLA Liquor Store;
- 85m<sup>2</sup> NLA Café (Restaurant) with alfresco dining space;
- 744m<sup>2</sup> NLA Shop/Office tenancy at the corner of Lisford Avenue and Azzurra Street; and
- 219 car parking spaces.

The Shop, Restaurant and Office land uses are identified as ‘P’ or permitted land uses within the Commercial and Mixed Use zones as identified within the City of Wanneroo District Planning Scheme No.2 (DPS 2) and Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70), whilst the Liquor Store is listed as an ‘A’ land use.

Plans of the proposed development are included as **Attachment 2**.



## **Background:**

### **History**

The subject site, and surrounding area historically formed part of the former Atlantis Marine Park, which was established in 1981 by Alan Bond as part of the Yanchep Sun City plan. The marine park provided a tourist attraction and included many iconic sculptures, most prominently being the King Neptune statue located directly north of the subject site.

The Atlantis Marine Park closed in 1990, with large structures such as the grandstands and pools being removed shortly after. A number of statues including King Neptune were retained and have subsequently been identified on the City of Wanneroo's Local Heritage Survey (LHS).

Since the closure of the marine park, the site has remained undeveloped until recent subdivisional works occurring in 2021.

### **Zoning**

The subject site is zoned 'Marina' under DPS 2, and 'Urban' under the MRS. The Two Rocks Town Centre area has been identified within the Yanchep-Two Rocks District Structure Plan No. 43 (DPS 43) as being a District Centre.

The subject site is identified within ASP 70 as being zoned Commercial, Mixed Use and Public Open Space (Drainage). The subject site is also identified within ASP 70 as being within the 'Precinct C – Main Street' precinct.

The area subject of this application is currently vacant and bound to the north by the recently created Azzurra Street, to the east by Lisford Avenue. The land to the west and south is currently undeveloped and subject to a recent subdivisional approval.

A location plan is included as **Attachment 1**.

### **Subdivision**

The subject site has been cleared, graded and stabilised in accordance with WAPC subdivision approval 158390 which approved the creation of future 'Lot 702' which will encompass the site. Subdivisional works have been undertaken under the terms of WAPC subdivision approval 155078, including the establishment and connection of Azzurra Street to both Lisford Avenue to the east and Enterprise Avenue to the north.

More recently, WAPC subdivision approval 161195 was also granted (**Attachment 10**) which will ultimately facilitate development surrounding the site, particularly to the west and south, including future road connections and a crossover to the south of the lot onto Lisford Avenue. WAPC approval 161195 also includes the relocation of the public open space as identified within ASP 70 to the western side of the subject site, along with a separate 604m<sup>2</sup> lot to facilitate future commercial tenancies. A 3066m<sup>2</sup> lot has also been created to the south of the subject site.



## **Legislation and Policy:**

### Legislation

Metropolitan Region Scheme (MRS)  
District Planning Scheme No. 2 (DPS 2)  
Notice of Delegation 2017/02 (DEL 2017/02)

### State Government Policies

State Planning Policy 2.6 – State Coastal Planning (SPP 2.6)  
State Planning Policy 3.7 Planning in Bushfire Prone Areas (SPP 3.7)  
WAPC Planning Bulletin 111 – Planning in bushfire prone areas  
State Planning Policy 4.2 – Activity Centres for Perth and Peel (SPP 4.2)  
State Planning Policy 5.4 – Road and Rail Noise (SPP 5.4)  
State Planning Policy 7.0 – Design of the Built Environment (SPP 7.0)  
State Planning Policy 7.2 – Precinct Design (SPP 7.2)  
Liveable Neighbourhoods 2009 (and Draft 2015 document)  
Development Control Policy 5.1 Regional Roads (Vehicular Access) (DC 5.1)

### Structure Plans/Activity Centre Plans

Yanchep-Two Rocks District Structure Plan No.43 (DSP 43)  
Two Rocks Activity Centre Agreed Structure Plan No.70 (ASP 70)

### Local Policies

Local Planning Policy 2.8 – Licenced Premises (LPP 2.8)  
Local Planning Policy 4.6 – Signs (LPP 4.6)  
Local Planning Policy 4.12 – Heritage Places (LPP 4.12)  
Local Planning Policy 4.23 – Design Review Panel (LPP 4.23)  
Local Planning Policy 4.27 – Mixed Use Zones (LPP 4.27)

## **Consultation:**

### Public Consultation

The application was advertised for a period of 14 days in accordance with Clause 64(4) of DPS 2 and the Deemed Provisions, commencing on 2 December 2021 and concluding on 17 December 2021.

Advertising was undertaken by way of a notice in the local newspaper and writing to 328 nearby landowners/occupiers within approximately 500 metres of the proposed development. The development plans and all supporting documentation were also published on the City's website and a sign was also installed on site.

A request to extend the consultation period until 10 January 2021 was issued to the applicant on Friday 10 December 2021 pursuant to Clause 64(7)(b) of the *Planning and Development Local Planning Scheme) Regulations 2015*. The request for an extension to the advertising period was subsequently refused by the applicant on 13 December 2021 and accordingly, no extension to the advertising was permitted. Notwithstanding, a number of submissions were received after the close of advertising and have been included within the consideration of this application.



A total of 208 submissions were received, with 173 being within the advertising period and the remaining 35 being received and acknowledged as late submissions. Of the submissions received 41 were in support, 19 provided general comments, and 148 objected to the proposal. Included within the submissions was a joint submission (identified as Submission 160 within the schedule of submissions) which included 1,202 signatories objecting to the proposal. For the purpose of consideration this was addressed as a single submission. Additional comments were also received from external referral agencies which are outlined below.

The main issues raised in objection were:

- The number of existing, and the commercial viability of similar uses in the surrounding and nearby localities;
- Location of the proposal being inappropriate due to proximity to the coastline and marina;
- Potential impacts of increased traffic on the surrounding road network;
- Potential impact on heritage values of the site and surrounds;
- Incompatibility of the design of the development with the surrounding locality; and
- Impact on amenity including light and air pollution, anti-social behaviour, waste and increased noise.

A summary of the submissions received and a response provided by the City is included as **Attachment 3**. The main issues raised, along with those identified by the City during the assessment process will be discussed in further detail in the 'Planning Assessment' section below.

#### Referrals/consultation with Government/Service Agencies

##### **Department of Planning, Lands and Heritage (DPLH)**

Due to the site's location, the only referral agency was DPLH. Notwithstanding, this included a referral to both the Traffic and Heritage teams who provided the following comments:

##### **Traffic**

The Department of Planning, Lands and Heritage has raised no objection to the proposal on Other Regional Road (ORR) planning grounds.

##### **Heritage**

Correspondence received from DPLH's Heritage Services provided the following comments:

*"The Atlantis Marine Park was identified by the Heritage Council as warranting assessment for possible inclusion in the State Register in September 2020 as part of the Sun City Precinct, Two Rocks, together with a number of other associated elements and features. This decision expanded on an earlier Heritage Council decision in 2003 that the Two Rocks Shopping Centre and Tavern, and the King Neptune Statue together warranted assessment for the Register.*



*As the Sun City Precinct has not yet been assessed for the State Register, DPLH was unable to provide comments on the impact the proposal may have on any state cultural heritage values”.*

### Design Review Panel Advice

The application was considered at two local Design Review Panel (DRP) meetings on 25 March 2021 and 22 July 2021 (See **Attachment 12**). The DRP was generally not supportive of the proposal, and following the July meeting, identified a number of matters to be addressed as outlined below:

1. Improve the northern building frontage, public areas and carpark interface with Azzurra Street to help activation and opportunities for community interaction on the designated Main Street;
2. Improve the scale, functionality and aesthetics of the independent retail/commercial gateway building to better meet the “landmark structure” provisions of the Draft LDP;
3. Improve the safety and legibility of the shared access zone and create continuity of the pedestrian path along the eastern frontage of Woolworths; and
4. Further develop the building aesthetic through use of the coastal-style lighter colour palette and engage a public artist to interpret and integrate local and coastal themes in a creative manner.

The proposal has undergone modifications following the DRP commentary, including relocation of components such as the ‘click and collect’ areas, and modification of tenancies and back of house services along the northern (Azzurra Street) frontage. Additional modifications to the design were undertaken following further consultation with the City, which ultimately sought to bring commercial frontage towards Azzurra Street as the intended main street, as well as more appropriate management and activation of the tenancies to the north of the supermarket.

The City considers that all of the DRP comments from the July meeting, with exception of item 4 have been sufficiently addressed, as outlined below:

- Point 1 has been addressed as the proposal, through the subsequent modifications has enabled a more appropriate activation of the main street. This is expanded upon under the ‘Design Compatibility’ section of the report below.
- Point 2 has been addressed as the independent retail/commercial building has been increased in scale and functionality to address the corner and main street design. The building includes an articulated parapet feature which is of an appropriate scale which does not impact on sight lines through the main street (Azzurra Street) or to King Neptune; and
- Point 3 has been addressed as the design now includes improved pedestrian safety and legibility through improved footpath connections and markings.
- Point 4 however, has not been addressed as the proposed colour palette is not commensurate to the coastal and local characteristics of the area. This is expanded upon under the ‘Design Compatibility’ section of the report below.

A copy of the Design Review Panel comments, responses by the applicant and consideration by the City has been included at **Attachment 9** and addressed below in the Planning Assessment.

### **Planning Assessment:**



The proposal has been assessed against the relevant legislative requirements of the Scheme, State and Local Planning Policies and the Two Rocks Town Centre Agreed Structure Plan No.70 as outlined in the Legislation and Policy section of this report. The following matters have been identified as key considerations for the determination of this application:

- Activity Centre consideration;
- ASP 70 development requirements;
  - Zoning;
  - Local Development Plan; and
  - Objectives.
- Heritage;
- Design compatibility;
  - Main Street Design;
  - Colours and Materials; and
  - Building Heights.
- Parking and Traffic;
- Landscaping;
- Signage;
- Commercial viability and alternative land uses; and
- Amenity impacts.

These matters are outlined and discussed below.

### **Activity Centres**

A number of submissions raised concerns as to the appropriateness of the proposed retail development to be located within the Two Rocks Town Centre area. State Planning Policy 4.2 – Activity Centres for Perth and Peel identifies the Two Rocks Town Centre as Yanchep District Structure Plan 'K' being a 'District Centre'. This designation has been reflected through the adopted Yanchep-Two Rocks District Structure Plan No.43 (DSP 43).

As outlined within SPP 4.2, the function of a District Centre is to have a greater focus on servicing the daily and weekly needs of residents. These centres are relatively smaller in catchment area which allows them to have a greater community focus and provide services, facilities and jobs that reflect the needs of the local catchment. Such centres typically include uses such as discount department stores, supermarkets, convenience goods, small scale comparison shopping, personal services and some specialty shops.

Clause 4.6 of ASP 70 outlines the intent of the centre specific to Precinct C, as follows:

*'A small main street will provide a structure to anchor retail floorspace that will provide for the daily needs of residents (i.e. food, groceries, magazines, etc.) via a supermarket. In addition tourism / recreation retail (surf/beachwear, fishing/diver shop, camera/photo shop, tavern/wine bar etc.) will be developed given the beachside/marina location. This form of retail development at Two Rocks is being defined as 'Coastal Boutique'.*

Moreover, Clause 4.8 of ASP 70 identifies that:



*'Other key buildings will be at the entry to the main street off Lisford Avenue. These buildings are nominated as medical/childcare and apartments over on one side and a small shopping centre on the southern side and will be important gateway buildings to the main street and commercial hub of the area.'*

ASP 70 sets out a framework that encourages and anticipates a supermarket and specialty retail to be implemented in this location. Accordingly, the nature of the development is in keeping with the function and intent of the Precinct C centre, as well as the intended range, scale, functionality and service provision within a District Centre.

### **Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70)**

#### **Zoning**

The subject site is zoned 'Marina' under DPS 2 which is intended to accommodate a wide range of commercial, residential, recreational and associated activities related to marinas. Pursuant to Clause 3.10.3 of DPS 2 development and permissibility/zoning within the Marina zone should be subject to an adopted Structure Plan; in this instance ASP 70.

As outlined within ASP 70 and as shown in Attachment 2, the subject site is zoned Commercial, Mixed Use and Public Open Space (Drainage), with the permissibility of certain land uses outlined within Table 4, Clause 2 of ASP 70.

Through recent subdivision approval (WAPC approvals 158390 and 161195), which will create the subject site on a separate title and facilitate the construction of the surrounding road layout. The POS drainage function, as indicated within ASP 70, has been designed to be accommodated in the south-west portion of the subject site. As a result, the portion of development located within this area has been considered as if it were 'Commercial' zoned for the purpose of this assessment.

The 'Shop' and 'Restaurant' land uses are identified as 'P' or permitted land uses within the Commercial and Mixed Use zones as identified within the City of Wanneroo District Planning Scheme No.2 (DPS 2) and Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70), whilst the Liquor Store is an 'A' land use.

The liquor store component in particular has been assessed against the requirements of Local Planning Policy 2.8 – Licensed Premises (LPP 2.8). The proposal was subsequently considered to meet all the requirements of LPP 2.8, with the location of the proposed liquor store and any associated signage having no frontage or primary access to any existing or proposed educational establishments, childcare centres or places of worship. It is understood that it is the intent of the applicant that the existing Liquor Store will be closed/relocated to this site, with the current licence being transferred to the new facility by Woolworths.

Accordingly, all proposed land uses are capable of consideration in this location.

#### **Local Development Plan**

Pursuant to Table 1, Clause 2.1 of ASP 70:

*'The City will not approve development within a Precinct in the absence of a precinct Detailed Area Plan (DAP), approved by the City pursuant to Clause 9.14 of the*



*Scheme, for the whole of each Precinct A-E, unless the City is satisfied that the development is of a scale and permanence that would not prejudice the: design of the DAP; timely provision of infrastructure and services to the area; or the development of the surrounding area in line with the Agreed Structure Plan.'*

A draft LDP is currently with the City under assessment. Therefore the LDP and the provisions therein have not been considered as part of the assessment of this application.

The proposal may be considered without the adoption of the Precinct C LDP. The City has been mindful of the objections of the structure plan to address and ensure the main street design philosophy is facilitated. The proposal itself through its design iterations has sought to incorporate the main street design elements and integrated heritage into its design and interface to King Neptune. The result is a proposal that is consistent with the intent of the Precinct C area.

The proposal facilitates future expansion of the site through providing space for future tenancies along the Azzurra Street frontage, and within the 'pad site' along the eastern boundary. Any future development within the lot would accordingly be able to be considered against the Precinct C LDP once adopted, which would also consider the outcomes of the current proposal. Accordingly, the proposal results in development which would be of a permanence that is appropriate as set out within the structure plan for the development of the surrounding area and the application can therefore be considered on this basis.

## **Objectives**

Objectives c), d) and j) set out within Clause 2.1 of ASP 70 state the following:

- c) Provide an open air 'Main Street' that creates the framework for mixed use, day and night activity, fostering a contemporary coastal community with boutique retail outlets.*
- d) Encourage tourism, 'festive' retail and entertainment uses, in particular in Precincts C (Main Street) and D (The Wall).*
- j) Provide for the sensitive incorporation of cultural heritage elements.*

The proposed Shop, Liquor Store, Restaurant and Office are considered to be consistent with the desired intent and functionality of the site and Precinct C area more broadly, offering shopping/retail services. The proposal includes a number of specialty retail tenancies, as well as identifying an area to the south-east of the site which will accommodate further commercial uses within the site. Whilst the exact use of these sites is unknown at this time, the development will be capable of accommodating uses which encourage tourism, retail and entertainment uses as considered within the Commercial zone under the structure plan.

The design and orientation of the buildings, and particularly the office/commercial building and specialty tenancies 4, 5 and 6 assist in facilitating a 'main street' design, with provision for future expansion to the west, along the Azzurra Street frontage.

The proposal has sought to incorporate a heritage response through the use of signage, establishing a key pedestrian plaza with alfresco café dining which interfaces directly to the adjacent King Neptune statue, as well as incorporating statues





associated with the former Atlantis Marine Park along Azzurra Street which will be utilised to create a 'heritage trail'. The site has also incorporated the use of vegetation within the landscaping of the site which acknowledges the heritage of the site. The utilisation of these aspects is considered to meet the requirements under the Category 4 listing of the site in the local heritage survey. This is explored further below.

Accordingly, the proposal and associated uses are considered to meet objectives c), d) and j) of ASP 70.

### **Heritage**

A number of submissions highlight the heritage significance of the area. The Local Heritage Survey (LHS) lists the former Atlantis Marine Park as a Category 4 listing as outlined below:

<b>Site Name</b>	<b>MHI Place No.</b>	<b>Category</b>	<b>State Place No.</b>	<b>Heritage Council Status</b>
Atlantis Marine Park	42	4 (Little Significance)	17523	To be assessed

A copy of the City of Wanneroo's LHS details for the abovementioned site (and nearby King Neptune Statue) is included at **Attachment 11**.

As outlined within LPP 4.12 – Heritage Sites, a Category 4 site is considered to be a recognised historic site or natural place. LPP 4.12 states that the desired outcome for a Category 4 listed site is as follows:

- Historic site often without built features or is a natural place.
- Recognise and interpret the site where possible – for example with a plaque, place name, or reflection in urban or architectural design.
- Photographic archival record required prior to major development or demolition.

In addition to the above, the Heritage Assessment which was undertaken in the preparation of ASP 70 recommended that acknowledgement of what remains of Atlantis Marine Park should be included in some element in public open space and some interpretation should be included as part of the development of the site to the satisfaction of the City.

The application included a Heritage Impact Statement (HIS) prepared by Griffiths Architects (**Attachment 4**). The HIS mentions the potential for heritage interpretation in the form of plaques and public art.

Heritage interpretation is reflected within the proposal through the inclusion of:

1. Signage located within the landscaped area at the north of the site adjacent to the Café and Specialty 4 building which will display information pertaining to the history of the site.
2. The café itself proposes an open alfresco area and key public realm node which allows full view to the north towards the King Neptune statue.
3. The proposal has also incorporated the use of three statues along Azzurra Street which were historically used as part of the former Atlantis Beach Marine



Park development and intended to form part of a 'heritage trail' which will link to adjoining sites and King Neptune statue to the north.

4. Incorporation of a number of Washington Robusta, which whilst not native to the area were utilised within the former marine park and have been incorporated through the broader landscaping of the site.

Such inclusions are considered to be consistent with the recommendations of a Category 4 listing. It is important to note that consideration of heritage does not restrict the ability to develop the subject site which has already been prepared through recent subdivision and associated clearing and earthworks.

The City considers that the incorporation of the abovementioned heritage components if incorporated will provide sufficient acknowledgement to the history of the site and surrounding area. It is recommended that a condition be imposed to require further consultation with the City's Heritage Officer to ensure appropriate signage, information and detail is included within these features to the City's satisfaction.

### **Design Compatibility**

The application was considered twice by the local Design Review Panel (DRP) on 25 March 2021, and subsequently on 22 July 2021. The DRP was generally not supportive of the proposal, and identified a number of matters that ought to be addressed.

A copy of the Design Review Panel comments, responses by the applicant and consideration by the City has been included at **Attachment 9**.

The City has continued to work with the applicant through the assessment process who ultimately, through consideration of the feedback and community comments. The applicant has enhanced the original design of the proposal primarily to improve the main street design outcomes and heritage consideration. However, the City does not consider that the DRP comments relating to the material and colours have been sufficiently addressed. These and other relevant design considerations are outlined further below.

### **Main Street Design**

Under ASP 70, Azzurra Street is intended to operate as a 'main street'. As outlined within Liveable Neighbourhoods 2009 (and Draft 2015 document), an appropriate main street should include:

*'Street-fronting retail instead of enclosed or parking lot dominated retail formats, with anchor stores normally opening out onto the main street'*.

This main street concept is illustrated by Figure 68 (and figure 26 of the Draft 2015 document): Supermarkets designed to front onto a main street, as below:

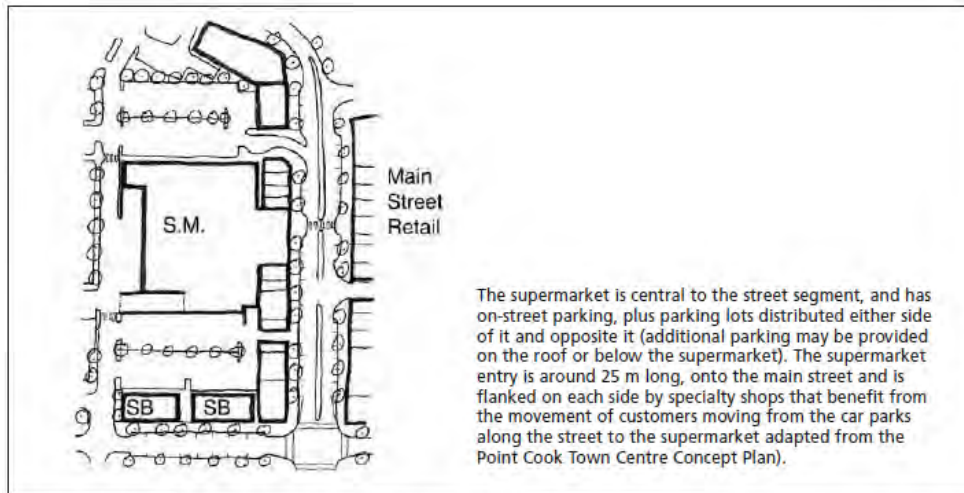


Figure 68: Supermarket designed to front onto a main street.

Source: *Liveable Neighbourhoods 2009*

In relation to the main street outcomes, the DRP recommended that the proposal should:

*'Improve the current northern building frontage, public areas and carpark interface with Azzurra Street to help activation and opportunities for community interaction on the designated Main Street.'*

The development site has a total Azzurra Street frontage of 178 metres. This includes 68 metres of building frontage, 58.8 metres of landscaped frontage, with the remaining 51.2 metres being carparking or vehicular crossovers. Of the frontage, the City has considered approximately 157.5 metres (88.5%) of frontage to be appropriately activated, consisting of tenancy frontages, parklets, playgrounds and open air alfresco areas. Whilst the proposal includes 38.5 metres of car park frontage towards the main street, this allows for the use of landscaping and the inclusion of the heritage statues to screen and provide pedestrian interest, and accordingly is also considered to provide a level of activation alternative to built form outcomes. Only a minor portion of 6.5m (3.6%) is considered to be un-activated frontage which relates to the amenities area being provided. The remaining 20m (7.9%) is excluded from consideration as this relates to the crossovers provided along this frontage.

Whilst the supermarket still partially provides an eastern frontage to the carpark, this is not considered to inhibit or detract from the main street uses and enables the parking areas to still be predominantly located or screened behind built form.

On balance, the City considers that the proposal has appropriately achieved a main street design outcome through built form with activated tenancies and open spaces along the Azzurra Street frontage.

### Colours / Materials

The proposal has undertaken progressive iterations with respect to the proposed colours and materials (See **Attachment 12** for original DRP plan iterations). However, the applicant has maintained the use of a dark grey colour palette. As recommended by DRP in both instances, the application should develop the building aesthetic through use of a coastal-style (lighter) colour palette and engage a public artist to interpret and integrate local heritage and coastal themes in a creative manner.



The proposal has failed to sufficiently address the City's and DRP's concerns which relate to the envisioned materiality of the development outlined within DSP 43. In relation to the colour palette, the dark tones are not considered appropriate in the context of the site or surrounding area.

On this basis, and to facilitate an appropriate outcome, it is recommended that a suitable condition be imposed requiring the applicant to provide a detailed schedule of colours and materials to the City of Wanneroo incorporating a coastal theme and referencing the cultural heritage of the site for approval. Thereafter to be implemented and maintained to the satisfaction of the City.

### **Building Heights**

A number of submissions raised concerns in relation to the overall height of the proposal in consideration of impacts to the adjoining King Neptune statue, impact on views to the coast and overall incompatibility with the surrounding locality.

Consideration of SPP 2.6 controls has been undertaken through the preparation of ASP 70, as well as the Draft Precinct C LDP controls.

As set out in ASP 70, a building height limit of five storeys (21m) in height, within 300m of the horizontal setback datum from the coastline would be considered appropriate. It was envisioned in the structure plan that Local Development Plans would also provide further guidance on maximum building heights for each precinct.

The highest point of the proposal is 9.3m above ground level, being the top of the parapet wall located in the south-western corner of the site. Along the Azzurra Street frontage, the maximum height is 8.3m identified at the accentuated entry point, with the remainder of the development being 7.2m and 5.3m to the top of the proposed awnings. Overall, the proposal generally presents as a typical single level commercial development, with architectural features included at key points to provide appropriate built form articulation.

As shown in the elevation plans provided (**Attachment 2**) the overall height of the proposal remains below the ground level at the base of the adjacent King Neptune Statue, and is not considered to impact on any predominant views which will be predominantly to the west.

The proposed building heights are considered to be well below the permissible heights outlined in SPP 2.6 and are considered to be appropriate in the context of the surrounding locality.

### **Parking / Traffic**

A number of submissions raise concerns in relation to the impact of increased traffic being generated by the development. The application included a Traffic Impact Assessment (TIA) prepared by traffic consultants Cardno (**Attachment 5**) which has considered the subject site, and future forecasted traffic demands.

As outlined within the TIA, the fully developed Precinct C area was forecast to generate a total weekday am and pm peak of 365 and 552 vehicles respectively, with a total of 664 vehicles forecast during weekend peak hours. The proposal itself generating between 53% and 67% of the total area. Based on the forecast trip generations, as



well as the existing and proposed road connections, the TIA concludes that the operation of all intersections and surrounding roads is capable of supporting the proposed and future development.

The TIA was reviewed in detail by the City’s Traffic Services who confirmed the above detail and information was true and correct, Traffic Services however have recommended that due to the swept path requirements for delivery vehicles, that the shoulder of Lisford Avenue adjoining the proposed Road 3 intersection be upgraded to accommodate the vehicle turning. It is recommended that a suitable condition be imposed to this effect. No other objections were raised relating to traffic.

In addition to the above, Table 7 of ASP 70 sets out car parking requirements for development within the Two Rocks Town Centre area and is considered below:

Tenancy	Provision	Area (m <sup>2</sup> )	Requirement
Woolworths (Shop)	4.6:100m2 GLFA	2,942	135.332
Spec 1 (Liquor Store)	4.6:100m2 GLFA	200	9.2
Spec 2 (Shop)	4.6:100m2 GLFA	82	3.772
Spec 3 (Shop)	4.6:100m2 GLFA	78	3.588
Spec 4 (Shop)	4.6:100m2 GLFA	68	3.128
Spec 5 (Shop)	4.6:100m2 GLFA	67	3.082
Spec 6 (Shop)	4.6:100m2 GLFA	61	2.806
Café (Restaurant)	4.6:100m2 GLFA	85	3.91
Retail/Commercial (Shop/Office)	Office: 1.9:100m2 GLFA; or Shop: 4.6:100m2 GLFA	744	14.136 34.224*
<b>TOTAL</b>			<b>199.042* (199)</b>

\*Highest potential ratio

The proposal provides for a total of 219 parking bays, which exceeds the calculated requirement of 199 for the site, and accordingly meets the City’s requirements.

### Amenity

A number of submissions raised concerns regarding the impact on the operational amenity of the proposal, including impacts from light and air pollution, increased anti-social behaviour and increased noise. As part of the application, the applicant has provided an Acoustic Assessment prepared by Herring Storer Acoustics (**Attachment 6**), as well as a Waste Management Plan (WMP) prepared by Talis Consultants (**Attachment 8**). These matters have been considered below.

### Lighting

The development will need to comply with the relevant Environmental Health Regulations and Australian Standards for the *Control of Obstructive Effects of Outdoor Lighting* (AS4282) relating to outdoor lighting. A condition to this effect is recommended.



## Noise

An Acoustic Report prepared by Herring Storer Acoustics dated September 2021 was provided as part of the application. As outlined within the acoustic report, the proposal will be fully compliant with the *Environmental (Noise) Regulations 1997* and accordingly there is considered to be no impact on surrounding land uses from an acoustic perspective.

## Waste Management

All waste is to be managed on site via private collection, with designated bin storage areas included within the proposal. As outlined within the WMP, the proposal provides sufficient bin storage areas based on the estimated waste generation and is considered to be appropriate for the management of waste on site.

## Anti-social behaviour

There is no evidence to demonstrate that the proposal will increase crime in the area.

## Landscaping

Landscaping requirements are considered in accordance with Clause 4.17 of DPS 2, as outlined below. The applicant has also provided a Landscape Plan which is included at **Attachment 2**.

Provision	Requirement	Proposal	Assessment
Clause 4.17.1 District Planning Scheme No.2 (DPS 2)	Minimum 8% landscaping on the lot.  Site Area: 16,929m <sup>2</sup> 8% = 1,354.32m <sup>2</sup>	Approximately 1,628.3m <sup>2</sup> or 9.6% landscaping.	The proposed landscaping meets the City's requirements.
Clause 4.17.2 District Planning Scheme No.2 (DPS 2)	3 metre landscape strip adjacent to the street.	The only landscaped areas which meet the 3m requirement are noted at the north-western 'parklet' area, and along the southern portion of the site adjoining the 'click and collect' area. All other areas of the lot do not achieve the 3m of landscaping per DPS 2.	Due to the intended main street nature of the site, the reduction of landscaping to facilitate reduced street setbacks and activation is supported, with the landscaped areas provided resulting in high-quality usable spaces for community interaction.
Clause 4.17.5	1 tree per 4 bays	Approximately 48 trees adjoining	Whilst the proposal does not meet the



<p>District Planning Scheme No.2 (DPS 2)</p>	<p>226 parking bays = 56.5 (57) trees</p>	<p>parking bays. Plus approximately 24 shade sail structures.</p>	<p>City's requirements for 1 tree per 4 car bays, the proposal has included a number of trees adjoining parking areas which is supplemented by the use of shade sails. This combination of shade cover is supported by the City and considered appropriate for the site.</p>
----------------------------------------------	-------------------------------------------	-------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In addition to the above, the proposal has also sought to utilise Washingtonia Palms which, whilst not native to the area, represent and reflect landscaping which was consistent with the use of the site as the former Atlantis Marine Park. This inclusion is welcomed and supported by the City.

The proposal accordingly generally meets the City's requirements for landscaping on the site.

**Signage**

The proposal has been considered against the provisions set out within the City's Local Planning Policy 4.6 – Advertising Signs (LPP 4.6) as the proposal includes a total of 34 signs across the site including a pylon sign, 25 wall signs, and eight (8) verandah signs.

The proposed number and dimensions of the signage is considered appropriate in the context of the site, with all content relating to the operation and branding of the proposal and provision for future tenancies. The signage is not considered to be obtrusive or negatively impact or detract from the amenity of the surrounding area and is supported.

**Conclusion:**

The development application for a Shop, Liquor Store, Restaurant and Office at Lot 9702 (10) Enterprise Avenue, Two Rocks has been assessed against the relevant legislation and planning requirements. The proposal has been advertised in accordance with the Deemed Provision requirements.

The proposed development is generally compliant with the requirements of DPS 2, the Two Rocks Town Centre Agreed Structure Plan No.70, and the relevant state and local planning policies as addressed through this report.

The City therefore recommends the proposed development be approved, subject to conditions.



0 50 100 150 200 m



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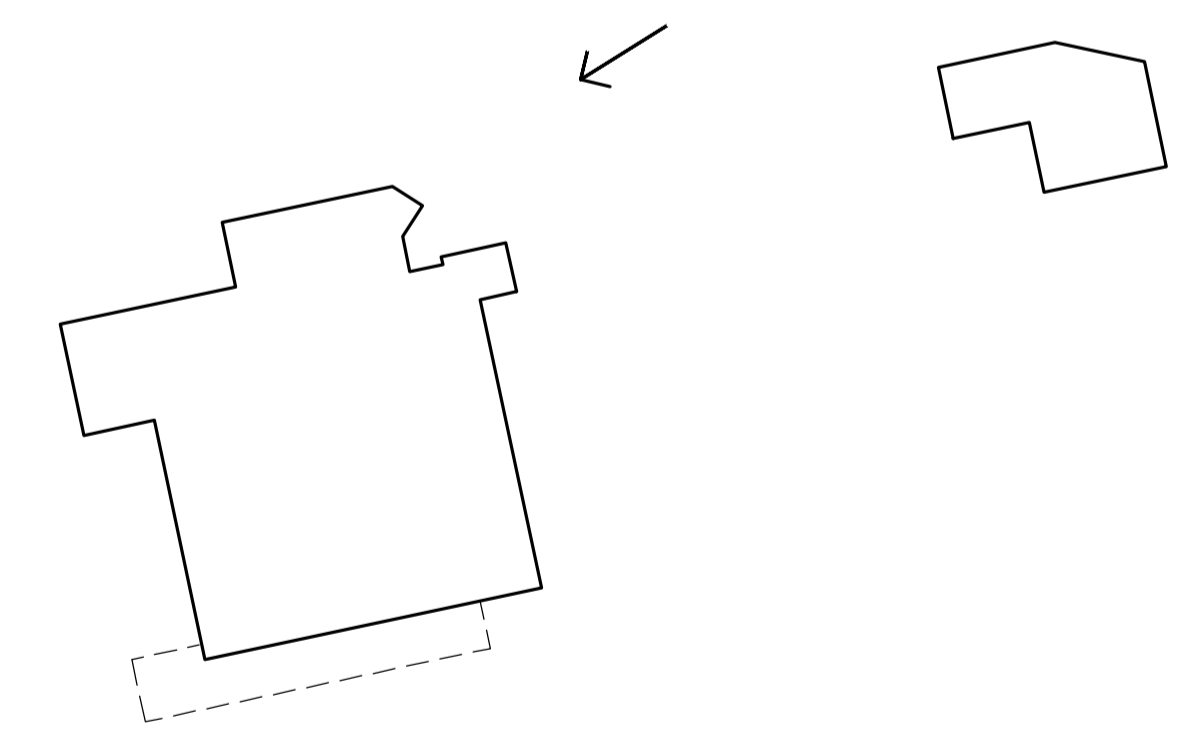
Attachment 1 - Location Plan

Scale = 1:6856





Rev.	Amendment	Date
A	DA ISSUE	15/10/21
B	ISSUE FOR REVIEW	08/02/22
C	ISSUE FOR REVIEW	10/09/22
D	ISSUE FOR REVIEW	16/02/22



## WOOLWORTHS TWO ROCKS

Azurra Street + Lisford Avenue, Two Rocks

Development Application  
February 2022

01	COVER SHEET	D
02	SITE PLAN	Y
03	ELEVATIONS	H
04	ELEVATIONS RETAIL	F
05	SECTIONS	D
06	3D VIEWS	C
07	3D VIEWS	C
08	3D VIEWS	D
09	3D VIEWS	B
10	AZZURRA STREET ELEVATION	A

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WOOLWORTHS TWO ROCKS

COVER SHEET

Scale 1 : 50  
Drawn DF Checked MJ  
Date 16/02/22  
Job No. 2020050  
Dwg No. **3353 01** Rev: **D** A1 SHEET

Rev.	Amendment	Date
A	FOR INFORMATION	24/1/20
B	FOR INFORMATION	17/02/21
C	FOR INFORMATION	05/03/21
D	FOR INFORMATION	09/03/21
E	FOR CLIENT ISSUE	18/03/21
F	FOR INFORMATION	19/03/21
G	FOR INFORMATION	23/03/21
H	FOR CLIENT REVIEW	25/05/21
J	DRP PRESENTATION	08/07/21
K	DRP PRESENTATION 2	20/07/21
L	ISSUE FOR REVIEW	16/08/21
M	ISSUE FOR REVIEW	01/09/21
N	FOR REVIEW	09/09/21
P	FOR REVIEW	13/09/21
Q	FOR REVIEW	14/09/21
R	FOR CLIENT APPROVAL	17/09/21
S	FOR CLIENT APPROVAL	06/10/21
T	DA ISSUE	15/10/21
U	SUBSTATION LOCATION	13/12/21
V	ISSUE FOR REVIEW	08/02/22
W	ISSUE FOR REVIEW	09/02/22
X	ISSUE FOR REVIEW	10/09/22
Y	ISSUE FOR REVIEW	16/02/22

**WOOLWORTHS SITE**

TOTAL SITE AREA	16929m <sup>2</sup>
SITE AREA	15533m <sup>2</sup>
WOOLWORTHS (WITH EXPANSION)	3600m <sup>2</sup>
WOOLWORTHS (WITHOUT EXPANSION)	2942m <sup>2</sup>
FUTURE EXPANSION - INCL. OFFICE MEZZANINE	658m <sup>2</sup>
CAFE	85m <sup>2</sup>
SPECIALTY 1 (LIQUOR)	200m <sup>2</sup>
SPECIALTY 2	82m <sup>2</sup>
SPECIALTY 3	78m <sup>2</sup>
SPECIALTY 4	68m <sup>2</sup>
SPECIALTY 5	67m <sup>2</sup>
SPECIALTY 6	61m <sup>2</sup>
<b>TOTAL AREA</b>	<b>4241m<sup>2</sup></b>
<b>PARKING REQUIRED</b>	<b>212 BAYS</b>
WV - 5 BAYS/100m <sup>2</sup> GLA	
OFFICE / COMMERCIAL	744 m <sup>2</sup>
<b>PARKING REQUIRED</b>	<b>23 BAYS</b>
3 BAYS/100m <sup>2</sup> GLA	

**FUTURE PAD SITE**

SITE AREA	1396 m <sup>2</sup>
<b>PARKING PROVIDED</b>	
GENERAL	219 BAYS
STREET PARKING	10 BAYS
PICKUP	6 BAYS
<b>TOTAL PARKING PROVIDED</b>	<b>235 BAYS</b>
<b>TOTAL PARKING REQUIRED</b>	<b>235 BAYS</b>

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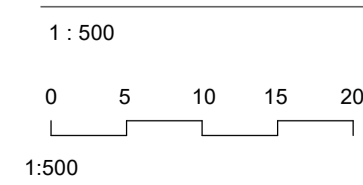
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WOOLWORTHS TWO ROCKS

**SITE PLAN**

Scale	As indicated			
Drawn	DF	Checked	MJ	
Date	16/02/22			
Job No.	2020050			
Dwg No.	<b>3353 02</b>	Rev:	<b>Y</b>	A1 SHEET

**SITE PLAN**



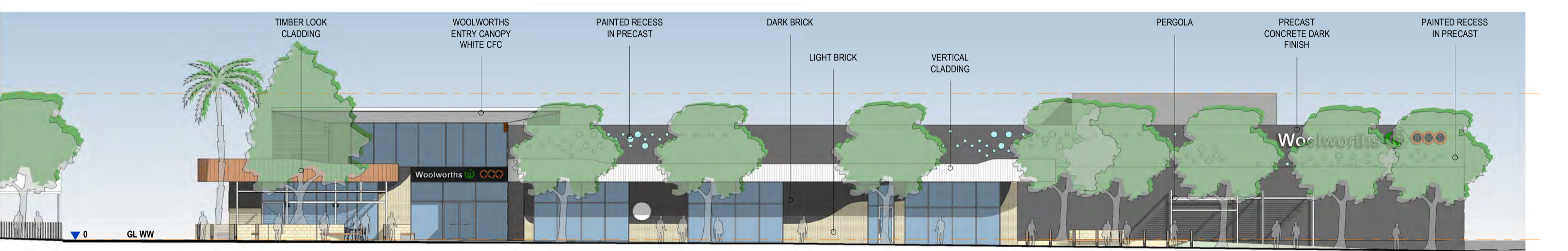
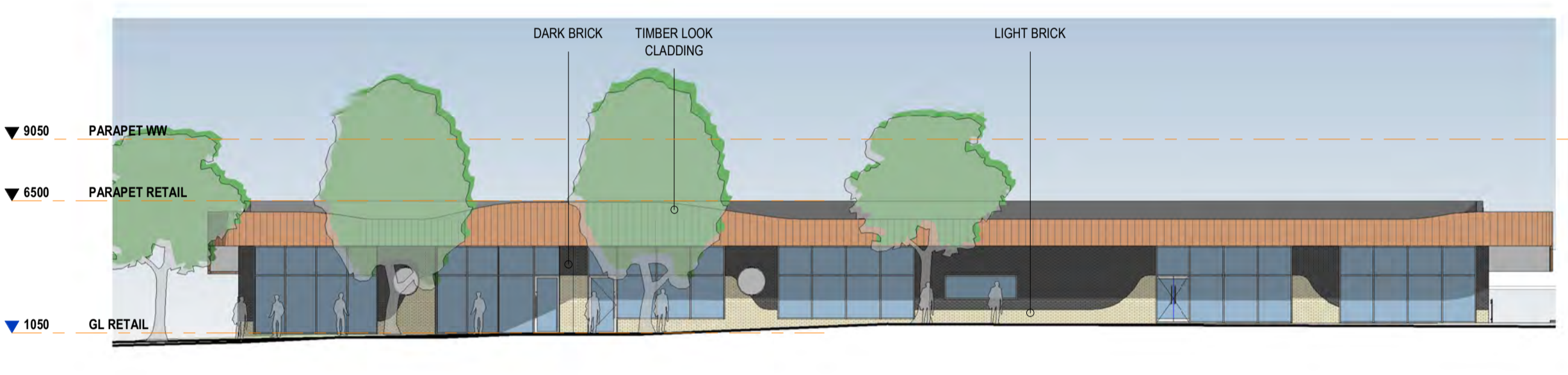
FUTURE EXPANSION 458m<sup>2</sup> ZONE

Rev.	Amendment	Date
A	FOR INFORMATION	19/03/21
B	FOR CLIENT REVIEW	25/06/21
C	DRP PRESENTATION	08/07/21
D	DRP PRESENTATION 2	20/07/21
E	DA ISSUE	15/10/21
F	ISSUE FOR REVIEW	08/02/22
G	ISSUE FOR REVIEW	10/09/22
H	ISSUE FOR REVIEW	16/02/22



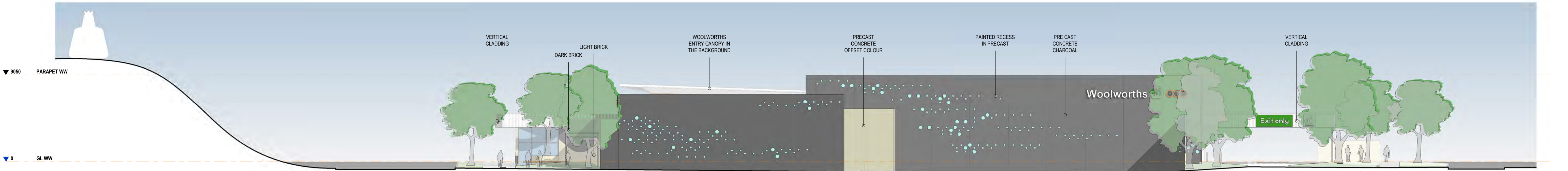
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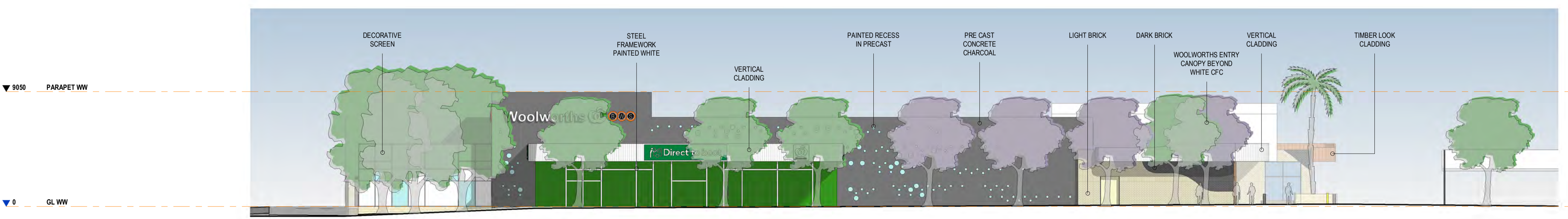
2 - NORTH ELEVATION

1 : 200



3 - WEST ELEVATION

1 : 200



4 - SOUTH ELEVATION

1 : 200

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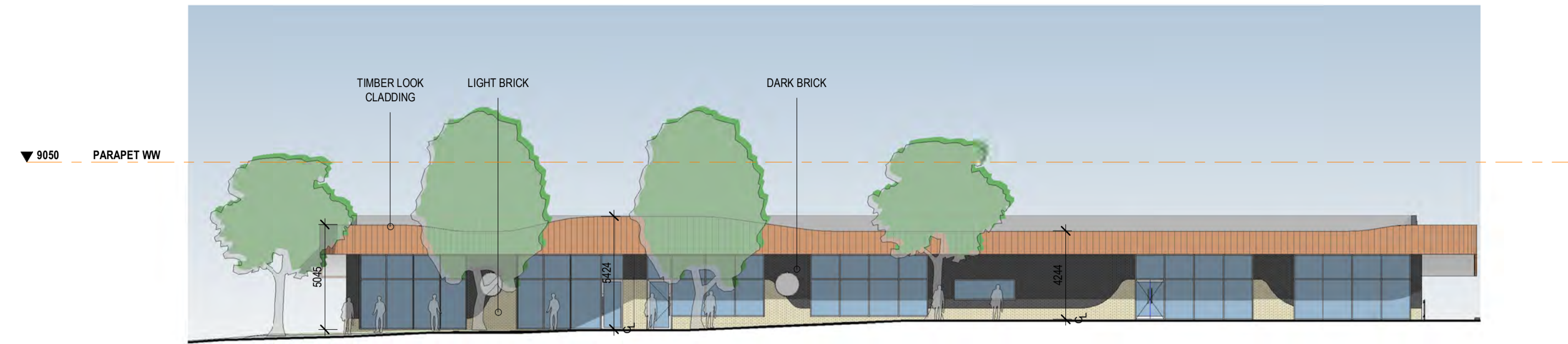
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WOOLWORTHS TWO ROCKS

ELEVATIONS

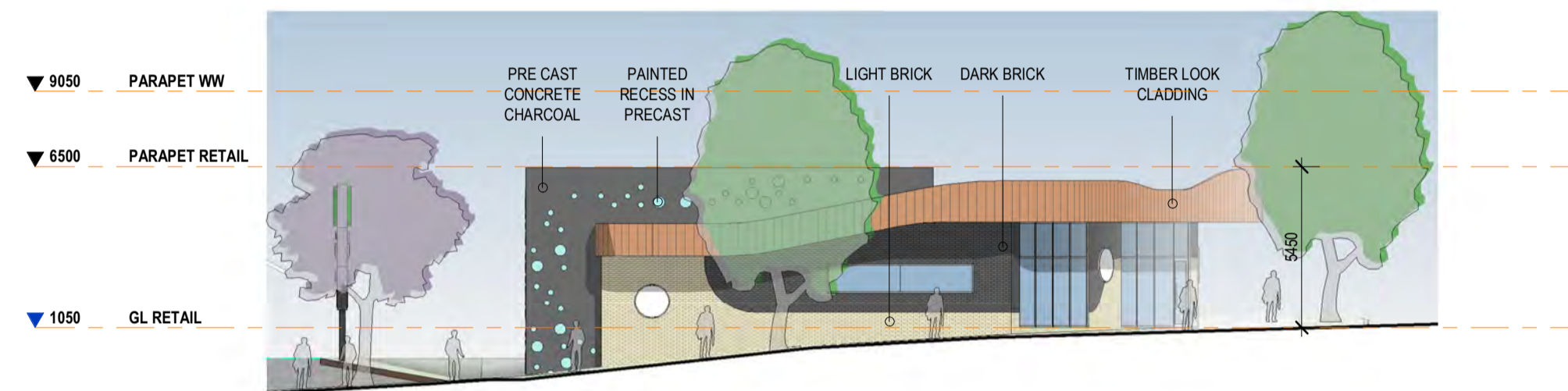
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Date 16/02/22  
Job No. 2020050  
Dwg No. 3353 03 Rev: H A1 SHEET

Rev.	Amendment	Date
A	DRP PRESENTATION	08/07/21
B	DRP PRESENTATION 2	23/07/21
C	DA ISSUE	15/10/21
D	ISSUE FOR REVIEW	08/02/22
E	ISSUE FOR REVIEW	10/09/22
F	ISSUE FOR REVIEW	16/02/22



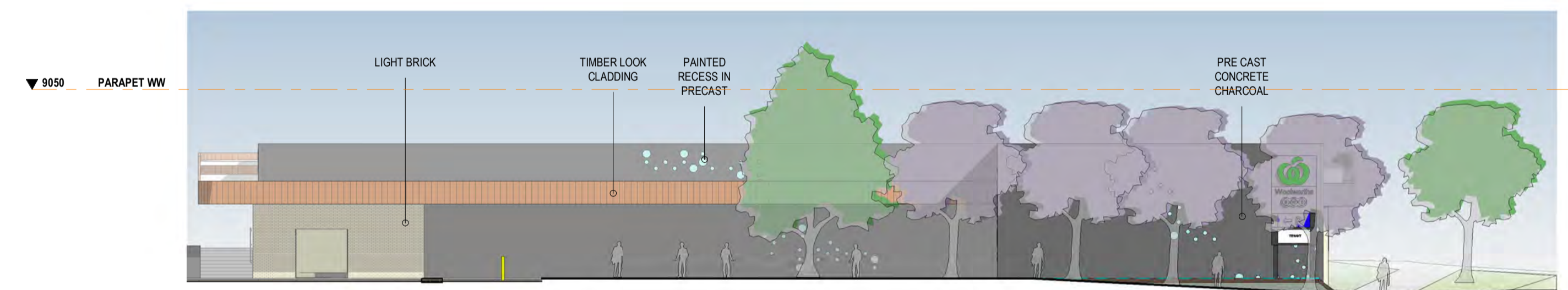
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1 : 200



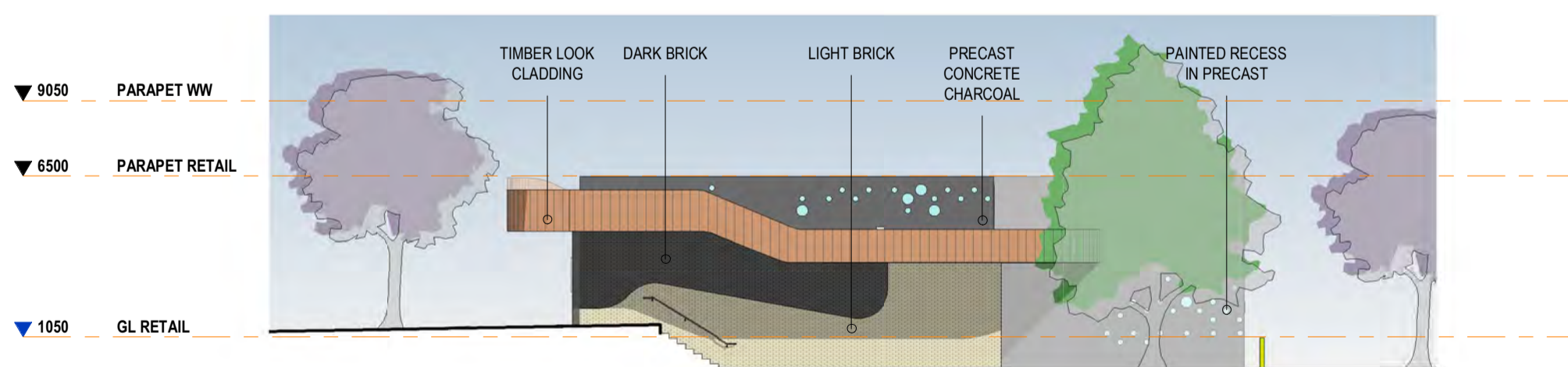
2 - RETAIL / COMMERCIAL - EAST

1 : 200



3 - RETAIL / COMMERCIAL - SOUTH

1 : 200



4 - RETAIL / COMMERCIAL - WEST

1 : 200

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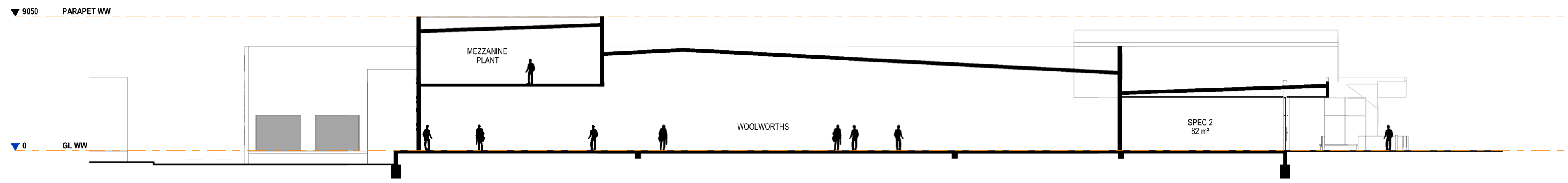
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WOOLWORTHS TWO ROCKS

ELEVATIONS RETAIL

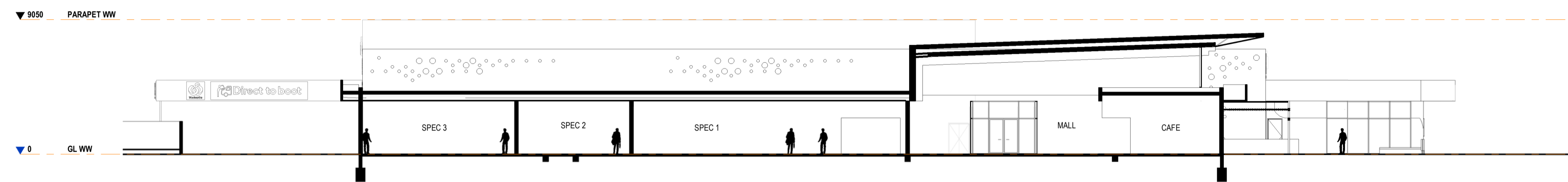
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Date 16/02/22  
Job No. 2020050  
Dwg No. 3353 04 Rev: F A1 SHEET

Rev.	Amendment	Date
A	DRP PRESENTATION	08/07/21
B	DA ISSUE	15/10/21
C	ISSUE FOR REVIEW	08/02/22
D	ISSUE FOR REVIEW	10/09/22



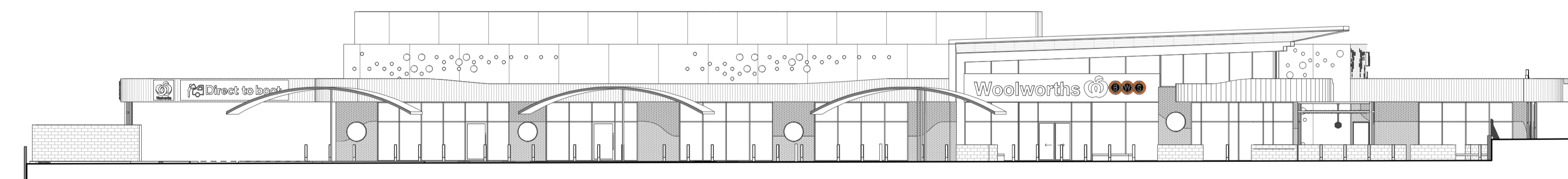
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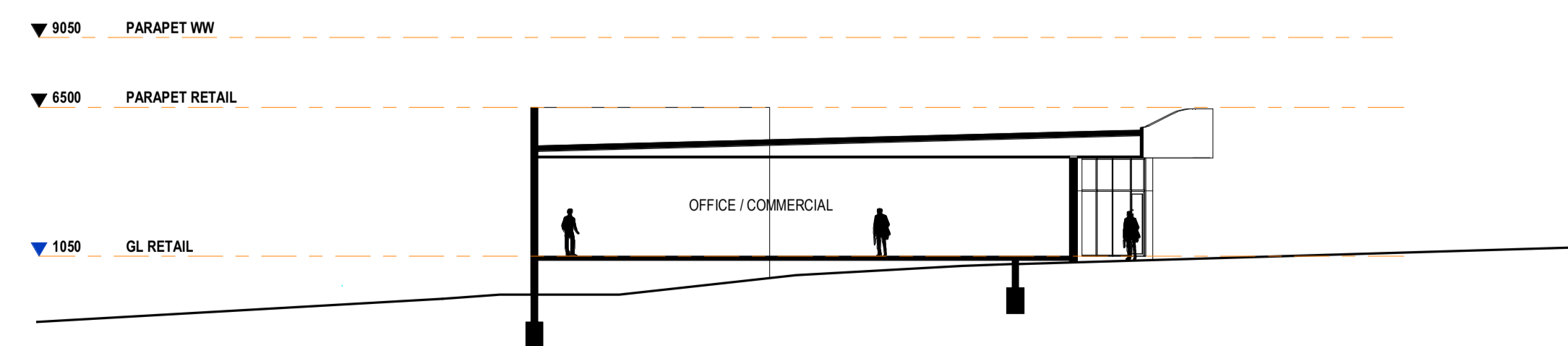
SECTION B

1 : 200



SECTION C

1 : 200



SECTION D

1 : 200

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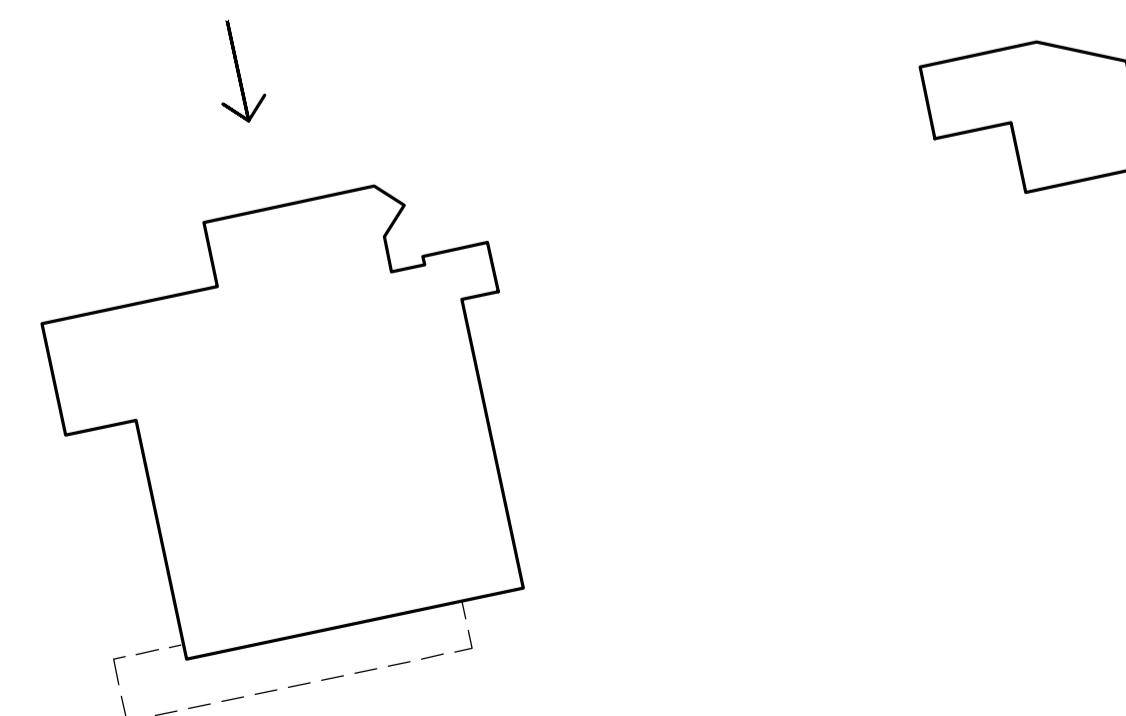
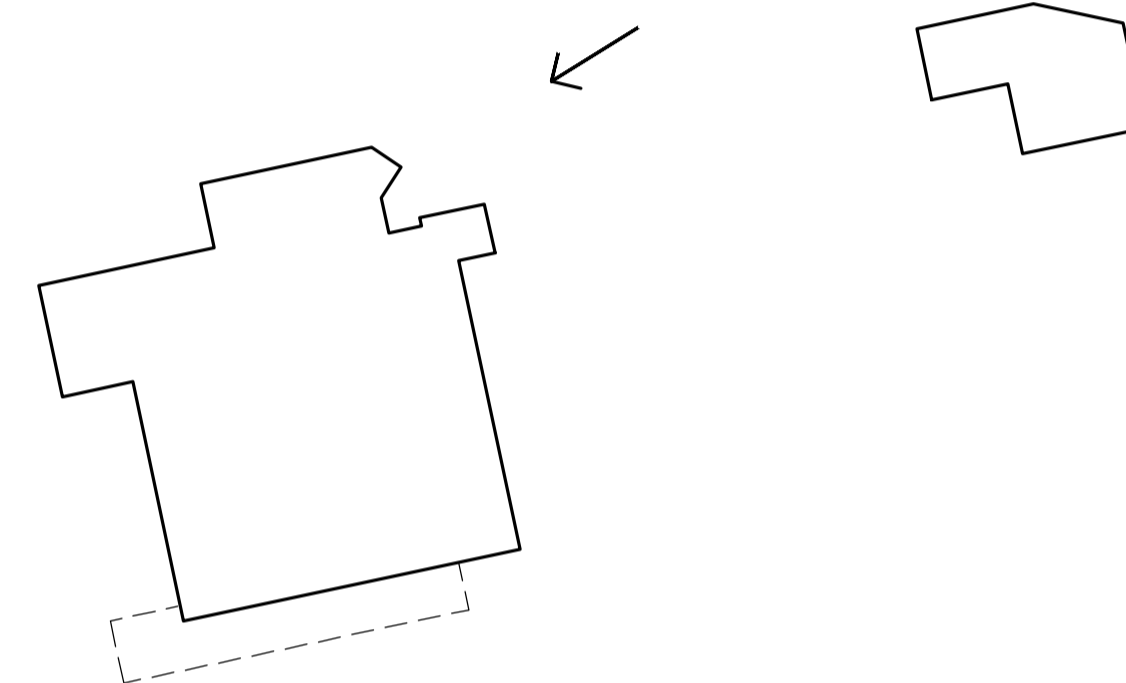
SECTIONS

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 Date 10/09/22  
 Job No. 2020050  
 Dwg No. **3353 05** Rev: **D** A1 SHEET

**DA ISSUE**

ISSUED FOR DEVELOPMENT APPROVAL

Rev.	Amendment	Date
A	DA ISSUE	15/10/21
B	ISSUE FOR REVIEW	08/02/22
C	ISSUE FOR REVIEW	10/09/22



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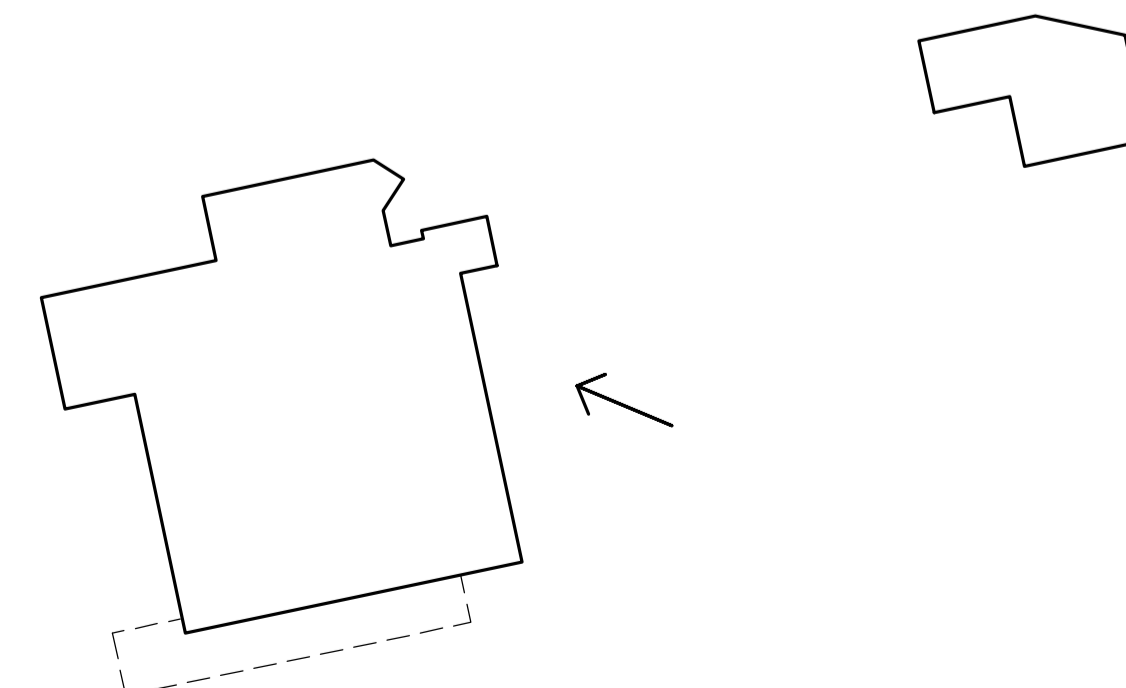
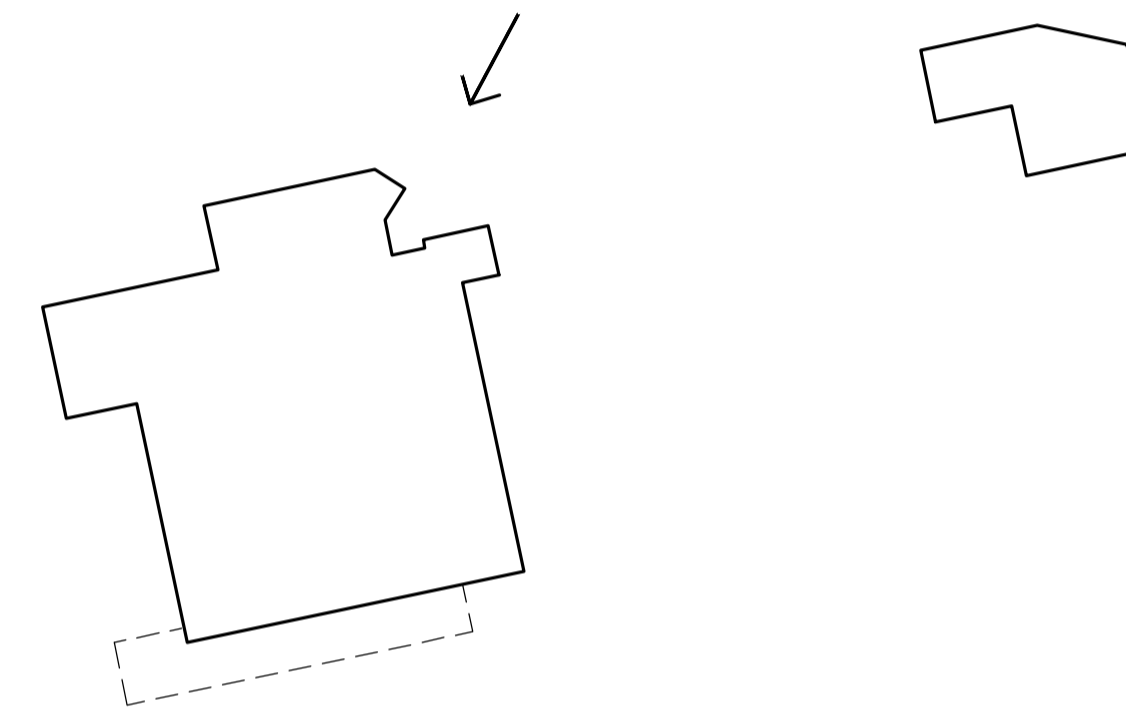
3D VIEWS

Scale 1 : 50  
Drawn DF Checked MJ  
Date 10/09/22  
Job No. 2020050  
Dwg No. **3353 06** Rev: **C** A1 SHEET

**DA ISSUE**

ISSUED FOR DEVELOPMENT APPROVAL

Rev.	Amendment	Date
A	DA ISSUE	15/10/21
B	ISSUE FOR REVIEW	08/02/22
C	ISSUE FOR REVIEW	10/09/22



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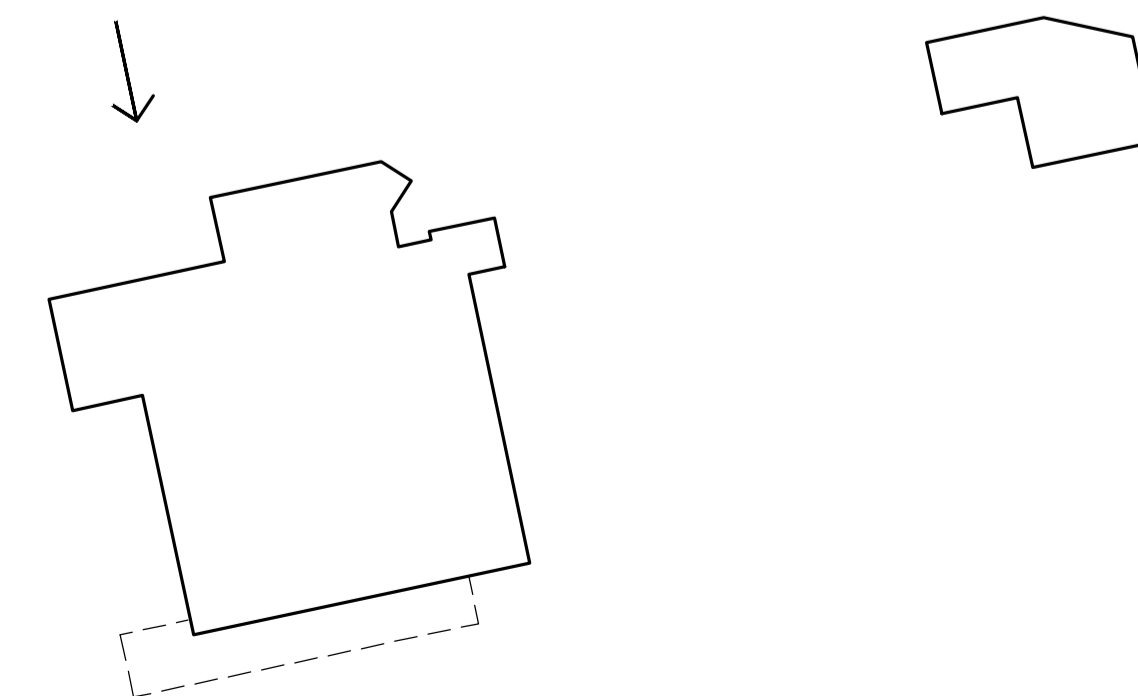
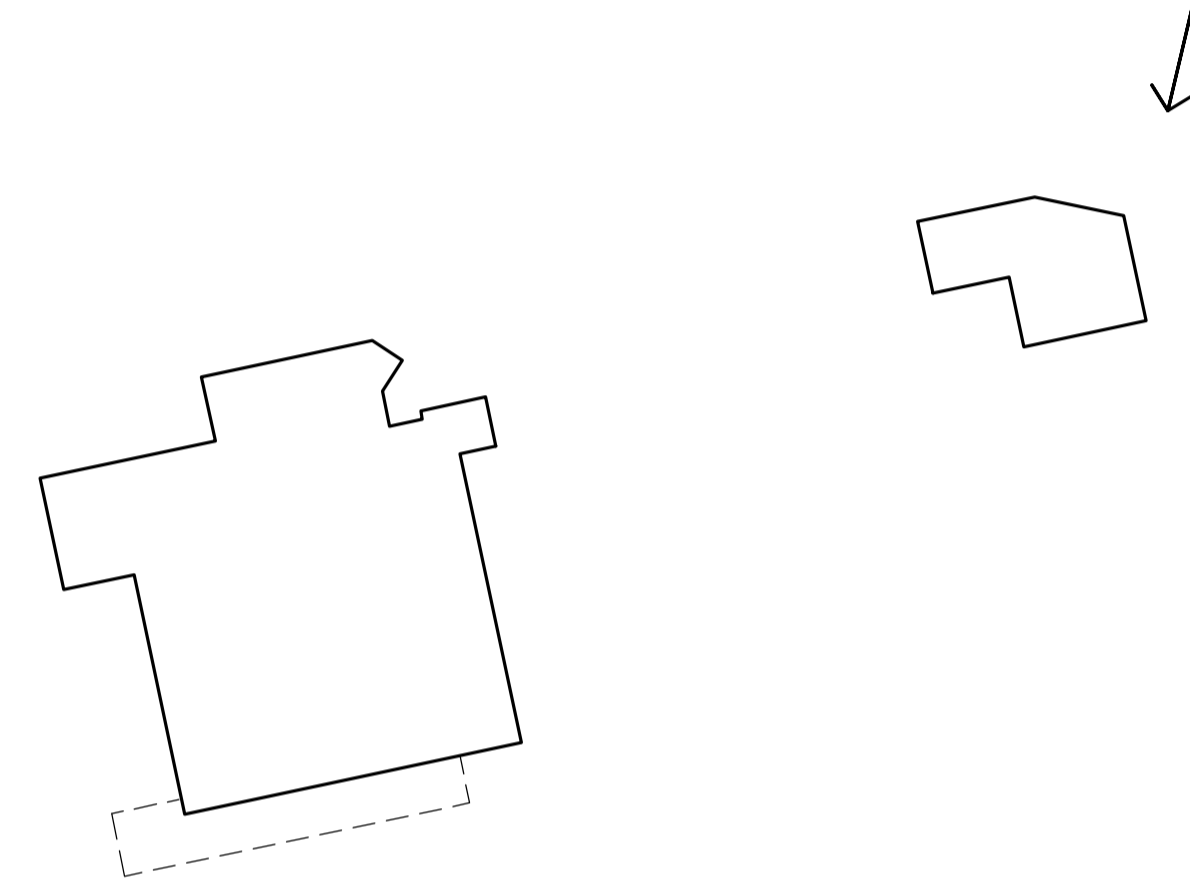
3D VIEWS

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Date 10/09/22  
Job No. 2020050  
Dwg No. **3353 07** Rev: **C** A1 SHEET

**DA ISSUE**

ISSUED FOR DEVELOPMENT APPROVAL

Rev.	Amendment	Date
A	DA ISSUE	15/10/21
B	ISSUE FOR REVIEW	08/02/22
C	ISSUE FOR REVIEW	10/09/22
D	ISSUE FOR REVIEW	16/02/22



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3D VIEWS

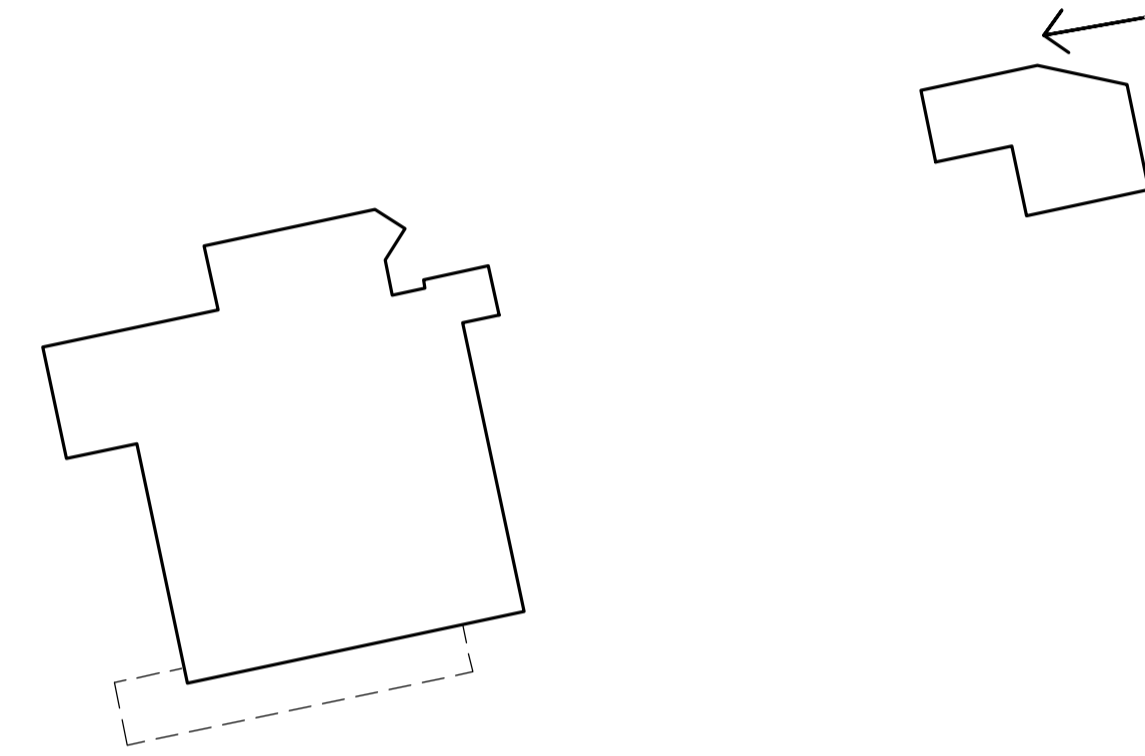
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Date 16/02/22  
Job No. 2020050  
Dwg No. **3353 08** Rev: **D** A1 SHEET



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ISSUED FOR DEVELOPMENT APPROVAL

Rev.	Amendment	Date
A	ISSUE FOR REVIEW	10/09/22
B	ISSUE FOR REVIEW	16/02/22



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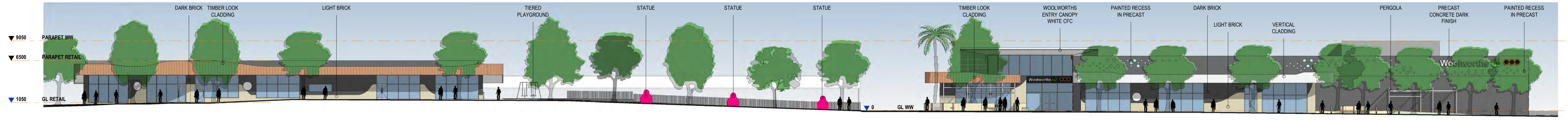
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WOOLWORTHS TWO ROCKS

3D VIEWS

Scale 1 : 50  
Drawn DF Checked MJ  
Date 16/02/22  
Job No. 2020050  
Dwg No. **3353 09** Rev: **B** A1 SHEET



AZZURRA STREET ELEVATION

1 : 250

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WOOLWORTHS TWO ROCKS

AZZURRA STREET ELEVATION

Scale 1 : 250  
 Drawn DF Checked MJ  
 Date 16/02/22  
 Job No. 2020050  
 Dwg No. 3353 10 Rev: A A1 SHEET

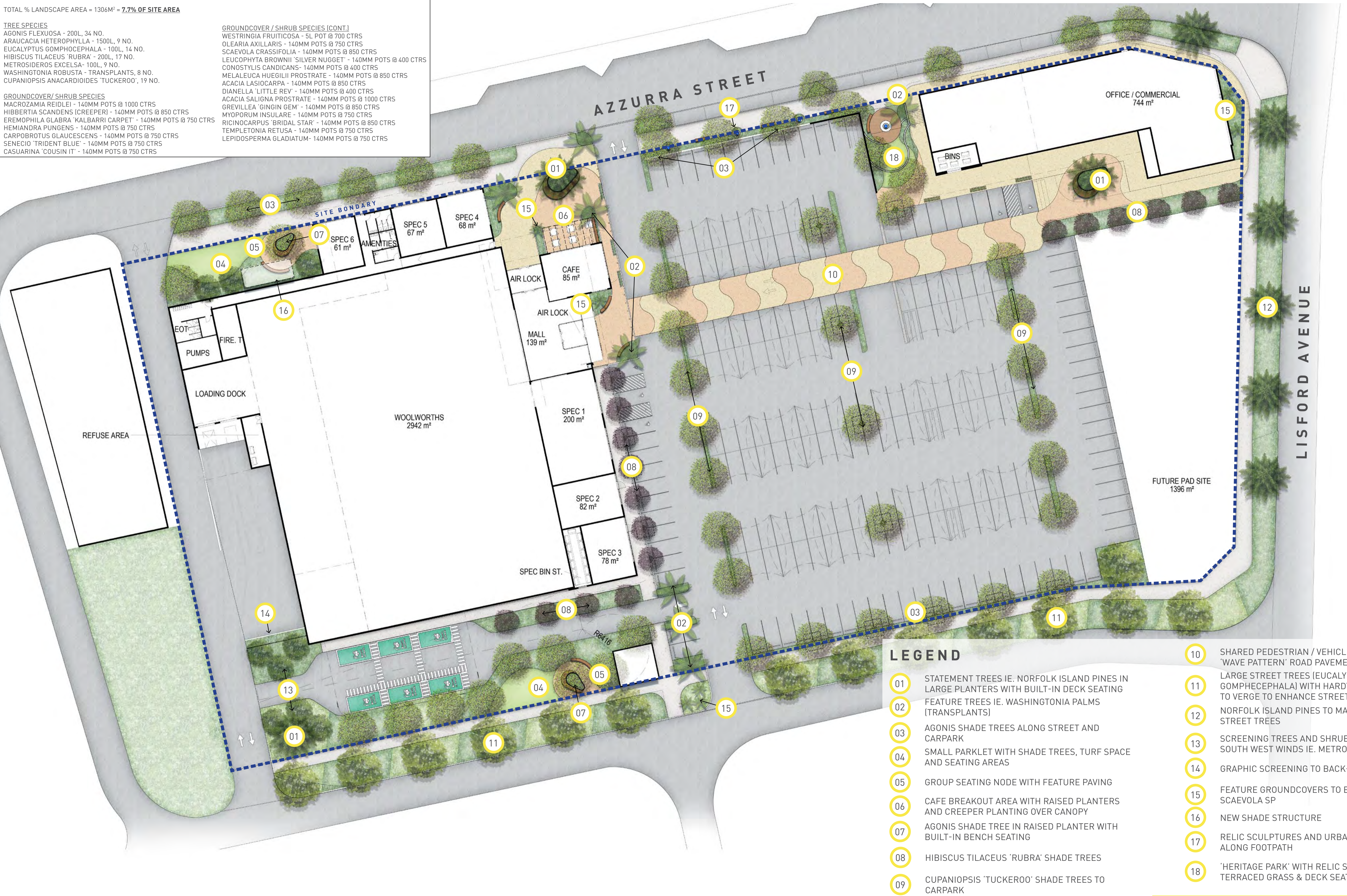
# PLANT QUANTITIES

TOTAL % LANDSCAPE AREA = 1306M<sup>2</sup> = 7.7% OF SITE AREA

**TREE SPECIES**  
 AGONIS FLEXUOSA - 200L, 34 NO.  
 ARAUCARIA HETEROPHYLLA - 1500L, 9 NO.  
 EUCALYPTUS GOMPHOCEPHALA - 100L, 14 NO.  
 HIBISCUS TILACEUS 'RUBRA' - 200L, 17 NO.  
 METROSIDEROS EXCELSA - 100L, 9 NO.  
 WASHINGTONIA ROBUSTA - TRANSPLANTS, 8 NO.  
 CUPANIOPSIS ANACARDIODES 'TUCKEROO', 19 NO.

**GROUNDCOVER / SHRUB SPECIES**  
 MACROZAMIA REIDLEI - 140MM POTS @ 1000 CTRS  
 HIBBERTIA SCANDENS (CREEPER) - 140MM POTS @ 850 CTRS  
 EREMOPHILA GLABRA 'KALBARRI CARPET' - 140MM POTS @ 750 CTRS  
 HEMIANDRA PUNGENS - 140MM POTS @ 750 CTRS  
 CARPOBROTUS GLAUDESCENS - 140MM POTS @ 750 CTRS  
 SENECIO 'TRIDENT BLUE' - 140MM POTS @ 750 CTRS  
 CASUARINA 'COUSIN IT' - 140MM POTS @ 750 CTRS

**GROUNDCOVER / SHRUB SPECIES (CONT)**  
 WESTRINGIA FRUITICOSA - 5L POT @ 700 CTRS  
 OLEARIA AXILLARIS - 140MM POTS @ 750 CTRS  
 SCAEVOLA CRASSIFOLIA - 140MM POTS @ 850 CTRS  
 LEUCOPHYTA BROWNII 'SILVER NUGGET' - 140MM POTS @ 400 CTRS  
 CONOSTYLIS CANDICANS - 140MM POTS @ 400 CTRS  
 MELALEUCA HUEGILII PROSTRATE - 140MM POTS @ 850 CTRS  
 ACACIA LASIOCARPA - 140MM POTS @ 850 CTRS  
 DIANELLA 'LITTLE REV' - 140MM POTS @ 400 CTRS  
 ACACIA SALIGNA PROSTRATE - 140MM POTS @ 1000 CTRS  
 GREVILLEA 'GINGIN GEM' - 140MM POTS @ 850 CTRS  
 MYOPORUM INSULARE - 140MM POTS @ 750 CTRS  
 RICINOCARPUS 'BRIDAL STAR' - 140MM POTS @ 850 CTRS  
 TEMPLETONIA RETUSA - 140MM POTS @ 750 CTRS  
 LEPIDOSPERMA GLADIATUM - 140MM POTS @ 750 CTRS



## LEGEND

- 01 STATEMENT TREES IE. NORFOLK ISLAND PINES IN LARGE PLANTERS WITH BUILT-IN DECK SEATING
- 02 FEATURE TREES IE. WASHINGTONIA PALMS (TRANSPLANTS)
- 03 AGONIS SHADE TREES ALONG STREET AND CARPARK
- 04 SMALL PARKLET WITH SHADE TREES, TURF SPACE AND SEATING AREAS
- 05 GROUP SEATING NODE WITH FEATURE PAVING
- 06 CAFE BREAKOUT AREA WITH RAISED PLANTERS AND CREEPER PLANTING OVER CANOPY
- 07 AGONIS SHADE TREE IN RAISED PLANTER WITH BUILT-IN BENCH SEATING
- 08 HIBISCUS TILACEUS 'RUBRA' SHADE TREES
- 09 CUPANIOPSIS 'TUCKEROO' SHADE TREES TO CARPARK
- 10 SHARED PEDESTRIAN / VEHICLE ACCESS WITH 'WAVE PATTERN' ROAD PAVEMENT
- 11 LARGE STREET TREES (EUCALYPTUS GOMPHOCEPHALA) WITH HARDY NATIVE PLANTING TO VERGE TO ENHANCE STREETSCAPE
- 12 NORFOLK ISLAND PINES TO MATCH EXISTING STREET TREES
- 13 SCREENING TREES AND SHRUBS TO BUFFER SOUTH WEST WINDS IE. METROSIDEROS SP
- 14 GRAPHIC SCREENING TO BACK-OF-HOUSE AREA
- 15 FEATURE GROUNDCOVERS TO ENTRIES - IE. SCAEVOLA SP
- 16 NEW SHADE STRUCTURE
- 17 RELIC SCULPTURES AND URBAN BENCH SEATING ALONG FOOTPATH
- 18 'HERITAGE PARK' WITH RELIC SCULPTURES AND TERRACED GRASS & DECK SEATING

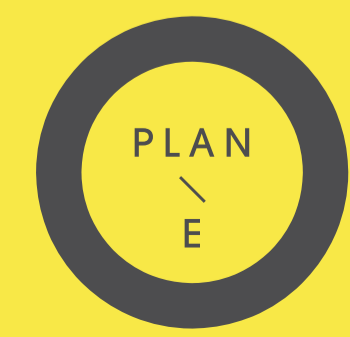
## WOOLWORTHS, TWO ROCKS

LANDSCAPE CONCEPT PLAN  
 FEBRUARY 2022

JOB NO. 2100101  
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LANDSCAPE ARCHITECTS  
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TURF & SEATING AREAS



COASTAL PLANTING & ART



CAFE BREAKOUT SPACE



HISTORICAL REFERENCES - WATER PARK

WOOLWORTHS, TWO ROCKS

CONCEPT IMAGERY  
MARCH 2021

JOB NO. 2021

C3.101

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**TREE PLANTING**



ARAUCACIA HETEROPHYLLA



WASHINGTONIA ROBUSTA



AGONIS FLEXUOSA



CUPANIOPSIS 'TUCKEROO'



HIBISCUS TILACEUS RUBRA



METROSIDEROS EXCELSA

**GROUNDCOVER / LOW SHRUB PLANTING**



EREMOPHILA GLABRA  
'KALBARRI CARPET'



HEMIANDRA PUNGENS



CARPOBROTUS GLAUDESCENS



SENECIO 'TRIDENT BLUE'



CASUARINA 'COUSIN IT'



SCAEVOLA AEMULA



SCAEVOLA CRASSIFOLIA



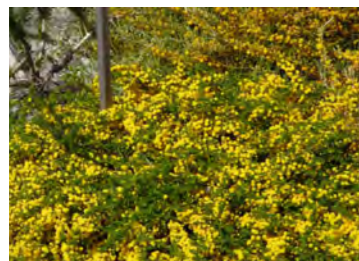
LEUCAPHYTA BROWNII



CONOSTYLIS CANDICANS



GREVILLEA 'GIN GIN GEM'



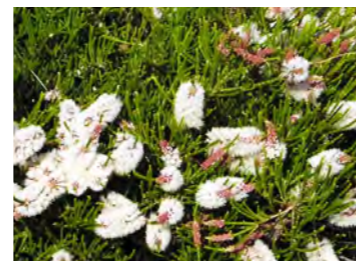
ACACIA LASIOCARPA



ACACIA SALIGNA 'PROSTRATE'



DIANELLA 'LITTLE REV'



MELALEUCA HUEGELII  
(PROSTRATE)



HIBBERTIA SCANDENS  
(CREEPER)

**SHRUB PLANTING**



OLEARIA AXILLARIS



MYOPORUM INSULARE



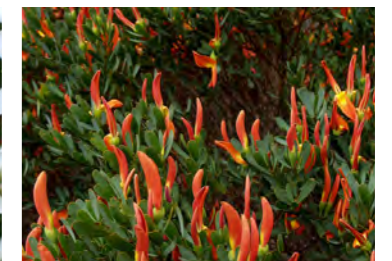
WESTRINGIA FRUITICOSA



LEPIDOSPERMA GLADIATUM



RICINOCARPUS 'BRIDAL STAR'



TEMPLETONIA RETUSA

**WOOLWORTHS, TWO ROCKS**

PLANTING PALETTE  
FEBRUARY 2022

JOB NO. 2100101

C3.103

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**CITY OF WANNEROO  
DA2021/1797 JDAP - SUPERMARKET, LIQUOR STORE, RESTAURANT & OFFICE  
SCHEDULE OF SUBMISSIONS FOLLOWING ADVERTISING**

*(Advertising Closed 17 December 2021)*

<b>Support</b>	<b>41</b>
<b>Comment</b>	<b>19</b>
<b>Object</b>	<b>148</b>
<b>TOTAL</b>	<b>208</b>

**\*1,410 submissions received inclusive of grouped submission signatories**

No.	Position	Summary of Submission	Administration Comment	Recommendation
<b>1</b>	<b>Object</b>	<b>Submitter 1</b>		
1.1		I approve of shopping facilities that are more up to date than the ones we currently have in Two Rocks. What I disapprove of is the introduction of a 4th Liquor Outlet. With a population of only 2,990 the last thing this suburb needs is greater access to alcohol. There are five roadside memorials to announce the death of six people in road accidents on Two Rocks Road that were alcohol related. One feels compelled to think that the City of Wanneroo is in support of road deaths and alcohol related deaths.	<p>Not a valid Planning consideration.</p> <p>The quantity, location and operation of the proposed uses is driven by market demand and there are no provisions within District Planning Scheme No.2 (DPS 2) or the Two Rocks Agreed Structure Plan No.70 (ASP 70) which limit the number or proximity of these uses in a particular area.</p> <p>The liquor store component in particular has been assessed against the requirements of Local Planning Policy 2.8 – Licensed Premises (LPP 2.8). The proposal was subsequently considered to meet all the requirements of LPP 2.8, with the location of the proposed liquor store and any associated signage having no</p>	No modifications required.

			frontage or primary access to any existing or proposed educational establishments, childcare centres or places of worship. It is understood that it is the intent of the applicant that the existing Liquor Store will be closed/relocated to this site, with the current licence being transferred to the new facility by Woolworths.	
<b>2</b>	<b>Support</b>	<b>Submitter 2</b>		
2.1		No comments	Noted.	No modifications required.
<b>3</b>	<b>Support</b>	<b>Submitter 3</b>		
3.1		No comments	Noted.	No modifications required.
<b>4</b>	<b>Object</b>	<b>Submitter 4</b>		
4.1		Woolworths already has the monopoly of our norther corridor being only 7 minutes down the road in Yanchep. We do not need another Woolworths, especially so close to our historic town mascot, the King! Please allow for something different for our beautiful town. We do not need to be a carbon print of every other suburb at 10-minute intervals.	Not a valid Planning consideration.  The quantity, location and operation of the proposed uses is driven by market demand and there are no provisions within District Planning Scheme No.2 (DPS 2) or the Two Rocks Agreed Structure Plan No.70 (ASP 70) which limit the number or proximity of these uses in a particular area.	No modifications required.
<b>5</b>	<b>Support</b>	<b>Submitter 5</b>		
5.1		The Two Rocks shopping centre really needs a big upgrade to bring it into the modern eta - this is a start to that process.	Noted.	No modifications required.

5.2		Then we need some great restaurants to come up here as well as a petrol station.	As the proposal is for a Shop, Liquor Store, Restaurant and Office, no alternative uses are being considered or recommended as part of this application. Additional development within the area will be subject to further Development Applications being submitted to the City for consideration.	No modifications required.
<b>6</b>	<b>Object</b>	<b>Submitter 6</b>		
6.1		We already have a perfectly locals run supermarket. This is no need for another. In addition, no need for another bottle shop.	Refer item 4.1 above.	No modifications required.
<b>7</b>	<b>Object</b>	<b>Submitter 7</b>		
7.1		We already have a woolies nearby in Yanchep, a Coles would be better for competition.	Refer item 4.1 above.	No modifications required.
7.2		We already have 2 liquor stores - we are not alcoholics.	Refer item 1.1 above.	No modifications required.
<b>8</b>	<b>Object</b>	<b>Submitter 8</b>		
8.1		Why provide what the town doesn't need? Perhaps get out there and find out what the people of the local community actually want, need and required. So many things our little town needs. Major food chains are not one of them.	Refer item 5.2 above.	No modifications required.
<b>9</b>	<b>Support</b>	<b>Submitter 9</b>		
9.1		No comments	Noted.	No modifications required.
<b>10</b>	<b>Object</b>	<b>Submitter 10</b>		
10.1		I object to the planned Woolworths development at the old Atlantis site. We don't need another cookie cutter shopping centre in Two Rocks; we have an IGA mere meters away, not to mention a Woolworths, ALDI and a planned Coles in Yanchep. Why on earth would we need more	Refer item 4.1 and 5.2 above.	No modifications required.



		grocery competition? Why not propose a pool facility, considering the nearest is in Gingin, Butler or Merriwa?		
10.2		Two Rocks shopping centre is full of old school charm, it has a beautiful café already, a liquor store, and I can't see at all why we need to double up, and risk hurting or losing the businesses that have provided for our community for literally decades. The IGA especially is very community focussed, and have done their level best to provide essential services throughout many bushfires, and more recently a pandemic. I just can't understand why putting different services in Two Rocks wouldn't make more sense than just more of the same?	Refer item 4.1 above.	No modifications required.
<b>11</b>	<b>Object</b>	<b>Submitter 11</b>		
11.1		I object the submission as Two Rocks already has and always should be a sleepy coastal area! A petrol station along Two Rocks Road before you enter Two Rocks would be better suited if there was to be more development, but leave the area as it is.	Refer item 5.2 above.	No modifications required.
<b>12</b>	<b>Support</b>	<b>Submitter 12</b>		
12.1		Woolworths/Coles, nice restaurant - something similar to the beach house in Jindalee.	Noted. Also refer item 5.2 above.	No modifications required.

<b>13</b>	<b>Object</b>	<b>Submitter 13</b>		
13.1		We have a perfectly good supermarket, Liquor Store and Café in that area already - locally owned business that as a local I am happy to support. Don't spoil what we have, don't bring in big business and cripple the independent supermarket owner. We have a Woolworths at Yanchep, can online shop so not needed.	Refer item 4.1 above.	No modifications required.
13.2		Woolworths can build a supermarket in one of the newer estates not in such a unique area by King Neptune.	The Shop, Restaurant and Office land uses are identified as 'P' or permitted land uses within the Commercial and Mixed Use zones as identified within the City of Wanneroo District Planning Scheme No.2 (DPS 2) and Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70), whilst the Liquor Store is an 'A' or advertised land use. Accordingly, all proposed land uses are capable of consideration within the proposed location.  Consideration of alternative site location is not a relevant Planning consideration.	No modifications required.
<b>14</b>	<b>Object</b>	<b>Submitter 14</b>		
14.1		We already have these facilities. Prefer something we haven't got, like specialty shops in keep with the waterfront.	Refer item 4.1 and 5.2 above.	No modifications required.
<b>15</b>	<b>Object</b>	<b>Submitter 15</b>		
15.1		Two Rocks shopping centre already has a supermarket, 2 liquor stores, café, newsagents, hair/beauty salons and a pharmacy, mostly local family owned and operated. We don't need a shopping centre like the Woolworths Yanchep that	Refer item 4.1 above.	No modifications required.

		is an un-maintained mostly empty ugly eyesore.		
<b>16</b>	<b>Object</b>	<b>Submitter 16</b>		
16.1		We have these facilities already, why double up with the big guys. Yanchep has a supermarket for any extra things we need. The area should be used to attract people to visit, smaller stores and parks, not an ugly Woolworths building.	Refer item 4.1 above.	No modifications required.
16.2		This is not the sort of development that should be there. Why not propose they build in the new estates. Big guys will get their way no doubt.	Refer item 13.2 above.	No modifications required.
<b>17</b>	<b>Support</b>	<b>Submitter 17</b>		
17.1		Great idea. Go for it.	Noted.	No modifications required.
<b>18</b>	<b>Object</b>	<b>Submitter 18</b>		
18.1		The duplication of local services by these powerful entities is an indictment on the Wanneroo Shire demonstrating yet again a lack of empathy for businesses that have supported the locals since day one. Come on Wanneroo Shire, be a leader not a follower, we need other services such as a fuel outlet, hardware, caravan park, vet etc.	Refer item 4.1 and 5.2 above.	No modifications required.
<b>19</b>	<b>Object</b>	<b>Submitter 19</b>		
19.1		Our suburb is not that big, I certainly can't see why any little suburb needs 3 liquor stores, that's absolutely ridiculous.	Refer item 1.1 above.	No modifications required.
19.2		Service station / hardware store wouldn't go astray.	Refer item 5.2 above.	No modifications required.

20	Object	Submitter 20		
20.1		I object to the proposed plan of a Woolworths in this space, it would be an eyesore. We need it to be more like Hillarys to attract tourists to our beautiful seaside town.	<p>The application has been considered extensively through the relevant planning frameworks which have identified an intended main street design along Azzurra Street. Prior to the submission of the application, the proposal was presented to two local Design Review Panel meetings which provided extensive feedback in relation to the built form and overall design of the proposal.</p> <p>The City considers that the DRP comments have been sufficiently addressed in relation to the built form components, however have not addressed the colours and materials commensurate with the coastal and heritage value of the site and surrounding. A condition of approval is recommended to be imposed to require a detailed schedule of colours and materials to be provided in this regard.</p>	No modifications required. Condition requiring a schedule of colours and materials recommended.
20.2		Definitely not another bottle shop. Two Rocks already has two. Please do not spoil this beautiful little town.	Refer item 1.1 above.	No modifications required.
21	Comment	Submitter 21		
21.1		Woolworths is not needed as we have the IGA. Woolworths is in Yanchep, a Coles may be better and competitive with GIA with prices and range of items.	Refer item 4.1 above.	No modifications required.
21.2		We have no petrol station that would be a benefit to our community.	Refer item 5.2 above.	No modifications required.

<b>22</b>	<b>Object</b>	<b>Submitter 22</b>		
22.1		That space is such a beautiful spot, why ruin it with a giant supermarket. Café or restaurant sure, but a supermarket building would be an eye sore.	Refer item 5.2 and 20.1 above.	No modifications required.
<b>23</b>	<b>Object</b>	<b>Submitter 23</b>		
23.1		We don't need a 3rd bottle shop.	Refer item 1.1 above.	No modifications required.
23.2		The location will ruin the marina and beachside feel we have here.	Refer item 13.2 above.	No modifications required.
23.3		We need a service station, a vet, a hospital and a car wash.	Refer item 5.2 above.	No modifications required.
<b>24</b>	<b>Comment</b>	<b>Submitter 24</b>		
24.1		Please provide business that the community needs not another liquor shop.	Refer item 5.2 above.	No modifications required.
24.2		Supermarkets should not be a big eyesore but compliment the unique landscape of the marina. Please keep our unique community feel and build buildings that suit our marina.	Refer item 20.1 above.	No modifications required.
<b>25</b>	<b>Support</b>	<b>Submitter 25</b>		
25.1		This is fantastic and about time Two Rocks got developed a bit more and provided a major retail grocery outlet for the growing population in our area.	Noted.	No modifications required.
<b>26</b>	<b>Object</b>	<b>Submitter 26</b>		
26.1		You aren't providing new services, simply stealing business from local small business. We already have a supermarket, bottle shop and café, we don't need more.	Refer item 4.1 above.	No modifications required.

26.2		How about provide a service we don't have e.g. Bunnings, Kmart, BigW etc.	Refer item 5.2 above.	No modifications required.
<b>27</b>	<b>Comment</b>	<b>Submitter 27</b>		
27.1		Large supermarket like Woolworths or Coles will bring more people and traffic to the area. The roads won't handle it.	<p>The application included a Traffic Impact Assessment (TIA) prepared by Cardno, which has considered the subject site, and future forecasted traffic demands.</p> <p>As outlined within the TIA, the fully developed Precinct C area was forecast to generate a total weekday am and pm peak of 365 and 552 vehicles respectively, with a total of 664 vehicles forecast during weekend peak hours. The proposal itself accommodating between 53% and 67% of the total area traffic generation. Based on the forecast trip generations, as well as the existing and proposed road connections, the TIA concludes that the operation of all intersections and surrounding roads is capable of supporting the proposed and future development.</p> <p>In addition to the above, the proposal provides for a total of 219 parking bays, which exceeds the calculated requirement of 199 for the site, and accordingly meets the City's requirements.</p>	No modifications required.
27.2		More rubbish to the area, damage to cars, break-ins etc. Strongly oppose any large retail/supermarket.	There is no evidence to demonstrate that the proposal will increase crime in the area. Moreover, the applicant has provided a Waste Management Plan (WMP), which identifies waste/rubbish collection from site, which will be	No modifications required.

			undertaken regularly by a private contractor. The provision of bins is considered to be sufficient for the operation of the proposed uses.	
27.3		Don't need another liquor store. Already have two.	Refer item 1.1 above.	No modifications required.
27.4		An independent fuel station would be advantageous as the closest one for Two Rocks residents is Yanchep, not to mention nothing on Indian Ocean Drive between Leeman and Neerabup. Considerations for towing vehicles - caravans and campers would be the smart choice - extra turning room, extra room for park-up - all for towing vehicles. Small outfits/shops/cafes would suit the area.	Refer item 5.2 above.	No modifications required.
27.5		Keep the feeling of Two Rocks being a small seaside town.	Refer item 20.1 above.	No modifications required.
<b>28</b>	<b>Object</b>	<b>Submitter 28</b>		
28.1		I cannot see why you would plan on building big shops on prime land which could be used for other things like a caravan park that would bring economy to the small town and especially where we already have these facilities, stores and everything you have listed at the Marina.	Refer item 4.1, 5.2 and 13.2 above.	No modifications required.
28.2		You have plenty of land in the new Atlantis area out near Breakwater Drive; build new shops out near new suburbs don't bring the old part of Two Rocks down.	Refer item 13.2 above.	No modifications required.
<b>29</b>	<b>Comment</b>	<b>Submitter 29</b>		
29.1		I'll be very happy with more supermarkets and affordable fuel station and cafes in Two Rocks.	Noted. Also refer item 5.2 above.	No modifications required.

<b>30</b>	<b>Comment</b>	<b>Submitter 30</b>		
30.1		I support the above projects, however myself and many other members of the community have expressed that it would be very beneficial for a petrol station to be part of planning at some stage. This would cater to people and tourists passing through, local residents, the boating community and jobs for local residents.	Noted. Also refer item 5.2 above.	No modifications required.
<b>31</b>	<b>Object</b>	<b>Submitter 31</b>		
31.1		Why do we need another bottle shop, café and supermarket. We have heaps of those. What we need is a fuel station. Ask the community what we want!	Refer item 4.1 and 5.2 above.	No modifications required.
31.2		It's going to put small business owners at risk of losing their shop/income.	Refer item 4.1 above.	No modifications required.
<b>32</b>	<b>Object</b>	<b>Submitter 32</b>		
32.1		Supermarket, bottle shop is not required. We already have those nearby. The area would be more suitable for entertainment e.g. swimming pool, water playground with King Neptune watching on.	Refer item 4.1 and 5.2 above.	No modifications required.
<b>33</b>	<b>Object</b>	<b>Submitter 33</b>		
33.1		Our town doesn't need a supermarket with Woolies and Coles a 5 minute drive away.	Refer item 4.1 above.	No modifications required.
<b>34</b>	<b>Object</b>	<b>Submitter 34</b>		
34.1		Double-up of services that are already there and not conducive to the feel of local area. Will not use it at all if built.	Refer item 4.1 above.	No modifications required.
34.2		Build on the outskirts of town where land is being developed.	Refer item 13.2 above.	No modifications required.
<b>35</b>	<b>Support</b>	<b>Submitter 35</b>		
35.1		I support any development in the area. Creates jobs for locals.	Noted.	No modifications required.



35.2		We also need a petrol station in Two Rocks or on the corner of Indian Ocean Drive and Breakwater Drive.	Noted. Also refer item 5.2 above.	No modifications required.
<b>36</b>	<b>Object</b>	<b>Submitter 36</b>		
36.1		Waste of valuable coastal land, may much more valuable options for this area.	Refer item 13.2 above.	No modifications required.
36.2		Will be an eyesore and diminish heritage and tourist potential.	Refer item 20.1 above.	No modifications required.
36.3		Does not provide any new options but unfairly competes with established local business who provide the same services.	Refer item 4.1 and 5.2 above.	No modifications required.
36.4		If we have to have Woollies, build it further from the coast. Plenty of land towards Atlantis Beach estate.	Refer item 13.2 above.	No modifications required.
<b>37</b>	<b>Object</b>	<b>Submitter 37</b>		
37.1		In Two Rocks, we already have 2 liquor stores, an IGA, and 2 cafes. We do not need these facilities and they will spoil what is a beautiful small town. There is already a Woolworths at Yanchep, which is 10 minutes away.	Refer items 1.1 and 4.1 above.	No modifications required.

37.2	These are oversized for the area and will spoil this town. King Neptune is part of the history of the area and is a lovely feature as was the old marine park. This has been bulldozed already.	<p>The maximum overall height of the proposal is identified at 9.3m, being the top of the parapet wall located in the south-western corner of the site. Along the Azzurra Street frontage, the maximum height is 8.3m identified at the accentuated entry point, with the remainder of the development being 7.2m and 5.3m to the top of the proposed awnings. Overall, the proposal generally presents as single storey buildings, with architectural features included at key points at a height similar to a two-storey dwelling.</p> <p>Building heights have been considered in accordance with the provisions set out within ASP 70, and State Planning Policy 2.6 - Coastal Planning, with the proposal being of an appropriate scale to maintain clear line of sight and emphasis to King Neptune to the north, which remains at a higher level than the proposal.</p>	No modifications required.
<b>38</b>	<b>Object</b>	<b>Submitter 38</b>	
38.1	This proposal says a supermarket and bottle shop. Am I reading this wrong as we already have a very good supermarket and not one but three bottle shops. Why on earth, if this plan is about another supermarket and bottle shop is it allowed. Can the developer not come up with other ideas. What about a petrol station, dentist or hardware store. These are needed up here.	Refer item 1.1, 4.1 and 5.2 above.	No modifications required.
<b>39</b>	<b>Object</b>	<b>Submitter 39</b>	
39.1	Specialties like X-Ray, imaging etc. Kmart of similar. Bunnings?	Refer item 5.2 above.	No modifications required.

40	Object	Submitter 40		
40.1		<p>You obviously don't live here, as you would see we have here in place already what you proposed to add to our town. This is not the same cookie cutter town as the rest of the suburbs that all look the same. This has history and should be considered when planning for the first future of our seaside town. We require better than a Woolies stuck right next to our marina, and in front of the old people's homes that will be built in close proximity. Once you bulldoze this, you cannot regain what was. Work with the current landscape, the community and please do not put an eyesore of more shops right on our coastline and view.</p>	<p>The subject site is subject to the controls set out within the Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70) which has been in place since 2014. In preparing ASP 70, matters such as heritage were considered.</p> <p>In relation to design, please refer item 20.1 above.</p>	<p>No modifications required.</p>

40.2	How about a community meeting at the Phil Remain Centre for other more sustainable ideas before you wreck it!	<p>Consultation has been undertaken in accordance with Clause 64(3) of DPS 2 and the Deemed Provisions, commencing on 2 December 2021 and concluding on 17 December 2021.</p> <p>Advertising was undertaken by way of a notice in the local newspaper and writing to 328 nearby landowners/occupiers within approximately 500 metres of the proposed development. The development plans and all supporting documentation were published on the City's website and a sign was also installed on site for the duration of the consultation period.</p> <p>A request to extend the consultation period until 10 January 2021 was issued to the applicant on Friday 10 December 2021 pursuant to Clause 64(7)(b) of the Planning and Development Local Planning Scheme) Regulations 2015. The request for an extension to the advertising period was subsequently refused by the applicant on 13 December 2021 and accordingly, no extension to the advertising was permitted. Notwithstanding, a number of submissions were received after the close of advertising and have been included within the consideration of the application.</p> <p>In relation to alternative uses, please refer item 5.2 above.</p>	No modifications required.
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<b>41</b>	<b>Object</b>	<b>Submitter 41</b>		
41.1		Two Rocks is a very unique town, that is why we choose to live here. We have the very best of supermarkets, 2 bottle shops, cafes, restaurants, chemist, doctors, hair and beauty, fitness studio, bakery, beautiful gardens, we really don't want our peaceful town ruined. What we would appreciate is a pool, petrol station and upgrade medical facilities or X-ray facilities.	Refer item 5.2 above.	No modifications required.
41.2		We are neglected in so many ways by not being even given Christmas decorations, every other shopping centre gets decorated at Christmas but we do not, so leave our centre as is but include us in these issues please.	Not a valid planning consideration.	No modifications required.
<b>42</b>	<b>Support</b>	<b>Submitter 42</b>		
42.1		I've lived nearly 10 years in Two Rocks; it needs a shopping centre, more parking and shops.	Noted.	No modifications required.
<b>43</b>	<b>Comment</b>	<b>Submitter 43</b>		
43.1		I am glad to see the proposal for Two Rocks, however I am opposed to the need for another liquor shop in Two Rocks. Currently, the tavern, Celebrations and BWS have stores in the area and unless BWS closes the current store and relocates it to the new supermarket area, another liquor shop to provide liquor for a population just under 4000 people is unjustified.	Noted. Also refer item 1.1 above.	No modifications required.
<b>44</b>	<b>Support</b>	<b>Submitter 44</b>		
44.1		No comments	Noted.	No modifications required.

<b>45</b>	<b>Object</b>	<b>Submitter 45</b>		
45.1		Two Rocks does not need a supermarket when there is already a Woolworths and 2 bottle shops 5 minutes down the road. The local IGA, Bakery, bottle shop, Neptune's Café and the Pickled Herring is all this small town needs. Don't ruin a small local town with some ridiculous supermarket when it's not needed. You'll also put other businesses who have been in this town a long time in jeopardy of going under. We don't want that.	Refer item 4.1 above.	No modifications required.
45.2		The proposed placement of this new supermarket will completely ruin a beautiful view that you get to enjoy whilst sitting at Neptune's café. The grass area needs to have fresh grass laid and then permanent tables and chairs with umbrellas placed for families to go down, have breakfast, lunch or dinner, and enjoy the ocean view.	Refer item 5.2 and 13.2 above.	No modifications required.
<b>46</b>	<b>Object</b>	<b>Submitter 46</b>		
46.1		I have lived in Two Rocks for nearly a decade and how on earth anyone thinks Two Rocks needs a fourth, bottle shop is beyond me. I can't believe Council are even considering it. We are a small suburb, with a tavern and multiple restaurants all with liquor licenses. Alcohol is more than available already. What we do need is a fuel station, office spaces to create more jobs, play centres and a bigger post office. I 100% object to another bottle shop being proposed. Unless you're also going to build another police station to deal with the antisocial behaviour and domestic issues that arise from excessive alcohol consumption, and a hospital to deal with the alcohol induced road and boating accidents, I'd strongly recommend declining this proposal.	Refer item 1.1, 4.1 and 5.2 above.	No modifications required.

<b>47</b>	<b>Object</b>	<b>Submitter 47</b>		
47.1		We don't need another shopping centre or bottle shop. We have them there already. Use this prime coastal land to develop something nowhere else has. Family friendly tourist attraction. Fresh local seafood market, local fruit and veg market, local butcher etc.	Refer item 1.1, 4.1 and 5.2 above.	No modifications required.
<b>48</b>	<b>Object</b>	<b>Submitter 48</b>		
48.1		I feel we have adequate shops at the moment and by adding a supermarket, you will kill off our small local shops. We know the staff and they know us. That will go if a large supermarket gets in.	Refer item 4.1 above.	No modifications required.
<b>49</b>	<b>Object</b>	<b>Submitter 49</b>		
49.1		We live in a semi-rural town for a reason...we don't want it built up. All the services we need are already in town and we have your proposed new Woolworths less than 10km down the road. We have a supermarket, we have 2 bottle shops. Why are we clearing land for pointless buildings when it could be utilised in other ways if you feel development of this area is essential? A petrol station makes sense; we don't have one of those! What about a caravan park or a holiday park for town revenue? Let's get the new promised Primary School built first before we add more unnecessary things to the town.	Refer item 1.1, 4.1 and 5.2 above.	No modifications required.
49.2		The proposed lifestyle village and new townhouses are going to be an eyesore as it is in our "town centre" please don't add to it with shopping centres, car parks and things we already have.	Refer item 4.1 and 20.1 above.	No modifications required.
49.3		If this Woolworths is a must, build it in the new estates. There's plenty of land there that has been cleared and built up. Not in the heart of "old Two	Refer item 13.2 above.	No modifications required.

		Rocks".		
<b>50</b>	<b>Object</b>	<b>Submitter 50</b>		
50.1		I have lived in the area for 46 years and have seen much change in the last 15 years, all not good. Especially with regards to more parks and green areas. Do we really need another supermarket and liquor store in Two Rocks so close to others, it will be less than 100m from the existing.	Refer item 4.1 above.	No modifications required.
50.2		It would be nice to see another park, picnic area, children's playground and barbecue facilities in this area. Think more about people's health and wellbeing instead of how much money you can make out of a small piece of land in such a beautiful picturesque spot so close to the ocean.	Refer item 5.2 above.	No modifications required.
50.3		I hope that there is someone in your department that does care, but I do know sometimes feedback is a waste of time - and no one listens, I hope this time there might be an exception.	Noted. Also refer item 40.2 above.	No modifications required.
<b>51</b>	<b>Object</b>	<b>Submitter 51</b>		
51.1		Why build a supermarket right near the marina. This would be without doubt an eyesore, a waste of prime real-estate, opportunities for small businesses in the area, overwhelming unwanted and not needed by the community.	Refer item 4.1, 5.2, 13.2 and 20.1 above.	No modifications required.
51.2		We already have an existing supermarket, bakery and 2 bottle shops. What is needed is cafes, restaurants, small boutique shops, office space, local arts and crafts, outdoor areas and a petrol station, which could service both the locals and boating visitors that use the boat ramp facilities.	Refer item 1.1, 4.1 and 5.2 above.	No modifications required.
51.3		If building yet another supermarket put it more inland in a more high-density populated area. Do	Refer item 13.2 above.	No modifications required.



		not spoil our lovely waterfront and harbour.		
<b>52</b>	<b>Support</b>	<b>Submitter 52</b>		
52.1		No objections.	Noted.	No modifications required.
<b>53</b>	<b>Object</b>	<b>Submitter 53</b>		
53.1		There's simply no need for shopping, fuel, small low budget businesses, sporting club store rooms and facilities to take up ocean side land and views. This is plenty of land on the east side of Two Rocks Road and Marmion Avenue up this way. Let the ocean side of the northern suburbs be filled with parks, housing and the kind of restaurants and cafes that would be on par with the Cottesloe tea rooms.	Refer item 4.1 and 13.2 above.	No modifications required.
53.2		I was shocked and still am saddened every time I walk up the ocean footpath in Yanchep to see the YSLSC building. Grey concrete thing. Taking up the once uninterrupted views from the Orion café. The life saving club should have been built on the down hill side of the old site as a split level facility. The old club knocked down and built an upstairs 200 degree view restaurant and reception centre into the tea room style Hampton's materials. The current new life saving club could have been a wonderful breakfast lunch and dinner facility set low enough not to interrupt views from the existing cafe.	The assessment is only considering the application at hand and not existing development within the City of Wanneroo. Also refer item 5.2 above.	No modifications required.

53.3		I know this is expensive type of building I'm talking which is why developers kept on strict rules could have delivered the kind of oceanside beauty that the eastern states would envy. Club Capricorn still needs to be our oceanfront 5-star luxury resort. It's time to stop and think about what quality and aesthetic we want forever along our beautiful Jindalee and Two Rocks coastline before we spend money haphazardly on non-cohesive visions for neighbouring suburbs. Happy to be a citizen on a design and aesthetic detail project for our coastline. Think big and beautiful. Don't settle for limited budgets for our beautiful coast.	Refer item 20.1 above.	No modifications required.
<b>54</b>	<b>Object</b>	<b>Submitter 54</b>		
54.1		There are already 2 liquor stores only 200m apart. Approving another liquor store is sending the wrong message to the community and basically saying if you live in Two Rocks you're an alcoholic. My family and I have already been threatened by drunks and these have been reported to the Police several times. Is money more important than your residents' safety? I'm all for the supermarket, cafe and specialty stores. This promotes good values. I oppose the liquor store.	Refer item 1.1 above.	No modifications required.
<b>55</b>	<b>Object</b>	<b>Submitter 55</b>		
55.1		We have two cafes and an IGA already. We also have two or more liquor stores and do not need more!	Refer item 1.1 and 4.1 above.	No modifications required.
55.2		This space could be used for something far more interesting to attract people visiting the beautiful coastal area of Two Rocks.	Refer item 13.2 above.	No modifications required.
<b>56</b>	<b>Object</b>	<b>Submitter 56</b>		
56.1		This little town does not need this huge change. Leave it as the peaceful sleepy little town. We	Refer item 5.2 above.	No modifications required.

		don't need to be like all the others, we are unique!		
<b>57</b>	<b>Support</b>	<b>Submitter 57</b>		
57.1		Also a fuel station.	Noted. Also refer item 5.2 above.	No modifications required.
<b>58</b>	<b>Object</b>	<b>Submitter 58</b>		
58.1		The addition of a giant Woolworths store in our small town is absolutely unnecessary. We have our wonderful family run IGA with Woolworths & Aldi less than 10 minutes away.	Refer item 4.1 above.	No modifications required.
58.2		King Neptune does not need to be overshadowed by a giant conglomerate business.	The proposal is not considered to result in any overshadowing of the King Neptune statue.	No modifications required.
58.3		What all the anti-social behaviour recently another liquor store is crazy. The two stores we have currently are ample to support our community as well as neighbouring communities. Retail store and café are invited by the big boys are not welcome in my eyes.	Refer item 27.2 above.	No modifications required.
58.4		Two Rocks is a wonderful little township that my family have lived in for 15 years and we need to keep it that way. We feel like one big family up here and I personally would like to keep it that way.	Noted. Also refer item 5.2 above.	No modifications required.
<b>59</b>	<b>Object</b>	<b>Submitter 59</b>		
59.1		Do not need another liquor store nor a Woolworths as we have IGA.	Refer item 4.1 above.	No modifications required.
59.2		I thought there was going to be a retirement village. We are a village not a town, that's why it's called the yachting village for peace and quiet.	The area to the north of the proposed site has been envisioned to facilitate an Aged Care / Retirement Village (refer Part 2, Section 4, Figure 18), however is subject to a formal development application. Also refer item 5.2 above.	No modifications required.

<b>60</b>	<b>Comment</b>	<b>Submitter 60</b>		
60.1		I love the idea of another supermarket but we need a service station more than anything and maybe a small hardware store.	Noted. Also refer item 5.2 above.	No modifications required.
<b>61</b>	<b>Object</b>	<b>Submitter 61</b>		
61.1		I feel a supermarket on prime beachside land is not needed. We have Woolworths in Yanchep down the road and a Coles is scheduled for Yanchep.	Refer item 4.1 and 13.2 above.	No modifications required.
61.2		This will spoil the holiday beachside vibe of this unique community. It should definitely be developed, more along those lines and not a retail area. Two Rocks is a very special suburb. Keep it that way. Cafes and recreational and definitely not a concrete blot on this beautiful landscape. Yanchep lagoon was spoilt with a big concrete area in my opinion.	Refer item 5.2 and 20.1 above.	No modifications required.
<b>62</b>	<b>Object</b>	<b>Submitter 62</b>		
62.1		As a long time resident of this area, I strongly object to a supermarket being built in such a unique and historical parcel of land. Wouldn't a Woolworths be suited more inland, or a bit further north at Atlantis Beach, not on prime coastal real estate.	Refer item 13.2 above.	No modifications required.
62.2		A tourist destination would be better suited to that area in my opinion. Please think more out of the square for this unique environment and do not turn our town into the next cookie cutter suburb. Yanchep and Two Rocks are unique but unfortunately Yanchep has lost a lot of that due to previous planning decisions, please don't destroy our town also with another supermarket and bottle shop, they are not needed, especially as there is a Woolworths only 7 minutes down the road.	Refer item 4.1, 5.2 and 20.1 above.	No modifications required.

<b>63</b>	<b>Support</b>	<b>Submitter 63</b>		
63.1		No comments	Noted.	No modifications required.
<b>64</b>	<b>Support</b>	<b>Submitter 64</b>		
64.1		We support more grocery shopping options in the area. Some undercover parking would be much needed. The area is getting bigger and more shops and places for people to have lunch etc. while visiting would attract more visitors.	Noted. Whilst undercover parking has not specifically be proposed as part of this application, it has included the provision of shade sail and trees within the parking areas.	No modifications required.
<b>65</b>	<b>Object</b>	<b>Submitter 65</b>		
65.1		I don't wholly object but don't need another Woolworths here or liquor store. We have our lovely IGA and if anything, need something for tourists i.e. caravan park as they're always looking for somewhere to park their vans. Two Rocks is beautiful sport and you don't need to ruin it with big supermarkets and more liquor stores.	Refer item 1.1, 4.1 and 5.2 above.	No modifications required.
65.2		We thought there was going to be a lifestyle village.	Refer item 59.2 above.	No modifications required.
<b>66</b>	<b>Object</b>	<b>Submitter 66</b>		
66.1		I believe having a big supermarket and another bottle shop will spoil the 'small country feel' Two Rocks is known for. A nice quaint looking wine/gin bar, Chinese, bespoke small owner shops that add tourist attractions not the usual hyped big stores found in every suburb. A small cinema even if done right. Please consider the small businesses that have kept the area attractive and encouraged the tourists to come to the area. Nice park area, with bbq's to enhance King Neptune, not spoil it.	Refer item 5.2 and 20.1 above.	No modifications required.
<b>67</b>	<b>Support</b>	<b>Submitter 67</b>		
67.1		No comments	Noted.	No modifications required.

<b>68</b>	<b>Comment</b>	<b>Submitter 68</b>		
68.1		Another liquor shop is not appropriate for the area. There is two in the vicinity of the Two Rocks shop area. I would support this if it was anything to help grow and enjoy the foreshore more i.e. Family friendly.	Refer item 1.1 and 5.2 above.	No modifications required.
<b>69</b>	<b>Comment</b>	<b>Submitter 69</b>		
69.1		I oppose very strongly the placement of a fourth liquor outlet in Two Rocks. With a population of only 2,990 this is totally unnecessary. This proposal does nothing to assist in the control and minimisation of alcoholism and alcohol abuse in the town. Two Rocks Road has five roadside memorial sites dedicated to the lives lost of a total of 7 people from alcohol related traffic accidents.	Refer item 1.1 above.	No modifications required.
69.2		The 200m2 would be better used by Woolworths to install a Citizens Support Office to assist the local population with such issues as alcohol and drug abuse, domestic violence and unemployment. Far greater needs for Two Rocks, than being given greater opportunities to buy alcohol and getting drunk.	Refer item 5.2 above.	No modifications required.
<b>70</b>	<b>Object</b>	<b>Submitter 70</b>		
70.1		The area around the King Neptune statue could be utilised for something more original and specialised than a supermarket with car park. This is short sighted, commerce driven ideology, driven by profit margins and corporate partnerships between Council and business and never truly considers the locals. No doubt, the 'specialised' retail will simply be clones from other national interests. It's a real shame that Wanneroo Shire seems intent on destroying the 'feeling' of Two Rocks, simply for pacifying their corporate dollar	Refer item 5.2 and 20.1 above.	No modifications required.

		grabbers.		
70.2		Our local supermarket needs supporting, just as they've supported the community. Woolworths and Aldi are less than 10 minutes away, so justify another eyesore. This town has an identity and soul that the Shire appears intent on crushing, turning it into a suburban clone, regardless of local voices. To think the heart of the town will be a Woolies car park with an old, cultural icon in the middle of it is a crying shame.	Refer item 4.1 and 20.1 above.	No modifications required.
70.3		Two Rocks needs sensitive, heritage focussed improvement, not heartless, cash grabbing development.	Refer item 5.2 above.	No modifications required.
70.4		I expect the decision have already been made and commercial discussions held, in which case a 'public consultation process' is simply a sham - as usual. Wanneroo needs to hold a public open forum in Two Rocks in order to truly hear voices. I look forward to the advertising of the date for this meeting.	The proposal is currently being considered and is to be determined by the Joint Development Assessment Panel (JDAP). The City is currently undertaking an assessment of the proposal against the relevant planning frameworks and providing a recommendation to the JDAP for consideration. This recommendation has also considered comments received during the consultation period. Also, refer 40.2 above.	No modifications required.
<b>71</b>	<b>Object</b>	<b>Submitter 71</b>		
71.1		On thoroughly reading through this proposal, I am objecting because I feel we are already well served with the local IGA, cafes and liquor stores. To be fair these local businesses have been doing it tough, and have looked after our community, and to bring in the very large Woolworths store	Refer item 4.1 above.	No modifications required.

		would definitely affect them. There is a Woolworths only 7 minutes away.		
71.2		I am thinking we do require a fuel outlet	Refer item 5.2 above.	No modifications required.
71.3		There is an opportunity to help maintain the uniqueness of Two Rocks, and not make it like every other suburb.	Refer item 20.1 above	No modifications required.
<b>72</b>	<b>Support</b>	<b>Submitter 72</b>		
72.1		I would like to know what rights small business owners have in regards to retail sales in the area as I am interested in opening a store in the area. As if Woolworths won't let me sell what I want, then I won't open a shop.	There is no restriction to what goods can be sold in the locality, nor is this something that can be enforced or restricted by Woolworths or similar. Also refer item 4.1 above.	No modifications required.
<b>73</b>	<b>Support</b>	<b>Submitter 73</b>		
73.1		I think this will be a brilliant shopping area, making it much easier for me to shop without having to trail down to Yanchep. It will also be good for a lot of the old folk who can just walk there, it will bring jobs for people of Two Rocks.	Noted.	No modifications required.
<b>74</b>	<b>Comment</b>	<b>Submitter 74</b>		
74.1		The property at Two Rocks Plaza at Cnr Sovereign Drive and Enterprise Avenue, Two Rocks includes a tenant operating a liquor store with a liquor licence. A Cellarbrations liquor store currently operates at 10 Enterprise Avenue, Two Rocks and I am concerned about the social impact and anti-social behaviours another liquor store proposed at located 10 Enterprise Avenue will have in the local area.	Refer item 1.1 and 27.2 above.	No modifications required.
74.2		I am concerned about the survival of three liquor stores in such close proximity.	Refer item 1.1 above.	No modifications required.



<b>75</b>	<b>Comment</b>	<b>Submitter 75</b>		
75.1		The only thing I would be against is another liquor shop. There are already two in Two Rocks which should be ample to supply the community. With it only being less than a ten minuter drive to Yanchep, there are more there. Encouraging people to slow down on the consumption of alcohol should be supported, not encouraging them by having cheaper alcohol due to competition.	Refer item 1.1 above.	No modifications required.
<b>76</b>	<b>Support</b>	<b>Submitter 76</b>		
76.1		Two Rocks is an urban expansion area and currently we all have to travel to Yanchep to shop. The local IGA is handy but it is not appropriate for family shopping given its limited stock range and size. This development meets all the required statutory planning considerations and competition from existing shop owners is not a valid planning consideration. Please approve this development.	Noted. The application has undergone a complete assessment against the relevant planning frameworks, with final considerations of the proposal contained within the Responsible Authority Report.	No modifications required.
<b>77</b>	<b>Object</b>	<b>Submitter 77</b>		
77.1		You have the opportunity to really make Two Rocks upmarket and a place to want to come to with the possibility of the Marina and jetty, you can really make a few nice restaurants and a walking main street for people to amble around maybe even change the library over to there with even a small tourism shop with old photos of Atlantis and have a place where people want to come and visit rather than having a Woolworths in this area kills the ambience of the area even a nice Quest hotel 3-4 stories would be better.	Refer items 5.2 and 20.1 above.	No modifications required.

77.2		Even the plans have the loading bay at the beach side.	The City have no objections to the location of the loading bay that is required for the operation of the centre. The location will be screened by future commercial development and landscaping to the west and is appropriately screened from view from Azzurra Street.	No modifications required.
77.3		These sort of commercial arrangements should be down near the Atlantis Baptist School and the childcare and health centre, it really has no place on our foreshore side. Please I hope you reconsider this area for a better planning project.	Refer item 13.2 above.	No modifications required.
77.4		3 liquor stores in a radius of 1km square is not necessary with a lot of families struggling already with alcohol.	Refer item 1.1 above.	No modifications required.
<b>78</b>	<b>Object</b>	<b>Submitter 78</b>		
78.1		We already have a Woolworths store only 5 mins away. We already have out local IGA supermarket that is Australian owned and run by local people. We already have cafes and bakery. Why are we going to stuff their businesses.	Refer item 4.1 above.	No modifications required.
78.2		If anything, we need a fuel station.	Refer item 5.2 above.	No modifications required.
78.3		I thought we were getting a retirement village.	Refer item 59.2 above.	No modifications required.
<b>79</b>	<b>Object</b>	<b>Submitter 79</b>		
79.1		There is an existing shopping precinct in Two Rocks. No need for two lots of shops.	Refer item 4.1 above.	No modifications required.
79.2		The shops close to the park may attract unsociable behaviour.	Refer item 27.2 above.	No modifications required.
<b>80</b>	<b>Support</b>	<b>Submitter 80</b>		
80.1		No comments	Noted.	No modifications required.

<b>81</b>	<b>Support</b>	<b>Submitter 81</b>		
81.1		No comments	Noted.	No modifications required.
<b>82</b>	<b>Object</b>	<b>Submitter 82</b>		
82.1		To have King Neptune overlooking a Woolworth supermarket and carpark would be a disgraceful example of what a materialistic consumer based society we have become.	Refer item 20.1 and 37.2 above.	No modifications required.
82.2		The area is unique and should be utilised as such with tourism based ideas.	Refer item 5.2 above.	No modifications required.
<b>83</b>	<b>Object</b>	<b>Submitter 83</b>		
83.1		There are already small businesses in this area and a new development would probably ruin them which would affect the entire Two Rocks population. The unique coastal village atmosphere would also be lost. Duplicating businesses with such close range of those existing already would cause upheaval. Please take into account the impact on existing business. Have they been consulted?	Refer item 4.1 above.  The local business owners and tenants are confirmed to have been included within the consultation and notification of the proposal.	No modifications required.
83.2		Of course, the size of Woolworths has no doubt influenced the possibility of this being considered.	Not a valid planning consideration.	No modifications required.
<b>84</b>	<b>Object</b>	<b>Submitter 84</b>		
84.1		The supermarket in this particular location would spoil the uniqueness of the Two Rocks shopping centre and would remove business from current shops - e.g. IGA and bakery. It also spoils the area, in that the area now consist of all small shops.	Refer item 4.1 and 20.1 above.	No modifications required.
84.2		There is a Woolworths already in Yanchep, 7 minutes away, and one in Butler, all in newer type locations, not in the middle of an established town centre. If there is going to be a Woolworths, put it	Refer item 4.1 and 13.2 above.	No modifications required.

		further out at Atlantis area or somewhere further away from the current shops.		
84.3		Tow Rocks is a unique suburb away from the sprawl of suburbs all conjoining further south. Let it stay that way and retain its relaxed, yet still bustling, open-air feel. Not a mall like in every other carbon copy suburb. Do we really want every suburb to look and feel the same?	Refer item 4.1 and 20.1 above.	No modifications required.
<b>85</b>	<b>Object</b>	<b>Submitter 85</b>		
85.1		We should support IGA. Stop big business taking over. We don't want another Woolworths. We have one in Yanchep.	Refer item 4.1 above.	No modifications required.
<b>86</b>	<b>Object</b>	<b>Submitter 86</b>		
86.1		We already have a local IGA supermarket; please consider other essentials such as a fuel service station in our area.	Refer item 4.1 above.	No modifications required.
<b>87</b>	<b>Comment</b>	<b>Submitter 87</b>		
87.1		I believe that the space needs to have more open land.	There are no provisions within DPS 2 or ASP 70 which restrict the amount of site cover for commercial development. ASP 70 outlines a retail cap of 7,000, of which the proposal contains 4,327m <sup>2</sup> of retail NLA. In addition to the above, DPS 2 requires 8% of the site be landscaped. In this instance, a total of approximately 1,628.3m <sup>2</sup> or 9.6% of the site contains landscaping which accordingly exceeds the City's requirements.	No modifications required.
87.2		There is a supermarket right next door already.	Refer item 4.1 above.	No modifications required.

87.3		Why can't that site be used for shops and keep the space around Neptune as a public space. I am open to cafes but I'd like to see more of a beach precinct like Oceans 27 style etc.	Refer item 5.2 above. The land around the King Neptune Statute is not being modified as part of this proposal and is intended to be retained as public open space to be ceded to the City.	No modifications required.
<b>88</b>	<b>Comment</b>	<b>Submitter 88</b>		
88.1		Another cash grab by the Council.	The application fees which have been paid by the applicant are in accordance with Clause 10 of the <i>Planning and Development (Development Assessment Panels) Regulations 2011</i> , which are required by all JDAP applications.	No modifications required.
88.2		IGA has served the community for many years putting local money into local business.	Refer item 4.1 above.	No modifications required.
88.3		Why build a supermarket so close to the ocean? Maybe inland, preferably 400kms inland and away from Two Rocks.	Refer item 13.2 above.	No modifications required.
<b>89</b>	<b>Object</b>	<b>Submitter 89</b>		
89.1		It will change the way of Two Rocks against how the town likes it.	Refer item 20.1 above.	No modifications required.
<b>90</b>	<b>Support</b>	<b>Submitter 90</b>		
90.1		I think all of the developments that are happening in the area area amazing and certainly long overdue. Some people that live in Yanchep/Two Rocks are ridiculous to oppose. The area is growing so quickly but we lack the proper amenities right now to cater for everyone. I'm so sick of driving 15kms to a decent shopping centre. I think this development is fantastic and wholeheartedly support.	Noted.	No modifications required.
<b>91</b>	<b>Object</b>	<b>Submitter 91</b>		
91.1		The land selected for such a business will completely take away the beauty of the town of Two Rocks. Not opposing a large supermarket for	Refer item 20.1 above.	No modifications required.

		the town, however the site would ruin the unique spot under King Neptune and the marina given the large nature of the supermarket creating a significant eyesore over the beautiful ocean views available.		
91.2		The environmental impact, with constant delivery trucks, increased risk of rubbish to the area from loading dock etc.	Refer item 27.2 above.	No modifications required.
91.3		Increased traffic to the area creating delays on Lisford Avenue, impacting local residential movements.	Refer item 27.1 above.	No modifications required.
<b>92</b>	<b>Object</b>	<b>Submitter 92</b>		
92.1		Two Rocks locals do not need big chain shops like Woolworths. Keep Two Rocks as a small town and support the locals such as the people that run the IGA who look after the locals!	Refer item 4.1 above.	No modifications required.
92.2		Look at all the rubbish McDonald's brings into Yanchep. Two Rocks do not need any other chain shops to run this beautiful little community driven town. It will ruin this town. Think bigger Shire of Wanneroo and look how much Byron Bay earns a year from having little organic shops and how it would bring tourism to Two Rocks. Yanchep looks terrible, it looks like every other suburb. Ruined!	Refer item 4.1 and 27.2 above.	No modifications required.
<b>93</b>	<b>Object</b>	<b>Submitter 93</b>		
93.1		I am against the proposal to have a Woolworth's supermarket in our foreshore precinct. If Woolworths wants to be in Two Rocks, they should be more inland or up at Atlantis Beach.	Refer item 13.2 above.	No modifications required.
93.2		A tasteful small shopping mall would be ok in the proposed location as it is an emphasis on holiday and leisure. Perhaps some accommodation, surf shop, café, lunch bar to cater to the boat ramp and beach users.	Refer item 5.2 above.	No modifications required.

93.3		We have the IGA and the Woolworths Yanchep is 10 minutes' drive.	Refer item 4.1 above.	No modifications required.
93.4		I do not agree to have Woolworths or any other large conglomerates like McDonalds or any other fast food. The City of Wanneroo should be helping Two Rocks remain a unique coastal village. Ban the conglomerated and big corporations!	Refer item 4.1, 5.2 and 13.2 above.	No modifications required.
<b>94</b>	<b>Object</b>	<b>Submitter 94</b>		
94.1		A Woolworths in Two Rocks is not needed. There is already one in Yanchep. It makes no sense at all. Make smart decisions, not decisions driven by the almighty dollar.	Refer item 4.1 above.	No modifications required.
94.2		Build something that we need like a Bunnings or a fuel station.	Refer item 5.2 above.	No modifications required.
<b>95</b>	<b>Support</b>	<b>Submitter 95</b>		
95.1		This is great for the area and the people who have bought property in Two Rocks deserve a local shopping centre, as Two Rocks is part of the Perth metro area. Fantastic design and great location. Nothing but positive feedback.	Noted.	No modifications required.
<b>96</b>	<b>Object</b>	<b>Submitter 96</b>		
96.1		We don't need a Woolworths or cafes and don't need another liquor shop. We have an IGA, we don't need to run them out of business.	Refer item 1.1 and 4.1 above.	No modifications required.
96.2		Woolworths bought the pub which is [less than optimal] now.	Not a valid planning consideration.	No modifications required.
<b>97</b>	<b>Support</b>	<b>Submitter 97</b>		
97.1		No comments	Noted.	No modifications required.
<b>98</b>	<b>Object</b>	<b>Submitter 98</b>		
98.1		I feel strongly that sites like the old Neptune/waterpark site should be redeveloped to encourage more small boutique businesses and eateries and recreational/communal picnic areas.	Refer item 5.2 above.	No modifications required.

98.2	Siting a supermarket on what locals feel is a heritage area is wholly inappropriate.	<p>The heritage value of the subject site and those surrounding has been considered as part of the proposal. The subject site is identified as the former Atlantis Marine Park Site which is a Category 4 listed site on the City of Wanneroo Local Heritage Survey. The park, which closed in 1990, was subsequently demolished with the site remaining unutilised until recent subdivisional works for the area. In recognition of the site's heritage, the proposal includes a number of features such as plaques and inclusion of statutes that use to occupy the site to establish a 'heritage trail'. The site is also considered to be appropriately positioned in consideration of the adjoining King Neptune site, with a cafe component of the proposal providing an alfresco area with direct views to the north to the statue. Overall, the City is satisfied that the proposal has considered the heritage value of the site and have developed a sensitive and responsive proposal in recognition of this.</p> <p>The above position has been supported by the City's Heritage Officer, with the proposal also being referred to the Department of Planning, Lands and Heritage's Heritage team. As the sites are not State Heritage Listed (including King Neptune), DPLH was unable to provide any further comments on the proposal.</p>	Recommend suitable condition for further collaboration with the City's Heritage Officer prior to installation of heritage items.
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98.3		I don't for a moment suggest that another place to shop isn't needed, the population is growing after all. But there are countless other site options further north into the Atlantis development. The marina foreshore area should not be one of them. Please look elsewhere.	Refer item 13.2 above.	No modifications required.
<b>99</b>	<b>Object</b>	<b>Submitter 99</b>		
99.1		The impact of the placement of this would deeply effect both tourism and the long standing heritage of Two Rocks. Woolworths doesn't honour the heritage of our town and in that position it takes away from the town we know.	Refer item 20.1 and 98.2 above.	No modifications required.
99.2		Two Rocks is still considered a town as were all local to one another. We focus on community and supporting our own. Yes, there's a demand for building local jobs but in doing so that strip would much better serve with local businesses along that strip not a multi-million dollar business that has no concern for our locals.	Refer item 4.1 and 5.2 above.	No modifications required.
99.3		Atlantis Beach has a proposed supermarket site on their land master planning and it not only will serve to the needs of Two Rocks residents but it will decrease the problematic 4WD and motorbike riders that utilises a number of resources including that of the City of Wanneroo, the RAC chopper, and police resources. Utilising this already proposed land site would not only gain more support from our town locals but it would be better equipped to adapt traffic around reducing our beaches being destroyed by further limiting access with extended development. It would be a much more beneficial site utilising this site as opposed to that of our King.  Rather than taking this proposal forward with the	Refer item 4.1, 5.2, 13.2 and 88.1 above.	No modifications required.

		focus on profit on your minds, please take into consideration that we wish to build as a community and whilst demand will make this development inevitable, this isn't the right land site for this business. It needs to be placed elsewhere.		
99.4		Putting Woolworths near King Neptune will decrease the aesthetic of our town and increase a major traffic issue on our already busy road.	Refer item 20.1 and 27.1 above.	No modifications required.
99.5		It will push out long standing IGA out of business, losing further heritage of our town.	Refer item 4.1 and 98.2 above.	No modifications required.
<b>100</b>	<b>Object</b>	<b>Submitter 100</b>		
100.1		Woolworth's shopping centre at this location is not suitable. Please locate it out of the marina. This area should only be suitable for small business and food, similar to Mindarie and Hillarys.	Refer item 5.2 and 13.2 above.	No modifications required.
<b>101</b>	<b>Object</b>	<b>Submitter 101</b>		
101.1		I think this proposal will have a traffic impact on the street and effect the peace and enjoyment at my property.	Refer item 27.1 above.	No modifications required.
101.2		I think this development will kill the attraction of Two Rocks as a small, village-like seaside community. That's why most people live there.	Refer item 20.1 above.	No modifications required.
<b>102</b>	<b>Object</b>	<b>Submitter 102</b>		
102.1		Don't ruin Two Rocks beautiful coastal line with a Woolworths. Yanchep is less than 10 minutes away. Build Yanchep up first.	Refer item 4.1 above.	No modifications required.
102.2		Build somewhere else. Or build in Two Rocks away from the coastline. Build inland.	Refer item 13.2 above.	No modifications required.
<b>103</b>	<b>Object</b>	<b>Submitter 103</b>		
103.1		If you put a Woolworths in Two Rocks you will kill IGA. There is already one in Yanchep. We don't need more shopping giants killing small	Refer item 4.1 above.	No modifications required.

		businesses.		
<b>104</b>	<b>Object</b>	<b>Submitter 104</b>		
104.1		Good idea but very bad and poorly thought of placement. Will be such a shame to put it in that spot.	Refer item 13.2 above.	No modifications required.
<b>105</b>	<b>Object</b>	<b>Submitter 105</b>		
105.1		Two Rocks already has two liquor stores, a tavern, an IGA, two cafes and two restaurants. I don't think Two Rocks needs any more of these. Woolworths in Yanchep is 6-10 minutes away, where there is another two liquor stores.	Refer item 1.1 above.	No modifications required.
105.2		Two Rocks is a nice town, it would be spoilt once the supermarkets move in. Land could be better used as a community garden, with BBQs and picnic tables and even some exercise equipment, similar to what has been installed in the park at Merriwa.	Refer item 5.2 above.	No modifications required.
<b>106</b>	<b>Object</b>	<b>Submitter 106</b>		
106.1		We already have a supermarket and bottle shops. Support local business instead of businesses that will destroy local family owned businesses. Sucking up to the big companies. We prefer the quiet life here.	Refer item 1.1 and 4.1 above.	No modifications required.
<b>107</b>	<b>Support</b>	<b>Submitter 107</b>		
107.1		I think in the long term, growth is inevitable and further amenities will be needed, so I support the proposal.	Noted.	No modifications required.
<b>108</b>	<b>Object</b>	<b>Submitter 108</b>		
108.1		No comments	Noted.	No modifications required.

109	Object	Submitter 109		
109.1		<p>I object to Woolworths at Two Rocks new hub because it is clear that Woolworths does not increase the range of businesses. It simply replicates the current offer. Many of the small cafes and shops in the centre are currently partially trading or even closed. A Woolworth's supermarket will make it less likely they will be able to weather the COVID storm and reopen in the future. This will lead to a weakening of the viability of our neighbourhood community. For this reason along, the reports must be dismissed as incorrect.</p>	Refer item 4.1 above.	No modifications required.
109.2		<p>The report fails to give any case studies which show how a Woolworths actually impacts, positively or negatively on a neighbourhood centre. It relies simply on opinions rather than real life economic examples. The report gives no evidence of Woolworths contributing to a local identity and sense of community. Is a national supermarket chain appropriate for Two Rocks. There are no other major chains in the area but rather owner-operated and small-scale local franchises. While there are many more inconsistencies in the reports, I hope this brief outline assists in demonstrating their failure to demonstrate any social or economic benefit to Two Rocks and to examine the adverse impact on our community should a Woolworths be allowed.</p>	Refer item 4.1 above.	No modifications required.

109.3		Are Wanneroo Council and the Wanneroo Local Planning Panel prepared to allow this development and bear the responsibility for destroying Two Rocks vibrant, diverse and unique neighbourhood centre, in direct contradiction to the Two Rocks unique and historic stated objectives? We must reject the proposal for Woolworths on the site - in keeping with the local character and our community's wishes.	Refer item 20.1 and 98.2 above. The City's recommendation has been included within the RAR and has been considered against a number of factors including submissions received as part of the consultation process and the relevant planning framework. Whilst the City provides recommendations, the JDAP is the ultimate determining authority.	No modifications required.
<b>110</b>	<b>Object</b>	<b>Submitter 110</b>		
110.1		Not necessary and location better suited for lifestyle and marine life environment.	Refer item 13.2 above.	No modifications required.
110.2		Corporate Woolworths not needed. Family friendly activities would be great as well.	Refer item 5.2 above.	No modifications required.
<b>111</b>	<b>Object</b>	<b>Submitter 111</b>		
111.1		We feel the proposed development at Two Rocks is ill advised and short-sighted. Development of the area was originally represented as residential, small retail, aged care, parks and green space.	<p>Clause 4.6 of ASP 70 clarifies the intent of the centre specific to Precinct C, as follows:</p> <p>'A small main street will provide a structure to anchor retail floorspace that will provide for the daily needs of residents (i.e. food, groceries, magazines, etc.) via a supermarket. In addition tourism / recreation retail (surf/beachwear, fishing/dive shop, camera/photo shop, tavern/wine bar etc.) will be developed given the beachside/marina location. This form of retail development at Two Rocks is being defined as 'Coastal Boutique.'</p> <p>Moreover, Clause 4.8 of ASP 70 identifies that:</p>	No modifications required.

		<p>'other key buildings will be at the entry to the main street off Lisford Avenue. These buildings are nominated as medical/childcare and apartments over on one side and a small shopping centre on the southern side and will be important gateway buildings to the main street and commercial hub of the area.'</p> <p>In consideration of the above, ASP 70 has envisioned a supermarket and specialty retail to be implemented in this location. Accordingly, the development is in keeping with the function and intent of the Precinct C centre, which is also reflected through the land use permissibility of the proposal.</p> <p>Additional development including residential, aged care, parks and gardens are envisioned for other areas within Precinct C and the surrounding precincts as per ASP 70.</p>	
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111.2	<p>The area is much better suited for that type of development and it is that type of development that is needed for the area rather than a duplication of services that are available in not even a ten minute drive south in Yanchep. There is already a Woolworths, an Aldi and soon there will be a Coles in Yanchep. There is no need for another Woolworths in such close proximity to these existing supermarkets.</p> <p>The impact on the true local small scale businesses will also be negative. As was seen when Yanchep Central was development, small businesses were forced to close because they couldn't compete with a large national corporation. Part of the charm and character of Two Rocks is defined by these small businesses and encouraging their development and success would better serve the area.</p>	Refer item 4.1 and 13.2 above.	No modifications required.
111.3	The environmental impact of this proposed development is also negative. This is a fragile dunes area close to the foreshore and this development and the large impervious surfaces which will come with it will result in further destruction of native fauna habitat and native flors.	The subject site is currently vacant and has been established through approved subdivisions. Consideration of the topography as well as flora and fauna impacts were considered at this stage. The operation of the site is not considered to have any impact on the surrounding environment, with all stormwater to be contained on site. Also refer item 27.2 above.	No modifications required. Suitable conditions relating to stormwater retention to be imposed.

111.4	<p>The area is much better suited to parks and green space which are much needed for the local population and, hopefully, future tourists and vacationers.</p> <p>With the proximity to Yanchep National Park, the presence of a marina and the natural beauty of the ocean front, the development of tourism related businesses would better serve the community. Short term accommodation or a small caravan parks with links to the national park are example of future development that would be more beneficial to the growth of Two Rocks. Specialty shops featuring local arts and crafts, local seafood, hospitality venues and possibly a marine education centre linked with the marina would also draw people to the area. More parks and green space where families can relax and mingle would be a better re-use for the former Atlantis Marine Park than another shopping centre.</p>	Refer item 5.2 above.	No modifications required.
111.5	Further growth and the advancement of the urban sprawl are inevitable, much of it further from the coast. Future plans for large infrastructure such as the freeway are to the east. To maintain the natural beauty and fragile environment of places such as Two Rocks while continuing to grow responsibly and smartly will only benefit future generations. This is a responsibility and can be an opportunity.	Noted.	No modifications required.



111.6	<p>*Addition to submission received late on 24/12/2021</p> <p>In addition to our submission on 15/12/2021 we would like to add that not only is the site on the City's heritage list, it is also being assessed for inclusion on the States register. This precludes development on the site for cultural and heritage reasons. Therefore, we respectfully urge that this proposed development be rejected not only on the ground we submitted earlier, but also on the heritage status grounds.</p>	<p>The proposal was referred to the State Heritage Office through the Department of Planning, Lands and Heritage as part of the assessment of the application. The Atlantis Marine Park was identified by the Heritage Council as warranting assessment for possible inclusion in the State Register in September 2020 as part of P26470 Sun City Precinct, Two Rocks, together with a number of other associated elements and features. This decision expanded on an earlier Heritage Council decision in 2003 that the Two Rocks Shopping Centre and Tavern, and the King Neptune Statue together warranted assessment for the Register.</p> <p>As the Sun City Precinct has not yet been assessed for the State Register, DPLH was unable to provide comments on the impact the proposal may have on any State cultural heritage values.</p> <p>Notwithstanding, it is important to note that consideration of heritage does not restrict the ability to develop the subject site, with the proposal also being considered per the City's Local Heritage requirements. Also refer item 98.2 above.</p>	No modifications required.
<b>112</b>	<b>Object</b>	<b>Submitter 112</b>	
112.1	<p>The plans as I see them are unsuitable for the locality. A substantial supermarket, car park and smaller shops would provide heavy traffic on a exist road close to residential properties and a children's/community park.</p>	Refer item 5.2 and 20.1 above.	No modifications required.

112.2		Is so close to the shoreline absolutely necessary when there are other areas available within the Two Rocks area which could be deemed more suitable?	Refer item 13.2 above.	No modifications required.
112.3		Being so close to the existing shopping precinct with its village like atmosphere would be spoiled with such a development of this size, its ensuing traffic and noise it would bring.	Refer item 27.1, 27.2 and 37.2 above.	No modifications required.
112.4		Progress and development to coastal areas happens to everywhere eventually but surely location on heritage sites and shoreline proximity should not be permitted in areas where other land is or could be available.	Refer item 13.2 above.	No modifications required.
<b>113</b>	<b>Comment</b>	<b>Submitter 113</b>		
113.1		I understand that community's grow and expand, and we can all agree we want to grow and expand for the better. What better will a bottle shop (already 2 within a few kms) and a Woolies (already have an IGA, and Woolies in Yanchep) do for the community?	Refer item 1.1 and 4.1 above.	No modifications required.
113.2		What about more room for childcare, retail shops, restaurants with views looking at King Neptune? That's something a town should be proud of. We are a beautiful, unique little fishing town that has a lot to offer and as we both know many agree, the current plan you have for the land isn't offering the town any more than wave already got. Don't let it go to waste.	Refer item 5.2 above.	No modifications required.
<b>114</b>	<b>Comment</b>	<b>Submitter 114</b>		
114.1		This type of development at the front and centre of our town is the quickest way to create an ugly, generic, commercial eyesore.	Refer item 20.1 above.	No modifications required.

114.2		The current local stores are never busy to the point you have to wait more than three or so minutes to be served, rendering the idea off a full scale complex vs. population requirements redundant. We already have a Woolworths and an Aldi six minutes away in Yanchep.	Refer item 4.1 above.	No modifications required.
114.3		Other options for the land if it has to be built on are: maritime training college, TAFE, University, short term / holiday / student accommodation, pool complex, aged care facilities, aquarium, water sports, dive school / centre etc.	Refer item 5.2 above.	No modifications required.
114.4		If it has to be built why not put it somewhere close where it won't destroy the character of the place.	Refer item 13.2 above.	No modifications required.
<b>115</b>	<b>Object</b>	<b>Submitter 115</b>		
115.1		Woolies does not belong beachside.	Refer item 13.2 above.	No modifications required.
<b>116</b>	<b>Object</b>	<b>Submitter 116</b>		
116.1		Two Rocks has an IGA, there is a Woolworths and Aldi 10 minutes down the road in Yanchep.	Refer item 4.1 above.	No modifications required.
116.2		Two Rocks needs a service station.	Refer item 5.2 above.	No modifications required.
<b>117</b>	<b>Support</b>	<b>Submitter 117</b>		
117.1		Population growth means we need more facilities. Also more jobs for locals.	Noted.	No modifications required.
<b>118</b>	<b>Object</b>	<b>Submitter 118</b>		
118.1		I feel that we already have a supermarket and 2 cafes and 2 bottle shops in town and only a short distance away to more again. I see this development as completely unnecessary.	Refer item 1.1 and 4.1 above.	No modifications required.
118.2		The location is very inappropriate being next to our town icon. Very disappointed that this has even been considered.	Refer item 13.2 above.	No modifications required.

<b>119</b>	<b>Object</b>	<b>Submitter 119</b>		
119.1		I object to these plans. The area around King Neptune is a landmark in Two Rocks history. The potential for what could be created is endless. The tourism that could be encouraged and therefore local existing businesses that could be supported could create something wonderful in a coastal town while still staying within what the suburb stands for. We should be looking to areas like Hillarys Marina or Mandurah foreshore for inspiration.	Refer item 5.2 above.	No modifications required.
119.2		Another Woolworth's supermarket will destroy our locally owned IGA.	Refer item 4.1 above.	No modifications required.
119.3		The current Woolworths never has all their registers open even around the busiest times of the year.	Not a valid planning consideration.	No modifications required.
<b>120</b>	<b>Object</b>	<b>Submitter 120</b>		
120.1		It impacts the whole area where this is being proposed. This isn't where a Woolworths should be built blocking prime ocean views and area. Build it across the road near north of Phil Renkin Centre.	Refer item 13.2 and 37.2 above.	No modifications required.
<b>121</b>	<b>Object</b>	<b>Submitter 121</b>		
121.1		I know we have to grow, but please not around King Neptune, it's such a historic site. It will be a shame to see a Woolworths and other shops and cafes at the foot of King Neptune. Please do not allow this development to continue around King Neptune.	Refer item 13.2 and 98.2 above.	No modifications required.
<b>122</b>	<b>Object</b>	<b>Submitter 122</b>		
122.1		No comments	Noted.	No modifications required.

<b>123</b>	<b>Object</b>	<b>Submitter 123</b>		
123.1		Many locals on the Two Rocks and Yanchep suburb group on Facebook are asking for support on this matter. Two Rocks beachfront is a beautiful space with a lot of natural bushland. I am supporting my local neighbourhood in objecting the proposal for yet another large supermarket to overtake a small town. My vote is purely in solidarity with the locals (of which I am one).	Refer item 4.1 and 20.1 above.	No modifications required.
123.2		I don't however object to it being out on the other side of town where it won't take away from the beautiful beach side.	Refer item 13.2 above.	No modifications required.
<b>124</b>	<b>Object</b>	<b>Submitter 124</b>		
124.1		It will just be another supermarket. It doesn't suit the small town of Two Rocks.	Refer item 4.1 and 20.1 above.	No modifications required.
124.2		Bring in fresh fruits and vegetables store but not a big chain.	Refer item 5.2 above.	No modifications required.
<b>125</b>	<b>Object</b>	<b>Submitter 125</b>		
125.1		I think the shopping centre will be an eye sore if anything and there is no proof it will support tourism in the area.	Refer item 20.1 above.	No modifications required.
125.2		I recommend cafes or a bar and playground to make it family friendly.	Refer item 5.2 above.	No modifications required.
125.3		There are plenty of shopping centres in and around the area.	Refer item 4.1 above.	No modifications required.
<b>126</b>	<b>Object</b>	<b>Submitter 126</b>		
126.1		The site must be heritage listed and kept free from development for financial gain. Woolworths is not to be associated with King Neptune or the history of Atlantis and/or Two Rocks.	Refer item 98.2 above.	No modifications required.
126.2		Light pollution and traffic congestion must be considered.	Refer item 27.1 and 27.2 above.	No modifications required.

<b>127</b>	<b>Support</b>	<b>Submitter 127</b>		
127.1		This will create potential for local jobs and make for increased tourism potential.	Noted.	No modifications required.
<b>128</b>	<b>Object</b>	<b>Submitter 128</b>		
128.1		It seems you have an obsession with ripping land up and building nothing but houses and shops on it. Dune rehabilitation and ever green just means property investment paradise.	Refer item 111.3 above.	No modifications required.
128.2		Why cant you have it as parkland with coffee shops, ice cream shops etc. Places with trees to have picnics under, even keep it with the Atlantis theme with a wave pool.	Refer item 5.2 above.	No modifications required.
<b>129</b>	<b>Object</b>	<b>Submitter 129</b>		
129.1		First and foremost, the proposed plans for the development do not compliment the unique historical and heritage value of the surroundings.	Refer item 20.1 and 98.2 above.	No modifications required.
129.2		The development is Woolworths-centric and is not inclusive of the existing stores or future stores. This again highlights the anti-competitive nature for which Woolworths is known and this is not appreciated within this community.	Refer item 4.1 above.	No modifications required.
<b>130</b>	<b>Object</b>	<b>Submitter 130</b>		
130.1		Why ruin and destroy a beautiful place with more shopping centres. Why can't the land be utilised in a similar manner, like a marine park or something to show off the beautiful coastlines WA has to offer.	Refer item 5.2 above.	No modifications required.
<b>131</b>	<b>Object</b>	<b>Submitter 131</b>		
131.1		Leave the corporate Woolworths in Yanchep. It is more than adequate where it is. We have an IGA family run business. We already have enough liquor stores (two of). We do not need more Woolies, Maccas garages and urban rubbish here.	Refer item 4.1 above.	No modifications required.

		We are watching.		
131.2		Yes for more parkland, café and art shops as we have a lot of tourists come through and weekend people from Perth just driving up for some peace and quiet and to see the sites.	Refer item 5.2 above.	No modifications required.
131.3		This place is unique and needs to be kept that way. Stop the urban sprawl at Yanchep.	Refer item 20.1 above. The proposal is located within the identified Two Rocks Town Centre area and whilst proposing new development is considered brownfield/infill development within the Two Rocks locality and not a contributor to greenfield development/urban sprawl.	No modifications required.
<b>132</b>	<b>Object</b>	<b>Submitter 132</b>		
132.1		I object to having a large supermarket and yet another liquor store built on prime land when we already have IGA and 2 bottle stores.	Refer item 4.1 above.	No modifications required.
132.2		This area should be utilised as a family friendly park or play area for all to enjoy.	Refer item 5.2 above.	No modifications required.
132.3		A supermarket does not need to be placed somewhere with ocean views. Nobody is going to get to enjoy the views they are wasted on a supermarket.	Refer item 13.2 above.	No modifications required.
<b>133</b>	<b>Object</b>	<b>Submitter 133</b>		
133.1		Area is under developed and having about 3 or more stores within a 10km radius is stupid.	Refer item 4.1 above.	No modifications required.
133.2		The area that is being looked at should be catering for more tourism or something else that would bring more people to Two Rocks rather than push them away.	Refer item 5.2 above.	No modifications required.
<b>134</b>	<b>Object</b>	<b>Submitter 134</b>		
134.1		Extra pollution in the air.	Refer item 27.2 above.	No modifications required.

134.2		More traffic.	Refer item 27.1 above.	No modifications required.
134.3		We have enough shops and a Woolworths at Yanchep. We don't need another one and the local IGA will lose customers as well.	Refer item 4.1 above.	No modifications required.
<b>135</b>	<b>Object</b>	<b>Submitter 135</b>		
135.1		We already have a supermarket, 3 bottle shops. This is a further supermarket 10 minutes away, with another going to be built in the new development planned for Yanchep Central. The Council needs to look at new opportunities for business instead of the same old ideas. All along Marmion Avenue there are supermarkets.	Refer item 1.1, 4.1 and 13.2 above. The proposal is private development on privately owned land and not a City proposal.	No modifications required.
135.2		What about more different types of restaurants that would bring in visitors and shops that are different to the franchises. This is an opportunity to really make a development matter. Please reconsider and think outside the square.	Refer item 5.2 above.	No modifications required.
<b>136</b>	<b>Object</b>	<b>Submitter 136</b>		
136.1		We have a very unique shopping centre with everything that we need, the best supermarket, café, restaurants, beautician, bakery etc. most of which are and have been all family businesses.	Refer item 4.1 above.	No modifications required.
136.2		We don't want our beautiful town turn into another Yanchep type centre with empty shops and dirty weeded verges, as Yanchep centre is. Why not put a new centre nearer to Seatrees which would service not only Seatrees but Guilderton and Gingin. We don't need more here.	Refer item 15.2 above.	No modifications required.



<b>137</b>	<b>Comment</b>	<b>Submitter 137</b>		
137.1		40 years of my life I have been led to believe this site was to be a respectable RAAFA retirement home, which considering where it would be would make and be best placed to see, feel and hear the ocean as your last years are lived out here. Further development of Two Rocks marina would be developed with surrounding nice to look at grounds and both would respectfully include King Neptune.	Refer item 5.2 and 59.2 above.	No modifications required.
137.2		Government is too quick to sell land and no surprise another shop which is ugly and does not care about future builds in quick put up ugly building and sell when made profit and leave a concrete monster behind to decay. Two Rocks is better than that, it is and could be a world class marina with though for its future not \$\$.	Not a valid planning consideration. Also refer item 135.1 above.	No modifications required.
<b>138</b>	<b>Object</b>	<b>Submitter 138</b>		
138.1		You're taking it away from the locals. Don't build a café. Another suburb overdeveloped brought to you by Woolworths.	Refer item 4.1 above.	No modifications required.
138.2		If you must build a Woolworths, make it a small one and the drawings are good, however it needs to be more beachy and needs to include more seating area at the front, bike rack and a place for dogs.	Refer item 20.1 above.	No modifications required.
<b>139</b>	<b>Object</b>	<b>Submitter 139</b>		
139.1		The Two Rocks shopping centre has history as a relaxed beachside vibe. We have a close community and building a new modern shopping centre does not fit in with that.	Refer item 20.1 above.	No modifications required.

<b>140</b>	<b>Support</b>	<b>Submitter 140</b>		
140.1		This project will be a boon to Two Rocks bringing it into the 21st century and further. It has great potential for younger generation to be employed and the mentality of ancient conservation needs to be addressed with new ideas and thoughts, currently it is a sleepy town and no interest is shown.	Noted.	No modifications required.
<b>141</b>	<b>Object</b>	<b>Submitter 141</b>		
141.1		We already have a Woolworths shop in Yanchep, enough liquor stores in Two Rocks, I think that a competition of another major supermarket chain would destroy the local IGA.	Refer item 1.1 and 4.1 above.	No modifications required.
141.2		The proposal does not fit into the pretty landscape around King Neptune.	Refer item 20.1 above.	No modifications required.
<b>142</b>	<b>Object</b>	<b>Submitter 142</b>		
142.1		When will big business have enough? No, we don't need a Woolworths on every street corner in Perth.	Refer item 4.1 above.	No modifications required.
		Maintain the area for public open space and retain the memory of a time when life in Perth was simpler and so, very much nicer. Keep history alive.	Refer item 5.2 above.	No modifications required.
<b>143</b>	<b>Object</b>	<b>Submitter 143</b>		
143.1		We do not need the big corporations here that will literally just leech business from our local small businesses. We have a supermarket, a café and two bottle shops within 500m of each other.	Refer item 1.1 and 4.1 above.	No modifications required.
143.2		At least bring something new to the table instead of the exact same services.	Refer item 5.2 above.	No modifications required.
<b>144</b>	<b>Support</b>	<b>Submitter 144</b>		
144.1		More jobs, more choice in shopping. Good for the growth in the area.	Noted.	No modifications required.

<b>145</b>	<b>Object</b>	<b>Submitter 145</b>		
145.1		Yanchep 7kms away has a Woolworths and the Two Rocks shopping precinct has 2 liquor stores already. Why would anyone consider this proposal.	Refer item 1.1 and 4.1 above.	No modifications required.
<b>146</b>	<b>Object</b>	<b>Submitter 146</b>		
146.1		The proposal to have a Woolworths in a prime coastal position is very short sighted. As Two Rocks population grows through the new housing development the proposed site should become a community hub with things like water play areas, green spaces and alfresco dining. This would enable Two Rocks to keep its coastal charm and be able to compete for tourism and weekend visitors by putting it in line with other coastal precincts like Hillarys.	Refer item 5.2 and 13.2 above.	No modifications required.
146.2		A local Woolworths would be good but would be better located in the new Atlantis area so that it isn't competing with established locally owned stores. It would also reduce traffic congestion with grocery options spread around the town.	Refer item 13.2 above.	No modifications required.
<b>147</b>	<b>Object</b>	<b>Submitter 147</b>		
147.1		I don't object to the Woolies going in at Two Rocks as I think it's more than needed that they have a supermarket. However, I do think the location of this needs to be altered and should not be so close to King Neptune.	Refer item 13.2 above.	No modifications required.
<b>148</b>	<b>Object</b>	<b>Submitter 148</b>		
148.1		We have enough shopping centres in this city.	Refer item 4.1 above.	No modifications required.

148.2		We do not have enough recreational spaces with trees and adventure for children and young people (and adults) to explore. Please do not just build another structure for commerce - a place can be inviting and 'activate' a space without shops - just do a nice landscaping job on what is currently there so people can safely walk their dogs and take their kids there to play. Not just another shopping centre. It is a place of magic that should be retained. I took pictures last time I was there - why would I have don't that?	Refer item 5.2 above.	No modifications required.
<b>149</b>	<b>Object</b>	<b>Submitter 149</b>		
149.1		Two Rocks does not need a Woolworths, post office or another bottle shop. It already has a great local IGA, liquor store and post office which all serve the community well. Residents can travel 10 minutes to the Woolworths in Yanchep.	Refer item 1.1 and 4.1 above.	No modifications required.
149.2		My main concern is the impact this development will have on the country town charm of Two Rocks, as well as the destruction of the beautiful coastline. Two Rocks is unique because it is away from the chain stores of larger towns. If developers really want to know how the community feels, they need to listen. Think more creatively, Two Rocks does not need to be yet another cookie cutter town.	Refer item 20.1 above.	No modifications required.
149.3		It does need a petrol station, it does need more facilities for families, it would be great to have more independent stores. It does not need more of the same stores that it already has or that are already available in Yanchep.	Refer item 5.2 above.	No modifications required.

<b>150</b>	<b>Object</b>	<b>Submitter 150</b>		
150.1		King Neptune, the Marina, Leemas Landing and the area between is what the local people love. It is also the reason why tourists come to the area. It will detract from the tourist appeal.	Refer item 20.1 above.	No modifications required.
150.2		King Neptune is supposed to be heritage listed. Yes, while the statue will be remaining, putting a large shopping centre right there is not in keeping with the landscape of feel of the area at all.	Refer item 20.1 and 98.2 above.	No modifications required.
150.3		Local opinion has not been considered.	Refer item 40.2 and 70.4 above.	No modifications required.
150.4		There is already a Woolworths in Yanchep which people are happy to go to.	Refer item 4.1 above.	No modifications required.
150.5		It could be placed in a more appropriate area, such as slightly further up Breakwater Drive.	Refer item 13.2 above.	No modifications required.
150.6		The area around King Neptune should be made into nice parkland with indigenous culture considered. Somewhere people can sit and enjoy.	Refer item 5.2 above.	No modifications required.
<b>151</b>	<b>Object</b>	<b>Submitter 151</b>		
151.1		We don't need more shops when Yanchep is 5 minutes away. We need more parks and open spaces. A tourism aspect how it use to be would be an idea.	Refer item 4.1 and 5.2 above.	No modifications required.
<b>152</b>	<b>Object</b>	<b>Submitter 152</b>		
152.1		Such a beautiful part of Two Rocks with great historical significance. Surely Woolworths can build somewhere else. They already have significant presence throughout our community please use other space elsewhere.	Refer item 13.2 above.	No modifications required.
152.2		This area should be for special shops or pubs or tourist features.	Refer item 5.2 above.	No modifications required.

<b>153</b>	<b>Object</b>	<b>Submitter 153</b>		
153.1		Support local. There is already a Woolworths in Yanchep. The IGA has been servicing the Two Rocks community for a long time. We have a good balance, a locally owned store open more convenient times and Yanchep Woolworths if you want to drive the 10 minutes up the road.	Refer item 4.1 above.	No modifications required.
<b>154</b>	<b>Object</b>	<b>Submitter 154</b>		
154.1		The plans for a new shopping centre, café etc. have been thought through properly. Two Rocks central is a historic place and has been for many years. Local are happy with the way it is and already have everything they need.	Refer item 20.1 and 98.2 above.	No modifications required.
154.2		It will remove the view we get to the marina and will diminish the history behind it all.	Refer item 120.1 and 98.2 above.	No modifications required.
154.3		It will affect local businesses that have been running for decades.	Refer item 4.1 above.	No modifications required.
154.4		I believe this shouldn't go ahead and is being placed in the wrong area and is affecting local businesses and the tourist attraction that is has of its history with the theme park and ocean views.	Refer item 13.2 above.	No modifications required.
<b>155</b>	<b>Object</b>	<b>Submitter 155</b>		
155.1		Two Rocks is a beautiful quiet suburb unique now it will be just like all the others with too many people and will be busy.	Not a valid planning consideration.	No modifications required.
155.2		There is another Woolworths already in Yanchep no one wants another Woolworths at all. How many bottle shops do we all need, surely not another one.	Refer item 4.1 above.	No modifications required.
155.3		Why can't we have something that isn't close by like Farmer Jacks would be ideal.	Refer item 5.2 above.	No modifications required.

156	Object	Submitter 156		
156.1		<p>The Wanneroo City should redevelop tourist attraction using that side. Atlantis was the best tourist spot in WA, sadly nobody helps to support and keep this beautiful park going. We have nothing in WA Perth to encourage tourists to visit the state. Northing to offer. This side should be redeveloped as family tourist friendly park and not another shopping centre.</p>	Refer item 5.2 above.	No modifications required.
157	Object	Submitter 157		
157.1		<p>This area is not only of local significance, but one of state-wide significance as families from all over the state of Western Australia recall the area steeping in history as the location of the Atlantis Marine Park, the Birdman Rally, a training ground for the America's Cup, a Bond Corporation construction marvel and a small crayfish town. It is a site of immense historical significance and should be protected as such.</p>	Refer item 98.2 and 111.6 above.	No modifications required.

158	Object	Submitter 158		
158.1		<p>The proposed development within the Marina Zone is inconsistent with the local planning framework and fails to recognise and develop its potential as a unique tourist destination.</p>	<p>Clause 4.6 of ASP 70 clarifies the intent of the centre specific to Precinct C, as follows:</p> <p><i>'A small main street will provide a structure to anchor retail floorspace that will provide for the daily needs of residents (i.e. food, groceries, magazines, etc.) via a supermarket. In addition tourism / recreation retail (surf/beachwear, fishing/dive shop, camera/photo shop, tavern/wine bar etc.) will be developed given the beachside/marina location. This form of retail development at Two Rocks is being defined as 'Coastal Boutique.'</i></p> <p>Moreover, Clause 4.8 of ASP 70 identifies that:</p> <p><i>'Other key buildings will be at the entry to the main street off Lisford Avenue. These buildings are nominated as medical/childcare and apartments over on one side and a small shopping centre on the southern side and will be important gateway buildings to the main street and commercial hub of the area.'</i></p> <p>In consideration of the above, ASP 70 has envisioned a supermarket and specialty retail to be implemented in this location. Accordingly, the development is in keeping with the function and intent of the Precinct C centre, which is also reflected through</p>	<p>No modifications required.</p>



			the land use permissibility of the proposal.	
158.2		The scale and design of the proposed development is not compatible with the surrounding area.	Refer item 37.2 above.	No modifications required.
158.3		The development plan does not preserve the unique historical and heritage value of the Marina Zone.	Refer item 20.1 and 98.2 above.	No modifications required.
158.4		There are alternative, more appropriate sites for the development.	Refer item 13.2 above.	No modifications required.
<b>159</b>	<b>Object</b>	<b>Submitter 159</b>		
159.1		The proposed development within the Marina Zone is inconsistent with the local planning framework and fails to recognise and develop its potential as a unique tourist destination.	Refer item 158.1 above.	No modifications required.
159.2		The scale and design of the proposed development is not compatible with the surrounding area.	Refer item 37.2 above.	No modifications required.
159.3		The development plan does not preserve the unique historical and heritage value of the Marina Zone.	Refer item 20.1 and 98.2 above.	No modifications required.
159.4		There are alternative, more appropriate sites for the development.	Refer item 13.2 above.	No modifications required.
<b>160</b>	<b>Object</b>	<b>Submitter 160</b>	<b>(Joint Submission (1,202 signatories))</b>	
160.1		The proposed development within the Marina Zone is inconsistent with the local planning framework and fails to recognise and develop its potential as a unique tourist destination.	Refer item 158.1 above.	No modifications required.
160.1.1		The Marina Zone classification recognises the different requirements of such an area and has distinct objectives. One of these objectives is to 'accommodate commercial, residential, recreational and associated activities related to marinas'. A large supermarket development	Refer item 158.1 above.	No modifications required.

	cannot be interpreted as a commercial activity that is 'related to a marina'.		
160.1.2	In a commercial sense the Two Rocks District Centre has been identified as performing a different function to that of the other District Centres and based on a tourism and resort economy. It is envisaged to feature restaurants, small shops and other location specific service businesses like surf shops and marina supplies. A large supermarket development does not fulfil any of these criteria.	Refer item 158.1 above.	No modifications required.
160.1.3	<p>The proposed development does not adequately address the objectives contained in the ASP 70. A large supermarket does not encourage tourism or provide a festive retail or entertainment use. The western-most point of the proposed development (and that closest to the marina) comprises a loading dock and refuse area and does not maximise views to the marina. A large singular supermarket structure does not create a mixed-use day and night activity area and Woolworths cannot be considered a boutique retail outlet.</p> <p>Finally, and possibly most importantly, the King Neptune statue overlooking a large supermarket roof and parking lot cannot be considered a 'sensitive incorporation' of the statues very significant cultural heritage.</p>	<p>The proposal has been considered against the relevant objectives set out within ASP 70 as they relate to the subject site; specifically objectives c), d) and j).</p> <p>In consideration of the above, the proposed Shop, Liquor Store, Restaurant and Office is considered to be consistent with the desired intent and functionality of the site and Precinct C area more broadly, offering shopping/retail services. The proposal includes a number of specialty retail tenancies, as well as identifying an area to the south-east of the site which will accommodate further commercial uses within the site. Whilst the exact use of these sites is unknown at this time, the proposal is capable of providing uses which would encourage tourism, retail and entertainment uses as considered within the commercial zone.</p> <p>The design and orientation of the buildings, and particularly the</p>	No modifications required.

		<p>office/commercial building and specialties 4, 5 and 6 assist in facilitating a 'main street' design, with provision for future expansion to the west.</p> <p>The proposal has sought to impose some heritage acknowledgement through the use of heritage signage, establishing a key pedestrian plaza with alfresco café dining which interfaces directly to the adjacent King Neptune statue, as well as incorporating historical statues along Azzurra Street which will be utilised to create a 'heritage trail'. The site has also incorporated the use of Washingtonia Robusta within the landscaping of the site which similarly acknowledge the heritage of the site. The utilisation of these aspects is considered to meet the City's requirements for the Category 4 listed site and is also explored further below.</p> <p>Accordingly, the proposal and associated uses are considered to meet objectives c), d) and j) of ASP 70.</p>	
160.2	The scale and design of the proposed development is not compatible with the surrounding development.	Refer item 37.2 above.	No modifications required.
160.2.1	The Yanchep-Two Rocks District Structure Plan 2010 provides that the 'urban design character will seek to optimise the relationship of the centre with the marina and coast, including orienting streets and creating open space configurations to optimise coastal views. The built form, building materials and landscape treatments will	As outlined within ASP 70, the subject site is intended to incorporate a 'main street' design and has been identified as including a supermarket and other speciality retail uses which are all being proposed as part of this application.	No modifications required. Recommend inclusion of suitable condition requiring a schedule of

	<p>complement and reinforce the coastal location'.</p> <p>The content and design of the development application for a large-scale supermarket does not compliment and reinforce the coastal location nor is it compatible with existing development in the area.</p>	<p>The City, and the City's Design Review Panel have provided further comment to the applicant in relation to the coastal colour palletete and it is subsequently recommended that a revised schedule of colours and materials be provided to the City for approval.</p> <p>The proposed landscaping and species is considered to be appropriate for the site and its coastal setting.</p>	<p>colours and materials to be provided to the City and approved prior to the issue of a Building Permit.</p>
160.2.2	<p>In addition to the concerns highlighted above, there is a high potential for negative social impacts of the shopping centre (including liquor store) and car park directly adjacent to the skate park and Charnwood park where it is common for children to gather and play.</p>	<p>There is no evidence to demonstrate that the proposal will increase crime in the area.</p>	<p>No modifications required.</p>
160.3	<p>The development plan does not preserve the unique historical and heritage value of the Marina Zone area.</p>	<p>Refer item 98.2 above.</p>	<p>No modifications required.</p>
160.3.1	<p>The Heritage Impact Statement prepared by Griffiths Architects to accompany the DA2021/1797 fails to recognise or address the significant historical and cultural significance of the Marina Zone as outlined above. We note that the entire Sun City Precinct, including the proposal site, is currently for assessment with the Heritage Council (WA) for heritage status.</p>	<p>Refer item 98.2 and 111.6 above.</p>	<p>No modifications required.</p>
160.3.2	<p>The area has great potential to create a unique tourist destination. The current development proposal does not incorporate or enhance the historical and cultural significance of the area, this is wholly inconsistent with the objectives of the State Coastal Planning Policy (SPP 2.6) which aims to protect, conserve and enhance coastal</p>	<p>Refer item 98.2 above.</p>	<p>No modifications required.</p>

	values, particularly in areas of [...] cultural significance.		
160.4	Impacts on nearby residential owners including light pollution, increased traffic and view restriction.	Refer item 27.1 and 37.2 above. In relation to lighting, the development will need to comply with the relevant Environmental Health Regulations and Australian Standards for the Control of Obstructive Effects of Outdoor Lighting (AS4282) relating to outdoor lighting. A condition to this effect is recommended for inclusion by the DAPs.	No modifications required. Suitable condition to ensure compliance with AS4282 to be included.
160.4.1	Under the current proposal, a significant number of houses in the direct vicinity of the proposed development will be subject to dramatically increased traffic, lighting and noise associated with a large scale supermarket and parking facility with extended trading hours. Residents who formally enjoyed parkland and ocean views will not have views of an expansive supermarket rooftop and car park.	Refer item 27.1 and 37.2, and 160.4 above. An Acoustic Report prepared by Herring Storer Acoustics and dated September 2021 was provided as part of the application. As outlined within the acoustic report, the proposal will be fully compliant with the Environmental (Noise) Regulations 1997 and accordingly there is considered to be no impact on surrounding land uses from an acoustic perspective.	No modifications required. Suitable condition to ensure compliance with Acoustic Report to be included.
160.4.2	Due regard should be had to the impacts on long term residents and property owners within the immediate area.	Consideration of all potential impacts and matters raised through the submissions received has been considered through the assessment of the proposal.	No modifications required.
160.4.3	We also note that the area of Lisford Avenue to the east of the development application site is prone to significant flooding in times of high rainfall which will only be exacerbated by the proposed development.	This matter is noted. An Urban Water Management Plan (UWMP) is being prepared for the area as a requirement through subdivision works. In addition, all stormwater is to be retained on site and be appropriately managed.	No modifications required. Suitable condition requiring all stormwater to be retained on site to be included.
160.5	Location of proposed development.	Refer item 13.2 above.	No modifications required.

160.5.1	We note that this objection is primarily based on the specific location of the development application site and not an objection to a large supermarket development in the general locality of Two Rocks.	Noted. Also refer item 13.2 above.	No modifications required.
160.5.2	Should the relevant authorities decide that a large supermarket development is needed within Two Rocks, we proposed that there are far more suitable locations. Examples include areas further inland towards the eastern extremities of Two Rocks and in particular we note the abundance of land in the vicinity of the Atlantis Beach development in the north-east sector of Two Rocks.	Refer item 13.2 above.	No modifications required.
160.6	In summary, we acknowledge that with significant growth comes unavoidable development which may include the development of a large supermarket facility in the suburb of Two Rocks. However, we believe the site of the current proposal is not consistent with the applicable planning framework and does not afford appropriate protection of, and value to, the cultural and heritage value of the area.	Refer items 98.2, 111.1 and 160.1.3 above.	No modifications required.
<b>161</b>	<b>Object</b>	<b>Submitter 161</b>	
161.1	The site proposed is not suitable for that kind of business and I, my neighbours and local friends strongly object. That land was a historic aquatic park and a local landmark. It is prime beach property crucial to the original legacy and history of Two Rocks. Money should not be the driving force for everything. A major supermarket and liquor store has no place in that area. Nor will the potential carpark(s), which will be a waste of a large area of otherwise beautiful land that could instead be used for businesses and facilities that	Refer item 5.2, 13.2 and 98.2 above.	No modifications required.

		promote Two Rocks. The businesses will be needed yes, but a more inland position is a far more sensible proposition for so many reasons. That land deserves something much better.		
<b>162</b>	<b>Object</b>	<b>Submitter 162</b>		
162.1		This is a historical site and should not be replaced with already large conglomerate shopping precinct. It does not work and will not be a suitable thing to do.	Refer item 4.1 and 98.2 above.	No modifications required.
<b>163</b>	<b>Object</b>	<b>Submitter 163</b>		
163.1		I can't comment as to the requirements of a shopping centre as I don't live in that immediate area. However, when visiting Two Rocks and seeing the great statue and bush pathways around it, it would be really neat to see some sort of park, nature trail or adventure centre in this area instead of another shopping centre. Perhaps a maze or something which ties into the other statues/artwork/carvings in the area would be a good reason to visit. Making a shopping centre there just blends this area into every other suburb around it. Not many areas have the foundations for something different so it would be great to see this utilised and add an unique attraction.	Refer item 5.2 above.	No modifications required.
<b>164</b>	<b>Support</b>	<b>Submitter 164</b>		
164.1		Two Rocks needs to grow with the times.	Noted.	No modifications required.
<b>165</b>	<b>Support</b>	<b>Submitter 165</b>		
165.1		A revamp and increased facilities for those of us who call Two Rocks our local shopping area is well and truly overdue. The indicative design looks to compliment the contemporary amenity of the area as a whole.	Noted.	No modifications required.

<b>166</b>	<b>Support</b>	<b>Submitter 166</b>		
166.1		The area needs a revamp and the design tabled is contemporary and will be well received by those who call Two Rocks their local shopping area. This is well overdue.	Noted.	No modifications required.
<b>167</b>	<b>Object</b>	<b>Submitter 167</b>		
167.1		The proposed development within the Marina Zone is inconsistent with the local planning framework and fails to recognise and develop its potential as a unique tourist destination.	Refer item 158.1 above.	No modifications required.
167.2		The scale and design of the proposed development is not compatible with the surrounding area.	Refer item 37.2 above.	No modifications required.
167.3		The development plan does not preserve the unique historical and heritage value of the Marina Zone.	Refer item 20.1 and 98.2 above.	No modifications required.
167.4		There are alternative, more appropriate sites for the development.	Refer item 13.2 above.	No modifications required.
<b>168</b>	<b>Object</b>	<b>Submitter 168</b>		
168.1		Why would we need this. Woolworths in Yanchep, bottle shop in Yanchep and Two Rocks. An empty café at Yanchep central. Stop ruining Yanchep and Two Rocks. Stop the development.	Refer item 1.1 and 4.1 above.	No modifications required.
<b>169</b>	<b>Object</b>	<b>Submitter 169</b>		
169.1		No comments	Noted.	No modifications required.
<b>170</b>	<b>Support</b>	<b>Submitter 170</b>		
170.1		No comments	Noted.	No modifications required.
<b>171</b>	<b>Object</b>	<b>Submitter 171</b>		



171.1		This was an absolute fantastic place. I brought my children here regularly when they were growing up, when it was in full operation. It should never have been closed down. A Western Australian icon.	Not a valid planning consideration.	No modifications required.
<b>172</b>	<b>Comment</b>	<b>Submitter 172</b>		
172.1		Please not another Woolworths, we have a Woolworths in Yanchep literally 10 minutes away, as well as another one in Butler another 15 minutes again. Please propose Coles or K-Mart.	Refer item 4.1 and 5.2 above.	No modifications required.
<b>173</b>	<b>Support</b>	<b>Submitter 173</b>		
173.1		The whole area has been neglected for so long, the few shops being proposed will be a start though more needs to be added as there is very poor facilities at present, they do have a post office which is more than can be said for Yanchep, no bank for either, at the rate of dwelling going up, we need more facilities in both towns. Two Rocks is not a tourist destination, there is nothing to see or do, let's move onwards.	Noted. Also refer item 5.2 above.	No modifications required.
<b>174</b>	<b>Support</b>	<b>Submitter 174 (Late)</b>		
174.1		Two Rocks definitely needs more commercial activity and a shopping centre, but I am against a liquor shop only.	Noted. Also refer item 1.1 above.	No modifications required.
<b>175</b>	<b>Support</b>	<b>Submitter 175 (Late)</b>		
175.1		More growth at Two Rocks requires more shops and restaurants. Great idea.	Noted.	No modifications required.

176	Object	Submitter 176 (Late)		
176.1		<p>Do you go to Bondi to buy toilet paper? Capri, Italy for tomato sauce and tampons? Mykonos for bread and milk? No. You go to these iconic beach location to forget your everyday problems and enjoy your leisure. Culture, heritage. To swim, let your children build sandcastles, perhaps an ice-cream and share a meal. Hillarys, Cottesloe, East Fremantle these are marinas and beaches/foreshore that very happily exist without being dominated by a Woolworths. Woolworths is also a global company, Two Rocks already has an IGA, liquor store, cafes and other multiple small businesses. I am sure they would enjoy a nice new car park and some planning and consideration of their survival with the new centre. I also think Scarborough Coles is a nightmare for parking, the beach, marina etc. should be kept iconic. Look at Cottesloe, all the way to Swanbourne, Port Beach, Leighton, parking is a nightmare. The beach and marina should be retained for beach and marina visitors and users. Retail giants have plenty of other land choices over our iconic coastline. I honestly can't think of a worse idea.</p>	Refer item 13.2 and 20.1 above.	No modifications required.
177	Object	Submitter 177 (Late)		
177.1		<p>I feel the location of the proposed Woolworths and BWS should be reconsidered as I do not believe it will fit in with the surrounding area, particularly so close to the King Neptune stature.</p>	Refer item 13.2 above.	No modifications required.
177.2		<p>If the BWS already located at Atlantis Shopping Centre will relocate to where Woolworths is, then that would be okay. I am not opposed to Woolworths coming to Two Rocks if it was in another location that would have less of an impact</p>	Refer item 13.2 above.	No modifications required.

		on the Two Rocks Town Centre.		
177.3		I do not believe Two Rocks needs and additional liquor store especially 2 BWS outlets.	Refer item 1.1 above.	No modifications required.
<b>178</b>	<b>Support</b>	<b>Submitter 178 (Late)</b>		
178.1		Having a supermarket such as Woolworths in the area will cut down any additional travel to Yanchep. Plus providing job opportunities for locals, who also won't need to travel further distances on the roads for work (cutting down congestion etc.).	Noted.	No modifications required.
178.2		I would prefer a Coles since there is already a Woolworths in Yanchep, but would be happy with either.	Refer item 5.2 above.	No modifications required.
<b>179</b>	<b>Support</b>	<b>Submitter 179 (Late)</b>		
179.1		No comments	Noted.	No modifications required.
<b>180</b>	<b>Object</b>	<b>Submitter 180 (Late)</b>		
180.1		The proposal is looking to remove heritage aspects of the local area.	Refer item 98.2 above.	No modifications required.
180.2		There is already a shopping centre located in the areas as well as small local businesses which would then be impacted and may not be able to continue to operate due to competition. How many shops does the suburb really need.	Refer item 4.1 above.	No modifications required.
180.3		In addition, there doesn't seem to have much thought on the implications of what the development would have on the immediate or surrounding environment.	Refer item 27.2 above.	No modifications required.

181	Object	Submitter 181 (Late)		
181.1		There is already a Woolworths and BWS at Yanchep. There is already a BWS in Two Rocks and there is already a café in Two Rocks. This would detract from the smaller businesses that are existing and have existed for years for the locals. We have access at Yanchep and don't need this at Two Rocks. The small businesses that already exist have put major effort into supporting our community and should not have to suffer because of greedy big businesses that want to take over our area. Is Yanchep not enough for them!.	Refer item 1.1 and 4.1 above.	No modifications required.
181.2		The land that has been cleared should if not already be heritage listed and that area where King Neptune is, is a monument and has a proud status for us locals.	Refer item 5.2 and 98.2 above.	No modifications required.
181.3		If anything were to be built there then it should be something to entertain our kids where they can have some fun or entertainment.	Refer item 5.2 above.	No modifications required.
181.4		I vehemently oppose this as it serves no purpose for us as residents and will detract way more than it will offer our community in Two Rocks. I also believe there is envisaged dense housing and high rise housing to the south of this plan and within the area. Again, I vehemently oppose this as it is a waste of money and serves no purpose for the community. I am tired of greedy developers who are interested in lining their pockets and not interested in building our community or doing anything in our communities' best interest. Small blocks with back-to-back housing. We have lovely views, a lovely town and it should stay with theme.	Refer item 158.1 above.	No modifications required.

<b>182</b>	<b>Object</b>	<b>Submitter 182 (Late)</b>		
182.1		The development proposed is simply a double up of what already exists and will detract from the heritage and potential amenity the area could provide.	Refer item 4.1, 27.2 and 98.2 above.	No modifications required.
182.2		All throughout Western Australia the areas which are sought after to live and recreate within have large open spaces with tree canopies providing shade for the public. There are no supermarkets in City Beach for Floreat and not even at Hillarys Marina. The only area with a supermarket is Scarborough and that does not work. If the area around the existing precinct was developed into an area for the public to recreate this would bring more people to the area, make it more liveable and provide more customers for existing business. If I could suggest one item for consideration it would be a 50m outdoor swimming pool like the one which has been built in Scarborough.	Refer item 5.2 above.	No modifications required.
<b>183</b>	<b>Object</b>	<b>Submitter 183 (Late)</b>		
183.1		Two Rocks doesn't need a supermarket when there are 2, soon to be 3, less than 10 minutes away. The introduction of this business will severely and negatively impact existing local business.	Refer item 4.1 above.	No modifications required.
183.2		The proposed site is prime area that should be used to support small local business and eateries, fitting with the aesthetic of the community. Find another site.	Refer item 5.2 and 13.2 above.	No modifications required.

<b>184</b>	<b>Object</b>	<b>Submitter 184 (Late)</b>		
184.1		I see no need for further redevelopment such as retail until the existing retail is redeveloped/renovated - is there no reason why the two existing major retail building that are where IGA and then BWS/Perth Lifestyle Residential real estate is cannot become such a development without Woolworths etc. A revamp would bring much to this small area and I believe many of us would prefer to keep the 'country' feel that the area has rather than yet another supermarket and other shops when this can be achieved with what is existing already.	Refer item 1.1, 4.1, 5.2 and 20.1 above.	No modifications required.
184.2		I would rather see parklands or some other Atlantis themed areas around the existing King Neptune to further enhance and celebrate the area's history.	Refer item 5.2 above.	No modifications required.
<b>185</b>	<b>Support</b>	<b>Submitter 185 (Late)</b>		
185.1		Two Rocks must continue to progress and can only do so with modern infrastructure. This centre will cater for not only local residents but those living further afield. As Covid 19 is about to enter WA home delivery times for groceries will also be reduced as less reliance is placed on the nearest Woolworths at Yanchep. Woolworths is also known as a branded company that supports local groups and events and should be encouraged to build. The supporting aesthetics such as landscaping, car parks, lighting and other exterior centre development will only enhance the suburb giving it a much long overdue facelift.	Noted.	No modifications required.
<b>186</b>	<b>Object</b>	<b>Submitter 186 (Late)</b>		
186.1		I am happy with the current shopping centre. We already have a Woolworths in Yanchep a short	Refer item 4.1 above.	No modifications required.

		drive from here.		
186.2		Although the town could use a petrol station.	Refer item 5.2 above.	No modifications required.
<b>187</b>	<b>Object</b>	<b>Submitter 187 (Late)</b>		
187.1		The location will impact upon the crowning glory of Two Rocks, King Neptune.	Refer item 98.2 above.	No modifications required.
<b>188</b>	<b>Object</b>	<b>Submitter 188 (Late)</b>		
188.1		The location of the proposed shopping precinct is not culturally conducive with this historical site. King Neptune and its surrounds are an important feature of Two Rocks and placing a shopping area there would spoil the whole area. We should aim to maintain Two Rocks as a coastal area to be enjoyed by locals and tourists alike, not to be built up like any other suburban area. Yanchep is now just a sea of housing and infrastructure - the uniqueness that it once was is now gone!	Refer item 98.2 above.	No modifications required.
188.2		Please allow Two Rocks to maintain its charm - any new shopping areas need to be set away from the marina / ocean side / old Atlantis site.	Refer item 13.2 and 20.1 above.	No modifications required.
188.3		Promoting tourism would be a far better option since Club Capricorn was torn down.	Refer item 5.2 above.	No modifications required.
<b>189</b>	<b>Object</b>	<b>Submitter 189 (Late)</b>		
189.1		Supporting my family who lives in Two Rocks.	Noted.	No modifications required.
<b>190</b>	<b>Support</b>	<b>Submitter 190 (Late)</b>		
190.1		The entire site has been an eyesore for many years now and it's great to see something positive and progressive being done that will provide more shops, cafes etc. to the area.	Noted.	No modifications required.
<b>191</b>	<b>Object</b>	<b>Submitter 191 (Late)</b>		

191.1		WA has a habit of knocking things down and building over them - instead of preserving heritage. I would love to see something built there that is close to what was originally there, do Neptune justice. He was kept there for a reason.	Refer item 5.2 and 98.2 above.	No modifications required.
191.2		Building a water park there would be beneficial to tourism and also families who are local or even not local. Another shopping centre is not the answer. Help get the kids away from their screens (a huge problem) give them somewhere to go that will be fun and exciting time after time, and will also encourage families to venture further and bring in tourism for close by and want to stay nearby too. Put into the economy a different way instead of just another boring shopping centre.	Refer item 5.2 above.	No modifications required.
<b>192</b>	<b>Object</b>	<b>Submitter 192 (Late)</b>		
192.1		There is plenty of other land to build a retail outlet on.	Refer item 13.2 above.	No modifications required.
192.2		This is a place of local and state heritage that should be maintained.	Refer item 98.2 and 111.6 above.	No modifications required.
<b>193</b>	<b>Object</b>	<b>Submitter 193 (Late)</b>		
193.1		No comments	Noted.	No modifications required.
<b>194</b>	<b>Object</b>	<b>Submitter 194 (Late)</b>		
194.1		Two Rocks is a unique community and has the potential for a tourism destination. Any and all developments should be undertaken with a view to retain this uniqueness and sense of community. All care should be taken to avoid cookie cutter chains and retail stores reducing us to the same as everywhere else. Developers should be challenged to consider how they can integrate their services into the dynamic of Two Rocks rather than impose their existing business	Refer item 20.1 above.	No modifications required.



		formulae onto the community.		
<b>195</b>	<b>Object</b>	<b>Submitter 195 (Late)</b>		
195.1		There is no need for this in Two Rocks. This is a small coastal town and that's how it should remain.	Refer item 4.1 above.	No modifications required.
<b>196</b>	<b>Object</b>	<b>Submitter 196 (Late)</b>		
196.1		I honestly think it should be restored to its former business. There isn't enough attractions as I is some of the best ones including Atlantis Marine Park have been abandoned including Castle Fun Park which was located in Mandurah.	Refer item 5.2 above.	No modifications required.
<b>197</b>	<b>Support</b>	<b>Submitter 197 (Late)</b>		
197.1		For a growing area, Two Rocks requires a modern facility and competition to existing facilities. The proposed facility will be within walking distance for most people and will avoid the requirement to travel to Yanchep to shop.	Noted.	No modifications required.
<b>198</b>	<b>Object</b>	<b>Submitter 198 (Late)</b>		
198.1		The proposed businesses are in too close proximity to existing supermarket, liquor store and cafes.	Refer item 1.1 and 4.1 above.	No modifications required.

198.2	This is classified as Maritime not Commercial.	<p>The subject site is zoned 'Marina' under DPS 2, and 'Urban' under the MRS.</p> <p>The subject site is identified within ASP 70 as being zoned Commercial, Mixed Use and Public Open Space (Drainage). The subject site is also identified within ASP 70 as being within the 'Precinct C – Main Street' precinct.</p> <p>The Shop, Restaurant and Office land uses are identified as 'P' or permitted land uses within the Commercial and Mixed Use zones as identified within the City of Wanneroo District Planning Scheme No.2 (DPS 2) and Two Rocks Town Centre Agreed Structure Plan No.70 (ASP 70), whilst the Liquor Store is an 'A' or advertised land use. Accordingly, all proposed uses are capable of consideration.</p>	No modifications required.
198.3	There is no consideration regarding the historical nature of the site and proximity to the ocean.	<p>The subject site has been considered against the relevant provisions of State Planning Policy 2.6 - State Coastal Planning and has been considered appropriate.</p> <p>Refer item 98.2 above.</p>	No modifications required.
198.4	There is no consideration as to rubbish generated by Woolies and its impact on the sensitive nature of the site.	Refer item 27.2 above.	No modifications required.
198.5	Prefer an area for public use: children's adventure playground, lawn open area, small variety shops that are complementary to existing business.	Refer item 5.2 above.	No modifications required.

<b>199</b>	<b>Object</b>	<b>Submitter 199 (Late)</b>		
199.1		The Two Rocks local business community has worked very hard to improve and get the Two Rocks shopping centre working as a people friendly environment with all the necessities required. It would be disappointing to see the vibe and businesses overtaken by a large multinational.	Refer item 4.1 and 20.1 above.	No modifications required.
199.2		If a major supermarket wants to establish itself in Two Rocks, why don't they look at Breakwater Drive instead.	Refer item 13.2 above.	No modifications required.
<b>200</b>	<b>Object</b>	<b>Submitter 200 (Late)</b>		
200.1		This was once a wonderful tourist destination. It would be great if it were redeveloped into something similar, something beautiful our local community can go out and enjoy with their families.	Refer item 5.2 above.	No modifications required.
<b>201</b>	<b>Object</b>	<b>Submitter 201 (Late)</b>		
201.1		I am a visitor to this area and in my view the proposed development is inconsistent with the surrounding residential area.	Refer item 20.1 above.	No modifications required.
201.2		The proposal fails to preserve the heritage and history of the marina zone.	Refer item 98.2 above.	No modifications required.
201.3		I believe there are much more appropriate sites for such a development and these should be considered.	Refer item 13.2 above.	No modifications required.
<b>202</b>	<b>Comment</b>	<b>Submitter 202 (Late)</b>		
202.1		The area should be developed as it was intended for tourism in the area.	Refer item 5.2 above.	No modifications required.
202.2		There is a large supermarket complex in Yanchep and an IGA in Two Rocks.	Refer item 4.1 above.	No modifications required.
202.3		The area is of cultural significance.	Refer item 98.2 above.	No modifications required.

<b>203</b>	<b>Comment</b>	<b>Submitter 203 (Late)</b>		
203.1		Given I overlook the site of this development I have concerns related to my enjoyment of my property. I regard the need for landscaping including the provision of trees to beautify the area as paramount. This will also enhance the outlook from the park on the other side of Lisford Avenue. Appropriate and agreeable landscaping may alleviate a little the general anger which is being expressed by local residents and landowners at the moment.	Refer item 87.1 and 120.1 above. As per the Landscaping Plan, the site will include a range of native tree, shrub and ground covers which will be utilised both within, and along the verge areas of the site. In addition, the proposal has sought to utilise Washingtonia Robusta, which whilst not native, reflect the landscaping and heritage of the former Atlantis Marine Park.	No modifications required.
203.2		It's positioning as outlined in the proposal means that traffic planning will be extremely important.	Refer item 13.2 and 27.1 above.	No modifications required.
203.3		I suspect it is probably this plan meets the criteria for developments in the zone where it is to be constructed according to the Two Rocks Town Centre Agreed Structure Plan No.70.	Refer item 76.1 above.	No modifications required.
203.4		Part of that anger is the timing of the feedback period to the appropriate authority. There is a sense that to put such feedback from December 2-17, then until the 24th is poor, particularly as there was no prior notification that such notice was coming. I am a very active member of the Two Rocks Yanchep Residents Association, and nothing came to our Association so that it could be considered and commented upon at our November 22 meeting, our last for the year.	Refer item 40.2 above.	No modifications required.
<b>204</b>	<b>Object</b>	<b>Submitter 204 (Late)</b>		
204.1		Not enough time has been available for a more in-depth response. Consequently I have primarily focused on their Vision Statement as it encompasses the general intent of their Development Proposal.	Refer item 40.2 above.	No modifications required.

204.2	The site of this proposed development may be prominent but is in an entirely inappropriate location.	Refer item 13.2 above.	No modifications required.
204.3	With seemingly little or no regard to the historical connections of the area or their perceived coastal context, on the contrary it is the precincts historical connection that set its character and accentuates the unsuitability for this "contemporary" abomination.	Refer item 20.1 and 98.2 above.	No modifications required.
204.4	Despite the assertion that this proposal will activate and be a catalyst, the increasing population growth will be the catalyst and provide the activators and not a new and unnecessary supermarket.	Refer item 4.1 above.	No modifications required.
204.5	In fact the comment I hear most is why a new Woolworths when there is one just down the road along with an ALdi and soon a Coles supermarket as well. There is also a glut of supermarkets/shopping centres and server stations between here and Clarkson. Again what is the point?	Refer item 4.1 above.	No modifications required.
204.6	"A high quality destination", I think not, the same comments could just as well apply to the existing Two Rocks Centre that has an adequate IGA supermarket with friendly and obliging owners and staff. Plus a variety of Restaurants/Cafes with indoor/outdoor dining which is already used as an informal community meeting place, we often see business groups, family and friends enjoying the food, view and ambience that these well patronised venues offer. Why reinvent the wheel? I seriously doubt a competing complex would have any appreciative effect on tourism and more than likely a negative impact on the existing shopping precinct.	Refer item 4.1 and 5.2 above.	No modifications required.

204.7	It has been suggested that a more appropriate development, connecting the area with that previous historic attraction the great, "Atlantis Marine Park". Possibly an adventure water world type attraction and or other similar activity that would fit well within the old marine park precinct. The area could even accommodate a short stay Caravan Park. Now we are talking about real increased visitor and tourist numbers along with jobs and economic outcomes long term. That trumps you Mr Woolworths.	Refer item 5.2 above.	No modifications required.
204.8	The recently completed Azzurra Road could possibly ease traffic congestion at the Sovereign Drive - Lisford Ave intersection only if this project is not approved. Secondly there is proposed to be another two future road/pathway connections to Lisford Ave, one a shared pathway connecting to Lisford Ave opposite the entry to Charnwood Park and on the southern side of the proposed Woolworths development (nominated as Australis Street) connecting Jordan Street to Lisford Ave at the Charnwood Ave intersection. This has to be madness, with a double S-bend on Lisford Ave south of Charnwood Ave which is a blind spot for traffic travelling north and traffic entering Lisford Ave from Charnwood Ave to top this off is the possibility of traffic signals. I hope not. There seems to be a lot of safety issues involved here.	Refer item 27.1 above. The existing and proposed share pathway is not a consideration as part of this proposal.	No modifications required.

204.9	<p>It is noted that the Two Rocks Shopping Centre it is only 8km (approx. 10min) north west of Yanchep Strategic Metropolitan Centre, which is still locally convenient. Lot 9702 consists of approx. 7.8 hectares bounded by Sovereign Drive to the north, Jordan Street to the South, Lisford Ave on the east and the Marina Precinct on the ocean or western boundary. The whole coastal urban development from Clarkson up to Two Rocks is littered with supermarket dominated shopping centres, we are inundated with choice of shopping locations all be it much the sameness. It would be refreshing if the town of Two Rocks could keep its small country village feel that why we choose to live here.</p>	Refer item 4.1 above.	No modifications required.	
<b>205</b>	<b>Object</b>	<b>Submitter 205 (Late)</b>		
205.1	<p>My objection is based on the disregard for the cultural heritage significance of the King Neptune Statue and the consequent close proximity, mezzanine architectural element, and the elevated land form in the southeast corner of the site. The HIS and DRP reports indicate a lack of knowledge of the site or understanding of the value of King Neptune, in support of the DA proposal.</p>	Refer item 98.2 above.	No modifications required.	

<p>205.2</p>	<p>There is inadequate understanding or consideration of the significance of King Neptune.</p> <p>Views to King Neptune from the entire southern hemisphere are impacted by the proximity of the siting of the proposed Woolworths building and the land form elevation to over 4 metres above the natural ground, and street level in the southeast corner of the site adjoining Lisford Avenue.</p> <p>The mezzanine is an unjustifiable architectural element that raises the height of the building in close proximity and further impacts the views of King Neptune.</p> <p>As outlined within the HIS, what constitutes "Sufficient setback from King Neptune"? There is no information to support any setback either horizontal or vertical. In my opinion it is not sufficient particularly with the mezzanine element.</p>	<p>Refer item 37.2 and 98.2 above.</p>	<p>No modifications required.</p>
<p>205.3</p>	<p>The elevated land in the southeast corner of the site restricts views from the footpath along the east, and particularly, the new dual use path along the west side of Lisford Avenue.</p> <p>It seems little consideration has been given to the Lisford Avenue 'frontage' of the development, and the impacted views.</p>	<p>Whilst Lisford Avenue is identified as an Other Regional Road, Azzurra Street is intended to service the main street frontage of the site, and accordingly has resulted in an improved interface and building frontage along the north of the site. Frontage of the corner tenancy between Azzurra Street and Lisford Avenue has also been included. A future pad site is located at the south-eastern corner of the site which will facilitate future development on this portion of the lot, which will ultimately provide an additional level of activation to Lisford Avenue at</p>	<p>No modifications required.</p>



		such time. The proposal is not considered to impact on any views and is at an appropriate scale and height for the area.	
205.4	The site includes an expansive carpark that could be an appropriate buffer to King Neptune	The proposal is considered to achieve a suitable level of separation to the King Neptune statue and has been designed to be sympathetic and responsive to the views both to and from the statue. As Azzurra Street is intended to be a main street, the use of car parking along this frontage would be contradictory to this intent, nor would it facilitate a good planning outcome.	No modifications required.
205.5	As outlined within the HIS, "The use of sculptures will have a positive impact". King Neptune is the positive element. Not to be detracted by the building or "the use of sculptures".	Refer items 98.2 and 205.4 above.	No modifications required.
205.6	As outlined within the HIS, "Overall the development will not negatively affect the heritage significant places within its surroundings". Wong. It will have a considerable impact on all views from the southern hemisphere to King Neptune. The proximity of the building, the height of the mezzanine, and land elevation in the southeast corner of the site.	Refer items 37.2, 98.2 and 205.4 above.	No modifications required.

205.7	<p>As stated in the Statement of Significance: "The limestone retaining walls and statue of King Neptune have acquired landmark status in a local context and the latter in terms of the region".</p> <p>The HIS States: "Minor positive impact. The café facing the King Neptune Statue ensures it retains its landmark qualities".</p> <p>This statement is repeated 3 times and is the only reference to King Neptune in the summary. The cafe will be facing a limestone wall that has been constructed along the south side of the base of the statue. How it ensures King Neptune's landmark status is unclear.</p> <p>The King Neptune landmark is highly valued by the local residents, the broader community, holidaymakers and tourists, as it identified the Atlantis Marine Park and generations of memories.</p> <p>This development is not respectful to that significance.</p>	King Neptune is identified as a Category 2 listed site within the City's Local Heritage Survey. As outlined in items 98.2 and 205.4 above, the proposal has been considered to appropriately address and be sympathetic to the heritage value of the site and area.	No modifications required.
205.8	<p>As stated by the DRP: "The optimal outcome for the site".</p> <p>I assume there was no site visit associated with the DRP considerations or other options?</p>	<p>Refer item 111.1 above. Understanding the site context is important for both the Design Review Panel and the City's officers to be able to assess how well a proposal responds to its site and context.</p> <p>Throughout the application process, several site visits have been undertaken to inform these considerations.</p>	No modifications required.

205.9		<p>In summary, there are no diagrams, plans, measurements or indication of the height difference or the aspects of the views to support the proposed plans and the assessed outcome of the development not impacting the King Neptune landmark.</p> <p>The DA and supporting HIS demonstrate a considerable disregard for the cultural heritage significance and viewing opportunities to and from king Neptune that represents not only a unique work by a renowned sculptor, but generations of residents, holiday makers and tourists at Atlantis Marine Park.</p>	<p>Refer plan 3353-03 Rev H - Elevations which clearly shows the King Neptune statue in comparison the proposal.</p> <p>Also, refer items 98.2 and 111.6 above.</p>	No modifications required.
<b>206</b>	<b>Object</b>	<b>Submitter 206 (Late)</b>		
206.1		Two Rocks is a beautiful area of significance and the proposed development will harm the natural environment in ways which cannot be offset.	Refer item 27.2 above.	No modifications required.
<b>207</b>	<b>Support</b>	<b>Submitter 207 (Late)</b>		
207.1		No comments	Noted.	No modifications required.
<b>208</b>	<b>Object</b>	<b>Submitter 208 (Late)</b>		
208.1		<p>Please keep the statue. I have very strong memories of Atlantis Marine Park. I think history is an important thing. It was very sad when it closed. I used to go look at the dolphins when they were at Hillary's when I was sad. Then as I remember, they died. I'm in tears, please don't mess this up.</p>	The proposal does not seek the removal of the King Neptune statue.	No modifications required.

# ATTACHMENT 4



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## **TWO ROCKS** Development Application Commercial Development

### **Woolworths, Two Rocks Heritage Impact Statement**

Prepared for:  
Urbis

On behalf of  
Fabcot Pty Ltd

October 2021

Griffiths Architects





Griffiths Architects is a leading architectural firm in Perth, Australia. Griffiths Architects was born out of a practice of which Philip Griffiths was a co-director for over 20 years.

The company emerged from a desire to diversify the range of work covered by the practice, and to take a fresh approach to design.

The practice undertakes commissions in architecture, heritage, urban, interior design, interpretation and heritage assessments. Griffiths Architects provides professional advice on a range of issues related to these areas of our discipline.

The practice has won architectural, planning, and heritage awards for a wide range of projects located throughout the state.

Griffiths Architects has a great depth of experience across numerous project types and delivers innovative solutions that embrace environmental responsibility with elegant and simple solutions. The projects are the product of working closely with clients, carefully assessing their expectations, and delivering high quality results.

Cover: Courtesy of the City of Wanneroo.

### Revision History

Date of this revision 26 October 2021

Document	Version	Author	Status	Date	Distribution
HIS	02	Griffiths Architects	Final	26/10/2021	Urbis
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## Introduction

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This Heritage Impact Statement (HIS) was prepared by Griffiths Architects and outlines a Development Application at 10 Enterprise Avenue, Two Rocks for a new Woolworths for Fabcot Pty Ltd.

The works are mainly located on land that used to be part of the Atlantis Marine Park that first opened in December 1981. The marine park featured performances by the dolphins, seals and sea lions were held throughout the day with visitors also able to view the feeding of sharks and giant stingrays in the oceanarium. Also on the site were three restaurants, a monorail, a water park, a playground, a trampoline park, a miniature golf course, a 'touch' pool and later an education area focussing on the marine world. The Park closed in 1990 and over time the structures on the site were filled in, removed or left to deteriorate.

With the loss of the park the Two Rocks town centre suffered but in the last 30 years with the increasing urban sprawl of Perth bringing new major urban centres closer to Two Rocks the Town Centre is once again thriving.

The HIS examines the impacts of the proposed development on the Two Rocks Town Centre Precinct.

The development application is for mixed use retail development that will include a new Woolworths, café and retail spaces with associated parking facilities.

The HIS considers the heritage values as described in the Statements of Significance from the Two Rocks Town Centre Precinct Heritage Assessment December 2006 by Philip Griffiths with Kris Bizzaca and the statement of significance from the City of Wanneroo Local Heritage Survey

### Summary

The area has been left vacant since the closure of Atlantis Marine Park in 1990 and its subsequent demolition.

The new development is set back sufficiently that it does not directly visually sit against the Two Rocks Shopping development. Linking development will occur between the two in the future. The materials palette of the new development is sympathetic to the existing shopping centre and existing landscape. The form and scale of the project is significantly larger than the existing shopping centre, but the facades are broken up with speciality shops and café to reduce the overall massing. The café facing the King Neptune Statue ensures it retains its landmark qualities.

Overall, the development will not negatively affect the heritage significant places within its surroundings.



## Location

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Two Rocks is located 61km from Perth and represents the northern most extent of the Perth Metropolitan area. The current population is 3,784 with a forecast to grow to 20,879 by 2041. Two Rocks is only 15km from Yanchep National Park a major tourist destination.

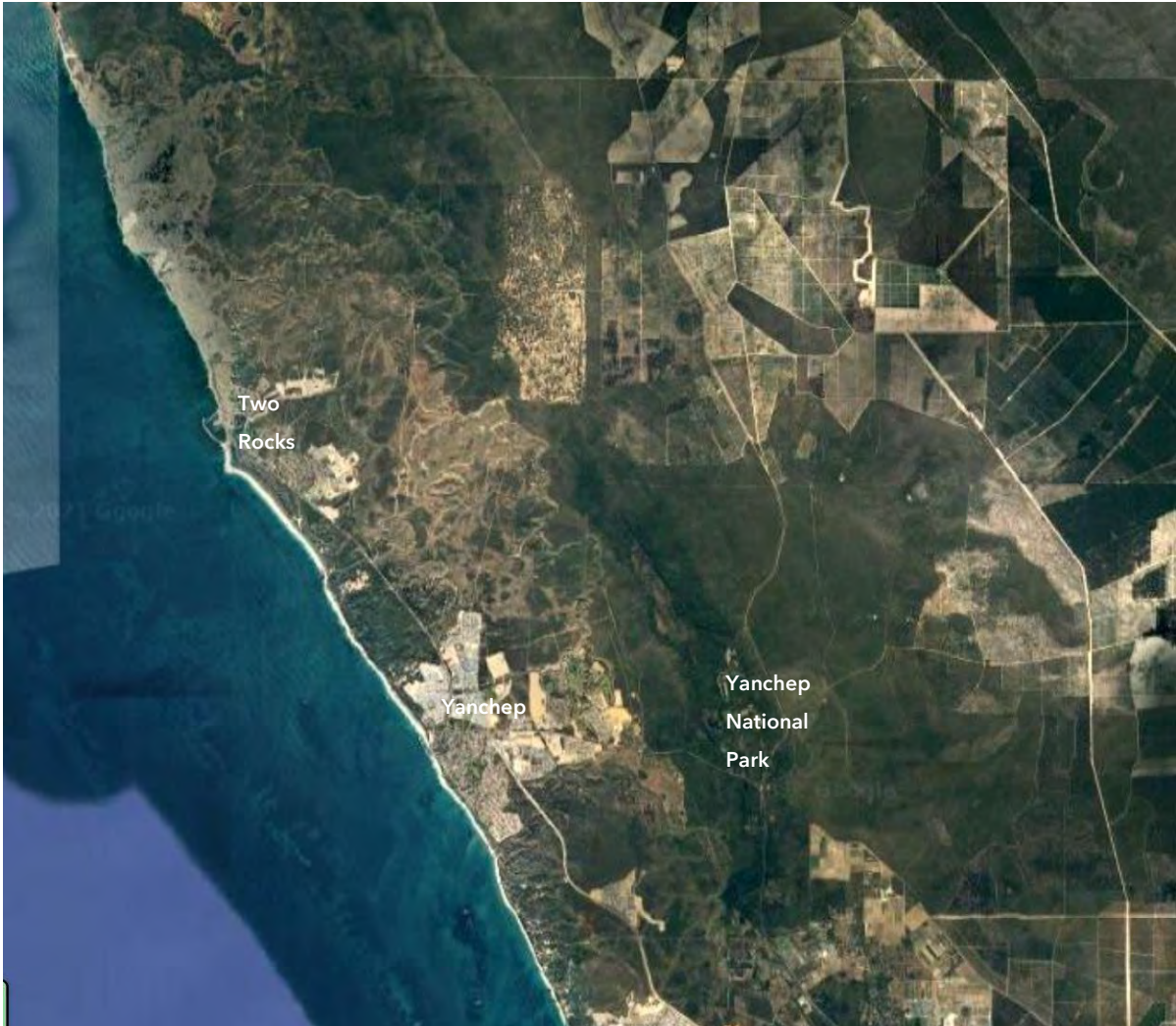


Figure 1 Location Plan, *Google Maps 2021*.





Figure 2 Site Plan with approx. location of development in red, Google Maps 2021.

## Heritage Listings

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State and Local Heritage Listings: there are numerous listings in the vicinity of the Two Rocks precinct. These included

- *Atlantis Marine Park (former) Place no. 17523 – RHP – to be assessed – 11 September 2020*
- *Sun City Precinct, Two Rocks Place no. 26470 – RHP – to be assessed – 11 September 2020*
- *Two Rocks Shopping Centre and Tavern Place no. 16771 – RHP – to be assessed – 11 September 2020*
- *King Neptune Sculpture Place no. 17935 – RHP – to be assessed – 11 September 2020*
- *Waugal Monoliths Place no. 17948 – RHP – to be assessed – 11 September 2020*

There is a listing under Two Rocks Marina Precinct Place no. 17953 that is RHP – Does not warrant assessment.



The place has multiple listings within the City of Wanneroo Local Heritage Survey:

- *Atlantis Marine Park (10 Enterprise Ave) Place no. 42 - Category 4*
- *King Neptune Sculpture (10 Enterprise Ave) Place no. 43 - Category 2*
- *Two Rocks Shopping Centre (10 Enterprise Ave) Place no. 44 - Category 4*
- *Two Rocks Tavern (10 Enterprise Ave) Place no. 45 - Category 4*
- *Waughal Monoliths (10 Enterprise Ave) Place no. 46 - Category 4*
- *Two Rocks Limestone Retaining Wall (Pope St and Enterprise Ave) Place 48 - Category 4*

## Contributors

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## Background

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For a full description of the former Atlantis, refer to the Heritage Assessment. This information is intended to assist in a better understanding of context.

Two Rocks Town Centre Precinct, which the proposed development sits within, comprises retained dunes, limestone retaining walls, a concrete block construction shopping centre and tavern in the Perth Regional style (1974) and limestone figures, together with the remains of Atlantis (1981) and concrete construction King Neptune statue (1981).

The post-World War Two period brought about significant changes to the Perth metropolitan region that came as a result of rapid expansion due to the massive post World War Two Australian reconstruction and mass immigration together with the WA industrial and mineral boom of the 1950s to the 1970s.<sup>1</sup> At this time, it was the 1955 'Plan for the Metropolitan Region, Perth and Fremantle'<sup>2</sup> that laid out the coordinated approach of the expansion of the metropolitan region.<sup>3</sup> One of these was the North West Corridor, stretching along the coast north of Perth and encompassing Yanchep National Park which was identified for residential and recreational purposes.<sup>4</sup>

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<sup>1</sup> Seddon, G. & Ravine, D., *A City and its Setting*, Fremantle Arts Centre Press, Fremantle, 1986, p. 187; Alexander, I., 'The Central Area', in Gentili, J., (ed), *Western Landscapes*, UWA Press, Nedlands, 1979, p. 412.

<sup>2</sup> Stephenson, G. & Hepburn, J.A., 'Plan for the Metropolitan Region, Perth and Fremantle, 1955 Report', Government Printing Office, Perth, 1955.

<sup>3</sup> Georgiou, J., 'The Metropolitan Region', in Pitt Morison, M. & White, J. (eds.), *Western Towns and Buildings*, UWA Press, Nedlands, 1979, pp. 249 & 251.

<sup>4</sup> Stannage, T., *Lakeside City: The Dreaming of Joondalup*, UWA Press, 1996, pp. 20 – 29; MRPA, 'The Corridor Plan for Perth', MRPA, 1970, pp. 40 – 43.



It is within this context, in 1969, that the Bond Corporation Pty Ltd purchased the Wydgee Pastoral Company's approximately 19,000 acre property for what became known as 'Yanchep Sun City' (YSC).<sup>5</sup> YSC was proclaimed to be the largest private landholding to be developed for a 'major leisure, residential and retirement centre'.<sup>6</sup>

in 1973, Sun City Marina was purportedly built in a record time of nine months. The first stage comprised the building of the breakwaters and service areas and the second incorporated tall retaining walls, dry and wet docks, and private and commercial boat pens.<sup>7</sup>

The marina went on to receive a Merit Award for excellence in design and construction in the 1976 WA Engineering Awards<sup>8</sup> and recognition from the WA Chapter of the Royal Australian Institute of Architects for its noteworthy design followed in 1979 by the WA Chapter's prominent Bronze Medal Award.<sup>9</sup>

Problems at the Bond Corporation resulted in the Tokyu corporation taking over management of YSC by 1975.<sup>10</sup> It had developed large scale urban projects at places like Seattle before President Noboru Gotoh became interested and then convinced of YSC's 'suitability for public recreation and a housing development'.<sup>11</sup> Ongoing problems led to Tokyu plans to purchase the Bond Corporation's 51% share of YSC. The purchase was finalised on 20 March 1978 making YSC fully owned and managed by Tokyu.<sup>12</sup>

The plans for the \$20 million marine park, which was located on 10 hectares adjacent to the Two Rocks Town Centre and Tavern, were announced in January 1981. The park was to:

feature aquatic shows with WA dolphins, seals, sealions [sic] and hand feeding of sharks and giant rays... it would include a series of pools and aquarium, an ocean theatre pool and a stadium.<sup>13</sup>

Taking its name from the island of legend, the Atlantis Marine Park was first opened at 10am on 26 December 1981.

<sup>5</sup> Bond Corporation, Annual Report, 1973, pp. 2& 4; Spillman, K., *The Dreamkeepers: Tokyu Corporation's First 30 years in Western Australia 1974 – 2004*, Yanchep Sun City Pty Ltd, 2005, pp. 12 – 13, 20; Chambers, op. cit., pp. 112 & 128. The pastoral property, known as the Yanchep Estate, was originally owned by the Hon. Lady Mary Lindsay, wife of Robert Lindsay Aide de Camp to Lord Beauchamp the Governor General of Australia. Mrs Lindsay purchased the place from the Midland Railway Company after she visited the Yanchep area in 1925/1926. She owned Yanchep Estate for some 30 years and was a prominent identity residing half the year at her isolated cottage in Yanchep and the other half in 'high society' Europe. There are several well-known stories about Mrs Lindsay including her solitary walks on her property while bedecked with jewels and tales of her spreading native seed by hand. (Moloney, A., 'The Story of Yanchep', typescript, n. d. [c. 1979], n. p. [Ch. 5]; Chambers, op. cit., pp. 56 – 58, 112; *Wanneroo Times*, 13/10/1992; *Countryman*, 3/4/1986.)

<sup>6</sup> Quotation from Bond Corporation, Annual Report, 1973, p. 4; see also Spillman, op. cit., pp. 12 – 13, 20.

<sup>7</sup> Bond Corporation, Annual Report, 1973, p. 4; Moloney, op. cit., Ch. 6.

<sup>8</sup> Bond Corporation, Annual Report, 1976, p. 6.

<sup>9</sup> *The Architect*, 79/2, Vol. 19, No.2, p. 14.

<sup>10</sup> Spillman, op. cit., p. 27 – 28; Bond Corporation, Annual Report, 1975, pp. 4 – 5.

<sup>11</sup> Ibid, p. 22. The joint venture meant that a number of executives from Tokyu in Japan relocated to WA. The move to Perth and to Yanchep/Two Rocks was a major cultural shock for the executives and their families with language and ethnicity barriers as well as significant changes to lifestyle. (Ibid, p. 26.)

<sup>12</sup> All information and quotation (p. 39) from Spillman, op. cit., pp. 34 – 40.

<sup>13</sup> Hamlet, J. & Langley-Kemp, J. (eds.), *Yanchep/Two Rocks: Yesterday and Today*, Sun City Writer's Group, 2000, p. 15.



In 1982, the Atlantis Marine Park was awarded Western Australia's most important prize for tourism, the Sir David Brand Award.<sup>14</sup>

This signalled a period of prosperity for the Yanchep/Two Rocks area. The early 1980s saw YSC redevelop of the Yanchep Holiday Village as the Club Capricorn holiday resort<sup>15</sup> and the opening of a new golf course club house by international golfer Jack Newton in November 1985.<sup>16</sup> YSC and the Wanneroo local government worked together with Yanchep/Two Rocks residents to improve and expand public facilities like the surf lifesaving club, the bowling green, an arts and crafts building, and the establishment of a library in the bini shell in 1983.<sup>17</sup> The marina grew to accommodate a number of pleasure craft as well as approximately 65 boats associated with the local crayfishing industry. The Two Rocks Shopping Centre and Tavern was open seven days a week and included a supermarket, bakery and medical centre.<sup>18</sup>

The closure of Atlantis Marine Park in 1990 in turn affected the economy of Two Rocks and resulted in several small businesses in the Two Rocks Shopping Centre and Tavern being shut down. During the 1990s, the community of Yanchep/Two Rocks went on to face much of the social and cultural problems felt by many small communities throughout the state and Australia.

The Fini Group purchased Two Rocks Town Centre Precinct, comprising the Shopping Centre and the former Atlantis Marine Park site, in 1999.<sup>19</sup>

In August 2006 when the heritage assessment was prepared, the Two Rocks Shopping Centre and Tavern continued to serve the purpose for which it was originally built. Some landscaping elements, limestone pathways and walls, the King Neptune Statue and the former entrance marked by Mark Le Buse's sculpture of a pod of dolphins were all that remained of the Atlantis Marine Park (fmr) in 2006.

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<sup>14</sup> Spillman, op. cit., p. 51; *YSC Gazette*, Issue 9, October 2004, p. 1. Note: The prize was not actually awarded until a ceremony in 1983, which has caused some confusion about the year in which the award was received.

<sup>15</sup> Spillman, op. cit., p. 55. Club Capricorn underwent major extensions in c. 1985. (*Western Mail*, 3-4/8/1985.)

<sup>16</sup> Spillman, op. cit., p. 58.

<sup>17</sup> Spillman, op. cit., p. 54; Chambers, op. cit., p. 163.

<sup>18</sup> Spillman, op. cit., p. 54.

<sup>19</sup> Certificate of Title, Vol. 1892, Fol. 740.



## Statement of Significance

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The statement of significance has been taken from the 2006 Two Rocks Town Centre Precinct Heritage Assessment by Philip Griffiths Architects with Kris Bizzaca

*Two Rocks Town Centre Precinct*, comprising retained dunes, limestone retaining walls, a concrete block construction shopping centre and tavern in the Late Twentieth Century Perth Regional style (1974) and limestone figures, together with the remains of Atlantis (1981) and concrete construction King Neptune statue (1981), has cultural heritage significance for the following reasons:

the place is integral to the history of the development of Yanchep Sun City from the early 1970s, one of the most significant residential, commercial and recreational investment projects undertaken by a private owner/company in this post World War Two period;

the limestone retaining walls and statue of King Neptune have acquired landmark status in a local context and the latter in terms of the region;

the place has social and historical significance to the local community for its contribution to the understanding of the development of Two Rocks and Yanchep, and also for the central role it has and still plays in the everyday lives of residents;

the place contributes to an understanding of the importance of Yanchep as a holiday and tourist destination in concert with the Yanchep caves and National Park, the beach and original shack and fishing settlements along the coast, the Two Rocks marina and town centre as well as Atlantis Marine Park (fmr), the first marine park and oceanarium to be established in Western Australia in 1981;

Two Rocks Shopping Centre and Tavern was a noteworthy design in the context of the mid and late 1970s; and,

the place has associations with former owner Alan Bond, the Japanese company Tokyu Corporation, which has owned and managed the Yanchep Sun City project for over 30 years, and Anthony Brand then of Forbes and Fitzhardinge, designer of the Two Rocks Shopping Centre and Tavern.

The carved limestone artworks, or Waugal Monolith Sculptures have no intrinsic artistic value and have little cultural heritage significance in relation to the shopping centre complex, while carved limestone figures that remain in the ruins of Atlantis contribute to an understanding of the facility.

The car parking, shopping centre service elements, chain link fences, shop fittings, together with the remains of substations, pump works, and the like have no cultural heritage significance.



Sun City Yacht Club and marina area together with the second shopping centre to the north of the original town centre precinct was not included in this assessment.

## New Works

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The proposed works involve clearing of the land to construct a mixed-use retail development that includes a new Woolworths with 4 speciality retail spaces and café to the north and south of the entrance, with service area to the west side, pick up area to the north and parklet to the northwest corner. A larger separate retail building at the northeast corner of the site is separated from the main building by a car park. Two areas are to be left vacant for future retail use by others.

## Impacts and Mitigation

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In this assessment, the proposals are measured against the heritage values as per the Statement of Significance.

**Statement of Significance - Two Rocks Town Centre Precinct Heritage Assessment December 2006** by Philip Griffiths with Kris Bizzaca

Heritage values	Potential Impact Analysis	Mitigation
The place is integral to the history of the development of Yanchep Sun City from the early 1970s, one of the most significant residential, commercial and recreational investment projects undertaken by a private owner/company in this post World War Two period	This is a historic value, there is no work that would impact on this value.	No impact or mitigation required
The limestone retaining walls and statue of King Neptune have acquired landmark status in a local context and the latter in terms of the region	There is no work that impact on the retaining walls. The outdoor café area opens out to the King Neptune statue giving patrons direct views to the statue.	Minor positive impact. The café facing the King Neptune Statue reinforces its landmark status.
The place has social and historical significance to the local community for its contribution to the understanding of the development of Two Rocks and Yanchep, and also for the central role it has and still plays in the everyday lives of residents	This is a historic value, there is no work that would impact on this value. The new development is typical of how commercial/retail spaces are constructed today. The juxtaposition of the two retail spaces shows the evolution of the retail environment.	No impact and no mitigation required.



The place contributes to an understanding of the importance of Yanchep as a holiday and tourist destination in concert with the Yanchep caves and National Park, the beach and original shack and fishing settlements along the coast, the Two Rocks marina and town centre as well as Atlantis Marine Park (fmr), the first marine park and oceanarium to be established in Western Australia in 1981	This is a historic value, there is no work that would impact on this value.	No impact and no mitigation required
Two Rocks Shopping Centre and Tavern was a noteworthy design in the context of the mid and late 1970s	There is no work that would impact on this value.	No impact and no mitigation required
The place has associations with former owner Alan Bond, the Japanese company Tokyu Corporation, which has owned and managed the Yanchep Sun City project for over 30 years, and Anthony Brand then of Forbes and Fitzhardinge, designer of the Two Rocks Shopping Centre and Tavern	This is a historic value, there is no work that would impact on this value.	No impact and no mitigation required

#### Statement of Significance - City of Wanneroo Local Heritage Survey

Heritage values	Potential Impact Analysis	Mitigation
Place 42 Atlantis Marine Park (site): The place has historic value for its association with the development of Two Rocks as a tourist destination and residential subdivision.	This is a historic value, there is no work that would impact on this value.	No impact and no mitigation required
Place 43 - King Neptune Sculpture: The sculpture is a landmark in the community of Two Rocks since 1982. The sculpture has historic value for its association with the development of Two Rocks Marina and the Atlantis Marine Park.	The outdoor café area opens out to the King Neptune statue giving patrons direct views to the statue.	Minor Positive impact. The café facing the King Neptune Statue reinforces its landmark status.
Place 44 - Two Rocks Shopping Centre: The place has aesthetic significance as a demonstration of the post war international/brutalist style expression in concrete block construction. The place has historic value for its association with the development of the Two Rocks townsite in the 1970's.	The materials palette of the new development is influenced by the existing Two Rocks Shopping Centre. The light-coloured brick and block work reflect the materials used in the existing shopping centre. The dark precast panels with recessed painted bubble pattern and white and timber cladding are designed to evoke a beach feel. The dark colour of the precast section of building and placement of specialty retail around the building will help disguise its bulk. While the west elevation is substantial future development in front will break up the bulk.	Little Impact/positive impact.



<p>Place 46 - Waughal Monoliths: The sculptures have aesthetic value as examples of a style of public art widely used in Perth during the 1970's.</p> <p>The sculptures have historic value for their association with the development of Two Rocks marina and townsite in the 1970's.</p>	<p>This is a historic value, there is no work that would impact on this value.</p> <p>It is the intention to relocate some of the sculptures to the site as art pieces, if permission to use them is granted.</p>	<p>No impact. The use of the sculptures as art pieces on the site would be a positive impact and will improve interpretation of the site.</p>
<p>Place 48 - Two rocks Limestone retaining wall: The structure is a landmark in the townsite as a dominant structure and for its bold construction form.</p> <p>The place has historic value for its association with the development of the area in the 1970's.</p>	<p>There is no work that would impact on this value.</p>	<p>No impact and no mitigation required.</p>

## Conclusion

In this assessment, the proposals are measured against the heritage values presented in the Statement of Significances for the places noted in the sections above.

The area has been left vacant since the closure of Atlantis Marine Park in 1990 and its subsequent demolition.

The new development is set back sufficiently that it does not directly visually sit against the Two Rocks Shopping development. Linking development will occur between the two in the future. The materials palette of the new development is sympathetic to the existing shopping centre and existing landscape. The form and scale of the project is significantly larger than the existing shopping centre, but the facades are broken up with speciality shops and café to reduce the overall massing. The café facing the King Neptune Statue ensures it retains its landmark qualities.

Overall, the development will not negatively affect the heritage significant places within its surroundings.

## References

*Two Rocks Town Centre Precinct Heritage Assessment December 2006* by Philip Griffiths with Kris Bizzaca

Local Heritage Place local assessments:

- *Atlantis Marine Park (10 Enterprise Ave) Place no. 42*
- *King Neptune Sculpture (10 Enterprise Ave) Place no. 43*





- *Two Rocks Shopping Centre (10 Enterprise Ave) Place no. 44*
- *Two Rocks Tavern (10 Enterprise Ave) Place no. 45*
- *Waughal Monoliths (10 Enterprise Ave) Place no. 46*
- *Two Rocks Limestone Retaining Wall (Pope St and Enterprise Ave) Place 48*

## Transport Impact Assessment

Two Rocks Precinct C Local  
Development Plan and Retail and  
Commercial Development Application

CW1197300



Prepared for  
Fabcot Pty Ltd

10 February 2022

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# 1 Introduction

## 1.1 Background

Cardno has been commissioned by Fabcot Pty Ltd ‘the Client’) to prepare a Transport Impact Assessment (TIA) for the Precinct C Local Development Plan (LDP) and proposed Woolworths/Commercial Development Application located at Part Lot 9702 Enterprise Avenue, Two Rocks, within the City of Wanneroo (the “Site”).

This report aims to assess the impacts of the proposed LDP and development application upon the adjacent transport network, with a focus on traffic operations, circulations, and car parking requirements. The report also provides detailed consideration of the impact of one specific development site within the LDP to support a Development Application.

This report has been prepared in accordance with the *Western Australian Planning Commission (WAPC) Transport Impact Assessment Guidelines for Developments: Volume 3 – Subdivisions (2016)* and the checklist is included in **Appendix A**.

## 1.2 Site Context

The Site is located at part of Lot 9702 Enterprise Avenue, Two Rocks and is currently vacant land. The Site is located in the City of Wanneroo. **Figure 1-1** shows an aerial image of the LDP area with **Figure 1-2** showing a close up of the development Site.

Figure 1-1 Aerial Image of LDP Area



Source: MetroMap (2021)

Figure 1-2 Close up of the Development Site



Source: MetroMap (2021)

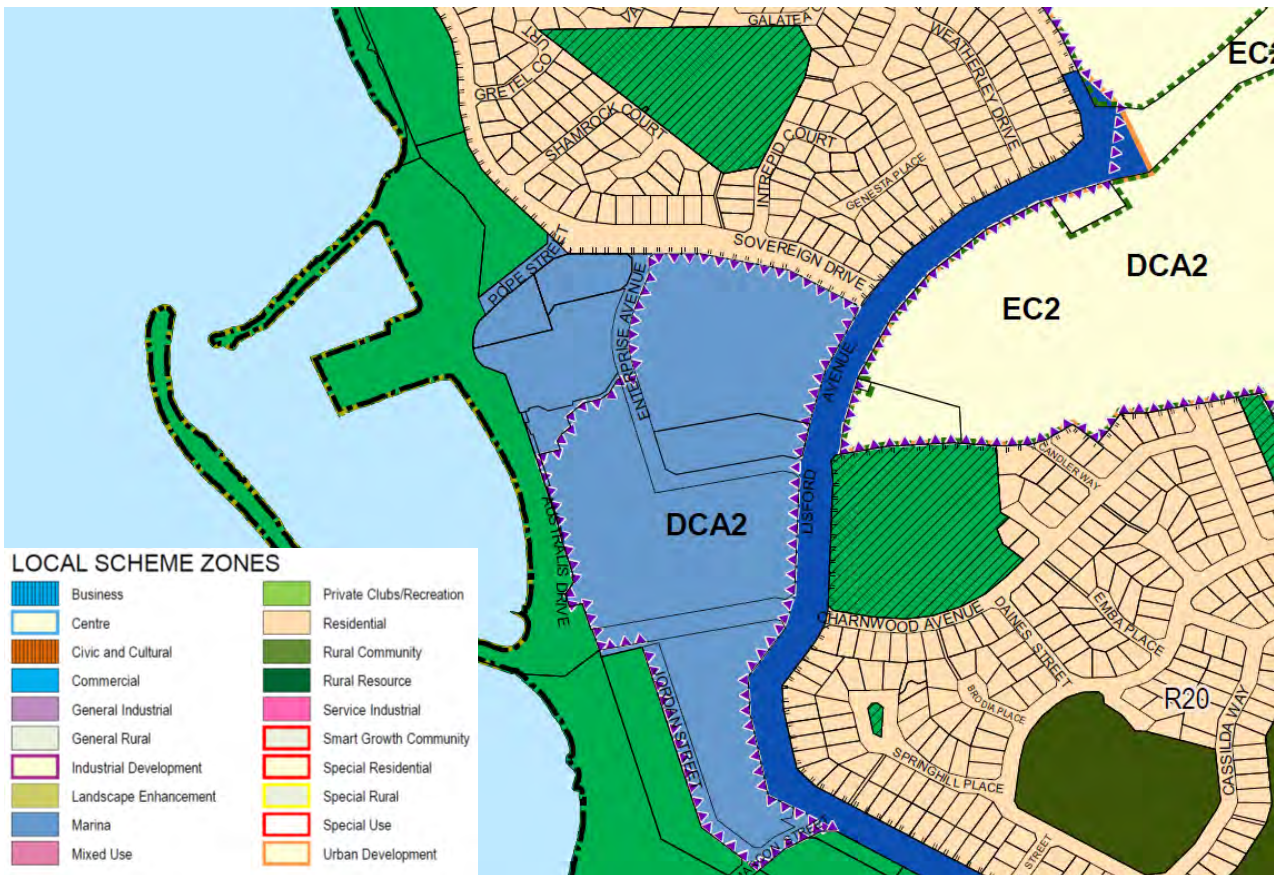


## 2 Existing Situation

### 2.1 Surrounding Land Uses

Pursuant to the provision of the *City of Wanneroo District Planning Scheme No. 2 (DPS2)*, the Site is zoned 'Marina', as shown in **Figure 2-1**. The Site is immediately surrounded by undeveloped land, with the existing Two Rocks Marina and small shopping precinct to the north west, and residential areas to the north, east and south.

Figure 2-1 City of Wanneroo Zoning



Source: City of Wanneroo District Planning Scheme No. 2

## 2.2 Existing External Road Network

Road classifications are defined in the Main Roads Functional Hierarchy as follows:

- > **Primary Distributors (light blue):** Form the regional and inter-regional grid of MRWA traffic routes and carry large volumes of fast-moving traffic. Some are strategic freight routes, and all are National or State roads. They are managed by Main Roads.
- > **Regional Distributors (red):** Roads that are not Primary Distributors, but which link significant destinations and are designed for efficient movement of people and goods within and beyond regional areas. They are managed by Local Government.
- > **District Distributor A (green):** These carry traffic between industrial, commercial and residential areas and connect to Primary Distributors. These are likely to be truck routes and provide only limited access to adjoining property. They are managed by Local Government.
- > **District Distributor B (dark blue):** Perform a similar function to District Distributor A but with reduced capacity due to flow restrictions from access to and roadside parking alongside adjoining property. These are often older roads with traffic demand in excess of that originally intended. District Distributor A and B roads run between land-use cells and not through them, forming a grid that would ideally be around 1.5 kilometres apart. They are managed by Local Government.
- > **Local Distributors (orange):** Carry traffic within a cell and link District Distributors at the boundary to access roads. The route of the Local Distributor discourages through traffic so that the cell formed by the grid of District Distributors only carries traffic belonging to or serving the area. These roads should accommodate buses but discourage trucks. They are managed by Local government.
- > **Access Roads (grey):** Provide access to abutting properties with amenity, safety and aesthetic aspects having priority over the vehicle movement function. These roads are bicycle and pedestrian friendly. They are managed by Local government.

The Site is bounded by Lisford Avenue to the east. The surrounding road network is further described in **Table 2-1** and shows the hierarchy as per the Main Roads WA Road Information Mapping System, whilst **Figure 2-2** shows the road hierarchy.

Table 2-1 Road Network Classification

Road Name	Road Hierarchy	Jurisdiction	No. of Lanes	No. of Footpaths	Road Width (m)	Posted Speed (km/h)
Lisford Avenue	District Distributor B	Local Government	2	1	7	60
Enterprise Avenue	Access Road	Local Government	2	1	6	50
Sovereign Drive	Local Distributor	Local Government	2	2	7.4	50

Figure 2-2 Road Hierarchy



Figure 2-3 Source: Main Roads WA – Road Information Mapping System

### 2.3 Existing Traffic Volumes

The most recent traffic volumes for the roads in the vicinity of the Site were obtained from the City of Wanneroo and are summarised in **Table 2-2**.

Table 2-2 Traffic Volumes

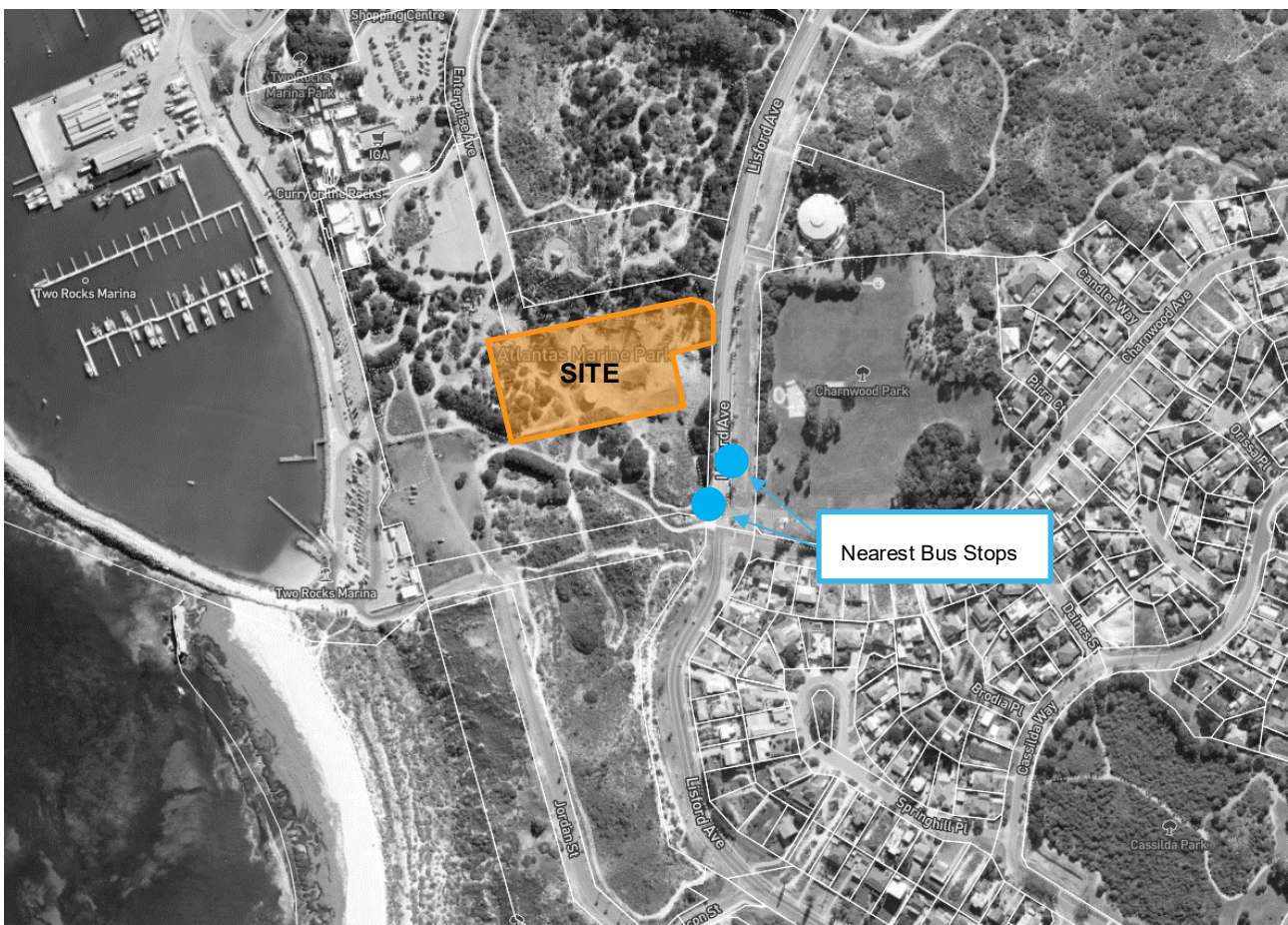
Road Name	Date	Average Two-way Daily Traffic Volume	Average Two-way AM Peak Traffic Volume (Weekday)	Average Two-way PM Peak Traffic Volume (Weekday)	Average Two-way Peak Traffic Volume (Weekend)
Lisford Ave (Sovereign Dr to Weatherly Dr)	2019	2,257	436	380	78
Charnwood Ave (East of Daines Street)	2017	223	25	26	21

Source: City of Wanneroo

### 2.4 Existing Public Transport Facilities

The nearest bus stops to the Site are located approximately 20 metres east of the Site, as shown in **Figure 2-4**. Bus route 490 operates from these stops along Lisford Avenue and travels to Two Rocks Shopping Centre in the north and Yanchep and Butler in the south, as shown in **Figure 2-5**.

Figure 2-4 Nearest Bus Stops



Source: MetroMap (2021)

Figure 2-5 Existing Bus Routes



Source: Transperth Network Maps (2021)

## 2.5 Existing Pedestrian/Cycle Network Facilities

A footpath is provided along Lisford Avenue. There are currently no other existing pedestrian and cycling facilities within the surrounding area of the Site.

## 2.6 Existing Crash Data

A search of the *Main Roads WA Reporting Centre* for crash data was undertaken for all recorded traffic accidents between 1 January 2016 and 31 December 2020 within the surrounding area of the subject Site. There were no recorded crashes within the surrounding area in the last 5 years.

## 3 Proposed Development

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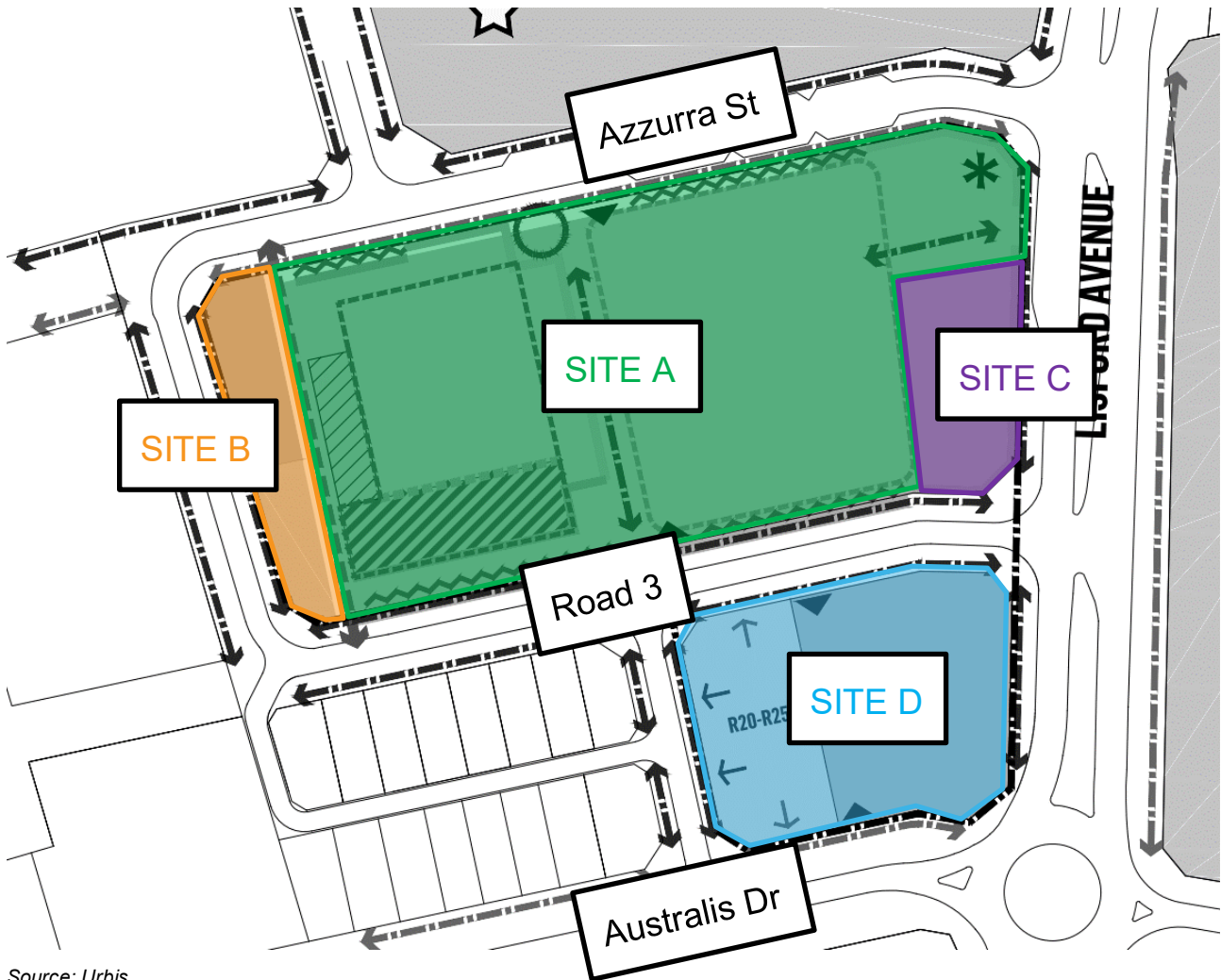
### 3.1 Proposed Development

The proposed LDP comprises of the following land uses:

- > **Site A (Proposed Woolworths/Commercial Development Application – 4,133m<sup>2</sup>)**
  - Supermarket
  - Liquor store
  - Café
  - Specialty retail stores
  - 242 car parking bays
- > **Site B (approximately 2,000m<sup>2</sup>)**
  - Future commercial development
  - Public open space/drainage
- > **Site C (1,702m<sup>2</sup>)**
  - Future pad site
- > **Site D (approximately 4,800m<sup>2</sup>)**
  - Future commercial development
  - Future residential development

Site A is the main focus of this development assessment with Site B, C and D to be considered in a separate development application. However, for the purposes of the traffic assessment, the anticipated traffic volumes generated by Site B, C and D will be considered.

Figure 3-1 Site Plan



Source: Urbis

### 3.2 Access Arrangements

#### 3.2.1 Site A

The proposed Site access arrangement (for Site A) is shown in **Figure 3-2** and summarised below:

- > Access 1 – Loading Dock Access
- > Access 2 – Loading Dock and Click-and-Collect Egress
- > Access 3 – Northern car park access – full movements
- > Access 4 – Southern car park access – full movements

Figure 3-2 Site Access Location (Site A, B & C)



Source: Brown Falconer (2021)

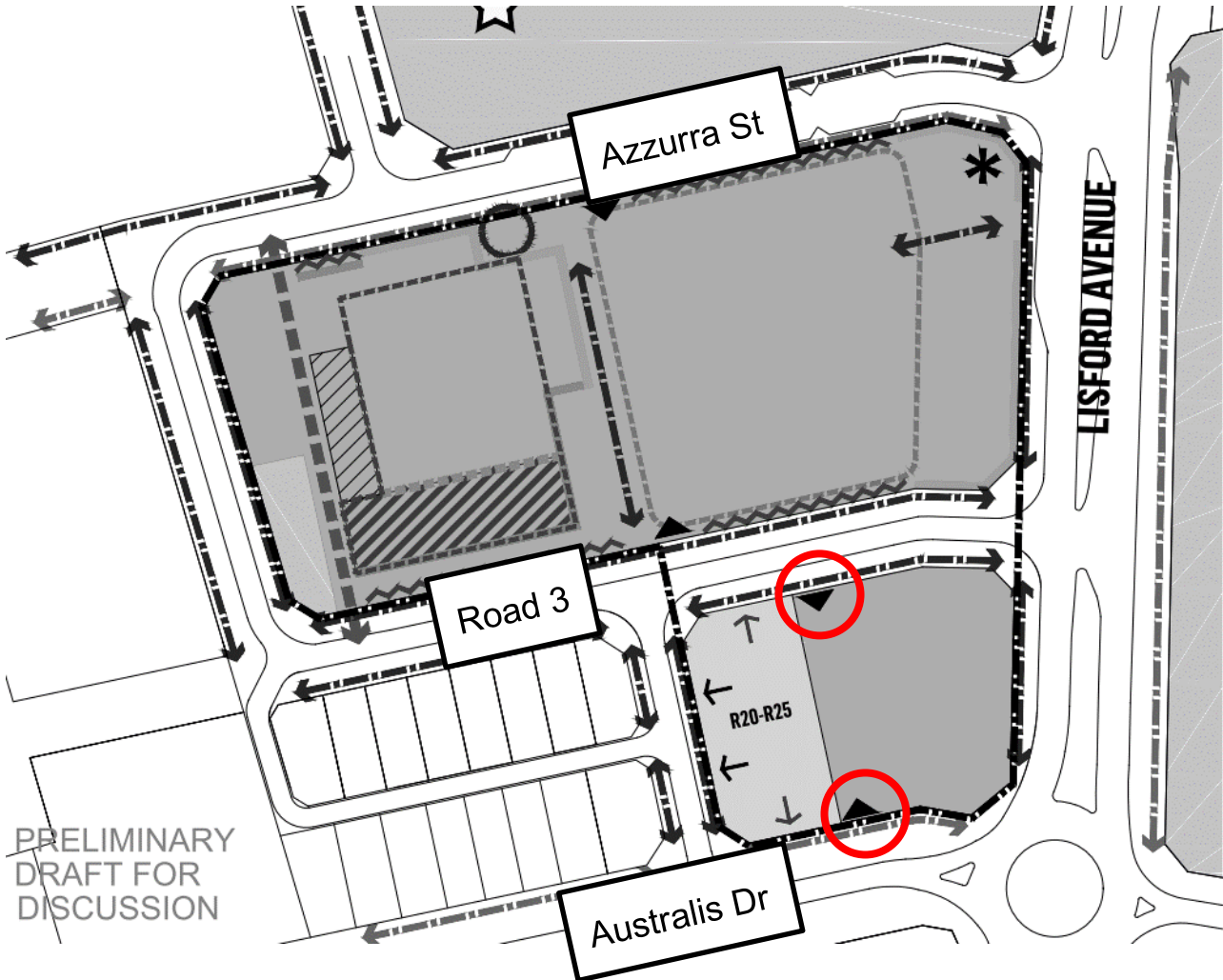


3.2.2 Site B, C & D

For the purpose of the transport assessment, it is assumed that vehicle access for Site B and C will be via the Site A accesses.

Site D residential lots will have access to their respective frontages and the commercial component will have access to Road 3 to the north and Australis Drive to the south as shown in Figure 3-3.

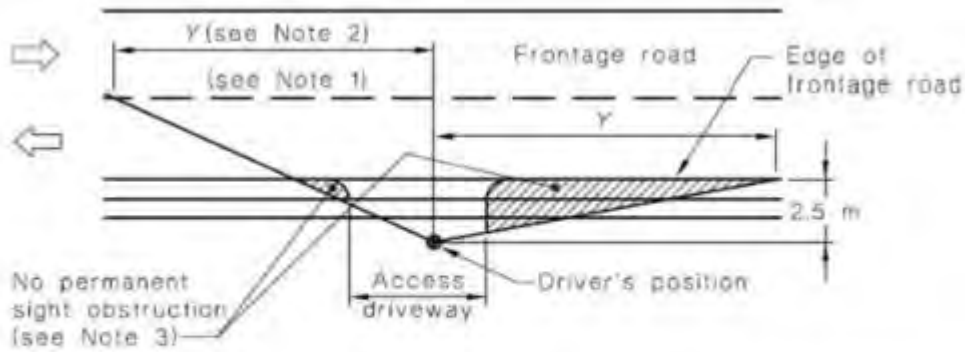
Figure 3-3 Site Access Location (Site D)



3.2.3 Sight Distance

In accordance with AS2890.1:2004 *Parking Facilities: Off-street car parking*, frontage roads with a speed of 50k/m require a minimum sight stopping distance of 45 metres (as shown in Figure 3-4) to allow for an adequate sight distance to traffic and pedestrians.

Figure 3-4 Minimum Sight Distance Requirements



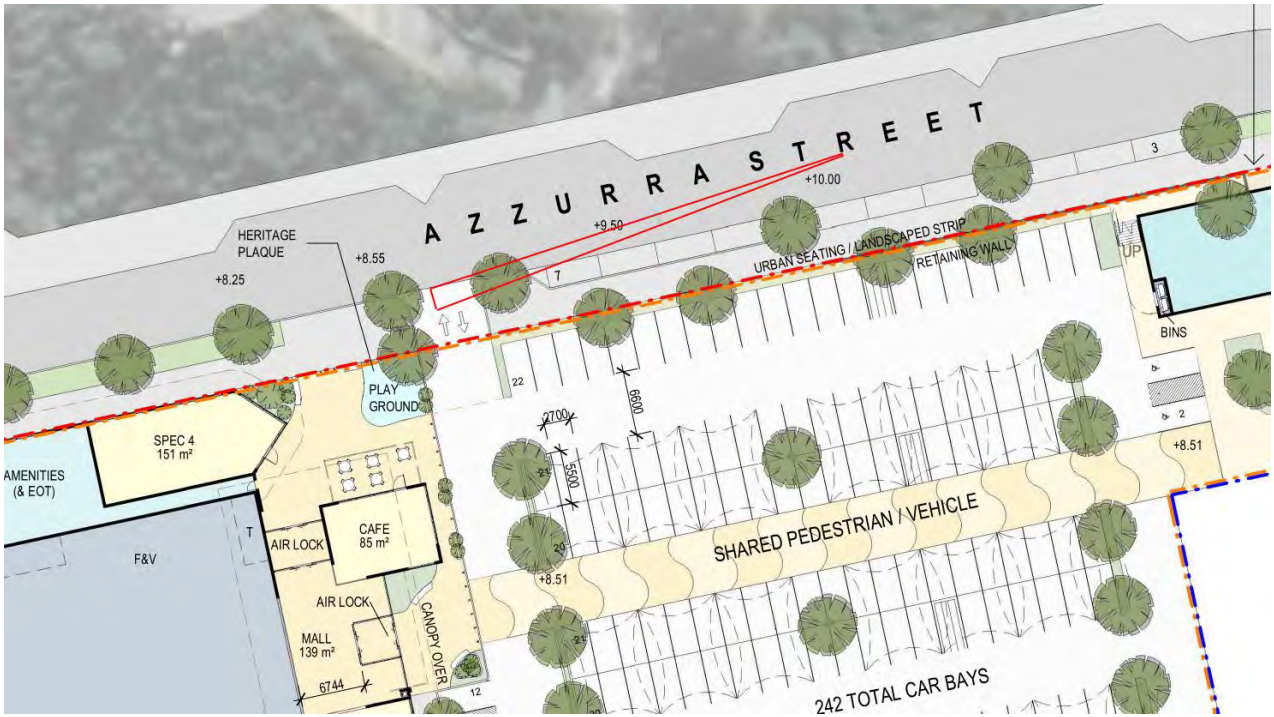
Frontage road speed (Note 4) km/h	Distance (Y) along frontage road m		
	Access driveways other than domestic (Note 5)		Domestic property access (Note 6)
	Desirable 5 s gap	Minimum SSD	
40	55	35	30
50	69	45	40
60	83	65	55
70	97	85	70
80	111	105	95
90	125	130	Use values from 2 <sup>nd</sup> and 3 <sup>rd</sup> columns
100	139	160	
110	153	190	

Source: AS2890.1:2004 Parking Facilities: Off-street car parking

Figure 3-5 shows that no permanent obstructions would appear to block the driver's lone of sight within the 45-metre minimum along Azzurra Street.

Given the above, the location of the crossover is considered to meet the minimum requirements and is appropriate.

Figure 3-5 Proposed Access Location



### 3.3 Servicing

Servicing for Site A will be undertaken primarily via the north-south laneway located at the rear of the supermarket. This laneway provides access to the loading docks and may also be used for servicing the 'Future Commercial' site.

The largest vehicles anticipated the access the Site are 19m semi-trailers, delivering goods to the supermarket. Typically, these vehicles would arrive and depart 2-3 times per weekday, subject to scheduling with other nearby supermarkets. To suit the layout the loading dock, the 19m semi-trailers will operate in an anti-clockwise direction around the perimeter of the Site, and reverse into the loading dock from the laneway.

A swept path analysis was conducted for the 19m semi-trailer and this is shown in **Figure 3-6** through **Figure 3-9**. Larger versions are provided at **Appendix C**.

Servicing for Site B will generally be handled by smaller delivery vehicles, with the City's waste truck likely to be the largest vehicle needing to access the site. Details of waste collection and servicing for these sites will be determined through later planning stages.

When loading dock 1 is occupied by another truck longer than 12.5m, a semi-trailer would be unable to access to loading dock 2. Active management of the loading dock will be undertaken by the supermarket operator (such as requiring a specific order of access to the loading docks and/or scheduled arrivals/departures) to ensure that there are no access and egress issues.

The semi-trailer movement turning right from Road 3 into Lisford Avenue does track across the northbound lane for an estimated 15m (worst case) based on swept path analysis. This will occur only for the short term, until the City upgrades Lisford Avenue to a wider cross section – e.g. with a median and/or shoulders. As the traffic volumes are low on Lisford Avenue, and only 2-3 semi-trailer movements occur per day, this is considered appropriate for an interim road arrangement. It is also noted that 19m semi-trailers are 'as of right' vehicles permitted to use these streets, and the design of this intersection was only recently approved by the City prior to construction.

Figure 3-6 Swept Paths for a 19m Semi-trailer (Loading Dock 1 IN)



Figure 3-7 Swept Paths for a 19m Semi-trailer (Loading Dock 1 OUT)





Figure 3-9 Swept Paths for a 19m Semi-trailer (Loading Dock 2 OUT)



## 4 Parking Supply (For Site A)

### 4.1 Car Parking

A reduction in the standard car parking requirements of the *City of Wanneroo District Planning Scheme No. 2* is proposed for the Two Rocks Town Centre, given that parking can be shared by different land uses that have different peak operating times.

As per the *SKM Two Rocks Town Centre Traffic and Transport Report* (January 2014) parking for land uses within the Two Rocks Town Centre, have been assessed based on a 25% reduction in parking rate, if 75% of non-residential parking in the town centre is provided as public parking.

The Statutory parking requirements, in accordance with the *City of Wanneroo Two Rocks Town Centre Structure Plan (2014)* have been considered in the context of the proposed development (Site A) and are summarised below in **Table 4-1**. The parking requirements for Site B, C and D will be determined as part of a future development application.

Table 4-1 Car Parking Provision and Requirements

Development Classification	Requirements	Yield	Parking Required	Parking Provided
Retail (Supermarket – Woolworths expansion included)	4.6 bays per 100 GLFA	4,791m <sup>2</sup>	221	242
<b>Total</b>			<b>221</b>	<b>242</b>

221 car parking bays are proposed on-site. Based on the above, the proposed on-site car parking is compliant with the requirements.

### 4.2 Bicycle Parking

The City of Wanneroo does not have statutory requirements for the provision of bicycle parking.

For Site A, a total of 10 long-stay bicycle parking bays have been provided for supermarket/retail employees. This quantum is sufficient to provide for a 10% cycling mode share for 100 employees, which is significantly in excess of the anticipated employee numbers for this Site. Short stay bicycle parking for customers should be provided in the form of U-rails, located conveniently near the entry points to the buildings.

Bicycle parking requirements for Site B, C and D will be determined as part of a future development application.



## 5 Changes to Surrounding Transport Network

### 5.1 Road Network

The *Two Rocks Town Centre Structure Plan* proposes a number of future changes to the existing road network, as shown in **Figure 5-1**.

Additional road network changes include:

- > Australis Drive to be connected to Lisford Avenue to form the western extension of Charnwood Avenue. This intersection is proposed with roundabout control;
- > Three new connections from internal streets to Lisford Avenue are proposed between Charnwood Avenue and Sovereign Drive; and
- > Enterprise Avenue is proposed to connect south to Australis Drive.

Some of these road connections will be delivered in the short term as part of subdivision works being undertaken to facilitate the development of this LDP.

Figure 5-1 Proposed Road Network Changes

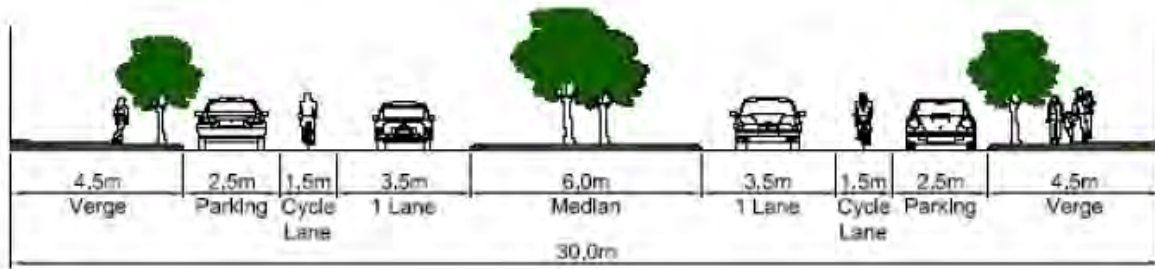


Source: City of Wanneroo Two Rocks Town Centre Structure Plan

The *Two Rocks Town Centre Traffic and Transport Report* does not provide traffic volume forecasts for Lisford Avenue. However it does nominate a proposed ultimate cross section for Lisford Avenue with a maximum capacity of 20,000 vpd. This cross-section is shown in 5.2 below.

The upgrade of Lisford Avenue would be undertaken by others (e.g. City of Wanneroo) as development of the wider Two Rocks area continues.

Figure 5-2 Proposed Lisford Avenue cross-section



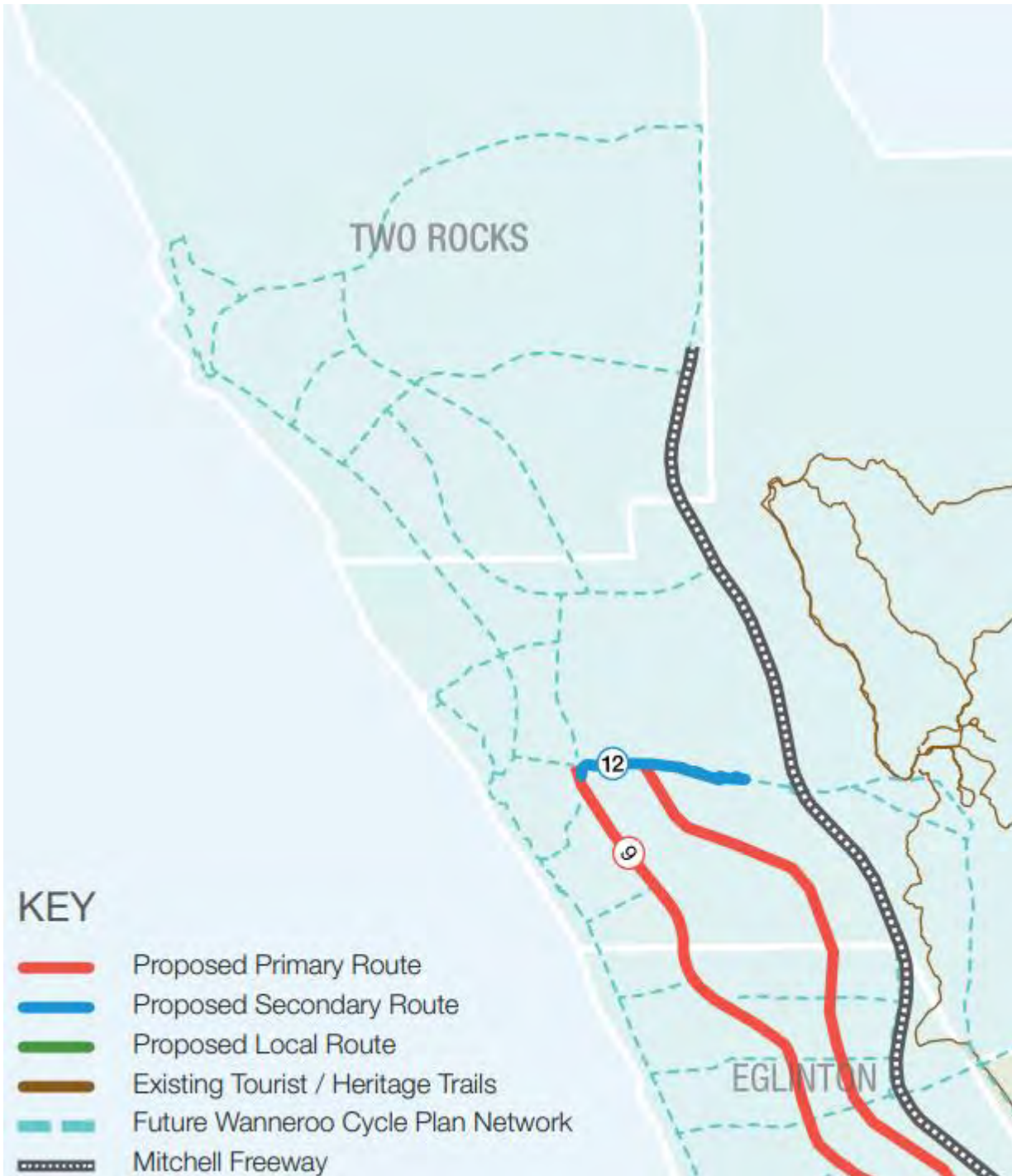
Source: *Two Rocks Town Centre Traffic and Transport Report* (SKM, 2014)

## 5.2 Pedestrian/Cycle Networks

Cardno contacted the City of Wanneroo and confirm no changes are proposed to the pedestrian/cycle network facilities within the short term. However, the City of Wanneroo Bicycle Plan identified Lisford Avenue as a key cycling corridor with **Figure 5-3** showing the proposed future network.

Design drawings prepared by JTSI and provided to Cardno indicate that footpaths will be provided on all internal streets within the LDP area.

Figure 5-3 Wanneroo Future Cycling Network Map



Source: City of Wanneroo Cycle Plan

### **5.3 Public Transport Networks**

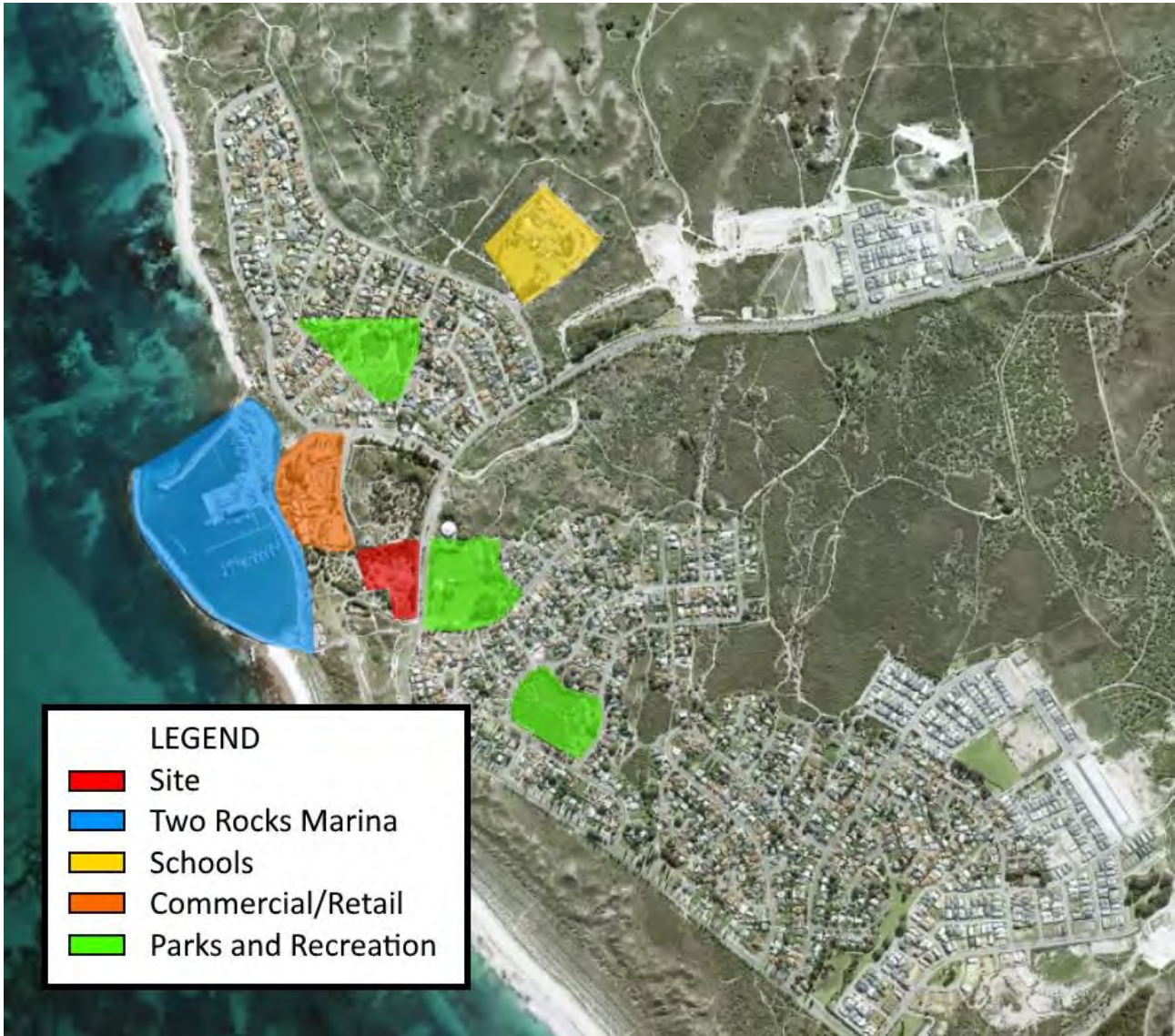
Cardno contacted the Public Transport Authority and were advised that there are no proposed changes to the network in this area in the short term. It is likely that changes to bus routes in the area will occur when the Yanchep Rail Extension commences operations in late-2023.

## 6 Integration with Surrounding Area

### 6.1 Major Attractors/Generators

The surrounding attractors/generators within close proximity to the Site are shown below in **Figure 6-1**.

Figure 6-1 Key Attractors/Generators within the Surrounding Area



Source: Metromap (2021)

## 7 Analysis of Transport Network

### 7.1 Assessment Years and Time Period

Peak times selected are 8:00 AM to 9:00 AM and 2:00 PM to 3:00 PM respectively for the morning and afternoon peak periods on weekdays and 12:00 PM to 1:00 PM as the peak hour on weekends, based on mid-block traffic volume data provided by the City of Wanneroo.

The following model scenarios have therefore been analysed as part of this assessment:

- > Scenario 1 – 2021 Existing Traffic without Development (AM, PM and Weekend)
- > Scenario 2 – 2024 Traffic with Development (AM, PM and Weekend)
- > Scenario 3 – 2034 Traffic with Development (AM, PM and Weekend)
- > Scenario 4 – 2034 Traffic with Development (AM, PM and Weekend) Worse Case

### 7.2 Key Assumptions

The following provides a list of assumptions use in the assessment.

- > Heavy vehicle volumes are based on the traffic data obtained from the City of Wanneroo.
- > Lisford Avenue/Azzurra and Lisford Avenue/Road 3 intersection layouts are in accordance with designs prepared by JTSI and provided to Cardno. The Lisford Avenue/Azzurra Street has since been constructed to those designs.
- > The *Two Rocks Town Centre Structure Plan* shows that the Lisford Avenue/Charnwood Avenue Intersection will be upgraded to a 4 way roundabout in the future which has been applied to the future assessment (Scenario 3).
- > Main Roads does not provide ROM outputs to third parties for the purpose of development application transport impact assessments, so ROM outputs could not be used to estimate future traffic growth. Instead, an estimate of 2% per annum of linear growth was used to represent increases in background traffic. This growth was applied to the 2019 'Existing' volumes for the relevant number of years for each scenario.
- > The opening year and full LDP traffic of the development for the purposes of the traffic assessment (Scenario 2 and 3) is assumed to be as follows:
  - Scenario 2 – Opening year traffic consists of Site A which includes the supermarket (excluding expansion), liquor store, speciality stores and the retail/commercial.
  - Scenario 3 – Full LDP traffic consists of the following:
    - Site A: supermarket (with expansion), liquor store, speciality stores, retail/commercial
    - Site B: future commercial
    - Site C: future pad site
    - Site D: residential and commercial.
- > The following assumptions were made for the Scenario 4 (worse case), based on information provided by the City following submission of the initial TIA (Rev A):
  - Based on the information provided by the City, the Main Roads WA ROM24 modelling shows Lisford Avenue carrying 26,600 vpd (two-way) in 2031. This equates to a growth rate of approximately 84% per annum, for a total of 10 years. This level of growth over such a period is completely unrealistic, and it is noted that using raw ROM traffic forecasts without calibration is not supported by Main Roads Operational Modelling Guidelines. The ROM estimates are also approximately 25% higher than the maximum 20,000vpd proposed in the *Two Rocks Town Centre Traffic and Transport Report*. As a sensitivity test, a more realistic – but still very high – linear growth rate of 20% per annum over 10 years was adopted.
  - Lisford Avenue is assumed to be upgraded to a four-lane divided carriageway, which would be required for an eventual volume of 26,600vpd.

- The upgrades to Lisford Avenue/Azzurra Street and Lisford Avenue/Road 3 intersections are assumed to allow staged right turns via a 6m wide median. This is consistent with the Two Rocks Town Centre Traffic and Transport Report (SKM 2014).

### 7.3 Development Trip Generation

Trip generation has been calculated for the proposed development utilising trip generation rates from the *Institute of Transportation Engineers (ITE) "Trip Generation" 10th Ed* and *RTA Guide to Traffic Generating Developments*. **Table 7-2** provides the trip generation rate during the Weekday AM, Weekday PM, and Weekend peak hours, **Table 7-3** outlines the directional distribution acquired from ITE for the proposed development and **Table 7-4** states the total trip generation for the proposed development.

Table 7-1 Development Yield Summary

Land Use	Yield (Opening Year: Site A)	Yield (Full LDP: Site A, B, C & D)
Supermarket & liquor	2,942 sqm 200 sqm	3,600 sqm 200 sqm
Café	85 sqm	85 sqm
Retail (Non-food retail)	906 sqm	2,525 sqm
Commercial	0 sqm	658 sqm
Residential	0 dwelling	5 dwellings*

\* the number of dwellings has been assumed based on the residential zoning (R20-25) as indicated in the LDP

Table 7-2 Trip Generation Rates

Land Use	Source	Weekday AM Peak	Weekday PM Peak	Weekend Peak
Supermarket & liquor	ITE 850	7.18 per 100 sqm	8.18 per 100 sqm	11.13 per 100 sqm
Café	WAPC Vol 5	10.00 per 100 sqm*	2.50 per 100 sqm*	10.00 per 100 sqm~
Retail (Non-food retail)	WAPC Vol 5	1.25 per 100 sqm	4.00 per 100 sqm	4.00 per 100 sqm~
Commercial	ITE 710	1.58 per 100 sqm	1.53 per 100 sqm	0.57 per 100 sqm
Residential	ITE 210	0.76 per dwelling	1.00 per dwelling	0.93 per dwelling

\* The AM and PM peak rates were switched for the café to be more representative of day to day business operations and customer behaviour for cafés.

~ No weekend rates. Max weekday rate used

Table 7-3 Directional Distribution

Land Use	Weekday AM Peak		Weekday PM Peak		Weekend Peak	
	In	Out	In	Out	In	Out
Supermarket & liquor	52%	48%	52%	48%	51%	49%
Café	50%*	50%*	80%*	20%*	50%*	50%*
Retail (Non-food retail)	50%*	50%*	80%*	20%*	50%*	50%*
Commercial	88%	12%	17%	83%	54%	46%
Residential	26%	74%	64%	36%	54%	46%

\* rates sourced from ITE rates of same land use

Table 7-4 Total Trip Generation – Opening Year Traffic (Site A)

Land Use	Weekday AM Peak		Weekday PM Peak		Weekend Peak	
	In	Out	In	Out	In	Out
Supermarket & liquor	117	108	134	123	117	108
Café	4	4	2	0	4	4
Retail (Non-food retail)	9	2	18	18	9	2
<b>Total</b>	<b>131</b>	<b>115</b>	<b>153</b>	<b>142</b>	<b>201</b>	<b>194</b>
	<b>246</b>		<b>295</b>		<b>395</b>	

Table 7-5 Total Trip Generation – Full LDP Traffic (Site A, B, C &amp; D)

Land Use	Weekday AM Peak		Weekday PM Peak		Weekend Peak	
	In	Out	In	Out	In	Out
<b>Site A</b>						
Supermarket & liquor	142	131	162	149	216	207
Café	4	4	2	0	4	4
Retail (Non-food retail)	26	7	52	52	52	52
Commercial	9	1	2	8	2	2
<b>Site B</b>						
Retail (Non-food retail)	1	3	3	2	3	2
Residential	30	8	60	60	60	60
<b>Total</b>	<b>212</b>	<b>153</b>	<b>280</b>	<b>272</b>	<b>337</b>	<b>327</b>
	<b>365</b>		<b>552</b>		<b>664</b>	

The opening year development represents a two-way trip generation of approximately 246 vehicles during the weekday AM peak hour, 295 vehicles during the weekday PM peak hour and 395 vehicles during the weekend peak hour.

The full LDP development represents a two-way trip generation of approximately 365 vehicles during the weekday AM peak hour, 552 vehicles during the weekday PM peak hour and 664 vehicles during the weekend peak hour.

## 7.4 Development Trip Distribution

The overall trip distribution used for the development traffic are detailed in **Figure 7-1** and **Figure 7-3**. For the inbound and outbound trips respectively. The development distribution considers the following:

- > Location of the development and vehicle access points relative to the surrounding area.
- > Driver behaviour based on the local and arterial road network.
- > Traffic to and from this development during the peak hours being predominantly local (within the Two Rocks area).
- > Future development to the north of the Site affecting the traffic distribution for the future scenarios.



Figure 7-1 Development Trip Distribution Inbound (Opening Year: Site A) (Scenario 2)

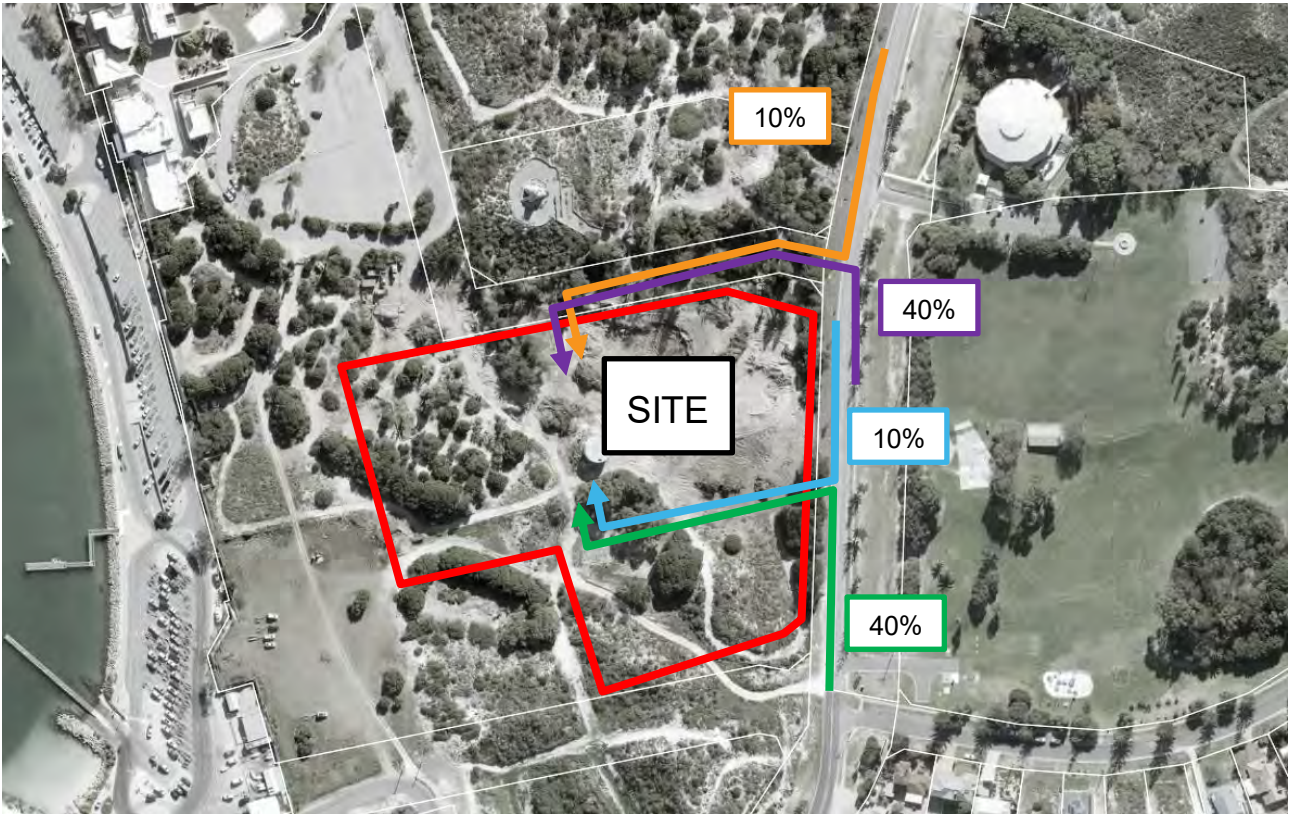


Figure 7-2 Development Trip Distribution Outbound (Opening Year: Site A) (Scenario 2)

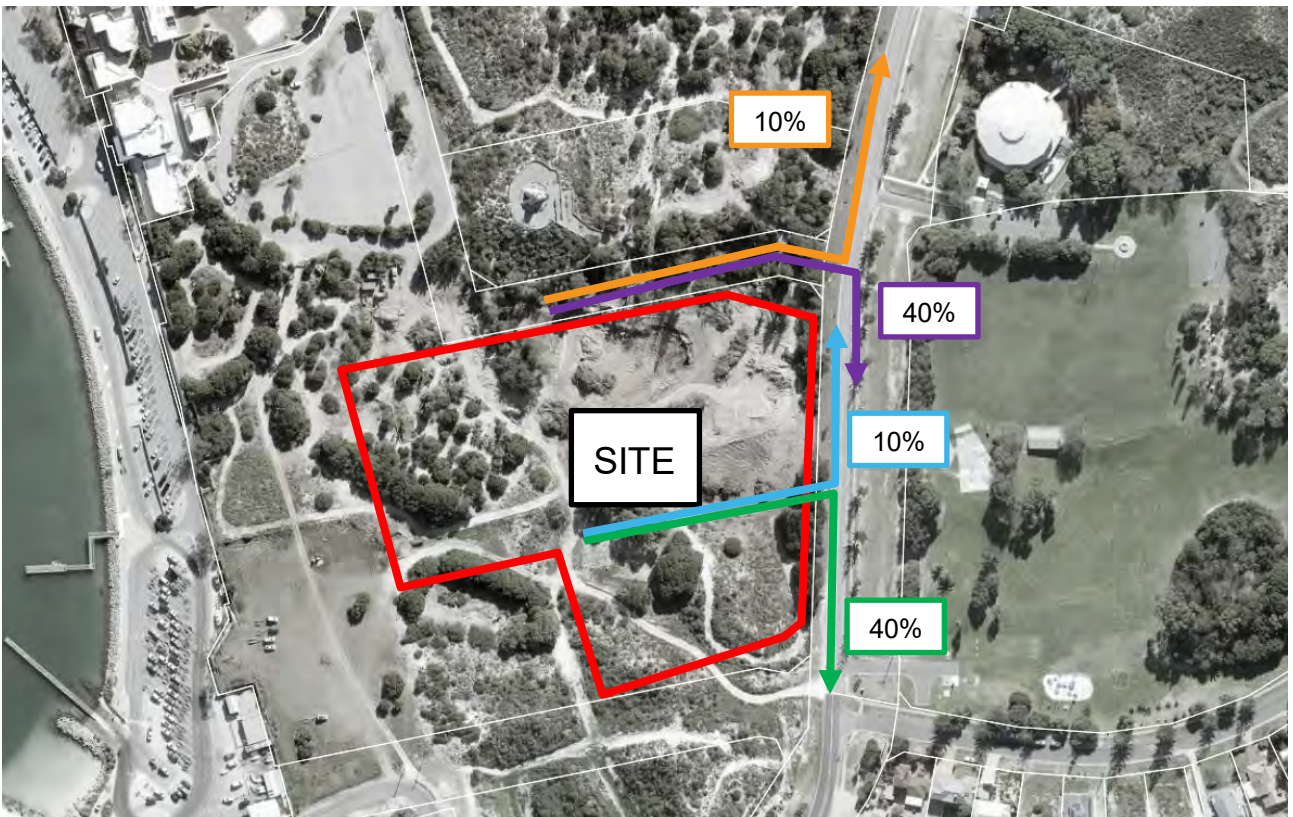


Figure 7-3 Development Trip Distribution Inbound (Full LDP: Site A, B, C & D) (Scenario 3 & 4)



Figure 7-4 Development Trip Distribution Outbound (Full LDP: Site A, B, C & D) (Scenario 3 & 4)



### 7.5 Background and Development Traffic Volumes

Figure 7-5, Figure 7-6 and Figure 7-7 shows the background traffic and proposed development volumes respectively. Existing traffic volumes provide by the City of Wanneroo were used as the background traffic. Figure 7-8 through to Figure 7-11 shows the traffic volumes for the 4 assessment scenarios.

Figure 7-5 Background Traffic

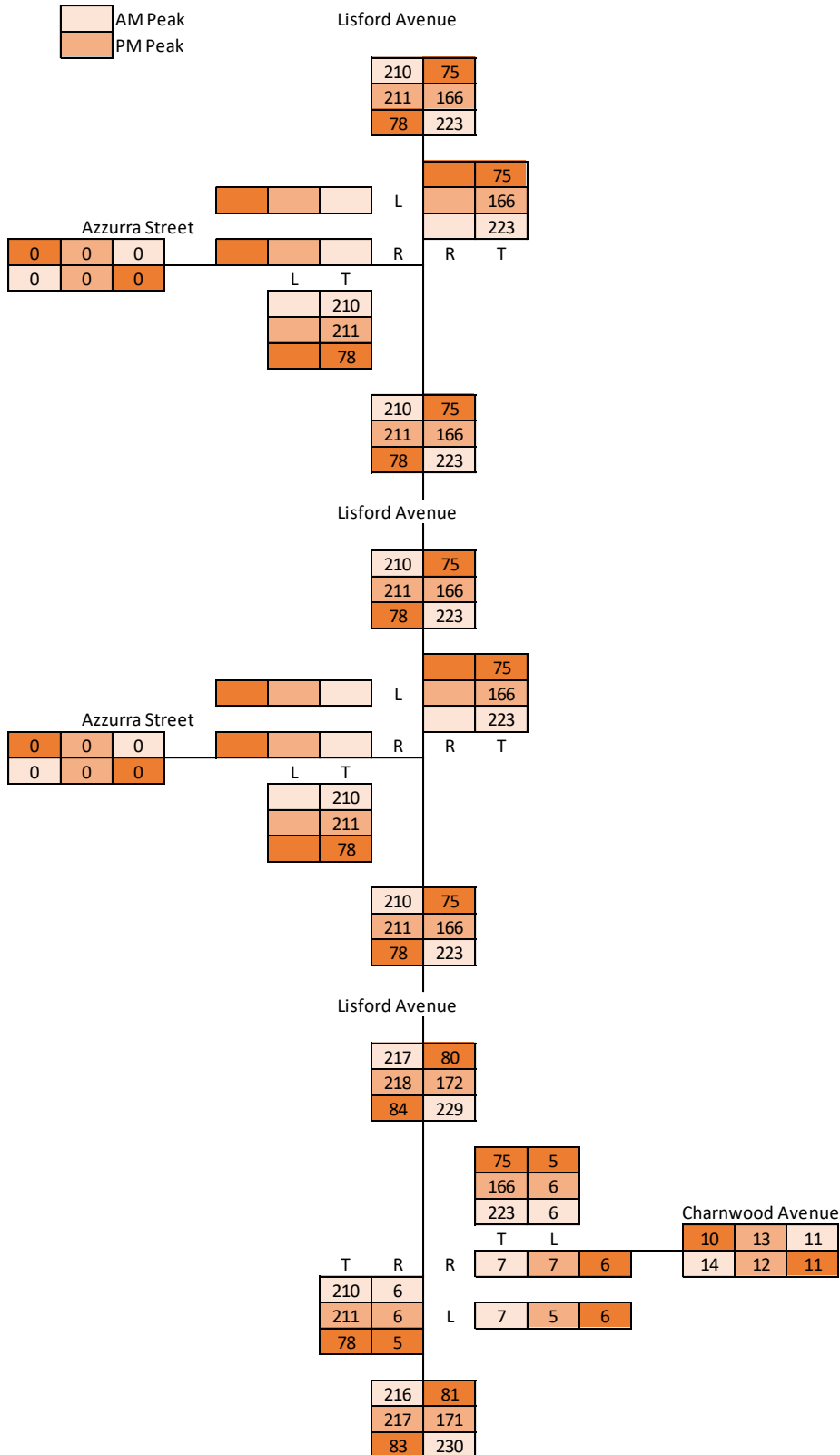


Figure 7-6 Development Volumes (Opening Year)

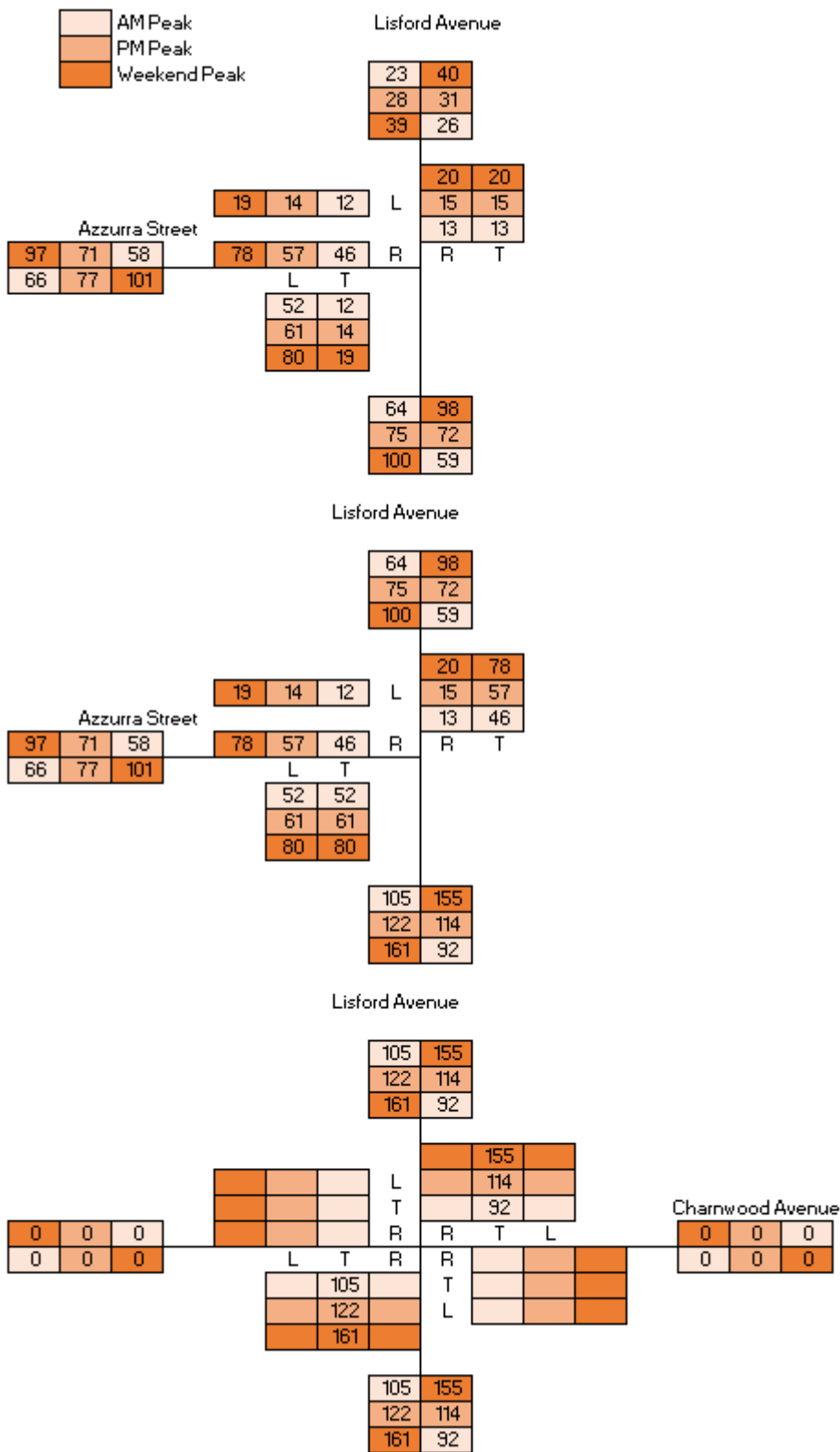


Figure 7-7 Development Volumes (Full Development)

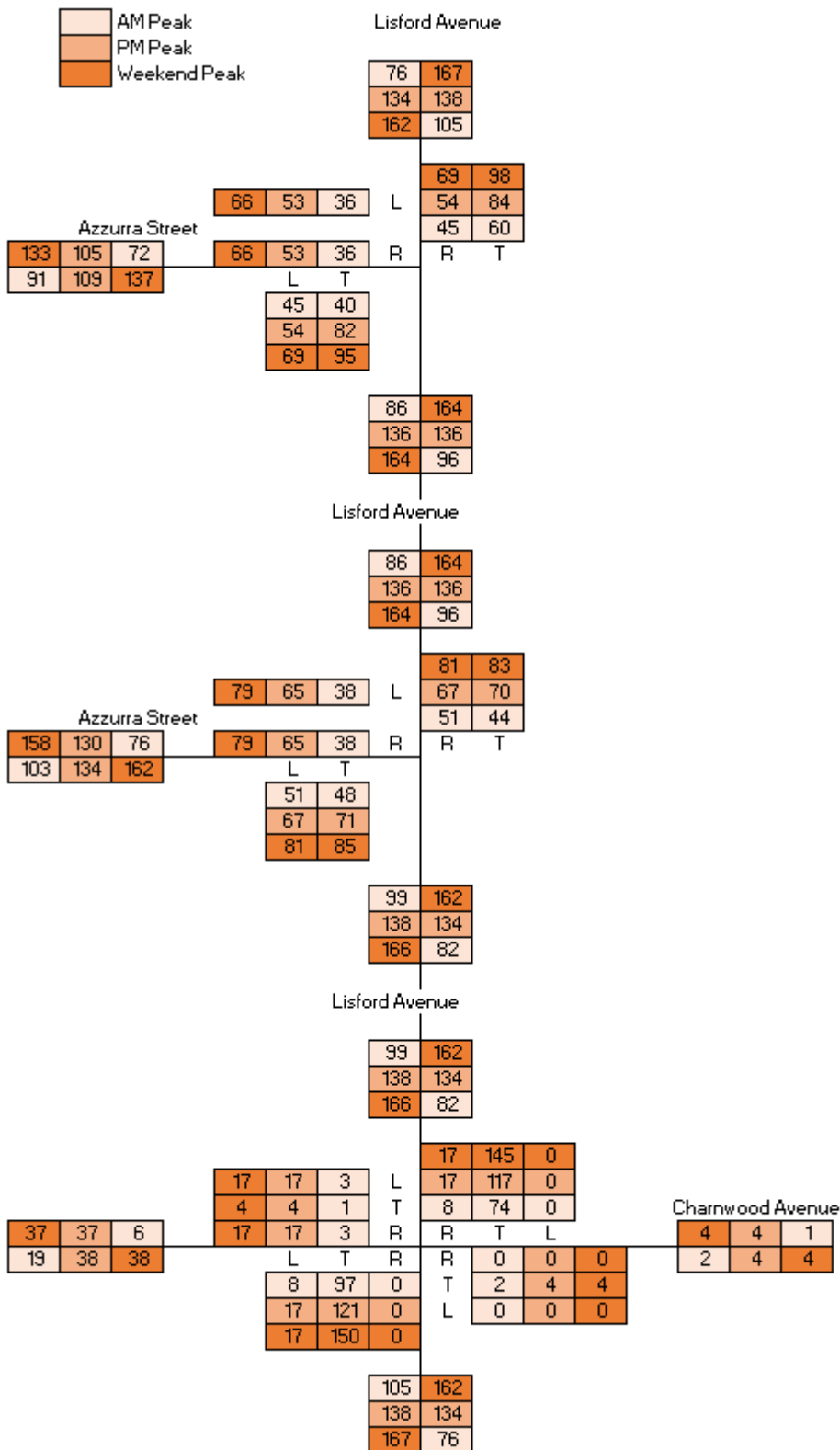


Figure 7-8 Scenario 1 – 2021 Existing Traffic without Development (AM, PM and Weekend)

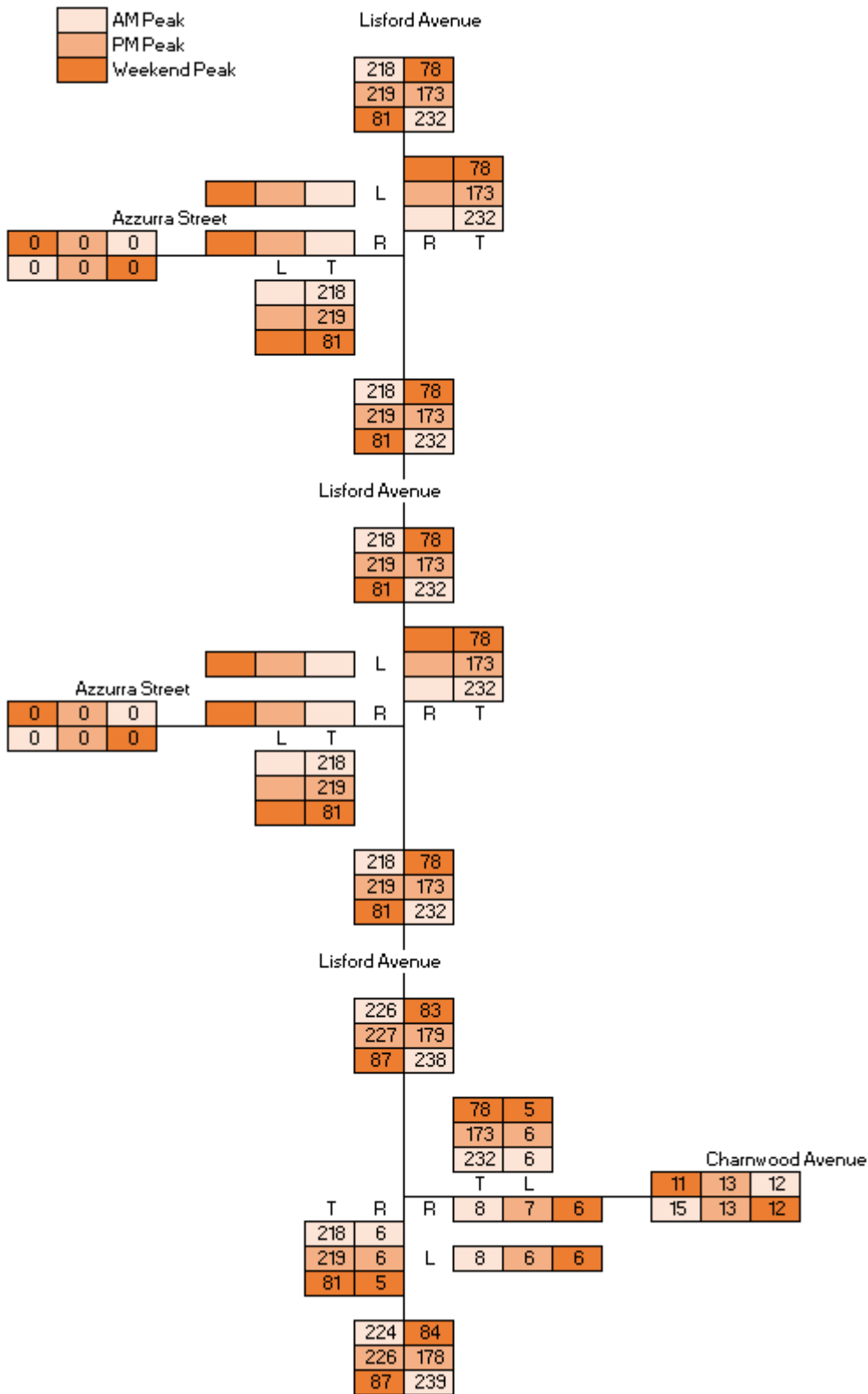


Figure 7-9 Scenario 2 – 2024 Traffic with Development (AM, PM and Weekend)

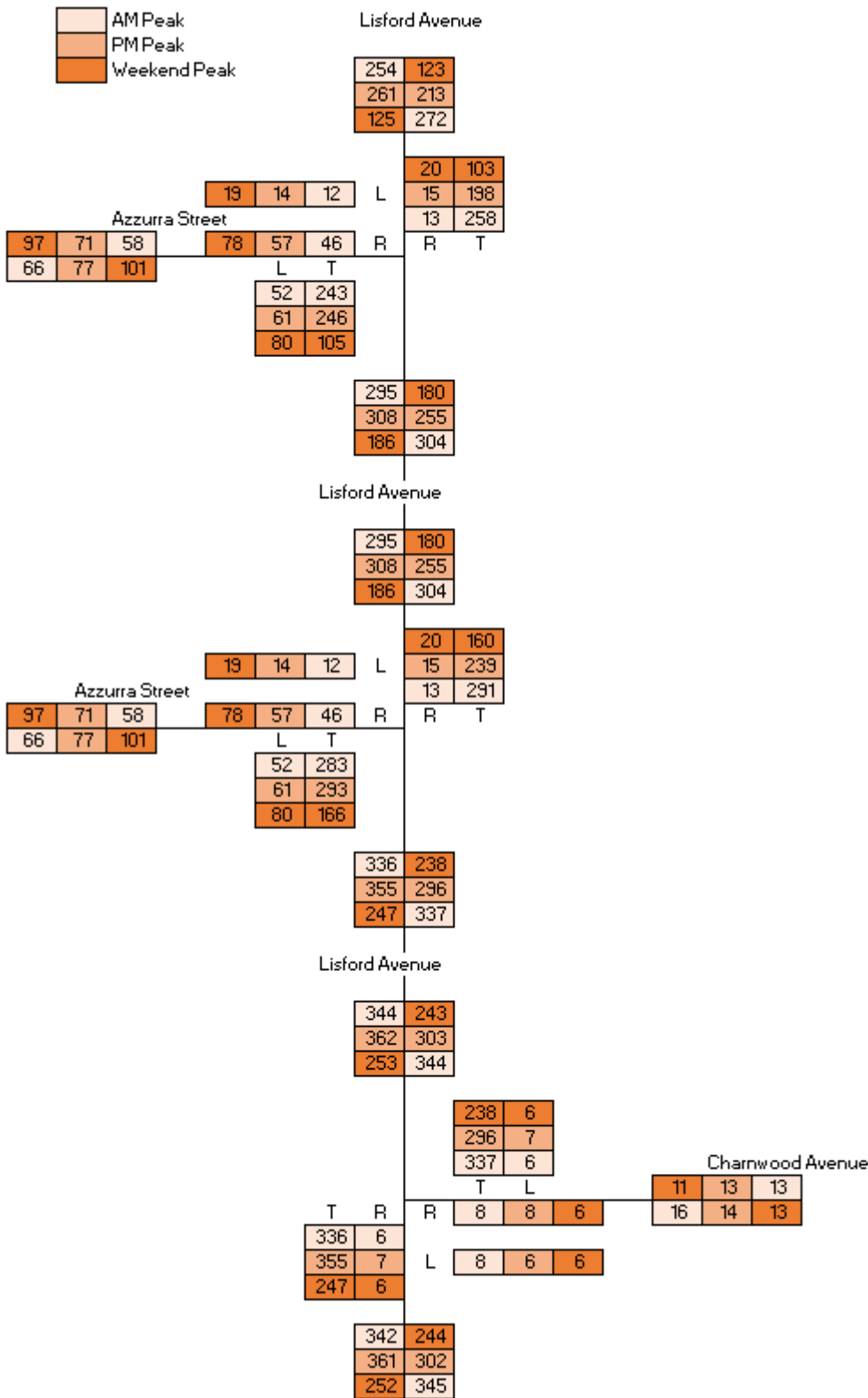




Figure 7-10 Scenario 3 – 2034 Traffic with Development (AM, PM and Weekend)

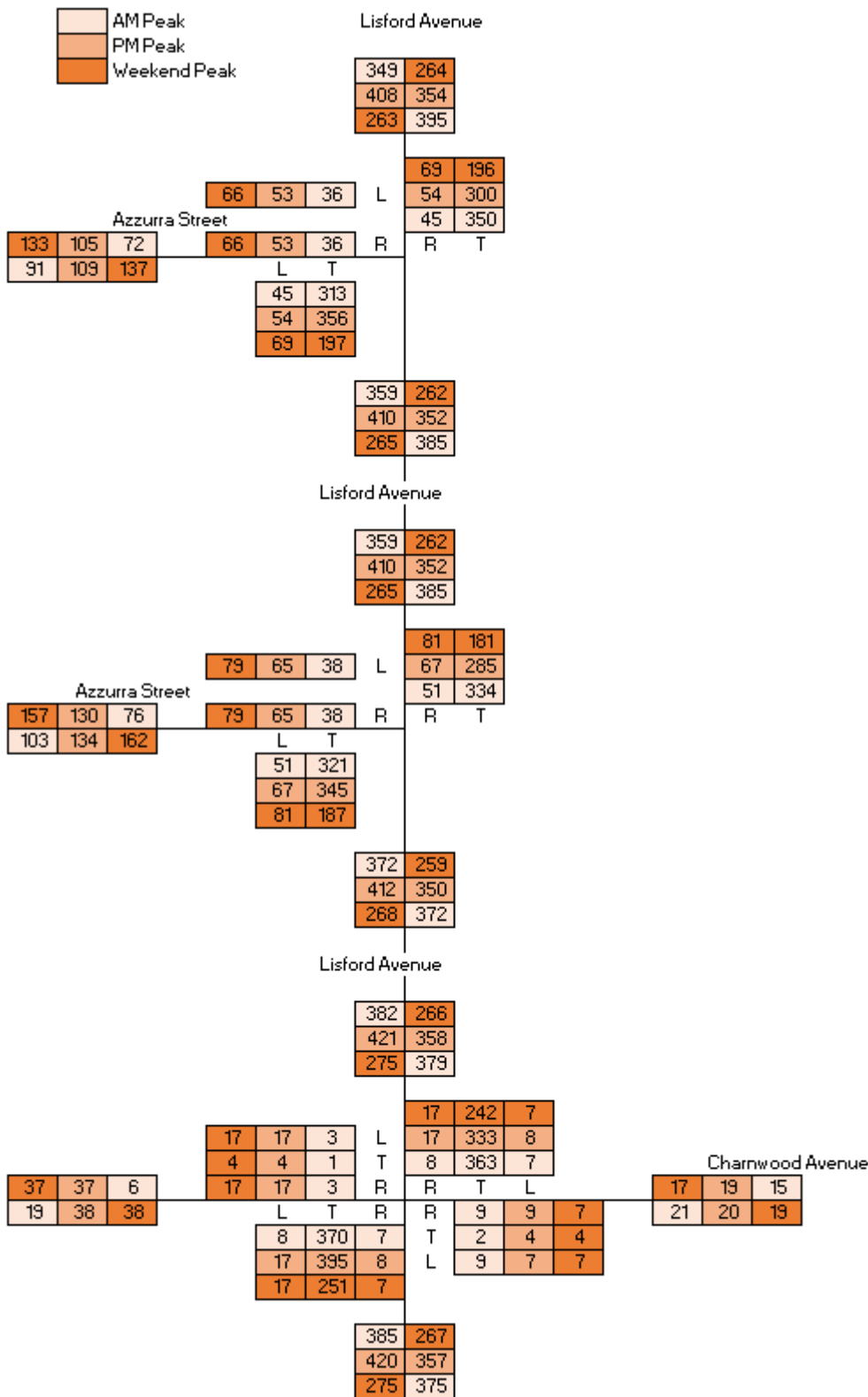
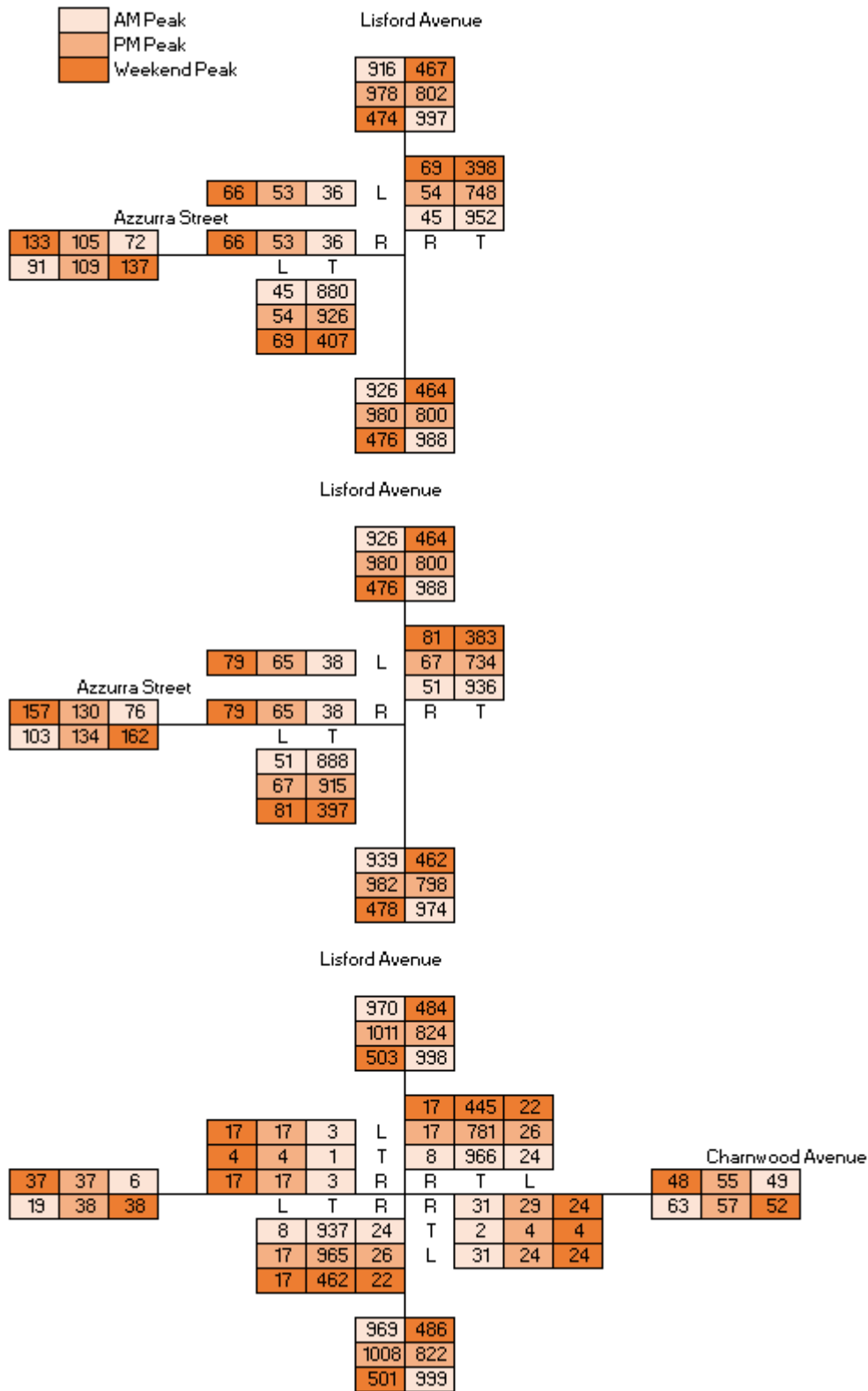


Figure 7-11 Scenario 4 – 2034 Traffic with Development (AM, PM and Weekend) Worse Case



## 7.6 Intersection Performance

Analysis of the traffic impacts of the proposed development has been carried out for the following intersections:

- > Lisford Avenue/Azzurra Street Intersection
- > Lisford Avenue/Road 3 Intersection
- > Lisford Avenue/Charnwood Avenue Intersection

The identified intersections have been analysed using the SIDRA analysis program. This program calculates the performance of intersections based on input parameters, including geometry and traffic volumes. As an output SIDRA provides values for the Degree of Saturation (DOS), queue lengths, delays, level of service, and 95th Percentile Queue. These parameters are defined as follows:

- > Degree of Saturation (DOS): is the ratio of the arrival traffic flow to the capacity of the approach during the same period. The theoretical intersection capacity is exceeded for an un-signalized intersection where  $DOS > 0.80$ ;
- > 95% Queue: is the statistical estimate of the queue length up to or below which 95% of all observed queues would be expected;
- > Average Delay: is the average of all travel time delays for vehicles through the intersection. An un-signalised intersection can be considered to be operating at capacity where the average delay exceeds 40 seconds for any movement; and
- > Level of Service (LOS): is the qualitative measure describing operational conditions within a traffic stream and the perception by motorists and/or passengers. The different levels of service can generally be described as shown in **Table 7-6**.

Table 7-6 Level of Service (LoS) Performance Criteria

LOS	Description	Signalised Intersection	Unsignalised Intersection
A	Free-flow operations (best condition)	≤10 sec	≤10 sec
B	Reasonable free-flow operations	10-20 sec	10-15 sec
C	At or near free-flow operations	20-35 sec	15-25 sec
D	Decreasing free-flow levels	35-55 sec	25-35 sec
E	Operations at capacity	55-80 sec	35-50 sec
F	A breakdown in vehicular flow (worst condition)	≥80 sec	≥50 sec

A LOS exceeding these values indicates that the road section is exceeding its practical capacity. Above these values, users of the intersection are likely to experience unsatisfactory queueing and delays during the peak hour periods.

## 7.7 SIDRA Analysis Results

### 7.7.1 Scenario 1

Figure 7-12 shows SIDRA layout of the Lisford Avenue/Charnwood Avenue intersection and Table 7-7 provides a summary of the SIDRA results.

Figure 7-12 SIDRA Layout for Lisford Avenue/Charnwood Ave Intersection



Table 7-7 Lisford Avenue/Charnwood Avenue Intersection – Scenario 1

Intersection Approach	AM				PM				Weekend				
	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	
Lisford Ave (S)	T	0.125	0	A	0.4	0.125	0	A	0.4	0.048	0	A	0.2
	R	0.125	4.9	A	0.4	0.125	4.7	A	0.4	0.048	4.2	A	0.2
Charnwood Ave (E)	L	0.017	6.3	A	0.4	0.013	6.1	A	0.3	0.01	5.8	A	0.2
	R	0.017	7.4	A	0.4	0.013	7.1	A	0.3	0.01	6	A	0.2
Lisford Ave (N)	L	0.135	4.5	A	0	0.102	4.5	A	0	0.047	4.5	A	0
	T	0.135	0	A	0	0.102	0	A	0	0.047	0	A	0
All vehicles		0.135	0.4	A	0.4	0.125	0.4	A	0.4	0.048	0.6	A	0.2

7.7.2 Scenario 2

Figure 7-13 shows SIDRA layout of the Lisford Avenue/Azzurra Street intersection and Table 7-8 provides a summary of the SIDRA results.

Figure 7-13 SIDRA Layout for Lisford Avenue/Azzurra Street Intersection

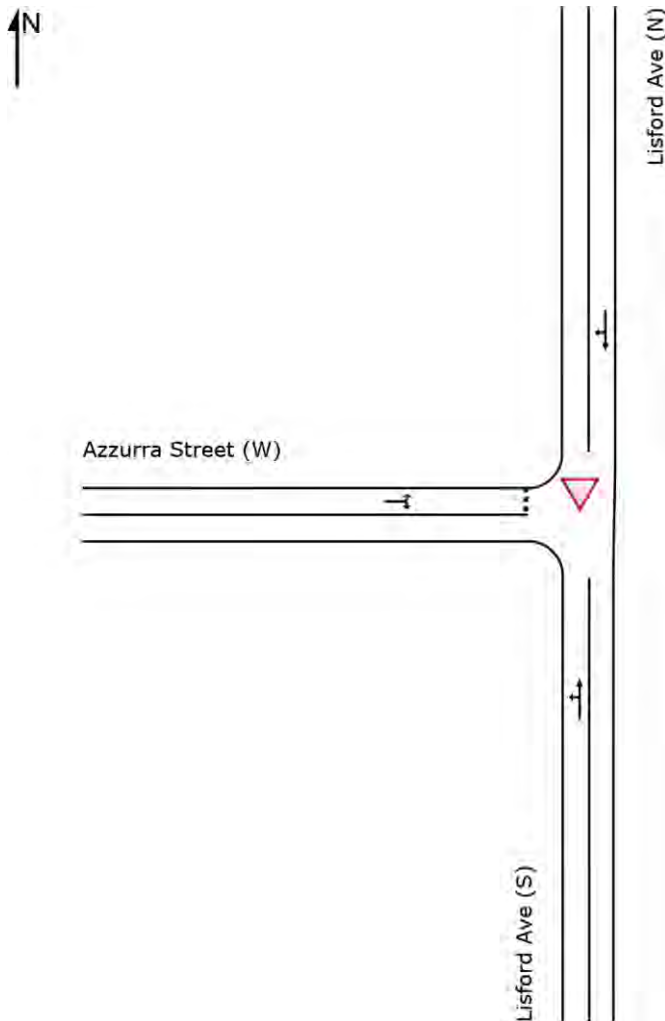


Table 7-8 Lisford Avenue/Azzurra Street Intersection – Scenario 2

Intersection Approach	AM					PM				Weekend			
		DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)
Lisford Ave (S)	L	0.17	4.1	A	0	0.177	4.1	A	0	0.113	4.1	A	0
	T	0.17	0	A	0	0.177	0	A	0	0.113	0	A	0
Lisford Ave (N)	T	0.157	0.1	A	0.4	0.125	0.1	A	0.4	0.073	0.2	A	0.5
	R	0.157	5.7	A	0.4	0.125	5.7	A	0.4	0.073	5.1	A	0.5
Azzurra Street (W)	L	0.076	5.5	A	0.8	0.089	5.5	A	0.9	0.097	5	A	1
	R	0.076	7.3	A	0.8	0.089	7	A	0.9	0.097	5.7	A	1
All vehicles		0.17	1.1	A	0.8	0.177	1.4	A	0.9	0.113	2.4	A	1

Figure 7-14 shows SIDRA layout of the Lisford Avenue/Road 3 intersection and Table 7-9 provides a summary of the SIDRA results.

Figure 7-14 SIDRA Layout for Lisford Avenue/Road 3 Intersection

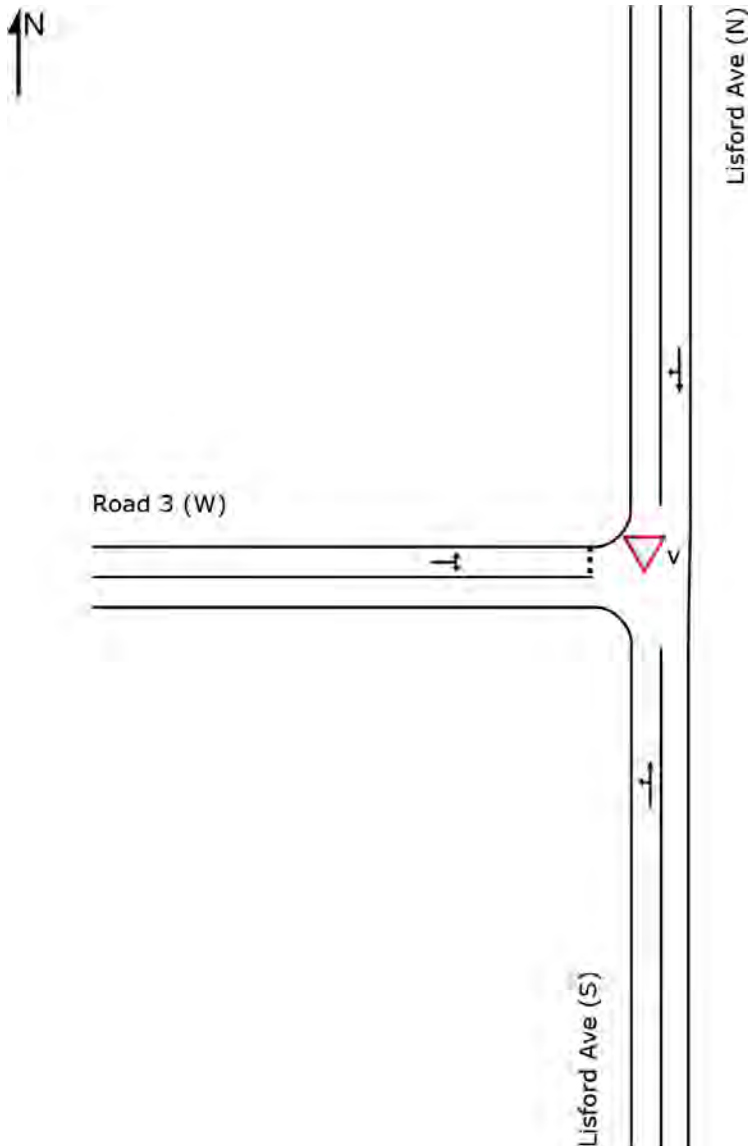


Table 7-9 Lisford Avenue/Road 3 Intersection – Scenario 2

Intersection Approach	AM				PM				Weekend				
		DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)
Lisford Ave (S)	L	0.192	5.5	A	0	0.203	5.5	A	0	0.147	5.5	A	0
	T	0.192	0	A	0	0.203	0	A	0	0.147	0	A	0
Lisford Ave (N)	T	0.176	0.1	A	0.4	0.149	0.2	A	0.5	0.106	0.2	A	0.5
	R	0.176	5.6	A	0.4	0.149	5.6	A	0.5	0.106	5	A	0.5
Road 3 (W)	L	0.082	5.6	A	0.8	0.098	5.7	A	1	0.108	5.2	A	1.1
	R	0.082	7.8	A	0.8	0.098	7.6	A	1	0.108	6.4	A	1.1
All vehicles		0.192	1.2	A	0.8	0.203	1.4	A	1	0.147	2.2	A	1.1

For Scenario 2, the intersection of Lisford Avenue/Charnwood Avenue remains unchanged from **Figure 7-12**. **Table 7-10** provides a summary of the SIDRA results.

Table 7-10 Lisford Avenue/Charnwood Avenue Intersection – Scenario 2

Intersection Approach		AM				PM				Weekend			
		DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)
Lisford Ave (S)	T	0.19	0	A	0.2	0.201	0	A	0.2	0.141	0	A	0.2
	R	0.19	7.1	A	0.2	0.201	6.8	A	0.2	0.141	6.4	A	0.2
Charnwood Ave (E)	L	0.021	6.7	A	0.2	0.018	6.5	A	0.2	0.013	6.3	A	0.1
	R	0.021	9	A	0.2	0.018	8.8	A	0.2	0.013	7.6	A	0.1
Lisford Ave (N)	L	0.195	5.5	A	0	0.172	5.5	A	0	0.139	5.5	A	0
	T	0.195	0	A	0	0.172	0	A	0	0.139	0	A	0
All vehicles		0.195	0.3	A	0.2	0.201	0.3	A	0.2	0.141	0.3	A	0.2

### 7.7.3 Scenario 3

For Scenario 3, the intersection of Lisford Avenue/Azzurra Street remains unchanged from **Figure 7-13**. **Table 7-11** provides a summary of the SIDRA results.

Table 7-11 Lisford Avenue/Azzurra Street Intersection – Scenario 3

Intersection Approach		AM				PM				Weekend			
		DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)
Lisford Ave (S)	L	0.202	4.1	A	0	0.228	4.1	A	0	0.149	4.1	A	0
	T	0.202	0	A	0	0.228	0	A	0	0.149	0	A	0
Lisford Ave (N)	T	0.199	0.1	A	0.6	0.172	0.3	A	0.8	0.109	0.2	A	0.7
	R	0.199	6.2	A	0.6	0.172	6.4	A	0.8	0.109	5.5	A	0.7
Azzurra Street (W)	L	0.108	5.7	A	1.1	0.158	5.9	A	1.6	0.149	5.2	A	1.6
	R	0.108	8.3	A	1.1	0.158	8.4	A	1.6	0.149	6.5	A	1.6
All vehicles		0.202	1.3	A	1.1	0.228	1.7	A	1.6	0.149	2.5	A	1.6

For Scenario 3, the intersection of Lisford Avenue/Road 3 remains unchanged from **Figure 7-14**. **Table 7-12** provides a summary of the SIDRA results.

Table 7-12 Lisford Avenue/Road 3 Intersection – Scenario 3

Intersection Approach		AM				PM				Weekend			
		DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)
Lisford Ave (S)	L	0.237	5.5	A	0	0.265	5.5	A	0	0.195	5.5	A	0
	T	0.237	0	A	0	0.265	0	A	0	0.195	0	A	0
Lisford Ave (N)	T	0.225	0.2	A	0.9	0.215	0.4	A	1.3	0.16	0.4	A	1.2
	R	0.225	6.3	A	0.9	0.215	6.6	A	1.3	0.16	5.6	A	1.2
Road 3 (W)	L	0.127	6	A	1.3	0.219	6.3	A	2.3	0.202	5.5	A	2.2
	R	0.127	9.3	A	1.3	0.219	9.9	A	2.3	0.202	7.7	A	2.2
All vehicles		0.237	1.5	A	1.3	0.265	2.2	A	2.3	0.202	2.7	A	2.2

For Scenario 3, the intersection of Lisford Avenue/Charnwood Avenue is upgraded to a 4 way roundabout (with a new western approach, Australis Drive) as shown in **Figure 7-15**. **Table 7-13** provides a summary of the SIDRA results.

Figure 7-15 SIDRA Layout for Lisford Avenue/Charnwood Avenue/Australis Drive Intersection



Table 7-13 Lisford Avenue/Charnwood Ave Intersection – Scenario 3

Intersection Approach	AM					PM				Weekend			
		DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)
Lisford Ave (S)	L	0.301	4.4	A	6.9	0.344	4.5	A	8.1	0.256	4.5	A	5.3
	T	0.301	4.8	A	6.9	0.344	4.9	A	8.1	0.256	4.8	A	5.3
	R	0.301	8.4	A	6.9	0.344	8.5	A	8.1	0.256	8.4	A	5.3
Charnwood Ave (E)	L	0.026	6.2	A	0.4	0.026	6.3	A	0.5	0.022	5.7	A	0.4
	T	0.026	6.2	A	0.4	0.026	6.3	A	0.5	0.022	5.8	A	0.4
	R	0.026	10.4	B	0.4	0.026	10.5	B	0.5	0.022	9.9	A	0.4
Lisford Ave (N)	L	0.282	4.3	A	6.3	0.303	4.4	A	7.4	0.252	4.4	A	5.7
	T	0.282	4.5	A	6.3	0.303	4.7	A	7.4	0.252	4.7	A	5.7
	R	0.282	8.3	A	6.3	0.303	8.4	A	7.4	0.252	8.4	A	5.7
Australis Dr (W)	L	0.009	6.2	A	0.1	0.049	6.7	A	0.8	0.043	5.7	A	0.7
	T	0.009	6.2	A	0.1	0.049	6.7	A	0.8	0.043	5.7	A	0.7
	R	0.009	9.8	A	0.1	0.049	10.3	B	0.8	0.043	9.3	A	0.7
All vehicles		0.301	4.8	A	6.9	0.344	5.1	A	8.1	0.256	5.1	A	5.7



7.7.4 Scenario 4

For Scenario 4, the intersection of Lisford Avenue/Azzurra Street has been modified as shown in **Figure 7-16**. **Table 7-14** provides a summary of the SIDRA results.

Figure 7-16 SIDRA Layout for Lisford Avenue/Azzurra Street Intersection (with assumed intersection upgrades)

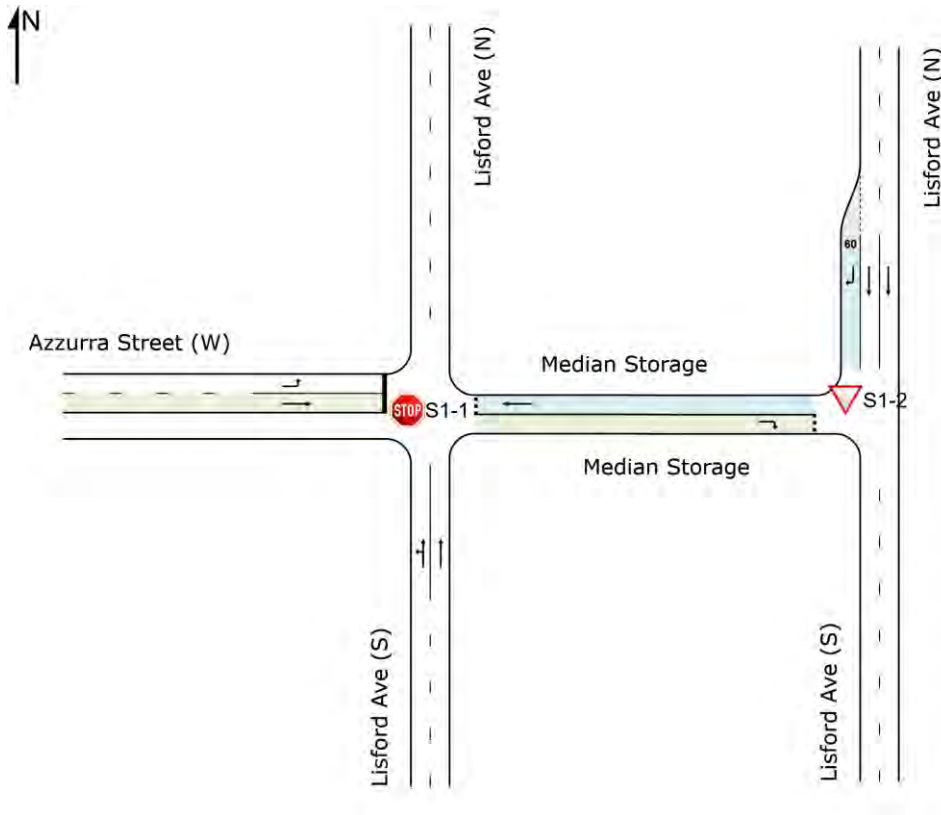


Table 7-14 Lisford Avenue/Azzurra Street Intersection – Scenario 4

Intersection Approach	AM					PM				Weekend			
		DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)
Lisford Ave (S)	L	L	0.253	4.1	A	0	0.269	4.1	A	0	0.131	4.1	A
	T	T	0.253	0	A	0	0.269	0	A	0	0.131	0	A
Lisford Ave (N)	T	T	0.265	0.1	A	0	0.206	0.1	A	0	0.11	0	A
	R	R	0.071	11.1	B	0	0.115	11.9	B	0	0.078	7.7	A
Azzurra Street (W)	L	L	0.043	10.3	B	0.5	0.066	10.5	B	0.8	0.058	8.9	A
	R	R	0.159	28.7	D	1.7	0.263	31.4	D	2.9	0.12	14.5	B
All vehicles			0.265	1.3	A	1.7	0.269	1.9	A	2.9	0.131	2.3	A

For Scenario 4, the intersection of Lisford Avenue/Road 3 has been modified as shown in **Figure 7-17**. **Table 7-15** provides a summary of the SIDRA results.

Figure 7-17 SIDRA Layout for Lisford Avenue/Road 3 Intersection (with assumed intersection upgrades)

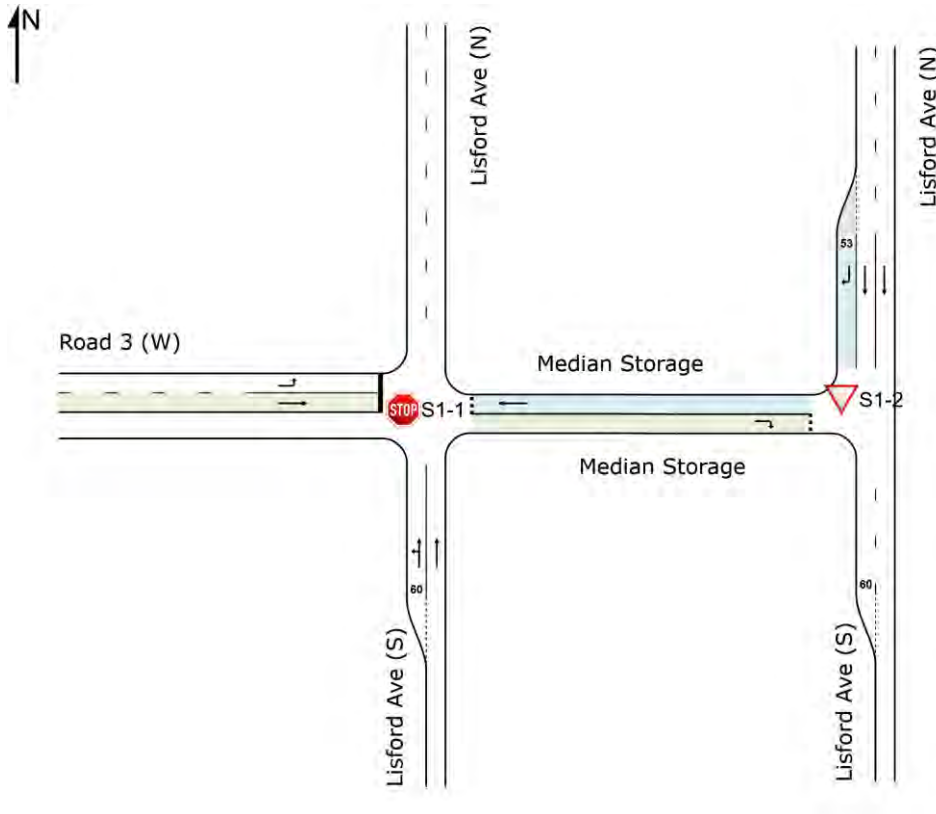


Table 7-15 Lisford Avenue/Road 3 Intersection – Scenario 4

Intersection Approach		AM				PM				Weekend			
		DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)
Lisford Ave (S)	L	0.257	5.5	A	0	0.269	5.5	A	0	0.132	5.5	A	0
	T	0.257	0	A	0	0.269	0	A	0	0.132	0	A	0
Lisford Ave (N)	T	0.39	0.6	A	0	0.305	0.4	A	0	0.159	0.2	A	0
	R	0.102	9.7	A	0	0.143	10.4	B	0	0.091	6.2	A	0
Road 3 (W)	L	0.046	10.3	B	0.5	0.079	10.5	B	0.9	0.069	8.8	A	0.8
	R	0.172	32.1	D	1.8	0.32	34.3	D	3.7	0.143	15.2	C	1.7
All vehicles		0.39	1.7	A	1.8	0.32	2.5	A	3.7	0.159	2.8	A	1.7

For Scenario 4, the intersection of Lisford Avenue/Charnwood Avenue remains unchanged from **Figure 7-15**. **Table 7-16** provides a summary of the SIDRA results.

Table 7-16 Lisford Avenue/Charnwood Ave Intersection – Scenario 4

Intersection Approach	AM				PM				Weekend				
		DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)	DOS	Delay (s)	LOS	Ave. Back of Queue (m)
Lisford Ave (S)	L	0.688	4.9	A	31.6	0.727	5.1	A	34.4	0.37	4.7	A	9.2
	T	0.688	5.2	A	31.6	0.727	5.4	A	34.4	0.37	5	A	9.2
	R	0.688	8.8	A	31.6	0.727	9.1	A	34.4	0.37	8.6	A	9.2
Charnwood Ave (E)	L	0.163	14.5	B	3.5	0.119	11	B	2.5	0.072	6.9	A	1.3
	T	0.163	14.5	B	3.5	0.119	11	B	2.5	0.072	6.9	A	1.3
	R	0.163	19.4	B	3.5	0.119	15.7	B	2.5	0.072	11.1	B	1.3
Lisford Ave (N)	L	0.686	4.6	A	30.8	0.601	4.7	A	21.9	0.36	4.5	A	8.9
	T	0.686	4.9	A	30.8	0.601	5	A	21.9	0.36	4.8	A	8.9
	R	0.686	8.6	A	30.8	0.601	8.8	A	21.9	0.36	8.5	A	8.9
Australis Dr (W)	L	0.017	13.5	B	0.3	0.102	14.9	B	2.1	0.051	7	A	0.9
	T	0.017	13.5	B	0.3	0.102	14.8	B	2.1	0.051	7	A	0.9
	R	0.017	17	B	0.3	0.102	18.4	B	2.1	0.051	10.6	B	0.9
All vehicles		0.688	5.5	A	31.6	0.727	5.8	A	34.4	0.37	5.4	A	9.2

## 7.8 Analysis Summary

A summary of the SIDRA results are as follows:

- > The Lisford Avenue/Azzurra Street intersection operates at an acceptable level of service for all scenarios.
- > The Lisford Avenue/Road 3 intersection operates at an acceptable level of service for all scenarios. There is no justification for restricting this intersection to Left-In-Left-Out movements, even after the duplication of Lisford Avenue.
- > The Lisford Avenue/Charnwood Avenue intersection operates at an acceptable level of service for all scenarios.

In conclusion, the proposed road network is able to satisfactorily accommodate the estimated traffic generated by the LDP.

## 8 Site Specific Issues

### 8.1 Access Arrangements for Lisford Avenue/Azzurra Street and Southern Site Access (Access 4)

The City of Wanneroo have provided comments suggesting that the access arrangements for Lisford Avenue/Azzurra Street and Southern Site Access (Access 4) be changed to left in, left out (LILO) only. The following section provides a summary of the implications

#### 8.1.1 Lisford Avenue/Azzurra Street

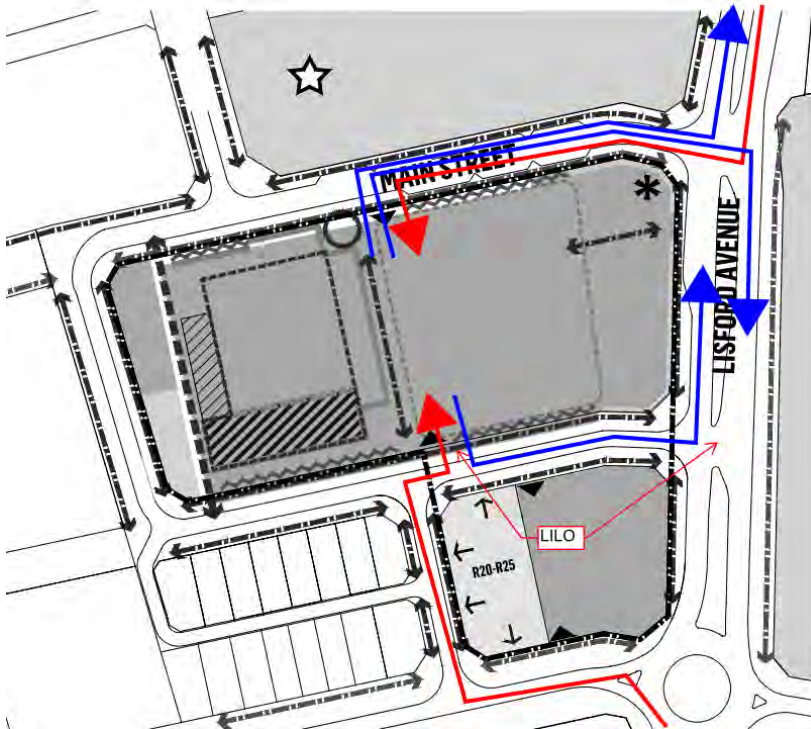
The advantages of retaining full movements at Lisford Avenue/ Road 3 intersection is that it reduces the traffic burden at the Azzurra Street/Lisford Avenue and Charnwood Avenue/Lisford Avenue intersections as traffic can be more evenly distributed across the three intersections. The effect of this is that it improves the overall operation across the three intersections whereas the LILO restrictions may result in one intersection (likely Azzurra Street/Lisford Avenue) operating significantly worse due to the additional right turn movements being re-routed to this intersection. **Figure 8-1** shows, in general terms, the concentration of traffic movements that would occur on Azzurra Street as a result of restricting Road 3 and the southern crossover to Left-In-Left Out movements.

A LILO intersection would also increase travel times for vehicles heading southbound along Lisford Avenue as vehicles will need to travel further to an intersection where right turns are permitted.

In addition, the movement restriction at this intersection will impact the proposed semi-trailer movements for the development as it will require the loading dock to be redesigned or further modifications potentially required to the nearby roads/intersections (likely dependent on the semi-trailer route).

SIDRA analysis of the Lisford Avenue / Road 3 intersection shows that it operates satisfactorily in all scenarios, even after duplication of Lisford Avenue. Therefore, there is no justification for restricting movements to Left-In-Left-Out at this location.

Figure 8-1 Likely Inbound and Outbound Routes (LILO arrangement)



### 8.1.2 Lisford Avenue/ Southern Site Access (Access 4)

The proposed Southern Site Access (to Road 3) is expected to function adequately in its proposed form, as a full movement crossover. Most of the traffic movements to/from the crossover will be to/from the east (Lisford Avenue). Minimal right turns out of the crossover towards the west are expected as there is limited network connectivity and land use to the west of the crossover. The crossover is located offset from the future south road, is on a section of town centre street that is designed for traffic speeds below 40km/h, and is compliant with AS2890.1.

The intersection of Road 3 and the future south road is expected to have very low turning volumes. Significantly less than 1,000vpd are projected to use both Road 3 and the future south road, based on the designation of 'Access Street' specified in the *Two Rocks Town Centre Traffic and Transport Report* (SKM, 2014).

## 9 Conclusions and Summary

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This Transport Impact Assessment outlines the transport aspects of the proposed Site A and Local Development Plan focusing on traffic operations, loading vehicle operations, access and the provision of car parking.

This assessment has been prepared in accordance with the *WAPC Transport Impact Assessment Guidelines for Developments: Volume 3 – Subdivisions (2016)*.

The following are conclusions about Site A and proposed LDP:

- > The proposed LDP comprises of the following:
  - **Site A (Proposed Woolworths/Commercial Development Application – 4,133m<sup>2</sup>)**
    - Supermarket
    - Liquor store
    - Café
    - Specialty retail stores
    - 242 car parking bays
  - **Site B (approximately 2,000m<sup>2</sup>)**
    - Future commercial development
    - Public open space/drainage
  - **Site C (1,702m<sup>2</sup>)**
    - Future pad site
  - **Site D (approximately 4,800m<sup>2</sup>)**
    - Future commercial development
    - Future residential development
- > The opening year development (comprising of Site A) represents a two-way trip generation of approximately 246 vehicles during the weekday AM peak hour, 295 vehicles during the weekday PM peak hour and 395 vehicles during the weekend peak hour.
- > The full LDP development (comprising of Site A, B, C & D) represents a two-way trip generation of approximately 365 vehicles during the weekday AM peak hour, 552 vehicles during the weekday PM peak hour and 664 vehicles during the weekend peak hour.
- > The SIDRA assessment shows that all intersections operate at an acceptable level of service for all scenarios. This includes a sensitivity test undertaken for a very high 20% per annum background traffic growth scenario.
- > All access points are anticipated to operate satisfactorily.
- > Parking supply for Site A is sufficient for the proposed development.

APPENDIX

A

WAPC CHECKLIST

ITEM	PROVIDED	COMMENTS
<b>Summary</b>		
<b>Introduction/Background</b>	Section 1	
<b>Subdivision proposal</b>		
regional context	Section 3	
proposed land uses	Section 3	
table of land uses and quantities	Section 3	
major attractors/generators	Section 3	
specific issues	N/A	
<b>Existing situation</b>		
existing land uses within structure plan	Section 2	
existing land uses within 800 metres of subdivision	Section 2	
existing road network within subdivision	Section 2	
existing pedestrian/cycle networks within subdivision	Section 2	
existing public transport services within structure plan area	Section 2	
existing road network within 2 (or 5) km of subdivision	Section 2	
traffic flows on roads within subdivision area (PM and/or AM peak hours)	Section 2	
traffic flows on roads within 2 (or 5) km of within subdivision area (AM and/ or PM peak hours)	Section 2	
existing pedestrian/cycle networks within 800m of subdivision	Section 2	
existing public transport services within 800m of subdivision area	Section 2	
<b>Proposed internal transport networks</b>		
changes/additions to existing road network or proposed new road network	N/A	
road reservation widths	N/A	
road cross-sections & speed limits	N/A	
intersection controls	N/A	
pedestrian/cycle networks and crossing facilities	N/A	
public transport routes	N/A	
<b>Changes to external transport networks</b>		
road network	Section 5	
intersection controls	N/A	
pedestrian/cycle networks and crossing facilities	Section 5	
public transport services	Section 5	
<b>Integration with surrounding area</b>		
trip attractors/generators within 800 metres	Section 6	
proposed changes to land uses within 800 metres	N/A	
travel desire lines from structure plan to these attractors/generators	N/A	



ITEM	PROVIDED	COMMENTS
adequacy of external transport networks	N/A	
deficiencies in external transport networks	N/A	
remedial measures to address deficiencies	N/A	
<b>Analysis of internal transport networks</b>		
assessment year(s) and time period(s)	Section 7	
subdivision generated traffic	Section 7	
extraneous (through) traffic	Section 7	
design traffic flows (that is, total traffic)	Section 7	
road cross-sections	N/A	
intersection sight distances	N/A	
intersection operation and method of control	N/A	
frontage access strategy	N/A	
pedestrian/cycle networks	N/A	
safe walk/cycle to school assessment (residential subdivisions only)	N/A	
pedestrian permeability & efficiency	N/A	
access to public transport	N/A	
<b>Analysis of external transport networks</b>		
base flows for assessment year(s)	Section 7	
total traffic flows	Section 7	
road cross-sections	N/A	
intersection layouts & controls	Section 7	
pedestrian/cycle networks	N/A	
<b>Safety issues</b>		
Identify issues	N/A	
Remedial measures	N/A	
<b>Conclusions</b>	Section 8	

APPENDIX

# B

SITE PLANS

Rev.	Amendment	Date
A	FOR INFORMATION	24/1/20
B	FOR INFORMATION	17/02/21
C	FOR INFORMATION	05/03/21
D	FOR INFORMATION	09/03/21
E	FOR CLIENT ISSUE	18/03/21
F	FOR INFORMATION	19/03/21
G	FOR INFORMATION	23/03/21
H	FOR CLIENT REVIEW	25/05/21
J	DRP PRESENTATION	08/07/21
K	DRP PRESENTATION 2	20/07/21
L	ISSUE FOR REVIEW	16/08/21
M	ISSUE FOR REVIEW	01/09/21
N	FOR REVIEW	09/09/21
P	FOR REVIEW	13/09/21
Q	FOR REVIEW	14/09/21
R	FOR CLIENT APPROVAL	17/09/21
S	FOR CLIENT APPROVAL	06/10/21
T	DA ISSUE	15/10/21



**WOOLWORTHS SITE**

TOTAL SITE AREA	16929m <sup>2</sup>
SITE AREA	15227m <sup>2</sup>
WOOLWORTHS (WITH EXPANSION)	3600m <sup>2</sup>
WOOLWORTHS (WITHOUT EXPANSION)	2942m <sup>2</sup>
FUTURE EXPANSION - INCL. OFFICE MEZZANINE	658m <sup>2</sup>
CAFE	85m <sup>2</sup>
SPECIALTY 1 (LIQUOR)	200m <sup>2</sup>
SPECIALTY 2	82m <sup>2</sup>
SPECIALTY 3	78m <sup>2</sup>
SPECIALTY 4	151m <sup>2</sup>
RETAIL / COMMERCIAL	595 m <sup>2</sup>
<b>TOTAL AREA</b>	<b>4791m<sup>2</sup></b>
PARKING REQUIRED WW - 5 BAYS/100m <sup>2</sup> GLA	<b>240 BAYS</b>

**FUTURE PAD SITE**

SITE AREA	1702 m <sup>2</sup>
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**PARKING PROVIDED**

GENERAL	226 BAYS
STREET PARKING	10 BAYS
PICKUP	6 BAYS
<b>TOTAL</b>	<b>242 BAYS</b>

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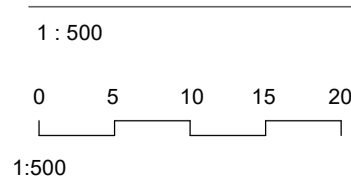
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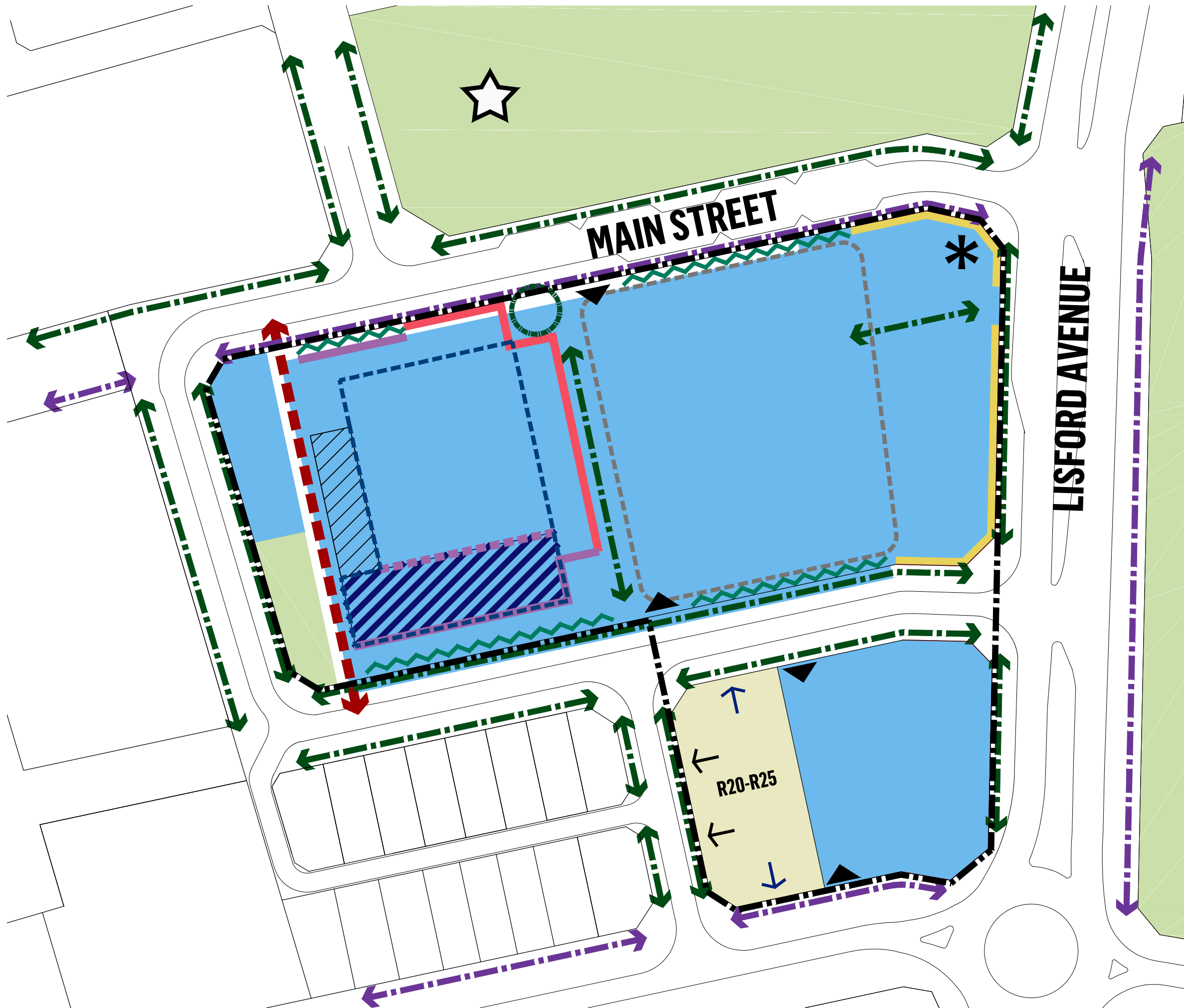
WOOLWORTHS TWO ROCKS

**SITE PLAN**

Scale	As indicated			
Drawn	DF	Checked	MJ	
Date	15/10/21			
Job No.	2020050			
Dwg No.	<b>3353 02</b>	Rev:	<b>T</b>	A1 SHEET

**SITE PLAN**





**LOCATION PLAN**



**LOCATION PLAN**

- LDP APPLICATION AREA
- ACTIVE FRONTAGE
- SEMI-ACTIVE FRONTAGE
- ATTRACTIVE FRONTAGE
- INTERIM ATTRACTIVE FRONTAGE
- LANDSCAPE FRONTAGE
- PRIMARY BUILDING ORIENTATION  
RESIDENTIAL DEVELOPMENT
- SECONDARY BUILDING ORIENTATION  
RESIDENTIAL DEVELOPMENT
- INDICATIVE BUILDING EMPHASIS LOCATION
- COMMERCIAL ZONE
- RESIDENTIAL ZONE
- PUBLIC OPEN SPACE AND DRAINAGE
- PUBLIC REALM NODE
- KING NEPTUNE STATUE
- SHARED PATH LINKAGES
- PEDESTRIAN LINKAGES
- INDICATIVE VEHICLE ACCESS - FULL  
MOVEMENT
- SERVICE LANE
- INDICATIVE SERVICE ZONE
- INDICATIVE CAR PARK AND CIRCULATION  
AREA
- INDICATIVE SUPERMARKET PRIORITY ZONE
- FUTURE EXPANSION AREA

**ENDORSEMENT TABLE**

This Local Development Plan has been approved by Council under clause 52(1)(a) of the Deemed Provisions of District Planning Scheme No.2

Manager Approval Services  
City of Wanneroo

Date



**Precinct C Local Development Plan**  
Part Lot 9702 Enterprise Avenue, Two Rocks

Level 14, The Quadrant, 1 William Street | Perth WA 6000 Australia | +61 8 9346 0500 | URBIS Pty Ltd | ABN 50 105 256 228

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**CLIENT**

Woolworths



PROJECT NO.  
P0027502

DATE  
08.10.2021

DRAWING NO.  
01.1

REVISION  
E

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# LDP PROVISIONS

The standards of the City of Wanneroo District Planning Scheme No.2 (DPS 2) and relevant policies are refined where detailed on this Local Development Plan (LDP).

This LDP is made pursuant to Part 6 of Schedule 2 - Deemed Provisions for Local Planning Schemes, of the *Planning and Development (Local Planning Schemes) Regulations 2015*, and the Two Rocks Town Centre Structure Plan (Structure Plan).

## VISION

The overall intent of the LDP is to facilitate the development of Precinct C as a high-quality, retail and service focused centre comprising a diversity of land uses. The precinct will be highly accessible to the surrounding community by walking and cycling and will be a central meeting place for the Two Rocks community.

Central to the precinct is the delivery of a convenience shopping precinct, providing opportunities for community gathering and social activity. The LDP allows for the expansion of the proposed retail use in the future, incorporating suitable provisions requiring a high-quality landscaping solution in the interim to ensure an attractive southern interface. The LDP has been designed to maximise views to the King Neptune statue to the north as well as north-west to the Marina.

Active frontages will be provided to key areas of Azzurra Street (main street) (particularly around the eastern perimeter of the proposed retail use, at the sites main entry). In particular, a public realm node is located at the site entrance on Azzurra Street, which will become a community focal point, incorporating alfresco dining and landscape elements such as seating and child play. Opportunities for buildings with landmark elements have also been identified to assist with legibility and wayfinding.

The LDP proposes a Public Open Space (POS) and Drainage area to the south-west of the LDP area to promote better use of core of the centre. The location of the POS has been designed and located in accordance with the broader water management strategy for the Two Rocks Town Centre Structure Plan area.

Residential development is provided to the south of the LDP area in the form of single residential lots. This will provide a suitable transition to future residential land south of the LDP area, within Precinct E.

## DESIGN ELEMENTS

### STREET FRONTAGES

The LDP provides for 4 façade types. These are distributed through the LDP to ensure that activity and built form is scaled and designed to respond to the relevant street context and foster the correct experience for users of the street.

The façade standards apply only to non-residential development. Residential development is to be as per the Residential Design Codes, or as provided for in DPS 2 and the Structure Plan.

### 1. Active Frontage

This frontage type is concentrated around the main street, where a high level of activation and clear visual engagement with pedestrians is promoted. Active frontage areas should be designed generally in accordance with the following:

- Default nil setback to street. Setbacks are permitted where required to accommodate alfresco dining, a landscaped edge or similar activities. No vehicle parking is permitted in the setback area between the property boundary and the built form.
- Minimum façade height of 5.2 metres to provide an appropriate scale and create a sense of enclosure for the pedestrian environment.
- Minimum floor to ceiling height of 3.6 metres on the ground floor.
- 70% ground floor glazing target, with 50% of glazed area to be unobscured.
- Continuous awnings provided along active frontages, which are to be integral to the design and functionality of the building, except where an awning is not practical.
- Awnings are to have a minimum height clearance of 3.0 metres from footpath/pavement level and be 2.6 metres deep.

### 2. Semi-Active Frontage

This frontage type relates to areas intended to reflect an urban character but does not necessarily accommodate highly active functions. Semi-active frontages shall be designed generally in accordance with the following:

- Setbacks shall be provided to ensure a sense of enclosure to the street.
- Minimum façade height of 5.2 metres.
- Minimum floor to ceiling height of 3.6 metres on the ground floor for non-residential uses.
- 50% ground floor glazing target.

### 3. Attractive Frontage

This frontage type is intended to ensure good design outcomes for areas where design limitations associated with 'big box' retail environments and service areas may occur, such as loading areas and inactive walls. Attractive frontages should be designed generally in accordance with the following:

- All walls to be appropriately treated to create visual interest in the built form through material choice and articulation.
- Application of CPTED principles through material selection is encouraged.
- Continuous built form is encouraged where achievable.
- Opportunities for public art integration into facades and/or buildings are encouraged.
- The 'Interim Attractive Frontage' shall provide an attractive frontage until such time as expansion occurs.

### 4. Landscape Frontage

This frontage type is to be provided where there are no opportunities for a built form street interface. Landscape frontages are intended to provide a high amenity streetscape that is attractive and encourages pedestrian movement through the following:

- Inclusion of statement trees such as Norfolk Island Pines and Cotton Palms as a reference to the site history.
- Verge landscape treatment around the perimeter of the site including hardy native verge planting with coastal groundcover species.
- Inclusion of feature seating and garden beds at key locations to encourage community gathering.

## OPEN SPACE, DRAINAGE AND LANDSCAPE

5. Public Open Space to be located in accordance with nominated location.
6. The 'Public Open Space and Drainage' area shall be designed in accordance with the Urban Water Management Plan prepared by RPS (dated 09 September 2021).
7. Water Sensitive Urban Design principles shall be applied to any drainage incorporated in the 'Public Open Space and Drainage' area.
8. The intent of the 'Public Realm Node' is to provide opportunities for community gathering and social activity on the main street, including high quality public realm elements (such as seating, shaded areas and children's play).
9. The 'Future Expansion Area' shall be appropriately landscaped to ensure a suitable southern interface until such time as the retail use is expanded.
10. Trees shall be provided in the 'Indicative Car Park and Circulation Area' at a rate of 1 tree per 10 bays.

## BUILDING EMPHASIS LOCATIONS

11. Identified locations should generally include:

- A variety of heights to parapets or more pronounced facades.
- Architectural features such as detailed panels, vertical and horizontal lines and glazing.
- Address both frontages to the street and/or public realm.

## SCREENING SERVICES

12. All external services shall be incorporated into the building design where possible.
13. Services shall be a similar colour to the roof and screened from adjacent streets and/or the public realm.
14. All service areas (bin storage etc.) and loading docks shall be incorporated into the building design and appropriately screened from the public realm to ensure potential noise and odour impacts are minimised.

## SIGNAGE

15. A Signage Strategy for the centre shall be required as a condition of approval, outlining the nature and extent of signage across the site. The strategy will ensure consistency in design and scale of signage.

## BUSHFIRE MANAGEMENT

16. Bushfire mitigation measures shall apply in accordance with the Bushfire Management Plan prepared by Bushfire Prone Planning (dated 06 October 2021).

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#### CLIENT

Woolworths



PROJECT NO.  
P0027502

DATE  
08.10.2021

DRAWING NO.  
01.2

REVISION  
E



Precinct C Local Development Plan  
Part Lot 9702 Enterprise Avenue, Two Rocks

Level 14, The Quadrant, 1 William Street | Perth WA 6000 Australia | +61 8 9346 0500 | URBIS Pty Ltd | ABN 50 105 256 228

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APPENDIX

# C

SWEPT PATHS

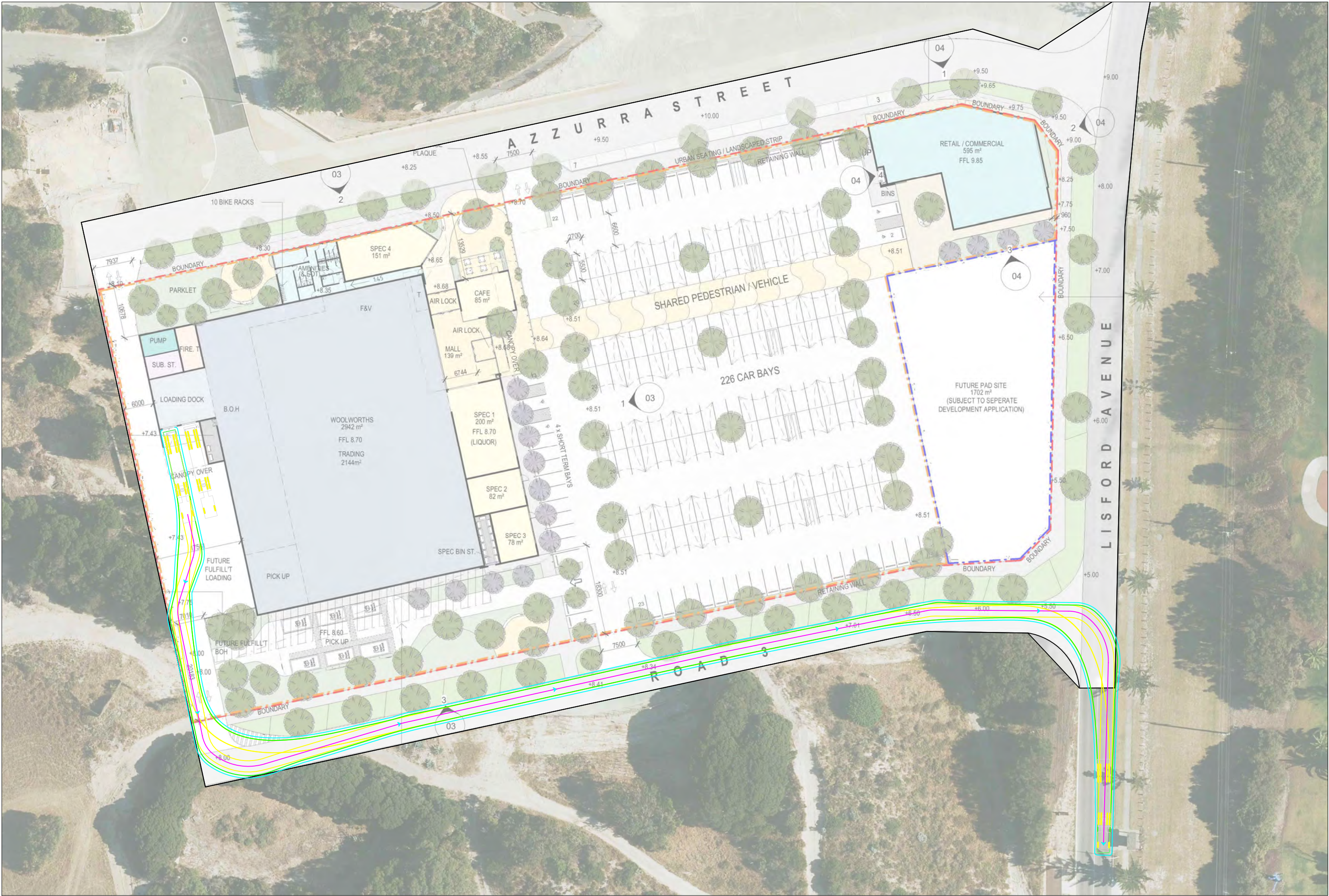




FUTURE DEVELOPMENT. NOT A PART OF THIS APPLICATION

FUTURE EXPANSION 458m² ZONE







APPENDIX

D

RESPONSE TO THE CITY'S COMMENTS



now



CW1197300

Two Rocks Precinct C LDP and Retail and Commercial DA TIA (Rev B)

28/01/2022

Traffic Comments	Cardno Response
<p>1. The TIA shall be updated to include turning movement diagrams for all assessed scenarios, as per WAPC TIA Guidelines Volume 5 Part C, splitting development traffic and background traffic.</p>	<p>Noted, can be included in updated TIA.</p>
<p>a. TIA should detail what volumes were adopted as existing along Lisford Avenue.</p>	<p>Noted. Can include the source of traffic data (originally requested from the City of Wanneroo) in the amended TIA report.</p>
<p>b. Furthermore, the TIA shall include commentary on the adopted growth rates for Lisford Avenue 2024 and 2031 scenarios, which is currently omitted from the TIA. Current Main Roads WA ROM24 modelling for 2031 shows this section of Lisford Avenue carrying 26,600 vpd (total both directions) indicating the need for the TIA to consider duplication of Lisford Avenue. The TIA also needs to include an assessment against Austroads requirements for turning lanes in the interim (existing) and also in the 2031 scenario assuming that Lisford Avenue is dualled. Ideally this would include concept drawings showing both scenarios.</p>	<p>Noted. Generally, we would only request Main Roads WA ROM data for larger scale developments or projects for Local Government, not individual development TIAs. The most recent traffic data available from 2019, along Lisford Ave (between Sovereign Dr and Weatherley Dr) carries approximately 2,400 vpd.</p> <p>The quoted ROM volumes suggest an average growth rate of approximately 84% per year, which is highly unlikely given that this would equate to volumes similar to parts of Wanneroo Road within the same time frame. The current growth rate assumed within the TIA is 2%. It may be that the Main Roads WA modelling assumes full development buildout of the entire Two Rocks area. However, this assumption would be unrealistic given the rate of development within the Two Rocks area is not anticipated to be that significant over the next 8 years.</p> <p>However, we can agree with the City a sensible long term growth rate to be applied and this can be assessed as a separate “worst case” scenario provided that the City provides us with the ROM data to review and use in the report.</p> <p>A turn warrant assessment can also be included in the updated TIA Report.</p>

<p>c. Traffic Services require further justification on the assumed directional traffic splits being heavily biased to/from the south. In the future scenarios it is more likely to be approximately 50/50 split unless sufficient justification can be provided.</p>	<p>The distribution splits used in the TIA report were made on the assumption that the rate of future development south of the Site will occur at a quicker rate compared to the north.</p> <p>This distribution can be adopted and tested for the “worse case” scenario assessment.</p>
<p>2. Loading area shall be modified so semi-trailers don't need to nose past the footpath before reversing into docks. Alternatively, perhaps one of the bays could be allocated for semi-trailers and the other for rigid trucks which may help address the above concern.</p>	<p>Noted, the potential for conflict between pedestrians will be low as these truck movements will be low speed and volume (approximately 1 truck per day). Additionally, these truck movements will occur outside of business hours where vehicle and pedestrian traffic will be low.</p> <p>However, we can try to rerun the swept paths minimise/reduce the distance the trucks travels past the footpath.</p>
<p>a. Semi-trailer ingress and egress swept path envelope from the service lane tracks extremely close to the footpath, a risk of conflict with pedestrians waiting to cross the service lane. Applicant is to comment on pedestrian safety.</p>	<p>The potential for conflict between pedestrians will be low as these truck movements will be low speed and volume (approximately 1 truck per day). Additionally, these truck movements will occur outside of business hours where vehicle and pedestrian traffic will be low.</p>
<p>3. Applicant to consider providing raised platforms on approach to the 'shared pedestrian / vehicle' treatments to ensure slow vehicle speeds.</p>	<p>Agreed, this will provide a safer outcome for pedestrians.</p>
<p>4. Applicant to demonstrate that proposed on-street parking along Azzurra Street complies with relevant standards, and does not obscure sightlines from Crossover 3.</p>	<p>Noted, can be included in the updated TIA.</p>
<p>5. Applicant to provide more detail regarding the footpath / verge treatment to be adopted along the eastern title boundary, Lisford Avenue frontage. Will the pad site front onto Lisford Avenue?</p>	<p>To be addressed by Architect.</p>
<p>a. It is recommended a 3m red asphalt path be included along the Lisford Avenue frontage between Azzurra Street and the future crossover to the south which will link into existing and future City shared footpath design.</p>	<p>To be addressed by Architect.</p>

6. The semi-trailer egress movement onto Lisford Avenue tracks across the northbound lane for over 20 metres. This may require local road widening, potential installation of a median to reduce potential conflict with northbound Lisford Avenue traffic.

The anticipated number of semi-trailers for the Site is expected to be very low (approximately 1 truck per day) and access/egress movements will generally occur outside of business hours where volumes will be low. However, the swept paths can be updated to try and minimise encroachment across the northbound lane.

7. Traffic Services recommends that the Road 3 intersection with Lisford Avenue is considered for a left-in / left-out arrangement, due to the proximity to the northern and southern intersections which both accommodate full turning movements.

Retaining full movements at Road 3/Lisford Ave intersection reduces the traffic burden at the Azzurra St/Lisford Ave and Charnwood Ave/Lisford Ave intersections as traffic can be more evenly distributed across the three accesses. A LiLo intersection would also increase travel times for vehicles heading southbound along Lisford Ave as vehicles will need to travel further to an intersection where right turns are permitted.

In addition, the movement restriction at this intersection will impact the proposed semi-trailer movements for the development as it will require the loading dock to be redesigned or further modifications potentially required to the nearby roads/intersections (likely dependent on the semi-trailer route).

Furthermore, volumes along local roads (particularly the future south road) will also increase which may be undesirable for future local residents.

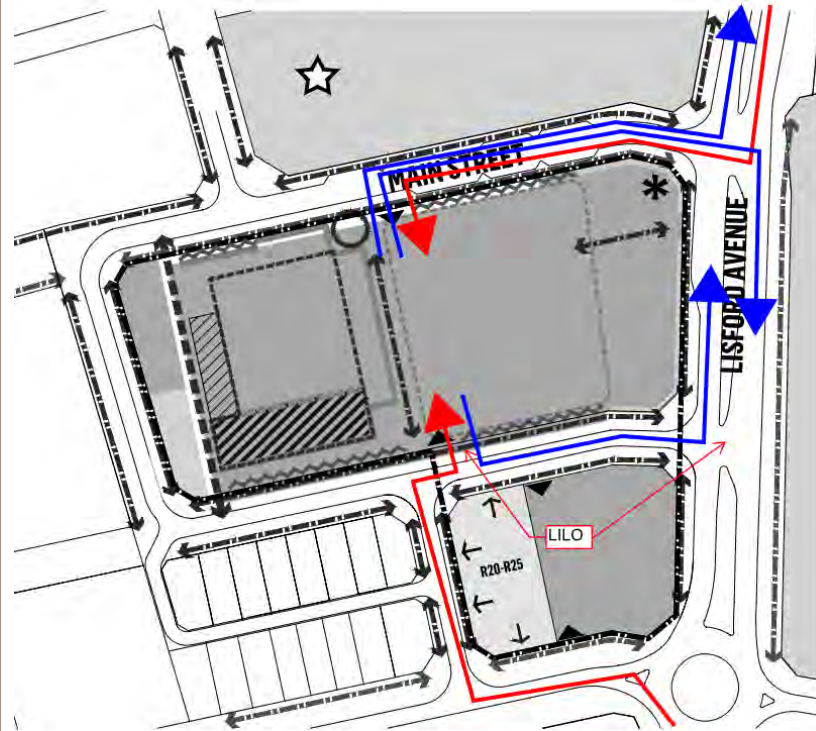
a. Depending on the analysis presented in the revised TIA (addressing the first comment above) a right-turn pocket and associated road widening should be provided for southbound vehicles accessing Main Street (Azzurra Street) as this is likely to accommodate the majority of all traffic approaching the site from the north /east.

To be determined based on the above assessment.

3. Concerns in relation to the location of the southern crossover entrance to/from Road-3 given close proximity to future road to the south. It is recommended this access point be reviewed by Traffic Consultant to ensure appropriate separations and vehicular circulation can occur. Perhaps look at a left-in, left-out style arrangement.

Traffic volumes along the future south road is expected to be low as it will be primarily used by local residents.

Additionally, it is likely that a median will be required to enforce any left in, left out arrangement which also has the potential to affect movements to any future south road. Combined with the LILLO restriction at Lisford Ave/Road 3 intersection, vehicles exiting the Site and heading southbound is limited and will likely increase traffic volumes along Azzurra Street as this is the most desirable route heading southbound (shown in figure below).



Alternatively, the access can potentially be moved further east to provide greater separation to the future south road and provide an environment where a full movement access will have a minimal impact on the future south road.



**WOOLWORTHS GROUP**

WOOLWORTHS COMMERCIAL DEVELOPMENT  
TWO ROCKS

**PRELIMINARY ENVIRONMENTAL ACOUSTIC ASSESSMENT**

SEPTEMBER 2021

OUR REFERENCE: 28451-1-21374





DOCUMENT CONTROL PAGE

**ENVIRONMENTAL ACOUSTIC ASSESSMENT**  
**WOOLWORTHS TWO ROCKS COMMERCIAL DEVELOPMENT**

Job No: 21374

Document Reference: 28451-1-21374

FOR

**WOOLWORTHS GROUP**

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## 1. INTRODUCTION

Herring Storer Acoustics were commissioned by Woolworths Group to undertake an acoustic assessment of noise emissions associated with the proposed commercial development located on Part Lot 9702 Enterprise Avenue, Two Rocks.

The objective of this study was to assess noise emissions from delivery vehicles and mechanical services at the premises surrounding the proposed site for compliance with the requirements of the *Environmental Protection (Noise) Regulations 1997*.

Existing and proposed premises have been considered in this assessment.

This preliminary assessment was undertaken to inform the design development team and accompany the development application.

## 2. SUMMARY

Refrigerated truck deliveries have been calculated to comply at all times.

Smaller truck deliveries, such as bakery deliveries, have been calculated to comply at all times.

Noise levels associated with the typical mechanical plant assumed for the purposes of this preliminary assessment have been calculated to comply at all times.

It is noted that the mechanical plant assumed in our assessment is indicative only, as selection of equipment has not been undertaken at this early stage of development. It is considered appropriate that an assessment of noise level emissions associated with the development would be a condition of approval.

## 3. CRITERIA

### 3.1 ENVIRONMENTAL PROTECTION (NOISE) REGULATIONS 1997

The *Environmental Protection (Noise) Regulations 1997* stipulate the allowable noise levels at any noise sensitive premises from other premises. The allowable noise level is determined by the calculation of an influencing factor, which is added to the baseline criteria set out in Table 1 of the Regulations. The baseline assigned noise levels are listed in Table 3.1.

**TABLE 3.1 – ASSIGNED NOISE LEVELS**

Premises Receiving Noise	Time of Day	Assigned Level (dB)		
		L <sub>A 10</sub>	L <sub>A 1</sub>	L <sub>A max</sub>
Noise sensitive premises within 15 metres of a dwelling (Highly Sensitive Areas)	0700 - 1900 hours Monday to Saturday	45 + IF	55 + IF	65 + IF
	0900 - 1900 hours Sunday and Public Holidays	40 + IF	50 + IF	65 + IF
	1900 - 2200 hours all days	40 + IF	50 + IF	55 + IF
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and Public Holidays	35 + IF	45 + IF	55 + IF
Commercial Premises	All Hours	60	75	80

Note: The L<sub>A10</sub> noise level is the noise that is exceeded for 10% of the time.  
 The L<sub>A1</sub> noise level is the noise that is exceeded for 1% of the time.  
 The L<sub>Amax</sub> noise level is the maximum noise level recorded.

It is a requirement that noise from the site be free of annoying characteristics (tonality, modulation and impulsiveness) at other premises, defined below as per Regulation 9.

**“impulsiveness”** means a variation in the emission of a noise where the difference between L<sub>Apeak</sub> and L<sub>Amax Slow</sub> is more than 15dB when determined for a single representative event;

**“modulation”** means a variation in the emission of noise that –

- (a) is more than 3dB L<sub>A Fast</sub> or is more than 3dB L<sub>A Fast</sub> in any one-third octave band;
- (b) is present for more at least 10% of the representative assessment period; and
- (c) is regular, cyclic and audible;

**“tonality”** means the presence in the noise emission of tonal characteristics where the difference between –

- (a) the A-weighted sound pressure level in any one-third octave band; and
- (b) the arithmetic average of the A-weighted sound pressure levels in the 2 adjacent one-third octave bands,

is greater than 3 dB when the sound pressure levels are determined as L<sub>Aeq,T</sub> levels where the time period T is greater than 10% of the representative assessment period, or greater than 8 dB at any time when the sound pressure levels are determined as L<sub>A Slow</sub> levels.

Where the above characteristics are present and cannot be practicably removed, the following adjustments are made to the measured or predicted level at other premises.

**TABLE 3.2 – ADJUSTMENTS FOR ANNOYING CHARACTERISTICS**

Where tonality is present	Where modulation is present	Where impulsiveness is present
+ 5 dB	+ 5 dB	+ 10 dB

Where the noise emission is music, if the music is audible, then any measured level is adjusted according to Table 3.3 below.

**TABLE 3.3 – ADJUSTMENTS TO MEASURED MUSIC NOISE LEVELS**

Where <b>impulsiveness</b> is not present	Where <b>impulsiveness</b> is present
+10 dB(A)	+15 dB(A)

The following locations have been determined to require an assessment of noise level emissions. It is noted that some locations are proposed, whilst others are existing premises.



**FIGURE 3.1 – RECEIVER POINTS**

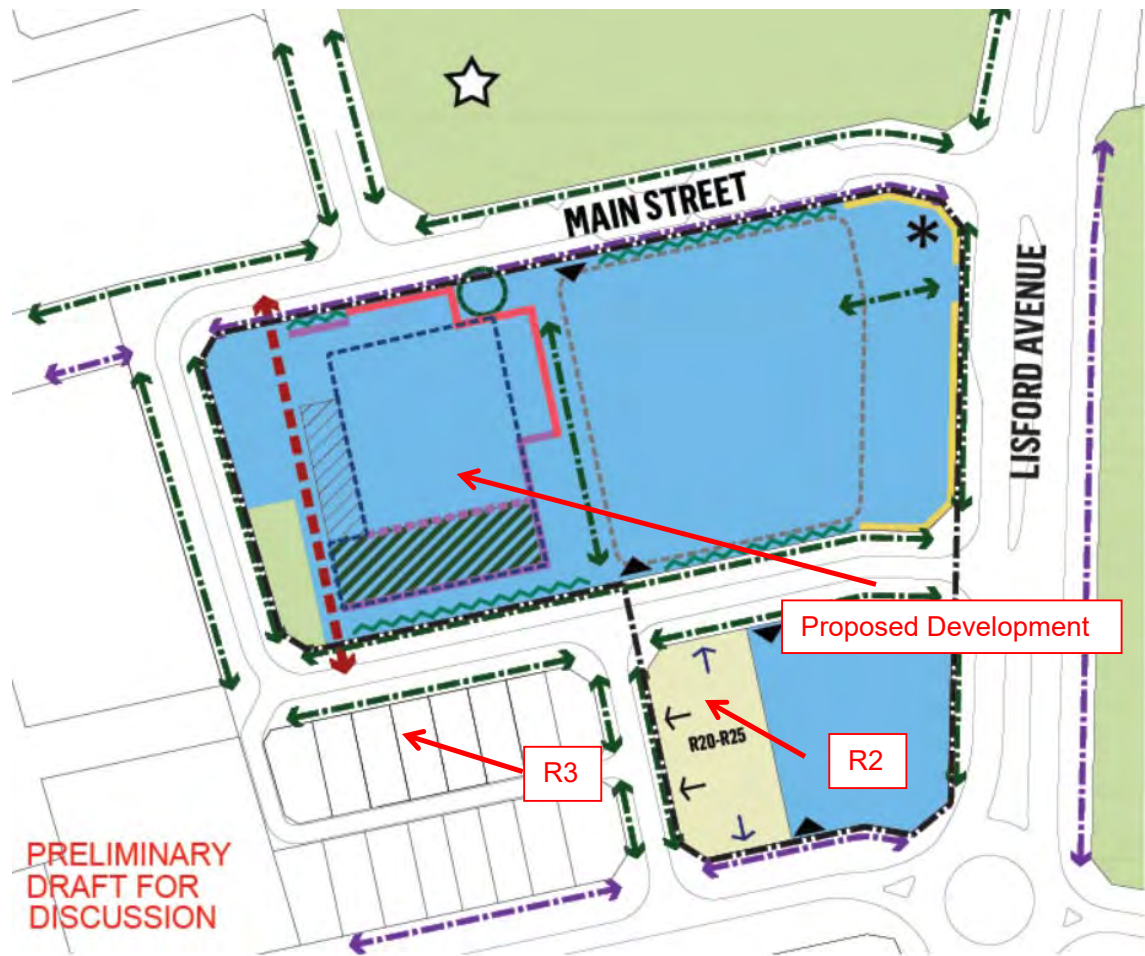


FIGURE 3.2 – RECEIVER POINTS

The influencing factor at the identified noise sensitive premises has been estimated at 0 dB.

Based on the above influencing factor, the assigned outdoor noise levels are listed in Table 3.4.

TABLE 3.4 - ASSIGNED OUTDOOR NOISE LEVEL FOR R1 AND R7

Premises Receiving Noise	Time of Day	Assigned Level (dB)		
		L <sub>A</sub> 10	L <sub>A</sub> 1	L <sub>A</sub> max
Noise sensitive premises	0700 - 1900 hours Monday to Saturday (Day)	45	55	65
	0900 - 1900 hours Sunday and Public Holidays (Sundays)	40	50	65
	1900 - 2200 hours all days (Evening)	40	50	55
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and Public Holidays (Night)	35	45	55

Note: L<sub>A</sub>10 is the noise level exceeded for 10% of the time.  
 L<sub>A</sub>1 is the noise level exceeded for 1% of the time.  
 L<sub>A</sub>max is the maximum noise level.

#### 4. PROPOSED DELIVERIES

The use of the delivery dock is understood to accommodate 15m articulated delivery trucks and have been assumed to be refrigerated trucks (i.e worst case scenario). In addition to the larger deliveries, smaller delivery vehicles (i.e. for bakery goods) have been assumed to be a 13m rigid truck.

## 5. MECHANICAL PLANT

Mechanical plant details have been based on information provided for previous Woolworths stores, with information listed in Table 6.3 below. This equipment has been located on the roof of the proposed development above/near the loading dock area.

## 6. METHODOLOGY

Noise modelling of the noise propagation from the site was carried out using the environmental noise modelling computer program, "SoundPlan". Single point calculations were undertaken.

Input data for computer modelling included:

- Location of store as per drawings in Appendix A.
- EPA standard weather condition for the day and night periods (see Table 6.1).
- Sound power levels, as summarised in Table 6.2 and 6.3.

**TABLE 6.1 - WEATHER CONDITIONS**

Condition	Day Period	Night Period
Temperature	20 °C	15 °C
Relative humidity	50%	50%
Pasquil Stability Class	E	F
Wind speed	4 m/s*	3 m/s*

\* From source to receiver

**TABLE 6.2 – SOUND POWER LEVELS OF DELIVERY VEHICLES**

DESCRIPTION	dB(A)
15m articulated delivery truck with refrigeration unit	97
13m rigid delivery truck	85

**TABLE 6.3 – SOUND POWER LEVELS OF MECHANICAL PLANT**

DESCRIPTION	dB(A)
Kitchen Exhaust Fan	83 dB(A)
Exhaust Fans	3 @ 70 dB(A)
Refrigeration Equipment	2 @ 88 dB(A)
Packaged Air Conditioning Unit	75 dB(A)

For the above sound power levels, single point calculations were undertaken for the following scenarios :

**Scenario 1 :** One large refrigerated truck delivery.

**Scenario 2 :** One 13m rigid truck delivery (bakery delivery).

**Scenario 3 :** Mechanical Plant.

Note : For the noise to be less than 10% of the time and be assessed under the  $L_{A1}$  assigned noise levels, the truck engines and refrigeration units would need to be turned off while unloading is occurring.

The  $L_{A1}$  assigned noise level would be the pertinent prescribed noise level in this instance (for deliveries) as the duration of time that the noise of the deliveries is present is less than 10% of a representative time period. The noise associated with the delivery is the manoeuvring of the truck into place, upon which the truck is switched off – hence – even if the delivery takes some time (i.e. 30 – 60 minutes) the noise level associated with the truck is not present throughout the duration of the delivery.

It is noted that this also means the noise assessment is more “realistic” as if the  $L_{A10}$  parameter was to be used as the noise level associated with the truck is not present for more than 10% of a representative time period, the  $L_{A10}$  noise level would be at the ambient noise level of the area, rather than the truck noise.

## 7. RESULTS

Single point calculations were undertaken for all locations shown in Figure 3.1, with the results of the modelling listed in Table 7.1. It is noted that for the locations with multiple floors, the highest noise level has been utilized for ease of report.

**TABLE 7.1 – RESULTANT NOISE LEVEL**

Receiver Location	Scenario / Calculated Noise Level, (dB(A))		
	Scenario 1	Scenario 2	Scenario 3
R1	11	0	27
R2	20	8	28
R3	45	33	28
R4	9	0	24

Given the location and the nature of the noise emissions, noise received at the neighbouring residences are unlikely to be tonal. However, to be conservative, the +5 dB(A) penalty has been added to the assessable noise level, noting that this is only applicable to mechanical services noise. Given the definitions of tonality in accordance with the Environmental Protection (Noise) Regulations 1997, truck deliveries would not be considered tonal. Therefore, Table 7.2 lists the assessable noise level for each scenario (including the adjustment for tonality where applicable).

**TABLE 7.2 – ASSESSABLE NOISE LEVELS**

Receiver Location	Scenario / Assessable Noise Level, (dB(A))		
	Scenario 1	Scenario 2	Scenario 3
R1	11	0	32
R2	20	8	33
R3	45	33	33
R4	9	0	29

Tables 7.3 and 7.4 compares the assessable noise level for large truck deliveries and small truck deliveries against the relevant  $L_{A1}$  Assigned Noise Levels for the day, evening (and Sundays) and night periods. Noise levels that are calculated to exceed the relevant criteria are listed in red.



**TABLE 7.3 – ASSESMENT OF NOISE LEVEL – SCENARIO 1 – LARGE TRUCK DELIVERIES**

Receiver Location	Assessable Noise Level, dB(A)	Assigned Noise Level, L <sub>A1</sub> dB		Exceedance to Assigned Noise Level
	Scenario 1	Time of Day	L <sub>A1</sub> dB	
R1	11	Day	55	Complies
		Sundays	50	Complies
		Evening	50	Complies
		Night	45	Complies
R2	20	Day	55	Complies
		Sundays	50	Complies
		Evening	50	Complies
		Night	45	Complies
R3	45	Day	55	Complies
		Sundays	50	Complies
		Evening	50	Complies
		Night	45	Complies
R4	9	Day	55	Complies
		Sundays	50	Complies
		Evening	50	Complies
		Night	45	Complies

**TABLE 7.4 – ASSESMENT OF NOISE LEVEL – SCENARIO 2 – SMALL TRUCK DELIVERIES**

Receiver Location	Assessable Noise Level, dB(A)	Assigned Noise Level, L <sub>A1</sub> dB		Exceedance to Assigned Noise Level
	Scenario 2	Time of Day	L <sub>A1</sub> dB	
R1	0	Day	55	Complies
		Sundays	50	Complies
		Evening	50	Complies
		Night	45	Complies
R2	8	Day	55	Complies
		Sundays	50	Complies
		Evening	50	Complies
		Night	45	Complies
R3	33	Day	55	Complies
		Sundays	50	Complies
		Evening	50	Complies
		Night	45	Complies
R4	0	Day	55	Complies
		Sundays	50	Complies
		Evening	50	Complies
		Night	45	Complies

Table 7.5 compares the assessable noise level for mechanical plant against the relevant L<sub>A10</sub> Assigned Noise Levels for the day, evening (and Sundays) and night periods. Noise levels that are calculated to exceed the relevant criteria are listed in red.

**TABLE 7.5 – ASSESMENT OF NOISE LEVEL – SCENARIO 3 – MECHANICAL PLANT**

Receiver Location	Assessable Noise Level, dB(A)	Assigned Noise Level, L <sub>A10</sub> dB		Exceedance to Assigned Noise Level
	Scenario 3	Time of Day	L <sub>A10</sub> dB	
R1	27	Day	45	Complies
		Sundays	40	Complies
		Evening	40	Complies
		Night	35	Complies
R2	28	Day	45	Complies
		Sundays	40	Complies
		Evening	40	Complies
		Night	35	Complies
R3	28	Day	45	Complies
		Sundays	40	Complies
		Evening	40	Complies
		Night	35	Complies
R4	24	Day	45	Complies
		Sundays	40	Complies
		Evening	40	Complies
		Night	35	Complies

Refrigerated truck deliveries have been calculated to comply at all times

Smaller truck deliveries, such as bakery deliveries, have been calculated to comply at all times.

Noise levels associated with the typical mechanical plant assumed for the purposes of this preliminary assessment have been calculated to comply with the Assigned Noise Levels at all times.

It is noted that the mechanical plant assumed in our assessment is indicative only, as selection of equipment has not been undertaken at this early stage of development. It is considered appropriate that an assessment of noise level emissions associated with the development would be a condition of approval.



**WOOLWORTHS SITE - STAGE 1**

SITE AREA	16229m <sup>2</sup>
WOOLWORTHS (WITH EXPANSION)	3600m <sup>2</sup>
WOOLWORTHS (WITHOUT EXPANSION)	2506m <sup>2</sup>
FUTURE EXPANSION - INCL. OFFICE MEZZANINE	1100m <sup>2</sup>
SPECIALTY 1 (BWS)	201m <sup>2</sup>
CAFE	65m <sup>2</sup>
SPECIALTY 2	87m <sup>2</sup>
SPECIALTY 3	242m <sup>2</sup>
<b>TOTAL AREA</b>	<b>4221m<sup>2</sup></b>
<b>PARKING REQUIRED</b> WW - 5 BAYS/100m <sup>2</sup> GLA	<b>211 BAYS</b>
<b>PARKING PROVIDED</b>	
GENERAL	245 BAYS
STREET PARKING	10 BAYS
PICKUP	6 BAYS
<b>TOTAL</b>	<b>258 BAYS</b>

**LISFORD AVENUE DEVELOPMENT - STAGE 1**

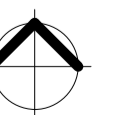
SITE AREA	1451m <sup>2</sup>
RETAIL / COMMERCIAL	519 m <sup>2</sup>
<b>PARKING REQUIRED</b> 5 BAYS/100m <sup>2</sup> GLA	<b>26 BAYS</b>
<b>PARKING PROVIDED</b>	
GENERAL	23 BAYS
STREET PARKING	3 BAYS
<b>TOTAL</b>	<b>26 BAYS</b>

**FUTURE DEVELOPMENT SITE**

SITE AREA	1015 m <sup>2</sup>
ESTIMATE COMMERCIAL AREA	420 m <sup>2</sup>
ESTIMATE PARKING REQUIRED PARKING 5 BAYS/100m <sup>2</sup> GLA	21 BAYS

**SITE PLAN**

1:500



**BROWN FALCONER**

brownfalconer.com.au  
WOOLWORTHS TWO ROCKS 2020050

Dwg No. 03 Rev. M Scale: As indicated @ A1

# Bushfire management plan/Statement addressing the Bushfire Protection Criteria coversheet

## ATTACHMENT 7

Site address:

Site visit: Yes  No

Date of site visit (if applicable): Day  Month  Year

Report author or reviewer:

WA BPAD accreditation level (please circle):

Not accredited  Level 1 BAL assessor  Level 2 practitioner  Level 3 practitioner

If accredited please provide the following.

BPAD accreditation number:  Accreditation expiry: Month  Year

Bushfire management plan version number:

Bushfire management plan date: Day  Month  Year

Client/business name:

	Yes	No
Has the BAL been calculated by a method other than method 1 as outlined in AS3959 (tick no if AS3959 method 1 has been used to calculate the BAL)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Have any of the bushfire protection criteria elements been addressed through the use of a performance principle (tick no if only acceptable solutions have been used to address all of the bushfire protection criteria elements)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Is the proposal any of the following (see [SPP 3.7 for definitions](#))?

	Yes	No
Unavoidable development (in BAL-40 or BAL-FZ)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Strategic planning proposal (including rezoning applications)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
High risk land-use	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vulnerable land-use	<input type="checkbox"/>	<input checked="" type="checkbox"/>

None of the above

**Note:** Only if one (or more) of the above answers in the tables is yes should the decision maker (e.g. local government or the WAPC) refer the proposal to DFES for comment.

Why has it been given one of the above listed classifications (E.g. Considered vulnerable land-use as the development is for accommodation of the elderly, etc.)?

The information provided within this bushfire management plan to the best of my knowledge is true and correct:

Signature of report author or reviewer



Date



# Bushfire Management Plan

Pt Lot 9702 (#10) Enterprise Avenue, Two Rocks

City of Wanneroo

---

<b>Planning Stage:</b>	Development Application and LDP Consideration
<b>Planning Development Type:</b>	Construction of Class 4 - 9 buildings and associated amenities.
<b>Bushfire Policy – Specific Development or Use Type:</b>	N/A

---

---

<b>Job Number:</b>	210744
<b>Assessment Date:</b>	14 September 2021
<b>Report Date:</b>	6 October 2021

---

BPP Group Pty Ltd t/a Bushfire Prone Planning  
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BMP (Standard DA-Non-Tourism) Template v8.5				
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Person/Business: Email:			<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Limitation of Liability:</b> The measures contained in this Bushfire Management Plan, are considered to be minimum requirements and they do not guarantee that a building will not be damaged in a bushfire, persons injured, or fatalities occur either on the subject site or off the site while evacuating. This is substantially due to the unpredictable nature and behaviour of fire and fire weather conditions. Additionally, the correct implementation of the required bushfire protection measures will depend upon, among other things, the ongoing actions of the landowners and/or operators over which Bushfire Prone Planning has no control.</p> <p>All surveys, forecasts, projections and recommendations made in this report associated with the proposed development are made in good faith based on information available to Bushfire Prone Planning at the time. All maps included herein are indicative in nature and are not to be used for accurate calculations.</p> <p>Notwithstanding anything contained therein, Bushfire Prone Planning will not, except as the law may require, be liable for any loss or other consequences whether or not due to the negligence of their consultants, their servants or agents, arising out of the services provided by their consultants.</p> <p><b>Copyright ©2020 BPP Group Pty Ltd:</b> All intellectual property rights, including copyright, in format and proprietary content contained in documents created by Bushfire Prone Planning, remain the property of BPP Group Pty Ltd. Any use made of such format or content without the prior written approval of Bushfire Prone Planning, will constitute an infringement on the rights of the Company which reserves all legal rights and remedies in respect of any such infringement.</p>				

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## EXECUTIVE SUMMARY

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This Bushfire Management Plan (BMP) is to accompany a Development Application for the Woolworths retail centre located on a portion of Lot 9702 (#10) Enterprise Avenue, Two Rocks in the City of Wanneroo. This BMP will also consider future development on land to the south and west of the Woolworths centre as shown on the Precinct C Local Development Plan.

Two proposed buildings will be assessed with respect to bushfire planning performance. These are the Woolworths and specialty shops retail centre located in the western portion of the development site, and the proposed retail/commercial building located in the north-eastern corner of the site. Future development sites as shown on Figure 1.1 will also be considered with respect to the bushfire protection criteria.

It is expected that the Woolworths site and surrounding roads, located at the northern portion of the Precinct C Local Development Plan, will be developed initially. Future commercial and residential sites as shown on Figure 1.1 will follow at a later date. Construction and management of the surrounding roads and verges will provide separation between native vegetation and the proposed development sites.

The assessments and bushfire protection measures detailed in the BMP, assume that environmental approval will be achieved or clearing permit exemptions will apply. The proposed development can comply with the bushfire protection criteria.

All revegetation on the proposed development sites will comply with the requirements of the Guidelines for Planning in Bushfire Prone Areas Schedule 1: Standards for Asset Protection Zones. An area of Public Open Space will exist to the west of the Woolworths development site and it is expected that this area will also be maintained to a low bushfire threat state.

The proposed Woolworths development, and future development sites on the Precinct C LDP, will provide an area of land within each lot that can be considered suitable for development as BAL-40 or BAL-FZ construction standards will not be required to be applied. This meets the requirements established by Acceptable Solution A1.1 and its associated explanatory note.

Future buildings on the proposed Woolworths development site, and future commercial and residential lots, can be surrounded by an APZ that will ensure the potential radiant heat impact of a bushfire does not exceed 29 kW/m<sup>2</sup> (BAL-29). The required APZ specifications of width, location and management can be achieved. The Asset Protection Zone (APZ) for the proposed two buildings, and future developments, will exist both within and outside the proposed lots. The portions of the required size APZ that exist outside each proposed lot consists of roads and managed road verges.

For this proposal, it is expected that the whole of each future lot and abutting road reserves are to be maintained to a low bushfire threat state. The proposed development consists of commercial lots and small scale housing lots. The commercial lots will consist of buildings, parking areas, loading areas and small areas of managed landscaping. The residential lots are required by the City of Wanneroo Fire Mitigation Notice to be maintained to a low bushfire threat state over the bushfire season.

A small area of Public Open Space and drainage reserve is located to the west of the proposed shopping complex. This area is expected to be landscaped and maintained to a low bushfire threat state by the landowner.

Perimeter roads are to be constructed around the proposed development sites and connecting to Lisford Avenue to the east, and Enterprise Avenue to the north. This road system will provide a minimum of two access/egress routes from each proposed lot. No buildings will be greater than 50 metres from a public road, therefore construction of driveways to bushfire standards is not required.

A reticulated water supply is available to the subject site and hydrants will be installed in locations throughout the development as required by the relevant authorities.

Buildings of Class 4 to Class 9 are not required by the Building Code of Australia (BCA) to be constructed to comply with bushfire performance requirements. As the proposed buildings will be located in a bushfire prone area and may be subject to a bushfire attack, Bushfire Prone Planning recommends that some degree of upgrading be considered to improve the protection for occupants and the building's survivability. At a minimum protection from ember attack should be considered (i.e. constructed to the standard required for BAL-12.5).



# 1 PROPOSAL DETAILS

## 1.1 Description and Associated Plans and Maps














Proponent:	Encon
Bushfire Prone Planning Commissioned to Produce the Bushfire Management Plan (BMP) By:	Encon
For Submission To:	City of Wanneroo
Purpose of the BMP:	To accompany a planning application
Description of the Proposed Development:	
<p>This Bushfire Management Plan (BMP) is to accompany a Development Application for the Woolworths retail centre located on a portion of Lot 9702 (#10) Enterprise Avenue, Two Rocks in the City of Wanneroo. This BMP will also consider future development on land to the south and west of the Woolworths centre as shown on the Precinct C Local Development Plan.</p> <p>Two proposed buildings will be assessed with respect to bushfire planning performance. These are the Woolworths and specialty shops retail centre located in the western portion of the development site, and the proposed retail/commercial building located in the north-eastern corner of the site. Future development sites as shown on Figure 1.1 will also be considered with respect to the bushfire protection criteria.</p>	
Staged Development and Management of Potential Bushfire Hazard Issues	
<p>It is expected that the Woolworths site and surrounding roads, located at the northern portion of the Precinct C Local Development Plan, will be developed initially. Future commercial and residential sites as shown on Figure 1.1 will follow at a later date.</p> <p>Construction and management of the surrounding roads and verges will provide separation between native vegetation and the proposed development sites.</p>	

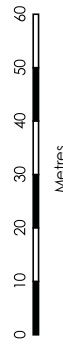
Figure 1.1

# Proposed Development and Precinct C LDP Site Layout

Portion of Lot 9702 on Plan 402964  
10 Enterprise Avenue  
TWO ROCKS  
CITY OF WANNEROO

## ----- LEGEND -----

-  Subject Site
-  Cadastral
-  Proposed Buildings
-  Parking Area
-  Delivery-Loading
-  Grocery Pick Up
-  Landscaping
-  External Area
-  POS-Drainage
-  Future Commercial Development
-  Future Residential Development
-  Proposed Road
-  Road Verge



## ----- LOCALITY -----



Coordinate System: GDA 1994, MGA, Zone 50  
Projection: Universal Transverse Mercator, Units: Metre  
Map by: Ian RAYMOND  
SCALE (A3): 1: 1000

21044 Woolworths, Liford Ave., Two Rocks DE Vagr.



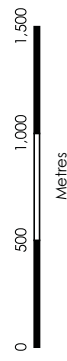
Disclaimer and Limitation: This map has been prepared for bushfire management planning purposes only. All dimensions shown are subject to survey. Bushfire Prone Planning does not guarantee that this map is without flaw of any kind and disclaims all liability for any errors, loss or other consequence which may arise from relying on any information depicted.

Figure 1.2

# Proposed Development Bushfire Prone Areas

Portion of Lot 9702 on Plan 402964  
10 Enterprise Avenue  
TWO ROCKS  
CITY OF WANNEROO

- LEGEND -----
- DFES Stations
  - Bush Fire Prone Areas 2019
  - Subject Site
  - Locality
  - Local Government Area
  - Cadastral



----- LOCALITY -----



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994, MGA, Zone 50  
 Projection: Universal Transverse Mercator, Units: Metre  
 Map by: Ian Ziegler  
 SCALE (A3): 1:2,800

Disclaimer and Limitation: This map has been prepared for bushfire management planning purposes only. All depicted areas, contours and any dimensions shown are subject to survey. Bushfire Prone Planning does not guarantee that this map is without fault or disclaims all liability for any errors, loss or other consequence which may arise from relying on any information depicted.



## 1.2 Existing Documentation Relevant to the Construction of this Plan

This section acknowledges any known reports or plans that have been prepared for previous planning stages, that refer to the subject area and that may or will impact upon the assessment of bushfire risk and/or the implementation of bushfire protection measures and will be referenced in this Bushfire Management Plan.

Table 2.1: Existing relevant documentation.

RELEVANT EXISTING DOCUMENTS		
Existing Document	Copy Provided by Client	Title
Structure Plan	No	
Environmental Report	No	
Landscaping (Revegetation) Plan	Yes	Included in Concept Design-Design Review Panel No. 2
Bushfire Risk Assessments	No	

## 2 ENVIRONMENTAL CONSIDERATIONS

### 2.1 Native Vegetation – Restrictions to Modification and/or Clearing

Many bushfire prone areas also have high biodiversity values. SPP 3.7 policy objective 5.4 recognises the need to consider bushfire risk management measures alongside environmental, biodiversity and conservation values (Guidelines s2.3).

There is a requirement to identify any need for onsite modification and/or clearing of native vegetation and whether this may trigger potential environmental impact/referral requirements under State and Federal environmental legislation. Confirmation that any proposed native vegetation modification and/or clearing is acceptable, should be received from the relevant agencies by the proponent and provided to the bushfire consultant for inclusion in the Bushfire Management Plan if it will influence the required bushfire planning assessments and outcomes. The following table details any potential environmental restrictions of which the author of this report is aware.

Table 2.2: Native vegetation and potential environmental considerations and restrictions.

NATIVE VEGETATION MODIFICATION / CLEARING - POTENTIAL ENVIRONMENTAL RESTRICTIONS IDENTIFIED				
Environmental Considerations / Features	Potential Mapping Data Source (SLIP / Local Planning)	Relevant to Proposed Development	Data Applied	Action Required
Onsite clearing of native vegetation is required.		Yes		
Environmental impact/referral requirements under State and Federal environmental legislation may be triggered.		Possible		
National Park / Nature Reserve	DBCA-011	No-Confirmed by Bushfire Consultant	Relevant Database Reviewed by Bushfire Consultant	None
Conservation Covenant	DPIRD-023	Not Known	Data Not Readily Available to Bushfire Consultant	Proponent to Seek Advice
Bush Forever Site	DPLH-019	No-Confirmed by Bushfire Consultant	Relevant Database Reviewed by Bushfire Consultant	None
RAMSAR Wetland	DBCA-010	No-Confirmed by Bushfire Consultant	Relevant Database Reviewed by Bushfire Consultant	None
Geomorphic and Other Wetland	DBCA-011-019, 040, 043, 044	No-Confirmed by Bushfire Consultant	Relevant Database Reviewed by Bushfire Consultant	None
Threatened and Priority Ecological Communities (TECs or PECs)	DBCA-038	No-Confirmed by Bushfire Consultant	Relevant Database Reviewed by Bushfire Consultant	None
Threatened and Priority Flora including Declared Rare Flora (DRFs)	DBCA-036	No-Confirmed by Bushfire Consultant	Relevant Database Reviewed by Bushfire Consultant	None

Land Identified as significant through a Local Biodiversity Strategy	LG - Intramaps	Not Known	Data Not Readily Available to Bushfire Consultant	Proponent to Seek Advice
<p><b>Statement of how the identified environmental feature(s) is dealt with in this Bushfire Management Plan (and the location of relevant information):</b></p> <p>The assessments and bushfire protection measures detailed the BMP, assume that environmental approval will be achieved or clearing permit exemptions will apply.</p> <p>It is advised that the proponent seek further advice from an Environmental Consultant or the WA Department of Biodiversity Conservation and Attractions for further information on the condition and species contained within the proposed development area and the requirement for referral of the proposal.</p>				

## Development Design Considerations

Establishing development in bushfire prone areas can adversely affect the retention of native vegetation through clearing associated with the creation of lots and/or asset protection zones. Where loss of vegetation is not acceptable or causes conflict with landscape or environmental objectives, it will be necessary to consider available design options to minimise the removal of native vegetation.

Table 2.3: Development design.

MINIMISE THE REMOVAL OF NATIVE VEGETATION	
Design Option	Assessment / Action
Reduction of lot yield	N/A
Cluster development	N/A
Construct building to a standard corresponding to a higher BAL as per BCA (AS 3959:2018 and/or NASH Standard)	N/A
Modify the development location	N/A
It is expected that the whole of the subject site will be cleared of native vegetation during the development stage.	
IMPACT ON ADJOINING LAND	
Is this planning proposal able to implement the required bushfire protection measures within the boundaries of the land being developed so as not to impact on the bushfire and environmental management of neighbouring reserves, properties or conservation covenants?	Yes
<p>The adjoining land to the proposed development will be road reserves and these will form a portion of the required low bushfire threat areas to provide necessary separation from bushfire prone areas.</p> <p>The required bushfire protection measures for the proposed Woolworths development will not affect lots on the far side of the surrounding roads.</p>	

## 2.2 Retained Vegetation / Re-vegetation / Landscape Plans (including POS)

Riparian zones, wetland/foreshore buffers, road verges and public open space may have plans to re-vegetate or retain vegetation as part of the proposed development. Vegetation corridors may be created between offsite and onsite vegetation and provide a route for fire to enter a development area.

All retained/planned vegetation and its management will be considered in the development of this Bushfire Management Plan.

Is re-vegetation of riparian zones and/or wetland or foreshore buffers and/or public open space a part of this Proposal?	No
There is no Public Open Space within the Woolworths development site. However, a small POS/drainage reserve will be located to the west of the Woolworths site and developed at a later date.	
Is the requirement for ongoing maintenance of existing vegetation in riparian zones and/or wetland or foreshore buffers and/or public open space a part of this Proposal?	No
However, this will be a requirement for the future abutting POS/drainage site.	
Has a landscape plan been developed for the proposed development?	Yes
A landscape design will be provided for the Woolworths development. It is expected that all landscaped areas within the Woolworths development site will be designed and maintained to a low bushfire threat state.	

### 3 POTENTIAL BUSHFIRE IMPACT ASSESSMENT

#### 3.1 Assessment Input

##### 3.1.1 Fire Danger Index (FDI) Applied

AS 3959:2018 Table 2.1 specifies the fire danger index values to apply for different regions. The values used in the model calculations are for the Forest Fire Danger Index (FFDI) and for which equivalent representative values of the Grassland Fire Danger Index (GFDI) are applied as per Appendix B. The values can be modified if appropriately justified.

Table 3.1: Applied FDI Value

FDI VALUE			
Vegetation Areas	As per AS 3959:2018 Table 2.1	As per DFES for the Location	Value Applied
All Vegetation Areas	80	N/A	80

##### 3.1.2 Vegetation Classification and Effective Slope

**Classification:** Bushfire prone vegetation identification and classification has been conducted in accordance with AS 3959:2018 s2.2.3 and the Visual Guide for Bushfire Risk Assessment in WA (DoP February 2016).

When more than one vegetation type is present, each type is identified separately, and the applied classification considers the potential bushfire intensity and behaviour from the vegetation types present and ensures the worst case scenario is accounted for – this may not be from the predominant vegetation type.

The vegetation structure has been assessed as it will be in its mature state (rather than what might be observed on the day). Areas of modified vegetation are assessed as they will be in their natural unmodified state (unless maintained in a permanently low threat, minimal fuel condition, satisfying AS 3959:2018 s2.2.3.2(f) and asset protection zone standards). Vegetation destroyed or damaged by a bushfire or other natural disaster has been assessed on its revegetated mature state.

**Effective Slope:** Refers to the ground slope under each area of classified vegetation and is described in the direction relative to the view from the building or proposed development site. Effective slope is not the same as ‘average slope’, rather it is the slope which most significantly influences fire behaviour. This slope has a direct and significant influence on a bushfire’s rate of spread and intensity.

Where there is a significant change in effective slope under an area of classified vegetation, that will cause a change in fire behaviour, separate vegetation areas will be identified to enable the correct assessment.

When the effective slope, under a given area of bushfire prone vegetation, will be different relative to multiple proposed development sites, then the effective slopes corresponding to the different locations, are separately identified.

#### Planned Re-vegetation/Landscaping Considerations/Public Open Space Management

All revegetation on the proposed development sites will comply with the requirements of the Guidelines for Planning in Bushfire Prone Areas Schedule 1: Standards for Asset Protection Zones (See Appendix 1).




An area of Public Open Space will exist to the west of the Woolworths development site and it is expected that this area will also be maintained to a low bushfire threat state.





Table 3.2: Vegetation classification and effective slope.

ALL VEGETATION WITHIN 150 METRES OF THE PROPOSED DEVELOPMENT				
Vegetation Area	Identified Vegetation Types <sup>1</sup> or Description if 'Excluded'	Applied Vegetation Classification <sup>1</sup>	Effective Slope (degrees) <sup>2</sup> (AS 3959:2018 Method 1)	
			Assessed	Applied Range
1	Low open forest A-04	Class A Forest	0	upslope or flat
2	Open scrub D-14	Class D Scrub	0	upslope or flat
3	Open heath C-11	Class C Shrubland	0	upslope or flat
4	Open scrub D-14	Class D Scrub	3	downslope >0-5
5	Tussock grassland G-22 , Sown pasture G-26 ,	Class G Grassland	3	downslope >0-5
6	Open heath C-11	Class C Shrubland	5-10	downslope >5-10
7	Managed parkland, bitumen parking area, areas recently cleared for development.	Excluded as per Section 2.2.3.2 (e) & (f)	N/A	N/A
Representative photos of each vegetation area, descriptions and classification justification, are presented on the following pages. The areas of classified vegetation are defined, and the photo locations identified on Figure 3.1, the vegetation and topography map.				
Note <sup>1</sup> : Described and classified as per AS 3959:2018 Table 2.3 and Figures 2.3 and 2.4 (A)-(H)				
Note <sup>2</sup> : Effective slope measured as per AS 3959:2018 Section 2.2.5 and Appendix B Part B4				



VEGETATION AREA 1	
AS 3959:2018 Vegetation Classification Applied:	Class A Forest
Vegetation Types Present:	Low open forest A-04
Description/Justification:	Eucalypts and some pines, average 10 metres tall, scrub to 5 metres, shrubs to 2 metres, grass understorey.
	
Photo ID: 1a	Photo ID: 1b
VEGETATION AREA 2	
AS 3959:2018 Vegetation Classification Applied:	Class D Scrub
Vegetation Types Present:	Open scrub D-14
Description/Justification:	Coastal scrub to 5 metres tall, shrubs to 2 metres tall.
	
Photo ID: 2a	Photo ID: 2b

VEGETATION AREA 2	
AS 3959:2018 Vegetation Classification Applied:	Class D Scrub
Vegetation Types Present:	Open scrub D-14
Description/Justification:	Coastal scrub regrowth to 6 metres tall, <30% foliage cover, occasional palm trees, grass understorey.
	
Photo ID: 2c	Photo ID: 2d
	
Photo ID: 2e	

VEGETATION AREA 3	
AS 3959:2018 Vegetation Classification Applied:	Class C Shrubland
Vegetation Types Present:	Open heath C-11
Description/Justification:	Coastal shrubs to 1 metre tall on undulating sand dunes, <30% foliage cover, grass understorey.
	
Photo ID: 3a	Photo ID: 3b
	
Photo ID: 3c	Photo ID: 3d

VEGETATION AREA 4	
AS 3959:2018 Vegetation Classification Applied:	Class D Scrub
Vegetation Types Present:	Open scrub D-14
Description/Justification:	Coastal scrub regrowth to 6 metres tall, <30% foliage cover, grass understorey.
	
Photo ID: 4a	Photo ID: 4b

VEGETATION AREA 5	
AS 3959:2018 Vegetation Classification Applied:	Class G Grassland
Vegetation Types Present:	Sown pasture G-26
Description/Justification:	Partly managed open grassland area.
	
Photo ID: 5a	Photo ID: 5b

VEGETATION AREA 5		
AS 3959:2018 Vegetation Classification Applied:	Class G Grassland	
Vegetation Types Present:	Tussock grassland G-22	Sown pasture G-26
Description/Justification:	Photo 5c: Cleared area with grassy regrowth. Photo 5d: Grasses and sedges and coastal dunes.	
<div style="display: flex; justify-content: space-around;">   </div>		
Photo ID: 5c		Photo ID: 5d
VEGETATION AREA 6		
AS 3959:2018 Vegetation Classification Applied:	Class C Shrubland	
Vegetation Types Present:	Open heath C-11	
Description/Justification:	Coastal shrubs to 1 metre tall, on undulating sand dunes. Occasional isolated scrub. Grass understorey.	
<div style="display: flex; justify-content: space-around;">   </div>		
Photo ID: 6a		Photo ID: 6b

**VEGETATION AREA 6**

<b>AS 3959:2018 Vegetation Classification Applied:</b>	Class C Shrubland
<b>Vegetation Types Present:</b>	Open heath C-11
<b>Description/Justification:</b>	Coastal shrubs to 1 metre tall, on undulating sand dunes. Occasional isolated scrub. Grass understorey.



Photo ID: 6c



Photo ID: 6d



Photo ID: 6e

**VEGETATION AREA 7**

<b>AS 3959:2018 Vegetation Classification Applied:</b>	Excluded as per Section 2.2.3.2 (e) & (f)
--------------------------------------------------------	-------------------------------------------

<b>Vegetation Types Present:</b>	Low bushfire threat vegetation.
----------------------------------	---------------------------------

<b>Description/Justification:</b>	Photos 7a & 7b: Managed parkland. Photos 7c & 7d: Driveways and parking areas. Photos 7e & 7f: Areas cleared for development.
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Photo ID: 7a

Photo ID: 7b



Photo ID: 7c

Photo ID: 7d



Photo ID: 7e

Photo ID: 7f



**VEGETATION AREA 7**

AS 3959:2018 Vegetation Classification Applied:	Excluded as per Section 2.2.3.2 (e) & (f)
Vegetation Types Present:	Low bushfire threat vegetation.
Description/Justification:	Areas cleared for development.



Photo ID: 7g



Photo ID: 7h



Photo ID: 7i

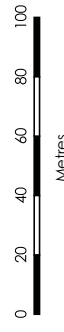
Figure 3.1

# Existing Topography & Classified Vegetation

Portion of Lot 9702 on Plan 402964  
 10 Enterprise Avenue  
 TWO ROCKS  
 CITY OF WANNEROO

## LEGEND

- Photos
  - Elevation (m)
  - Subject Site
  - 150m\_Assessment\_Area
  - Cadastral
- Classified Vegetation**
- Class A - Forest
  - Class C - Shrubland
  - Class D - Scrub
  - Class G - Grassland
  - Exclusion 2.2.3.2

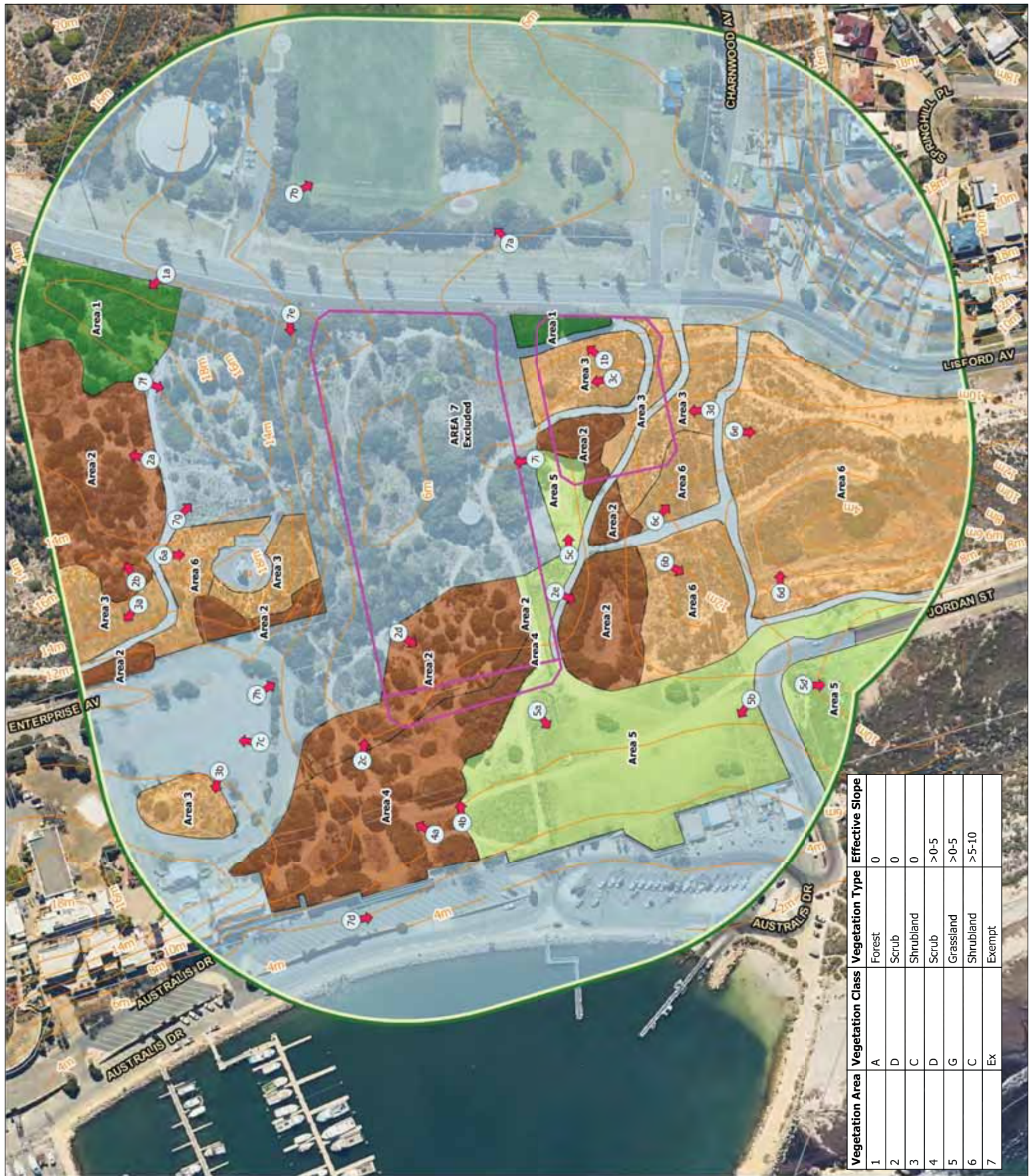


## LOCALITY



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994, MGA Zone 50  
 Projection: Universal Transverse Mercator Units: Metre  
 Map by: Ian Mackay  
 SCALE (A3): 1:1800



Vegetation Area	Vegetation Class	Vegetation Type	Effective Slope
1	A	Forest	0
2	D	Scrub	0
3	C	Shrubland	0
4	D	Scrub	>0-5
5	G	Grassland	>0-5
6	C	Shrubland	>5-10
7	Ex	Exempt	

Disclaimer and Limitation: This map has been prepared for bushfire management planning purposes only. All depicted areas, contours and any dimensions shown are subject to survey. Bushfire Prone Planning does not guarantee that this map is without fault of any kind and disclaims all liability for any errors, loss or other consequence which may arise from relying on any information depicted.

### 3.1.3 Vegetation Separation Distance

The vegetation separation distance is the horizontal distance measured from the relevant parts of an existing building or a future building's planned location (within a lot), to the determined edge of an area of classified vegetation.

This separation distance applied to determining a Bushfire Attack Level (BAL) can be either:

- The *measured distance* – for which the location of the building relative to the edge of classified vegetation must be known. This will result in single determined BAL that will apply to a building. (The measured distance is a required calculation input); or
- A *calculated minimum and maximum distance (range)* that will correspond to each individual BAL. The calculated distances provide an indicative (or achievable) BAL for which the determined BAL will be dependent on the known location of the building relative to the edge of classified vegetation.

The calculated range of distances corresponding to each BAL can be presented in different formats (tables or a BAL contour map), dependent on the form of information that is most appropriate for the proposed development/use. These distance ranges corresponding to BAL(s) will be presented in Section 3.2: 'Assessment Output'.

For the proposed development/use, the applicable vegetation separation distances will be presented within the Bushfire Management Plan in this location:

In Section 3.2 'Assessment Output' as a table containing the calculated ranges of distance corresponding to each BAL and illustrated as a BAL Contour Map.

## 3.2 Assessment Output

### UNDERSTANDING THE RESULTS OF THE BUSHFIRE IMPACT ASSESSMENT

#### Bushfire Attack Levels (BALs) – Their Application in the Building Environment is Different to the Planning Environment

In the building environment, a **determined BAL** is required for the proposed construction at the building application stage. This is to inform approval considerations and establish the bushfire construction standards that are to apply. An indicative BAL is not acceptable for a building application.

In the planning environment, through the application of SPP 3.7 and associated Guidelines, the deemed to satisfy requirement for a proposed ‘development site’ or sites (defined by the LPS Amendment Regulations 2015 as “that part of a lot on which a building that is the subject of development stands or is to be constructed”), is that a BAL-29 or lower rating can be achieved once all works associated with the proposal are completed. For planning approval purposes, an **indicative BAL** can provide the required information.

#### Determined Bushfire Attack Level

A determined BAL is to apply to an existing building or the ‘development site’ on which the building is to be constructed and not to a lot or building envelope. Its purpose is to state the potential radiant heat flux to which the building will be exposed, thereby determining the construction standard to be applied.

A determined BAL cannot be given for a future building whose design and position on the lot are unknown or the vegetation separation distance has not been established. It is not until these variables have been fixed that a determined BAL can be stated, and a BAL Certificate can be issued.

The one exception is when a building **of any dimension** can be **positioned anywhere** on a proposed lot (within R-Code building setbacks) or within a defined building envelope, and always remain subject to the same BAL, regardless of the retention of any existing classified vegetation either onsite or offsite.

#### Indicative Bushfire Attack Level

If a BAL is not able to achieve ‘determined’ status it will be an indicative BAL. It indicates the BAL that can be achieved by the proposed development/use. However, it is conditional upon an assessment variable(s) being confirmed at a later stage (e.g. the building location is established/changed, or vegetation is modified/removed to establish the vegetation separation distance).

A BAL certificate cannot be issued for an indicative BAL – unless that BAL cannot vary (refer to ‘Determined BAL’ above).

In table form, a single or a range of indicative BAL(s) may be presented. If a single indicative BAL is stated for a defined area (i.e. the lot or building envelope), this will be the highest indicative BAL impacting the defined area.

In BAL contour map form (refer to Section 3.2.1), the illustrated BAL contours visually identify areas of land for which if any part of an existing or proposed building is located on that land and within the BAL contours, then the highest BAL affecting that building (or part of the land on which the building will be constructed), will be the indicative BAL that is to apply.

The BAL can only become a determined BAL once the actual location of that building on the land is known and/or the required minimum vegetation separation distance corresponding to the relevant BAL contour is established (refer to Table 3.3).

## 3.2.1 Bushfire Attack Level Results - BAL Contour Map Format

### **INTERPRETATION OF THE BUSHFIRE ATTACK LEVEL (BAL) CONTOUR MAP**

The contour map will present different coloured contour intervals extending from the areas of classified bushfire prone vegetation. These represent the different bushfire attack levels that will exist at varying distances away from the classified vegetation in the event of a bushfire in that vegetation.

The areas of classified vegetation to be considered in developing the BAL contours, are those that will remain as the intended end state of the subject development once earthworks, clearing and/or landscaping and re-vegetation have been completed (or each stage completed).

Each bushfire attack level corresponds to a set range of radiant heat flux that is generated by a bushfire. That range is defined by the AS 3959:2018 BAL determination methodology.

The width of each shaded BAL contour is a diagrammatic representation of the separation distances from the classified vegetation that correspond to each BAL for each separately identified area of classified vegetation. They have been calculated by the application of the unique site variables including vegetation types and structure, ground slope and applied fire weather.

(Refer to Section 3.2 'Understanding the Results of the Bushfire Impact Assessment' for the explanation of how BAL(s) for buildings will be assessed from the BAL Contour Map).

## Construction of the BAL Contours

### **VEGETATION AREAS APPLIED TO THE DEVELOPMENT OF THE BAL CONTOUR MAP**

All identified areas of classified vegetation have been applied with the following exceptions:

1. For Figure 3.4, all classified vegetation within the subject sites (as shown on Fig 3.4) and surrounding road reserves is excluded (See Figure 3.2 – 'Development Extents Stg 1'), and the BAL contours are constructed into the development from any classified vegetation outside these road boundaries; and
2. For Figure 3.5 all classified vegetation within the subject sites (as shown on Fig 3.5) and surrounding road reserves is excluded (See Figure 3.3 – 'Development Extents Stg 1 & 2'), and the BAL contours are constructed into the development from any classified vegetation outside these road boundaries.

This approach is applied to indicate the achievable bushfire attack levels within the specified development sites and the resultant area of developable land (i.e. subject to BAL-29 or less). It is based on the following assumptions:

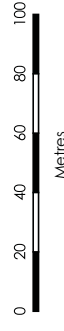
1. Any classified vegetation within each lot will be managed by the landowner to meet asset protection zone standards to achieve a low bushfire threat state; and
2. All road reserves surrounding the subject sites will be managed and maintained to a low bushfire threat state.

Figure 3.2

# Topography & Classified Vegetation Post Development Stage 1

Portiou of Lot : 702 ou PL\_u 402: 64  
 10 Euler| rise Avenue  
 TWO ROCKS  
 CITY OF WANNEROO

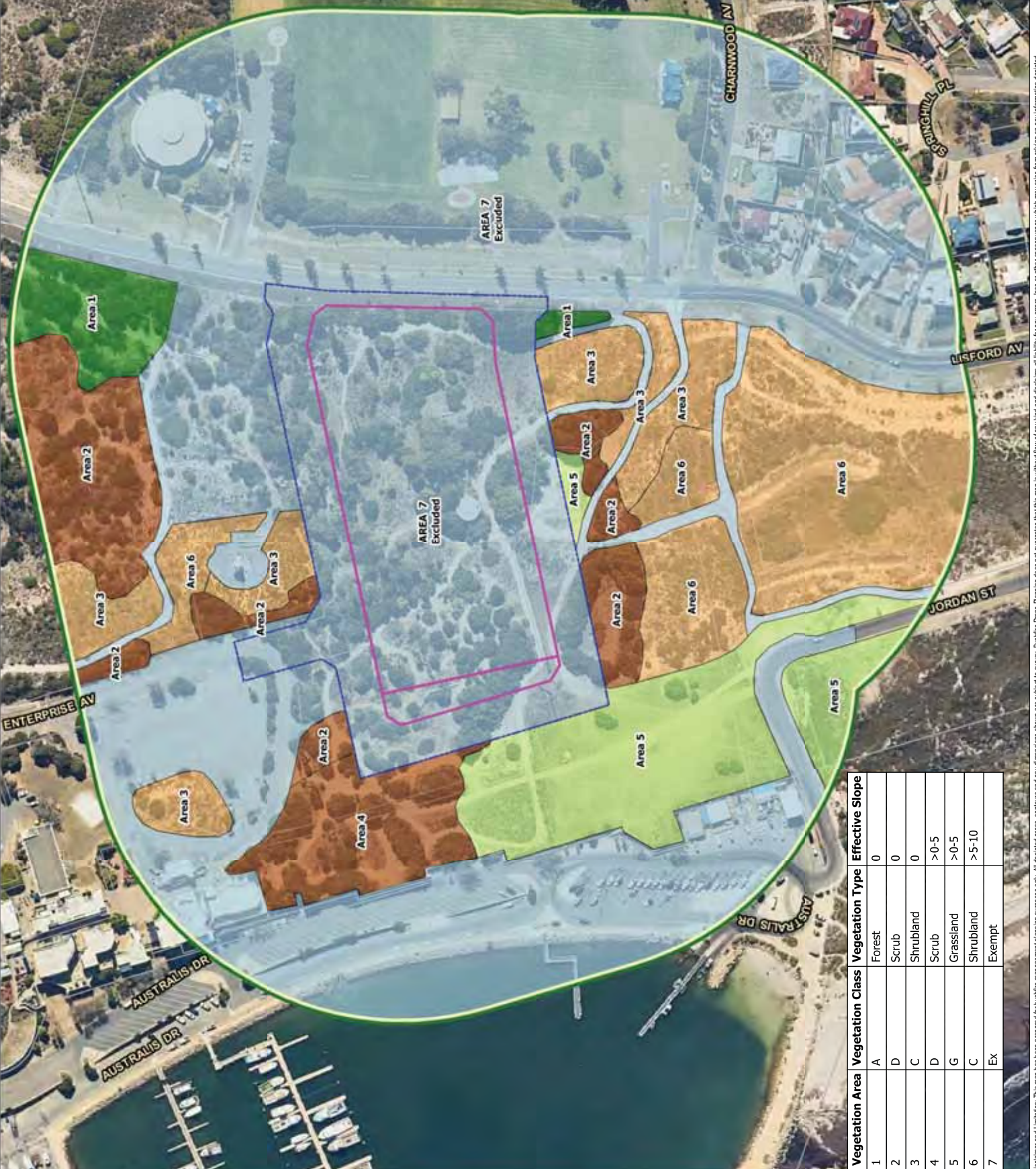
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  - Develo) S euf Ebbeu's dtg l
  - l j OS 5Assess\$ euf 5Are\_
  - C\_d\_ site
- Classified Vegetation**
- CL\_ss A - Forest
  - CL\_ss C - dtrm( l\_ ud
  - CL\_ss D - œarm(
  - CL\_ss G - Gr\_ ssl\_ ud
  - Ebcin\$iou 2.2.x.2



AERIAL IMAGERY | \_udg\_ | e/d | IP

Coordi...\_te d'ites\_ YGDA 1: 4 MGA 806 | 0  
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 M... | 139...0...M...C...G...P...y...1...0...8...0  
 G...NE P...Y...Y...8...0

210744 Woolworths Lisford Ave, Two Rocks VEG Post Dev.dwg



Vegetation Area	Vegetation Class	Vegetation Type	Effective Slope
1	A	Forest	0
2	D	Scrub	0
3	C	Shrubland	0
4	D	Scrub	>0-5
5	G	Grassland	>0-5
6	C	Shrubland	>5-10
7	Ex	Exempt	

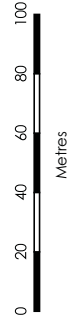
Disclaimer and Limitation: This map has been prepared for bushfire management planning purposes only. All depicted areas, contours and any dimensions shown are subject to survey. Bushfire Prone Planning does not guarantee that this map is without flaw of any kind and disclaims all liability for any errors, loss or other consequence which may arise from relying on any information depicted.

Figure 3.3

# Topography & Classified Vegetation Post Development Stages 1 and 2

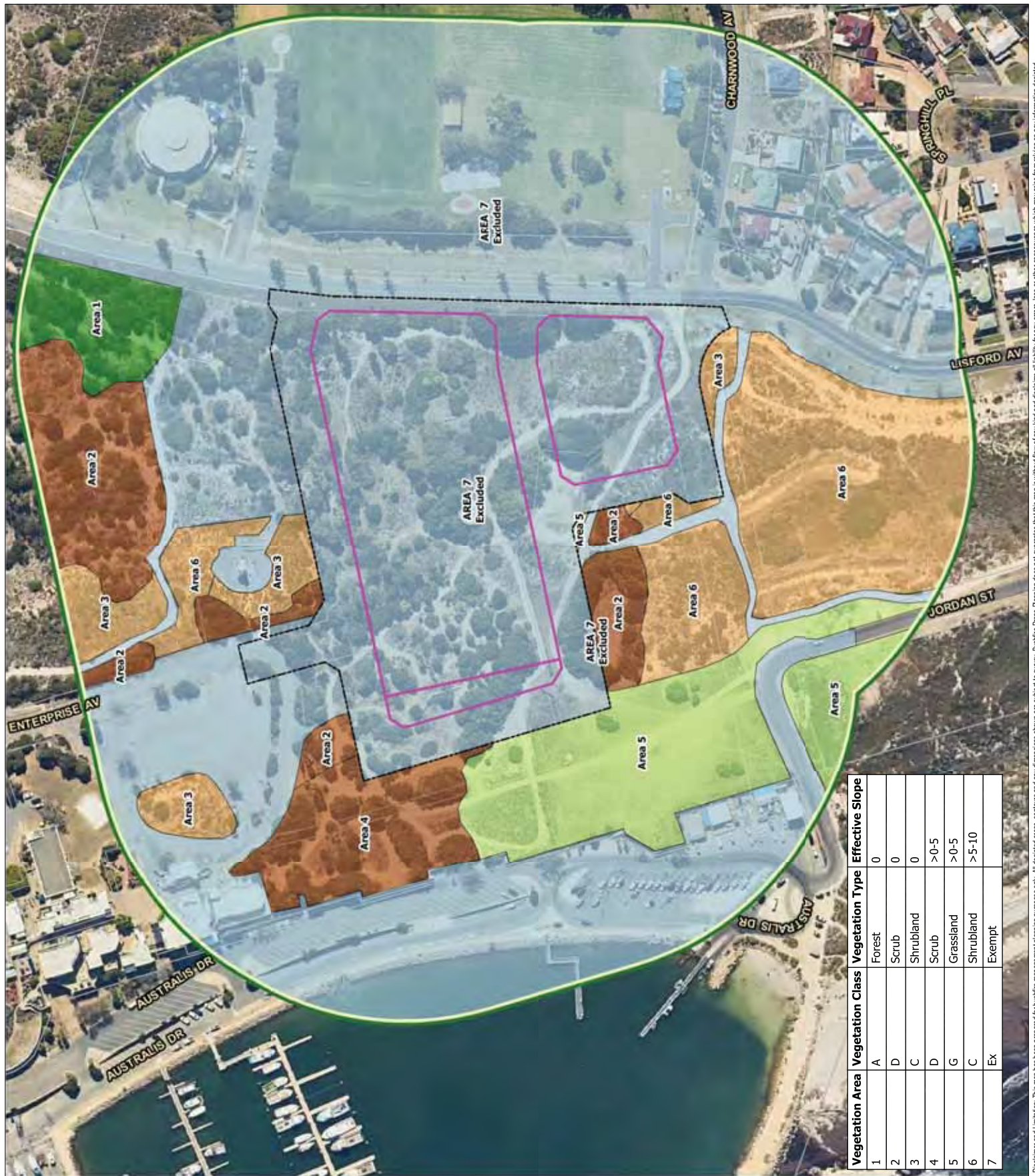
Portion of Lot 9702 on Plan 402964  
 10 Enterprise Avenue  
 TWO ROCKS  
 CITY OF WANNEROO

- LEGEND -----
- Subject Site
  - Development Extents Stgs 1 & 2
  - 150m\_Assessment\_Area
  - Cadastre
- Classified Vegetation**
- Class A - Forest
  - Class C - Shrubland
  - Class D - Scrub
  - Class G - Grassland
  - Exclusion 2.2.3.2



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50  
 Projection: Universal Transverse Mercator Units: Metre  
 Map by: Ian Mackay  
 Scale (A3): 1:1800



Vegetation Area	Vegetation Class	Vegetation Type	Effective Slope
1	A	Forest	0
2	D	Scrub	0
3	C	Shrubland	0
4	D	Scrub	>0-5
5	G	Grassland	>0-5
6	C	Shrubland	>5-10
7	Ex	Exempt	

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## VEGETATION SEPARATION DISTANCES APPLIED

The distances that have been applied to illustrating the width of each BAL contour shown in Figures 3.2 and 3.3 are stated in Table 3.3. These correspond to each Bushfire Attack Level and are specific to the proposed development site.

Table 3.3: Vegetation separation distances applied to construct the BAL contours.

BAL CONTOUR MAP – APPLIED VEGETATION SEPARATION DISTANCES								
Derived from the Application of Method 1 BAL Determination Methodology (AS 3959:2018 Section 2, Table 2.5) <sup>1</sup>								
Vegetation Area	Vegetation Classification	Effective Slope (degree range)	BAL and Corresponding Separation Distance (m)					
			BAL-FZ	BAL-40	BAL-29	BAL-19	BAL12.5	BAL-LOW
1	Class A Forest	upslope or flat	<16	16-<21	21-<31	31-<42	42-<100	>100
2	Class D Scrub	upslope or flat	<10	10-<13	13-<19	19-<27	27-<100	>100
3	Class C Shrubland	upslope or flat	<7	7-<9	9-<13	13-<19	19-<100	>100
4	Class D Scrub	downslope >0-5	<11	11-<15	15-<22	22-<31	31-<100	>100
5	Class G Grassland	downslope >0-5	<7	7-<9	9-<14	14-<20	20-<50	>50
6	Class C Shrubland	downslope >5-10	<8	8-<11	11-<17	17-<25	25-<100	>100

Note<sup>1</sup> All the assessment inputs applied are presented in Section 3.1.

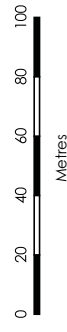


Figure 3.4

# Proposed Development BAL Contour Map Stage 1

Portion of Lot 9702 on Plan 402964  
10 Enterprise Avenue  
TWO ROCKS  
CITY OF WANNEROO

- LEGEND -----
- Proposed Buildings
  - Subject Site
  - Asset Protection Zone
  - Development Extents Stg 1
  - 100m BAL Buffer
  - 150m Assessment Area
  - Cadastre
  - Vegetation Outline Stg 1
- Bushfire Attack Levels**
- BAL-FZ
  - BAL-40
  - BAL-29
  - BAL-19
  - BAL-12.5
  - BAL-LOW

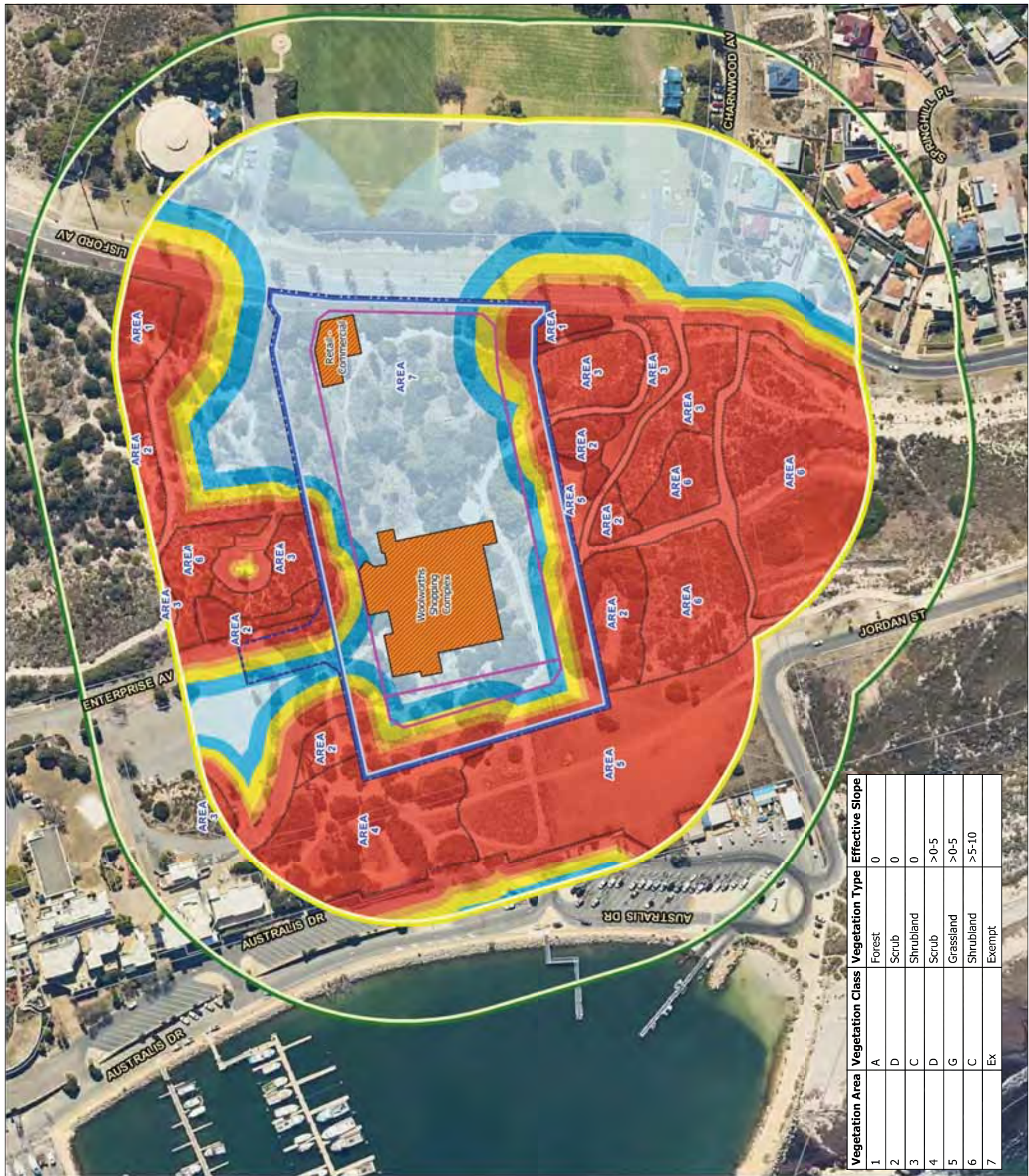


----- LOCALITY -----



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994, MGA Zone 50  
Projection: Universal Transverse Mercator Units: Metre  
Map by: Ian McNeill  
SCALE (A3): 1:1800  
21044 Woodworths, Liford Ave., Two Rocks BAL Stg 1.qrz



Vegetation Area	Vegetation Class	Vegetation Type	Effective Slope
1	A	Forest	0
2	D	Scrub	0
3	C	Shrubland	0
4	D	Scrub	>0-5
5	G	Grassland	>0-5
6	C	Shrubland	>5-10
7	Ex	Exempt	

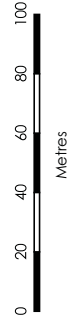
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Figure 3.5

# Proposed Development BAL Contour Map Stages 1 and 2

Portion of Lot 9702 on Plan 402964  
10 Enterprise Avenue  
TWO ROCKS  
CITY OF WANNEROO

- LEGEND -----
- Proposed Buildings
  - Future Development Site
  - Subject Site
  - Asset Protection Zone
  - Development Extents Stgs 1 & 2
  - 100m BAL Buffer
  - 150m Assessment Area
  - Cadastral
  - Vegetation Outline
- Bushfire Attack Levels**
- BAL-FZ
  - BAL-40
  - BAL-29
  - BAL-19
  - BAL-12.5
  - BAL-LOW

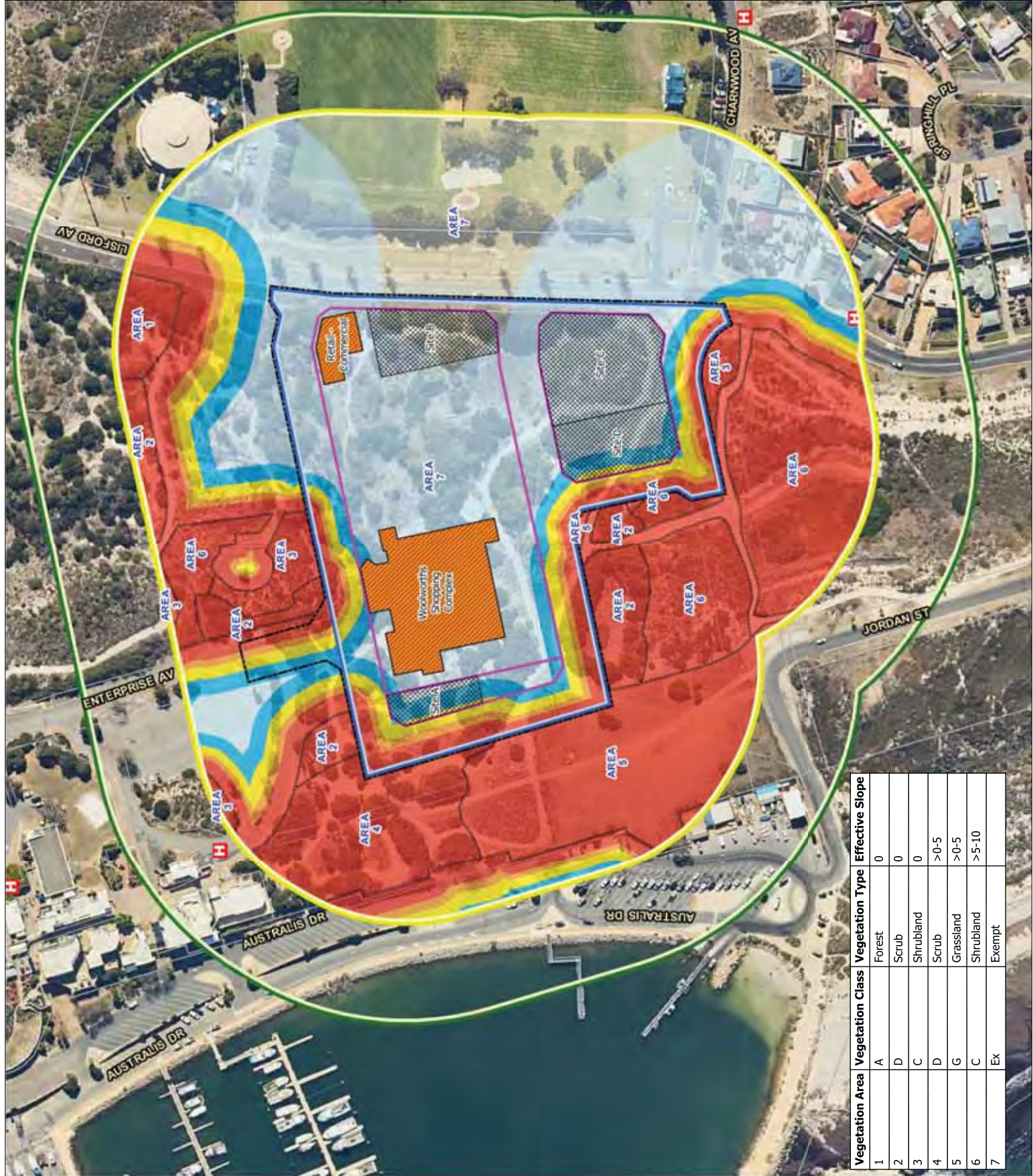


----- LOCALITY -----



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994, MGA Zone 50  
Projection: Universal Transverse Mercator Units: Metre  
Map by: Ian Clarke  
SCALE (A3): 1:1800  
**BUSHFIRE PRONE PLANNING**



Vegetation Area	Vegetation Class	Vegetation Type	Effective Slope
1	A	Forest	0
2	D	Scrub	0
3	C	Shrubland	0
4	D	Scrub	>0-5
5	G	Grassland	>0-5
6	C	Shrubland	>5-10
7	Ex	Exempt	

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### 3.2.2 Bushfire Attack Level Results - Derived from The BAL Contour Maps

Table 3.4: Stage 1 Indicative BAL(s) for proposed building works.

BUSHFIRE ATTACK LEVEL FOR PLANNED BUILDINGS	
BAL Determination Methodology Applied <sup>1</sup>	Method 1 as per AS 3959:2018 s2.2.6 and Table 2.5.
Building Description (planned)	Indicative BAL (refer to start of s3.2)
Woolworths Shopping Complex	BAL-19
Retail/Commercial building	BAL-12.5
Note <sup>1</sup> Assessment inputs applied are presented in Section 3.1.	

Table 3.5: Stage 2 Indicative BAL(s) for proposed future development sites.

BUSHFIRE ATTACK LEVEL FOR FUTURE DEVELOPMENT SITES	
BAL Determination Methodology Applied <sup>1</sup>	Method 1 as per AS 3959:2018 s2.2.6 and Table 2.5.
Building Description (Future Development)	Indicative BAL (refer to start of s3.2)
Site A (Commercial)	BAL-29
Site B (Commercial)	BAL-12.5
Site C (Commercial)	BAL-19
Site D (Residential)	BAL-29
Note <sup>1</sup> Assessment inputs applied are presented in Section 3.1.	

## 4 IDENTIFICATION OF BUSHFIRE HAZARD ISSUES

In response to the Bushfire Management Plan requirements established by Appendix 5 of the Guidelines for Planning in Bushfire Prone Areas (WAPC 2017 v1.3), the following statements are made to assist in the understanding of whether the proposal is likely to be able to comply with the bushfire protection criteria now or in subsequent planning stages.

<b>Spatial Context - Broader Landscape Considerations</b>	
Wider road network and access constraints	Two roads service the settlement of Two Rocks. Two Rocks Road leads south to Yanchep and from there access is available to the major roads of Marmion Avenue and Wanneroo Road. Breakwater Drive heads east from Two Rocks to Indian Ocean Drive. From here access is available south to Wanneroo Road and Perth, or north to Lancelin.  At a local level the proposed development will have roads on all four sides providing multiple access/egress routes for occupants. There is no access constraint for the subject site with regard to what is considered acceptable from a planning perspective.
Proximity of settlements and emergency services	The proposed development is located within the settlement of Two Rocks. The Two Rocks Volunteer Bush Fire Brigade is located approximately 7.5kms east of the subject site on Caraway Loop.
Bushfire prone vegetation types and extent (including conserved vegetation)	Significant extents of bushfire prone vegetation exist across the broader landscape as retained native vegetation. Vegetation types are mainly shrubland, scrub or grassland with small pockets of woodland or forest. Corridors of vegetation run south and east from the subject lot. Large areas of developed residential lands are located to the north and south-east of the site.
Topography and fire behaviour interactions.	The topography is gently undulating. Some areas of flat land exist but most have slopes of zero to five degrees and up to ten degrees. Bushfire rates of spread can double for every ten degrees of upslope while downslopes will slow the rate of spread.
Potential for extreme fire behaviour and pyro convective events.	Possible over the broader landscape due to continuous fuel loads and open areas subject to strong coastal winds.
<b>Environmental Considerations</b>	
Constraints to implementing required and/or additional bushfire protection measures	The environment considerations have not identified any constraints to implementing the required bushfire protection measures.
<b>Provision of Access Within the Subject Site</b>	
Potential constraints	There are no constraints to establishing the required access.
<b>Potential Bushfire Impacts</b>	
Flame and radiant heat and ability to establish an APZ	The proposed development lot size and location of surrounding roads will allow a minimum BAL-29 dimensioned APZ to be established for buildings within the development. This will prevent flame contact from the classified vegetation. Application of the bushfire construction standard will mitigate the risks from radiant heat impact to what is considered an acceptable level.
Embers/firebrands, smoke and fire-driven wind	These will be the major impacts to the subject site. The appropriate protection measures of building construction and strict management of the APZ will mitigate the risk to what is considered an acceptable level.

## 5 ASSESSMENT AGAINST THE BUSHFIRE PROTECTION CRITERIA ESTABLISHED BY THE GUIDELINES

For a development application that is not a 'Tourism Land Use' to be considered compliant with SPP 3.7, it must satisfy (achieve) the intent of each of the four elements of the bushfire protection criteria. These criteria are established by the Guidelines for Planning in Bushfire Prone Areas WAPC 2017 v1.3). Compliance can be achieved by either:

- Meeting all applicable acceptable solutions corresponding to each element (i.e. the minimum bushfire protection measures that are deemed to satisfy planning requirements); or
- Where an acceptable solution cannot be met, by developing a performance solution that satisfies the established requirements.

### 5.1 Local Government Variations to Apply

Local governments may add to or modify the acceptable solutions of the Bushfire Protection Criteria (BPC) and/or apply technical requirements that vary from those specified in the Guidelines for Planning in Bushfire Prone Areas (WAPC). In such instances, this Proposal will be assessed against these variations and/or any specific local government technical requirements for emergency access and water. Refer to Appendices 2 and 3 for relevant technical requirements.

Will local or regional variations (endorsed by WAPC / DFES) to the applicable acceptable solutions established by the Guidelines or the Position Statement: Tourism land uses in bushfire prone areas WAPC October 2019, apply to this Proposal?	N/A
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## 5.2 Summary of Assessment Against the Bushfire Protection Criteria

SUMMARISED OUTCOME OF THE ASSESSMENT AGAINST THE BUSHFIRE PROTECTION CRITERIA					
Element of the Bushfire Protection Criteria	Basis for the Proposal Achieving Full Compliance with SPP 3.7			The Proposal Cannot Achieve Full Compliance with SPP 3.7	
	Acceptable Solutions Met	Achieves the Intent of the Element		Bushfire planning development type that may not require full compliance is applied	An improvement in bushfire performance compared to the existing development is detailed (refer Note 4)
	All applicable solutions are fully met	All applicable solutions are not fully met. A merit based assessment and/or a bushfire performance comparison of the proposals residual risk with that of the residual risk of the acceptable solution is conducted (refer Note 4)	A performance principle-based solution is applied		
1. Location	✓			N/A	
2. Siting and Design of Development	✓				
3. Vehicular Access	✓				
4. Water	✓				
<p>Note: The development proposal has been assessed:</p> <ol style="list-style-type: none"> <li>Against the requirements established in Appendix 4 of the Guidelines for Planning in Bushfire Prone Areas, WAPC 2017 v1.3 (Guidelines). The Guidelines are found at <a href="https://www.planning.wa.gov.au/8194.aspx">https://www.planning.wa.gov.au/8194.aspx</a>; and</li> <li>Applying the interpretation guidance provided in Position Statement: Planning in bushfire prone areas – Demonstrating Element 1: Location and Element 2: Siting and design (WAPC Nov 2019).</li> <li>Applying any endorsed variations to the Guideline's acceptable solutions and associated technical requirements that have been established by the local government. If known and applicable these have been stated in Section 5.1 with the detail included as an appendix if required by the local government.</li> <li>When non-compliant with SPP 3.7 and when appropriate, by utilising additional compliance pathways that include the application of merit based assessment and comparative bushfire performance. The validity of this approach is derived from relevant decisions made by the responsible authorities (refer Appendix 2).</li> </ol>					

## 5.3 Assessment Detail

Element 1: Location	
<p><b>Intent:</b> To ensure that strategic planning proposals, subdivision and development applications are located in areas with the least possible risk of bushfire to facilitate the protection of people, property and infrastructure.</p>	
<p><b>Compliance:</b> How the proposed development achieves the intent of Element 1:</p>	<p>By fully meeting all applicable acceptable solutions established by the bushfire protection criteria (Guidelines v1.3 WAPC 2017)</p>
<p><b>ASSESSMENT (COMPLIANCE) STATEMENTS</b></p>	
<p>For each applicable acceptable solution, the following statements present the results of the assessment of the proposed development/use against the requirements established by the Guidelines (WAPC 2017 v1.3) and apply the interpretation guidance established by the Position Statement: Planning in bushfire prone areas – Demonstrating Element 1: Location and Element 2: Siting and design (WAPC Nov 2019).</p>	
<p><b>Acceptable Solution: A1.1: Development Location</b></p>	
<p><b>ASSESSMENT AGAINST THE REQUIREMENTS ESTABLISHED BY THE GUIDELINES</b></p>	
<p>The proposed Woolworths development, and future development sites on the Precinct C LDP, will provide an area of land within each lot that can be considered suitable for development as BAL-40 or BAL-FZ construction standards will not be required to be applied. This meets the requirements established by Acceptable Solution A1.1 and its associated explanatory note.</p>	
<p><b>ASSESSMENT AGAINST THE REQUIREMENTS ESTABLISHED BY THE POSITION STATEMENT</b></p>	
<p>The position statement establishes that:</p> <ul style="list-style-type: none"> <li>• The source of risk (the hazard) to be considered in Element 1 is the “level of bushfire exposure” from the type and extent of bushfire prone vegetation and the topography of the land on which it exists; and</li> <li>• “Consideration should be given to the site context” which includes the land both “within and adjoining the subject site” . The “hazards remaining within the site should not be considered in isolation of the hazards adjoining the site, as the potential impact of a bushfire will be dependent on the wider risk context.”</li> </ul> <p>The position statement also recognises:</p> <ul style="list-style-type: none"> <li>• That the proposed development site and its surrounding land may be part of an area “identified for development or intensification of land use prior to the release of SPP 3.7”; consequently</li> <li>• Consideration by decision-makers “should also be given to improving bushfire management of the site and surrounding area, thereby reducing the vulnerability of people property and infrastructure to bushfire”; and</li> <li>• The application of mitigation measures to lessen the risk to the broader area would include improvements to the local road network (including emergency access ways), improvements/additions to firefighting water supply and increasing separation distance from the hazard.</li> </ul>	
<p><b>The Hazard Within the Subject Site</b></p> <p>The proposed lots will be cleared of vegetation during the construction stage. Any revegetation or landscaping on the lots will be designed and maintained to a low bushfire threat state. The greater portion of the Woolworths site is currently clear of vegetation.</p>	

## Element 1: Location

### **The Hazard Adjoining the Subject Site**

Vegetation adjoining the north of the Woolworths site is currently cleared and a road is under construction. Further north is a relatively small area of native vegetation and then developed residential lots.

A small area of scrub, shrub and grassland vegetation sits to the west of the site. Further west is the Two Rocks marina and the Indian Ocean.

Directly east of the development site is an area of public open space consisting of reticulated playing fields and further east are developed residential lots. A corridor of native vegetation sits to the north-east of the subject site and joins larger expanses of bushfire prone vegetation.

To the south of the development site is a corridor of vegetation running along the coast and again joins larger areas of bushfire prone vegetation. South-east of the site sits built up residential areas.

Due to the fragmented layout of bushfire prone vegetation close to the development site there are limited scenarios in which the subject development site is likely to be subject to a significant bushfire event.



## Element 2: Siting and Design of Development

**Intent:** To ensure that the siting and design of development (note: not building/construction design) minimises the level of bushfire impact.

<b>Compliance:</b> How the proposed development achieves the intent of Element 2:	By fully meeting all applicable acceptable solutions established by the bushfire protection criteria (Guidelines v1.3 WAPC 2017)
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### ASSESSMENT (COMPLIANCE) STATEMENTS

For each applicable acceptable solution, the following statements present the results of the assessment of the proposed development/use against the requirements established by the Guidelines (WAPC 2017 v1.3) and apply the interpretation guidance established by the Position Statement: Planning in bushfire prone areas – Demonstrating Element 1: Location and Element 2: Siting and design (WAPC Nov 2019).

#### Acceptable Solution: A2.1: Asset Protection Zone

#### THE APZ - DEVELOPMENT SITING AND DESIGN PLANNING REQUIREMENTS

The necessary outcome of bushfire planning for development siting and design, is to ensure that a building can be located within the developable portion of any lot (i.e. outside those parts of the lot that form the required R-Code building setbacks, or any other excluded area), and be subject to potential radiant heat from a bushfire not exceeding 29 kW/m<sup>2</sup> (i.e. a maximum BAL of BAL-29).

This will be achieved when the size of the “low fuel area immediately surrounding a building”, the asset protection zone (APZ), is large enough. This requires a certain separation distance to exist between the building and areas of classified vegetation. These are the BAL-29 APZ dimensions and they will vary dependent on site specific parameters.

The APZ should be contained solely within the boundaries of each lot, except in instances where the neighbouring lot(s) or adjacent public land will be managed in a low-fuel state on an ongoing basis, in perpetuity.

Where possible, planning for siting and design should incorporate elements that include non-vegetated areas (e.g. roads/parking/drainage) and/or formally managed areas of vegetation (public open space/recreation areas/services installed in a common section of land), as either part of the required APZ dimensions or to additionally increase separation distances to provide greater protection. These elements create robust and easier managed asset protection zones.

#### THE ASSESSMENT

Future buildings on the proposed Woolworths development site, and future commercial and residential lots, can be surrounded by an APZ that will ensure the potential radiant heat impact of a bushfire does not exceed 29 kW/m<sup>2</sup> (BAL-29). The required APZ specifications of width, location and management can be achieved.

**APZ Width:** The required APZ dimensions to ensure buildings are subject to a maximum BAL of BAL-29 (measured from any external wall or supporting post or column to the edge of the classified vegetation), has been determined in Section 3.2 of this BMP and are:

BAL-29 APZ Dimensions		
Applicable to Following Buildings/Lots:  Woolworths Shopping Complex Retail/Commercial building Future Development Sites	Building to Vegetation Area 1	Minimum 21 metres
	Building to Vegetation Area 2	Minimum 13 metres
	Building to Vegetation Area 3	Minimum 9 metres
	Building to Vegetation Area 4	Minimum 15 metres
	Building to Vegetation Area 5	Minimum 9 metres
	Building to Vegetation Area 6	Minimum 11 metres

**APZ Location:** The Asset Protection Zone (APZ) for the proposed two buildings, and future developments, will exist both within and outside the proposed lots. The portions of the required size APZ that exist outside each proposed lot consists of roads and managed road verges.

## Element 2: Siting and Design of Development

**APZ Management:** It is expected that vegetation on all proposed lots and surrounding road reserves will either be removed or maintained to a low bushfire threat state.

Retained vegetation will be managed in accordance with the technical requirements established by the Schedule 1: 'Standards for Asset Protection Zones (Guidelines)'. The APZ specifications are also detailed in Appendix 1 and the City of Wanneroo may have additional requirements established by their Fire Mitigation Notice.

### **THE APZ – REQUIRED DIMENSIONS TO SATISFY FUTURE BUILDING (AND ONGOING MANAGEMENT)**

It is important for the landowner to be aware that the APZ dimensions that will be required to be physically established and maintained on each lot surrounding relevant future buildings, may be different to those stated above for the BAL-29 APZ - which is the minimum dimension a planning proposal needs to show can be established to comply with SPP 3.7.

For this proposal, it is expected that the whole of each future lot and abutting road reserves are to be maintained to a low bushfire threat state. The proposed development consists of commercial lots and small scale housing lots. The commercial lots will consist of buildings, parking areas, loading areas and small areas of managed landscaping. The residential lots are required by the City of Wanneroo Fire Mitigation Notice to be maintained to a low bushfire threat state over the bushfire season.

A small area of Public Open Space and drainage reserve is located to the west of the proposed shopping complex. This area is expected to be landscaped and maintained to a low bushfire threat state by the landowner.

## Element 3: Vehicular Access

**Intent:** To ensure that the vehicular access serving a subdivision/development is available and safe during a bushfire event.

**Compliance:** How the proposed development achieves the intent of Element 3:

By fully meeting all applicable acceptable solutions established by the bushfire protection criteria (Guidelines v1.3 WAPC 2017)

### ASSESSMENT (COMPLIANCE) STATEMENTS

For each applicable acceptable solution, the following statements present the results of the assessment of the proposed development/use against the requirements established by the Guidelines (WAPC 2017 v1.3).

#### **Acceptable Solution: A3.1: Two Access Routes**

Perimeter roads are to be constructed around the proposed development sites and connecting to Lisford Avenue to the east, and Enterprise Avenue to the north. This road system will provide a minimum of two access/egress routes from each proposed lot.

#### **Acceptable Solution: A3.2: Public Road**

New public roads will be constructed for this development. The construction technical requirements established by the Guidelines will be complied with.

#### **Acceptable Solution: A3.3: Cul-de-sacs (including a dead-end road)**

No cul-de-sacs exist or are planned for this development.

#### **Acceptable Solution: A3.4: Battle-axe**

No battle-axe lots are planned for this development.

#### **Acceptable Solution: A3.5: Private Driveways**

No buildings will be greater than 50 metres from a public road, therefore construction of driveways to bushfire standards is not required.

#### **Acceptable Solution: A3.6: Emergency Access Way**

There are no Emergency Access Ways planned for this development.

#### **Acceptable Solution: A3.7: Fire Service Access Routes**

There are no Fire Service Access Routes planned for this development.

#### **Acceptable Solution: A3.8: Firebreak Width**

The proposed lots will comply with the requirements of the local government annual firebreak notice issued under s33 of the Bush Fires Act 1954.

## Element 4: Water

**Intent:** To ensure water is available to the subdivision, development or land use to enable people, property and infrastructure to be defended from bushfire.

**Compliance:** How the proposed development achieves the intent of Element 4:

By fully meeting all applicable acceptable solutions established by the bushfire protection criteria (Guidelines v1.3 WAPC 2017)

### ASSESSMENT (COMPLIANCE) STATEMENTS

For each applicable acceptable solution, the following statements present the results of the assessment of the proposed development/use against the requirements established by the Guidelines (WAPC 2017 v1.3).

#### Acceptable Solution: A4.1: Reticulated Areas

A reticulated water supply is available to the subject site and hydrants will be installed in locations throughout the development as required by the relevant authorities.

#### Acceptable Solution: A4.2: Non-Reticulated Areas

N/A

#### Acceptable Solution: A4.3: Non-Reticulated Areas – Individual Lots

N/A

## 5.4 Recommended Additional Bushfire Protection Measures

The following bushfire protection measures are to be implemented and maintained. They are additional to those established by the relevant acceptable solutions applied to the proposed subdivision, development or use.

The relevant acceptable solutions are those against which this planning proposal has been assessed in Section 5.3 of this Bushfire Management Plan.

### 5.4.1 Recommended Additional Measures to Improve Bushfire Performance

Buildings of Class 4 to Class 9 are not required by the Building Code of Australia (BCA) to be constructed to comply with bushfire performance requirements. As the proposed buildings will be located in a bushfire prone area and may be subject to a bushfire attack, Bushfire Prone Planning recommends that some degree of upgrading be considered to improve the protection for occupants and the building's survivability. At a minimum protection from ember attack should be considered (i.e. constructed to the standard required for BAL-12.5).

## 6 RESPONSIBILITIES FOR IMPLEMENTATION AND MANAGEMENT OF THE BUSHFIRE PROTECTION MEASURES

Table 6.1: BMP Implementation responsibilities prior to occupancy or building.

Landowner (Developer) - Prior to Occupancy or Building	
No.	Implementation Actions
1	<p>The local government may condition a development application approval with a requirement for the landowner/proponent to register a notification onto the certificate of title and deposited plan.</p> <p>This will be done pursuant to Section 70A Transfer of Land Act 1893 as amended ('Factors affecting use and enjoyment of land, notification on title'). This is to give notice of the bushfire hazard and any restrictions and/or protective measures required to be maintained at the owner's cost.</p> <p>This condition ensures that:</p> <ol style="list-style-type: none"> <li>1. Landowners/proponents are aware their lot is in a designated bushfire prone area and of their obligations to apply the stated bushfire risk management measures; and</li> <li>2. Potential purchasers are alerted to the Bushfire Management Plan so that future landowners/proponents can continue to apply the bushfire risk management measures that have been established in the Plan.</li> </ol>
2	<p>Prior to building and post planning approval, the entity responsible for having the BMP prepared should ensure that anyone listed as having responsibility under the Plan has endorsed it and is provided with a copy for their information and informed that it contains their responsibilities. This includes the landowners/proponents (including future landowners where the Plan was prepared as part of a subdivision approval), local government and any other authorities or referral agencies ('Guidelines' s4.6.3).</p>
3	<p>Prior to building establish the Asset Protection Zone (APZ) surrounding the proposed development, as shown in Figures 3.4 and 3.5.</p> <p>Establish the APZ to the standards established by the Guidelines (refer to Appendix 1) or as varied by the local government through their Firebreak Notice. This is the responsibility of the developer.</p>
4	<p>Prior to occupation of the development, the development is to be compliant with the City of Wanneroo Fire Mitigation Notice issued under s33 of the Bushfires Act 1954.</p> <p>This may include specifications for asset protection zones that differ from the Guideline's APZ Standards, with the intent to better satisfy local conditions. When these are more stringent than those created by the Guidelines, or less stringent and endorsed by the WAPC and DFES, they must be complied with. Refer to Appendix 1.</p>
5	<p>Prior to occupancy, public roads are to be constructed and hydrants established to the standards stated in the BMP.</p>
6	<p>To implement and maintain, the additional bushfire protection measure contained in Section 5.4 of this Bushfire Management Plan, in addition to the measures that are established by the acceptable solutions.</p>
7	<p>Prior to any building work, inform the builder of the existence of this Bushfire Management Plan and the responsibilities it contains, regarding the required construction standards. This will be:</p> <ul style="list-style-type: none"> <li>• The standard corresponding to the determined BAL, as per the bushfire provisions of the Building Code of Australia (BCA); and/or</li> <li>• A higher standard because the BMP establishes that the construction standard is to correspond to a higher BAL as an additional bushfire protection measure.</li> </ul>

Table 6.2: Ongoing management responsibilities for the Landowner/Occupier.

6.2 Landowner/Occupier - Ongoing	
No.	Ongoing Management Actions
1	Maintain the Asset Protection Zone (APZ) surrounding the proposed development, as shown in Figures 3.4 and 3.5. Maintain the APZ to the standards established by the Guidelines (refer to Appendix 1) or as varied by the local government through their Firebreak Notice. This is the responsibility of the developer.
2	Comply with the City of Wanneroo Fire Mitigation Notice issued under s33 of the Bush Fires Act 1954. This may include specifications for asset protection zones that differ from the Guideline's APZ Standards, with the intent to better satisfy local conditions. When these are more stringent than those created by the Guidelines, or less stringent and endorsed by the WAPC and DFES, they must be complied with. Refer to Appendix 1.
3	Maintain vehicular access routes within the lots.
4	Ensure that any builders (of future structures on the lot) are aware of the existence of this Bushfire Management Plan and the responsibilities it contains regarding the application of construction standards corresponding to a determined BAL.
5	Ensure all future buildings the landowner has responsibility for, are designed and constructed in full compliance with: <ol style="list-style-type: none"> <li>1. the requirements of the WA Building Act 2011 and the bushfire provisions of the Building Code of Australia (BCA); and</li> <li>2. with any identified additional requirements established by this BMP or the local government.</li> </ol>

Table 6.3: Ongoing management responsibilities for the Local Government.

6.3 Local Government - Ongoing	
No.	Ongoing Management Actions
1	Monitor landowner compliance with the Bushfire Management Plan and the annual Fire Mitigation Notice.
2	The adjoining road reserves to be managed to ensure the vegetation remains as low threat vegetation, in accordance with AS3959:2018.

## APPENDIX 1: TECHNICAL REQUIREMENTS FOR ONSITE VEGETATION MANAGEMENT

### A1.1 Requirements Established by the Guidelines – Standards for Asset Protection Zones

(Source: Guidelines for Planning in Bushfire Prone Areas - WAPC 2017 v1.3 Appendix 4, Element 2, Schedule 1 and Explanatory Note E2.1)

#### DEFINING THE ASSET PROTECTION ZONE (APZ)

**Description:** An APZ is an area surrounding a building that is managed to reduce the bushfire hazard to an acceptable level (by reducing fuel loads). The width of the required APZ varies with slope and vegetation and varies corresponding to the BAL rating determined for a building (lower BAL = greater dimensioned APZ).

For planning applications, the minimum sized acceptable APZ is that which is of sufficient size to ensure the potential radiant heat impact of a fire does not exceed 29kW/m<sup>2</sup> (BAL-29). It will be site specific.

For subdivision planning, design elements and excluded/low threat vegetation adjacent to the lot(s) can be utilised to achieve the required vegetation separation distances and therefore reduce the required dimensions of the APZ within the lot(s).

**Defendable Space:** The APZ includes a defendable space which is an area adjoining the asset within which firefighting operations can be undertaken to defend the structure. Vegetation within the defendable space should be kept at an absolute minimum and the area should be free from combustible items and obstructions. The width of the defendable space is dependent on the space, which is available on the property, but as a minimum should be 3 metres.

**Establishment:** The APZ should be contained solely within the boundaries of the lot on which the building is situated, except in instances where the neighbouring lot or lots will be managed in a low-fuel state on an ongoing basis, in perpetuity.

The APZ may include public roads, waterways, footpaths, buildings, rocky outcrops, golf courses, maintained parkland as well as cultivated gardens in an urban context, but does not include grassland or vegetation on a neighbouring rural lot, farmland, wetland reserves and unmanaged public reserves.

[Note: Regardless of whether an Asset Protection Zone exists in accordance with the acceptable solutions and is appropriately maintained, fire fighters are not obliged to protect an asset if they think the separation distance between the dwelling and vegetation that can be involved in a bushfire, is unsafe.]

#### Schedule 1: Standards for APZ

**Fences:** within the APZ are constructed from non-combustible materials (e.g. iron, brick, limestone, metal post and wire). It is recommended that solid or slatted non-combustible perimeter fences are used.

**Objects:** within 10 metres of a building, combustible objects must not be located close to the vulnerable parts of the building i.e. windows and doors.

**Fine Fuel Load:** combustible dead vegetation matter less than 6 mm in thickness reduced to and maintained at an average of two tonnes per hectare (example below).



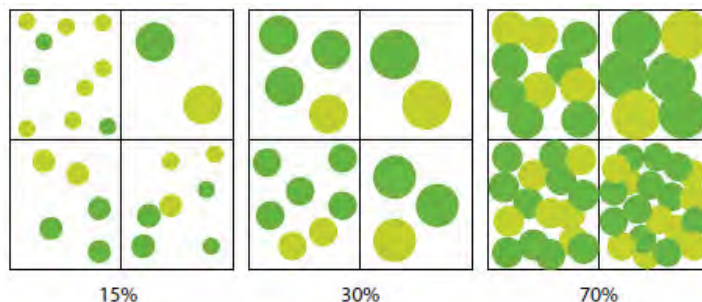
Example: Fine fuel load of 2 t/ha

(Image source: Shire of Augusta Margaret River's Firebreak and Fuel Reduction Hazard Notice)



**Trees (> 5 metres in height):** trunks at maturity should be a minimum distance of 6 metres from all elevations of the building, branches at maturity should not touch or overhang the building, lower branches should be removed to a height of 2 metres above the ground and or surface vegetation, canopy cover should be less than 15% with tree canopies at maturity well spread to at least 5 metres apart as to not form a continuous canopy. Diagram below represents tree canopy cover at maturity.

Tree canopy cover – ranging from 15 to 70 per cent at maturity



(Source: Guidelines for Planning in Bushfire Prone Areas 2017, Appendix 4)

**Shrubs (0.5 metres to 5 metres in height):** should not be located under trees or within 3 metres of buildings, should not be planted in clumps greater than 5m<sup>2</sup> in area, clumps of shrubs should be separated from each other and any exposed window or door by at least 10 metres. Shrubs greater than 5 metres in height are to be treated as trees.

**Ground covers (<0.5 metres in height):** can be planted under trees but must be properly maintained to remove dead plant material and any parts within 2 metres of a structure, but 3 metres from windows or doors if greater than 100 mm in height. Ground covers greater than 0.5 metres in height are to be treated as shrubs.

**Grass:** should be managed to maintain a height of 100 mm or less.

The following example diagrams illustrate how the required dimensions of the APZ will be determined by the type and location of the vegetation.



## A1.2 Requirements Established by the Local Government – the Firebreak Notice

The local government's current Firebreak Notice is available on their website, at their offices and is distributed as ratepayer's information. It must be complied with.

These requirements are established by the local government's Firebreak Notice created under s33 of the Bushfires Act 1954 and issued annually (potentially with revisions). The Firebreak Notice may include additional components directed at managing fuel loads, accessibility and general property management with respect to limiting potential bushfire impact.

If Asset Protection Zone (APZ) specifications are defined in the Firebreak Notice, these may differ from the Standards established by the Guidelines, with the intent to better satisfy local conditions. When these are more stringent than those created by the Guidelines, or less stringent and endorsed by the WAPC and DFES, they must be complied with.

The APZ dimensions to be physically established and maintained, will be based on which of the following establishes the larger APZ dimension:

- The dimensions corresponding to the determined BAL of a building (refer to Section 3.2 explanation of the 'planning' versus 'building' requirements and 'indicative' versus 'determined' BAL(s)); or
- The APZ dimensions established by the local government's Firebreak Notice.

## A1.3 Requirements Recommended by DFES – Property Protection Checklists

Further guidance regarding ongoing/lasting property protection (from potential bushfire impact) is presented in the publication 'DFES – Fire Chat – Your Bushfire Protection Toolkit'. It is available from the Department of Fire and Emergency Services (DFES) website.

## A1.4 Requirements Established by AS 3959:2018 – 'Minimal Fuel Condition'

This information is provided for reference purposes. This knowledge will assist the landowner to comply with Management Requirement No. 3 set out in the Guidance Panel at the start of this Appendix. It identifies what is required for an area of land to be excluded from classification as a potential bushfire threat.

*"Australian Standard - AS 3959:2018 Section 2.2.3.2: Exclusions - Low threat vegetation and non-vegetated areas:*

The Bushfire Attack Level shall be classified BAL-LOW where the vegetation is one or a combination of the following:

- a) Vegetation of any type that is more than 100m from the site.
- b) Single areas of vegetation less than 1ha in area and not within 100m of other areas of vegetation being classified vegetation.
- c) Multiple area of vegetation less than 0.25ha in area and not within 20m of the site or each other or other areas of vegetation being classified vegetation.
- d) Strips of vegetation less than 20m in width (measured perpendicular to the elevation exposed to the strip of vegetation) regardless of length and not within 20m of the site or each other, or other areas of vegetation being classified vegetation.
- e) Non-vegetated areas, that is, areas permanently cleared of vegetation, including waterways, exposed beaches, roads, footpaths, buildings and rocky outcrops.
- f) Vegetation regarded as low threat due to factors such as flammability, moisture content or fuel load. This includes grassland managed in a minimal fuel condition, (means insufficient fuel available to significantly increase the severity of a bushfire attack – for example, recognisable as short cropped grass to a nominal height of 100mm), mangroves and other saline wetlands, maintained lawns, golf courses (such as playing areas and fairways), maintained public reserves and parklands, sporting fields, vineyards, orchards, banana plantations, market gardens (and other non-curing crops), cultivated gardens, commercial nurseries, nature strips and windbreaks (single row of trees)."

## APPENDIX 2: TECHNICAL REQUIREMENTS FOR VEHICULAR ACCESS

Each local government may have their own standard technical requirements for emergency vehicular access, and they may vary from those stated in the Guidelines.

When required, these are stated in Section 5.1 of this bushfire management plan.

### Requirements Established by the Guidelines – The Acceptable Solutions

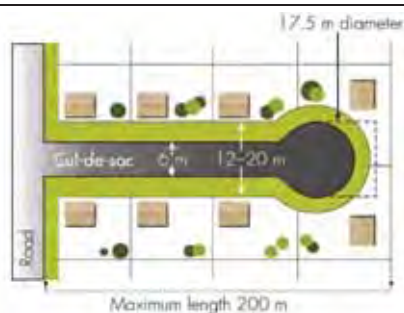
(Source: Guidelines for Planning in Bushfire Prone Areas WAPC 2017 v1.3, Appendix 4)

#### VEHICULAR ACCESS TECHNICAL REQUIREMENTS - PART 1

##### Acceptable Solution 3.3: Cul-de-sacs (including a dead-end road)

Their use in bushfire prone areas should be avoided. Where no alternative exists then the following requirements are to be achieved:

- Maximum length is 200m. If public emergency access is provided between cul-de-sac heads (as a right of way or public access easement in gross), the maximum length can be increased to 600m provided no more than 8 lots are serviced and the emergency access way is less than 600m in length;
- Turnaround area requirements, including a minimum 17.5m diameter head to allow type 3.4 fire appliances to turn around safely;
- The cul-de-sac connects to a public road that allows for travel in two directions; and
- Meet the additional design requirements set out in Part 2 of this appendix.



##### Acceptable Solution 3.4: Battle-axe

Their use in bushfire prone areas should be avoided. Where no alternative exists then the following requirements are to be achieved:

- Maximum length 600m and minimum width 6m; and
- Comply with minimum standards for private driveways.



## VEHICULAR ACCESS TECHNICAL REQUIREMENTS - PART 1

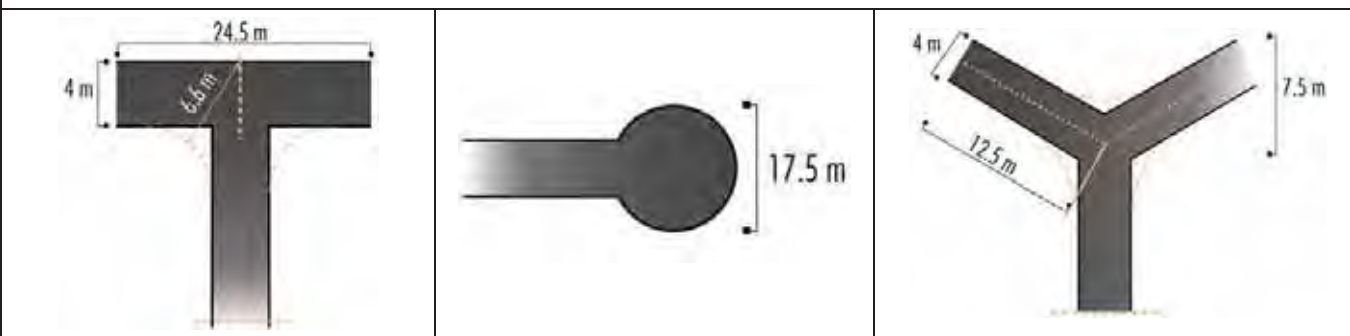
### Acceptable Solution 3.5: Private Driveways

The following requirements are to be achieved:

- The design requirements set out in Part 2 of this appendix; and

Where the house site is more than 50 metres from a public road:

- Passing bays every 200 metres with a minimum length of 20 metres and a minimum width of two metres (ie combined width of the passing bay and constructed private driveway to be a minimum six metres);
- Turn-around areas every 500 metres and within 50 metres of a house, designed to accommodate type 3.4 fire appliances to turn around safely (ie kerb to kerb 17.5 metres);
- Any bridges or culverts are able to support a minimum weight capacity of 15 tonnes; and
- All weather surface (i.e. compacted gravel, limestone or sealed).

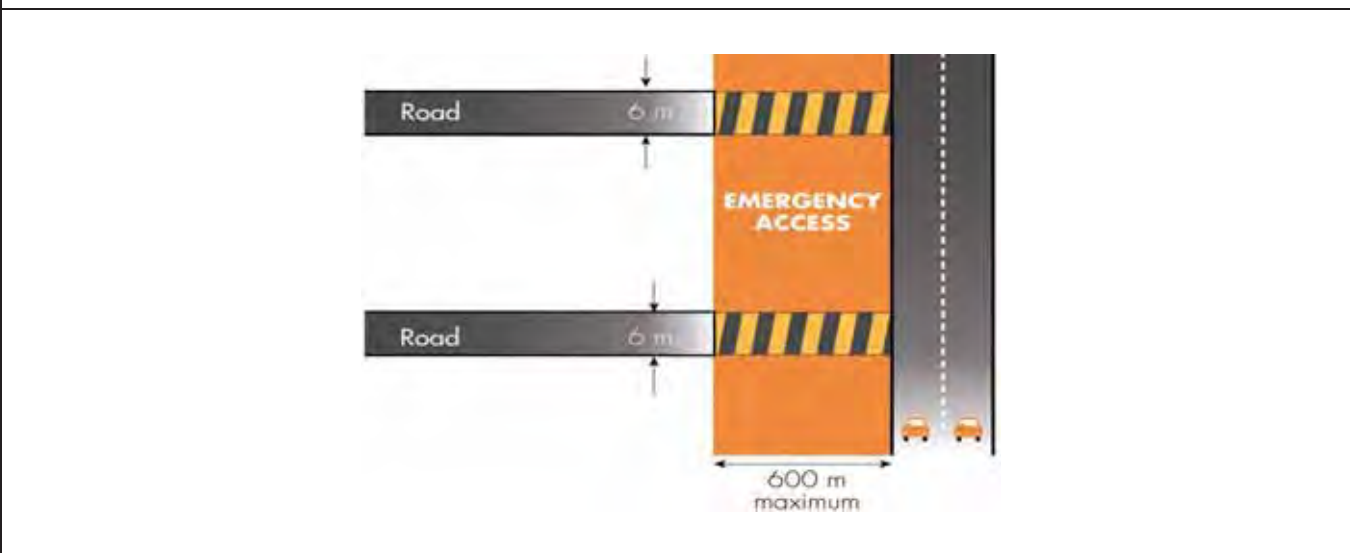


### Acceptable Solution 3.6: Emergency Access Way

An access way that does not provide through access to a public road is to be avoided bushfire prone areas.

Where no alternative exists, an emergency access way is to be provided as an alternative link to a public road during emergencies. The following requirements are to be achieved:

- No further than 600 metres from a public road;
- Must be signposted including where they ajoin public roads;
- Provided as a right of way or public access easement in gross;
- Where gates are used they must not be locked and they must be a minimum width of 3.6 metres with design and construction approved by local government (refer to the example in this appendix); and
- Meet the additional design requirements set out in Part 2 of this appendix.



## VEHICULAR ACCESS TECHNICAL REQUIREMENTS - PART 1

### Acceptable Solution 3.7: Fire Service Access Routes (Perimeter Roads)

Are to be established to provide access within and around the edge of subdivision and related development and to provide direct access to bushfire prone areas for firefighters and link between public road networks for firefighting purposes. Fire service access is used during bushfire suppression activities but can also be used for fire prevention work. The following requirements are to be achieved:

- No further than 600 metres from a public road (driveways may be used as part of the designated fire service access);
- Dead end roads not permitted;
- Allow for two-way traffic (i.e. two 3.4 fire appliances);
- Provide turn-around areas designed to accommodate 3.4 fire appliances and to enable them to turn around safely every 500m (i.e. kerb to kerb 17.5 metres);
- All weather surface (i.e. compacted gravel, limestone or sealed) and have erosion control measures in place;
- Must be adequately sign posted;
- Where gates are used, they must be a minimum width of 3.6 metres with design and construction approved by local government (refer to the example in this appendix) and may be locked (use a common key system);
- Meet the additional design requirements set out in Part 2 of this appendix;
- Provided as right of ways or public access easements in gross; and
- Management and access arrangements to be documented and in place.

### Acceptable Solution 3.8: Firebreak Width

Lots greater than 0.5 hectares must have an internal perimeter firebreak of a minimum width of three meters or to the level as prescribed in the local firebreak notice issued by the local government.

## VEHICULAR ACCESS TECHNICAL REQUIREMENTS - PART 2

Technical Component	Vehicular Access Types				
	Public Roads	Cul-de-sacs	Private Driveways	Emergency Access Ways	Fire Service Access Routes
Minimum trafficable surface (m)	6*	6	4	6*	6*
Horizontal clearance (m)	6	6	6	6	6
Vertical clearance (m)	4.5	4.5	4.5	4.5	4.5
Maximum grade <50 metres	1 in 10	1 in 10	1 in 10	1 in 10	1 in 10
Minimum weight capacity (t)	15	15	15	15	15
Maximum cross-fall	1 in 33	1 in 33	1 in 33	1 in 33	1 in 33
Curves minimum inner radius (m)	8.5	8.5	8.5	8.5	8.5

\* A six metre trafficable surface does not necessarily mean paving width. It could, for example, include four metres of paving and one metre of constructed road shoulders. In special circumstances, where 8 lots or less are being serviced, a public road with a minimum trafficable surface of four metres for a maximum distance of ninety metres may be provided subject to the approval of both the local government and DFES.

## APPENDIX 3: TECHNICAL REQUIREMENTS FOR FIREFIGHTING WATER

### Reticulated Areas

[Source: Guidelines for Planning in Bushfire Prone Areas WAPC 2017 v1.3, Appendix 4, Element 4]

The Water Corporation's 'No 63 Water Reticulation Standard' is deemed to be the baseline criteria for developments and should be applied unless local water supply authority's conditions apply.

The requirement is to supply a reticulated water supply and fire hydrants, in accordance with the technical requirements of the relevant water supply authority and DFES.

Key specifications in the most recent version/revision of the design standard include:

- Residential Standard – hydrants are to be located so that the maximum distance between the hydrants shall be no more than 200 metres.
- Commercial Standard – hydrants are to be located with a maximum of 100 metre spacing in Industrial and Commercial areas.
- Rural Residential Standard – where minimum site areas per dwelling is 10,000 m<sup>2</sup> (1ha), hydrants are to be located with a maximum 400m spacing. If the area is further subdivided to land parcels less than 1ha, then the residential standard (200m) is to be applied.

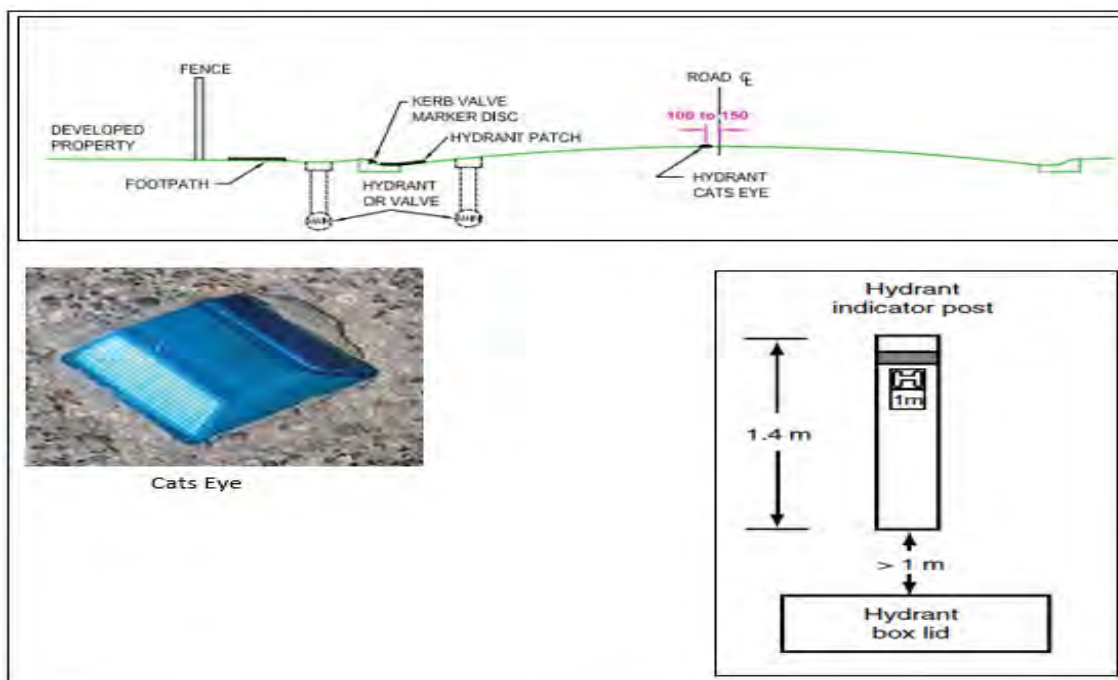


Figure A4.1: Hydrant Location and Identification Specifications



# Waste Management Plan

Woolworths Two Rocks

Prepared for Fabcot Pty Ltd

27 October 2021

Project Number: TW21112

<b>DOCUMENT CONTROL</b>					
<b>Version</b>	<b>Description</b>	<b>Date</b>	<b>Author</b>	<b>Reviewer</b>	<b>Approver</b>
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## Executive Summary

Fabcot Pty Ltd is seeking development approval for the proposed Woolworths Two Rocks development (the Proposal).

To satisfy the conditions of the development application the City of Wanneroo (the City) requires the submission of a Waste Management Plan (WMP) that will identify how waste is to be stored and collected from the Proposal. Talis Consultants has been engaged to prepare this WMP to satisfy the City's requirements.

A summary of the bin size, numbers, collection frequency and collection method is provided in the below table.

### Proposed Waste Collection Summary

Waste Type	Generation (L/week)	Bin Size (L)	Number of Bins	Collection Frequency	Collection
<b>Café and Speciality Tenancies Bin Storage Area</b>					
Refuse	3,574	660	Six	Once each week	Private Contractor
Recycling	2,700	660	Five	Once each week	Private Contractor
<b>Retail / Commercial Bin Storage Area</b>					
Refuse	417	660	One	Once each week	Private Contractor
Recycling	417	660	One	Once each week	Private Contractor

A private contractor will service the tenancies onsite, directly from the respective Bin Storage Area. The private contractor's waste collection vehicle will enter and exit the Proposal in forward gear via Future Road 3 or Azzurra Street.

Building management will oversee the relevant aspects of waste management at the Proposal.

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Figure 1: Locality Plan

## 1 Introduction

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To satisfy the conditions of the development application the City of Wanneroo (the City) requires the submission of a Waste Management Plan (WMP) that will identify how waste is to be stored and collected from the Proposal. Talis Consultants has been engaged to prepare this WMP to satisfy the City's requirements.

The Proposal is bordered by vacant land to the north (future Azzurra Street), south (Future Road 3) and west (future commercial) and Lisford Avenue to the east, as shown in Figure 1.

### 1.1 Objectives and Scope

The objective of this WMP is to outline the equipment and procedures that will be adopted to manage waste (refuse and recyclables) at the Proposal. Specifically, the WMP demonstrates that the Proposal is designed to:

- Adequately cater for the anticipated volume of waste to be generated;
- Provide adequately sized Bin Storage Areas, including appropriate bins; and
- Allow for efficient collection of bins by appropriate waste collection vehicles.

To achieve the objective, the scope of the WMP comprises:

- Section 2: Waste Generation;
- Section 3: Waste Storage;
- Section 4: Waste Collection;
- Section 5: Waste Management; and
- Section 6: Conclusion.

## 2 Waste Generation

The following section shows the waste generation rates used and the estimated waste volumes to be generated at the Proposal.

### 2.1 Proposed Tenancies

The anticipated volume of refuse and recyclables is based on the floor area (m<sup>2</sup>) of the tenancies at the Proposal. The Proposal consists of the following:

- Supermarket (Woolworths) – 2,942m<sup>2</sup>;
- Café – 85m<sup>2</sup>;
- Spec 1 (Liquor) – 200m<sup>2</sup>;
- Spec 2 – 82m<sup>2</sup>;
- Spec 3 – 78m<sup>2</sup>;
- Spec 4 – 151m<sup>2</sup>; and
- Retail / Commercial – 595m<sup>2</sup>.

Note, the Woolworths Supermarket has their own back of house and manages waste through their own internal processes governed by national waste collections contracts, and therefore has not been included as part of this report.

### 2.2 Waste Generation Rates

The estimated amount of refuse and recyclables to be generated by the Proposal is based on the Western Australian Local Government Association's (WALGA) *Commercial and Industrial Waste Management Plan Guidelines (2014)* and the City of Melbourne's *Guidelines for Preparing a Waste Management Plan (2014)*.

It should also be noted that a conservative approach has been taken with regards to waste generation across the Proposal by overestimating the potential waste volumes by assuming seven days of operation for all tenancies.

Table 2-1 shows the waste generation rates which have been applied to the Proposal.

**Table 2-1: Waste Generation Rates**

Tenancy Use Type	Guideline Reference	Refuse Generation Rate	Recycling Generation Rate
Café	Melbourne – Café	300L/100m <sup>2</sup> /day	200L/100m <sup>2</sup> /day
Spec 1 (Liquor)	WALGA – Retail Shop > 100m <sup>2</sup>	50L/100m <sup>2</sup> /day	50L/100m <sup>2</sup> /day
Spec 2	WALGA – Retail Shop < 100m <sup>2</sup>	50L/100m <sup>2</sup> /day	25L/100m <sup>2</sup> /day
Spec 3	WALGA – Retail Shop < 100m <sup>2</sup>	50L/100m <sup>2</sup> /day	25L/100m <sup>2</sup> /day
Spec 4	WALGA – Retail Shop > 100m <sup>2</sup>	50L/100m <sup>2</sup> /day	50L/100m <sup>2</sup> /day
Retail / Commercial	WALGA – Offices	10L/100m <sup>2</sup> /day	10L/100m <sup>2</sup> /day

## 2.3 Waste Generation Volumes

Waste generation is estimated by volume in litres (L) as this is generally the influencing factor when considering bin size, numbers and storage space required.

Waste generation volumes in litres per week (L/week) adopted for this waste assessment are shown Table 2-2. It is estimated that the tenancies at the Proposal will generate 3,991L of refuse and 3,117L of recyclables each week.

**Table 2-2: Estimated Waste Generation**

Tenancies	Area (m <sup>2</sup> )	Waste Generation Rate (L/100m <sup>2</sup> /day)	Waste Generation (L/week)
<b>Refuse</b>			
Café	85	300	1,785
Spec 1 (Liquor)	200	50	700
Spec 2	82	50	287
Spec 3	78	50	273
Spec 4	151	50	529
Retail / Commercial	595	10	417
<b>Total</b>			<b>3,991</b>
<b>Recyclables</b>			
Café	85	200	1,190
Spec 1 (Liquor)	200	50	700
Spec 2	82	25	144
Spec 3	78	25	137
Spec 4	151	50	529
Retail / Commercial	595	10	417
<b>Total</b>			<b>3,117</b>

### 3 Waste Storage

Waste materials generated within the Proposal will be collected in the bins located in the Bin Storage Areas, as shown in Diagram 1 and Diagram 2, and discussed in the following sub-sections.

#### 3.1 Internal Bins

To promote positive recycling behaviour and maximise diversion from landfill, the café, each speciality tenancy and the retail/commercial tenancy will have two internal bins for the separate disposal of refuse and recyclables. Waste from these internal bins will be transferred by the tenant, staff or cleaners to the respective Bin Storage Area and be deposited into the appropriate refuse and recycling bins.

Tenants, staff or cleaners will transfer waste to the respective Bin Storage Areas outside of normal operating hours to minimise disturbance to customers and visitors at the Proposal.

The Supermarket will have their own internal bins for the collection of refuse and recyclables. Staff/cleaners will transfer the contents of these bins to the dedicated Supermarket Bin Storage Area as required outside of normal operational hours to minimise disturbance to customers and visitors at the Proposal. Staff/cleaners will be required to empty their internal bins daily and will be responsible for the cleaning and maintenance of the Supermarket internal bins.

#### 3.2 Bin Sizes

Table 3-1 gives the typical dimensions of standard bins sizes that may be utilised at the Proposal. It should be noted that these bin dimensions are approximate and can vary slightly between suppliers.

**Table 3-1: Typical Bin Dimensions**

Dimensions	Bin Sizes			
	240L	360L	660L	1,100L
Depth (mm)	730	848	780	1,070
Width (mm)	585	680	1,260	1,240
Height (mm)	1,060	1,100	1,200	1,300
Area (mm <sup>2</sup> )	427	577	983	1,327

Reference: *SULO Bin Specification Data Sheets*

#### 3.3 Café and Speciality Tenancies Bin Storage Area Size

To ensure sufficient area is available for storage of the café and speciality tenancies bins, the amount of bins required for the Café and Specialty Tenancies Bin Storage Area was modelled utilising the estimated waste generation in Table 2-2, bin sizes in Table 3-1 and based on collection of refuse and recyclables once each week.

Based on the results shown in Table 3-2 the Café and Specialty Tenancies Bin Storage Area has been sized to accommodate:

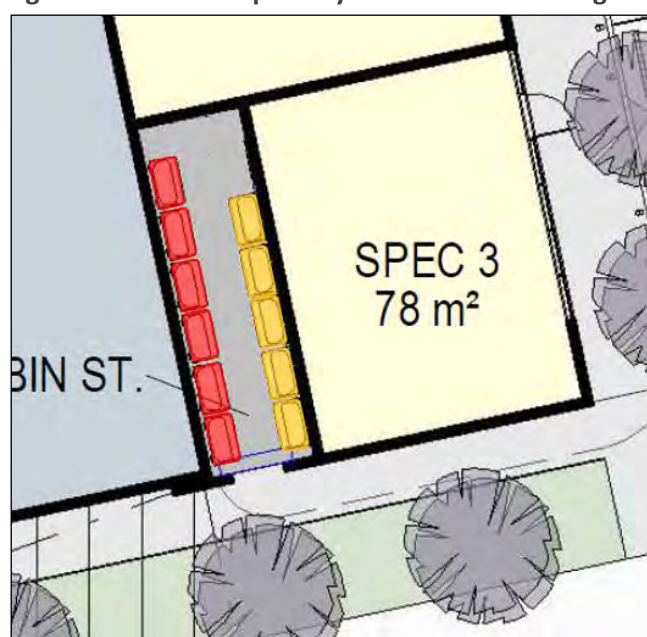
- Six 660L refuse bins; and
- Five 660L recycling bins.

**Table 3-2: Bin Requirements for Bin Storage Area – Café and Specialty Tenancies**

Waste Stream	Waste Generation (L/week)	Number of Bins Required			
		240L	360L	660L	1,100L
Refuse	3,574	15	10	6	4
Recycling	2,700	12	8	5	3

The configuration of these bins within the Café and Specialty Tenancies Bin Storage Area is shown in Diagram 1. It is worth noting that the number of bins and corresponding placement of bins shown in Diagram 1 represents the maximum requirements assuming collections once each week of refuse and recyclables. Increased collection frequencies would reduce the required number of bins.

**Diagram 1: Café and Specialty Tenancies Bin Storage Area**



### 3.4 Retail / Commercial Bin Storage Area Size

To ensure sufficient area is available for storage of the retail / commercial bins, the amount of bins required for the Retail / Commercial Bin Storage Area was modelled utilising the estimated waste generation in Table 2-2, bin sizes in Table 3-1 and based on collection of refuse and recyclables once each week.

Based on the results shown in Table 3-3 the Retail / Commercial Bin Storage Area has been sized to accommodate:

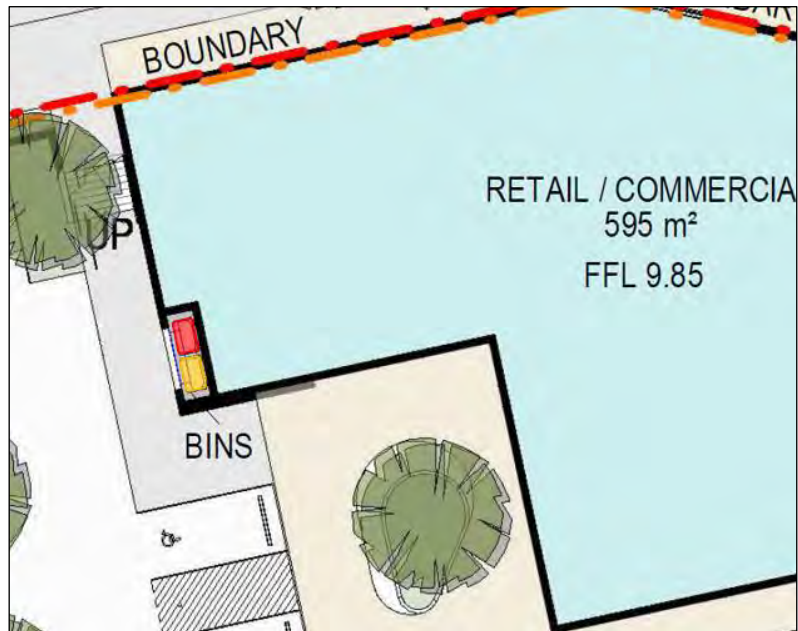
- One 660L refuse bins; and
- One 660L recycling bins.

**Table 3-3: Bin Requirements for Bin Storage Area – Retail / Commercial**

Waste Stream	Waste Generation (L/week)	Number of Bins Required			
		240L	360L	660L	1,100L
Refuse	417	2	2	1	1
Recycling	417	2	2	1	1

The configuration of these bins within the Retail / Commercial Bin Storage Area is shown in Diagram 2. It is worth noting that the number of bins and corresponding placement of bins shown in Diagram 2 represents the maximum requirements assuming collections once each week of refuse and recyclables.

Diagram 2: Retail / Commercial Bin Storage Area



### 3.5 Bin Storage Area Design

The design of the Bin Storage Areas will take into consideration:

- Smooth impervious floor sloped to a drain connected to the sewer system;
- Taps for washing of bins and Bin Storage Areas;
- Adequate aisle width for easy manoeuvring of bins;
- No double stacking of bins;
- Doors to the Bin Storage Areas self-closing and vermin proof;
- Doors to the Bin Storage Areas wide enough to fit bins through;
- Ventilated to a suitable standard;
- Appropriate signage;
- Undercover where possible and be designed to not permit stormwater to enter into the drain;
- Located behind the building setback line;
- Bins not to be visible from the property boundary or areas trafficable by the public; and
- Bins are reasonably secured from theft and vandalism.

Bin numbers and storage space within the Bin Storage Areas will be monitored by building management during the operation of the Proposal to ensure that the number of bins and collection frequency is sufficient.



## 4 Waste Collection

A private waste collection contractor will service the Proposal utilising a rear loader waste collection vehicle as follows:

### Café and Speciality Tenancies:

- Six 660L refuse bins, collected once each week; and
- Five 660L recycling bins, collected once each week.

### Retail / Commercial

- One 660L refuse bin, collected once each week; and
- One 660L recycling bin, collected once each week.

The private contractor's rear loader waste collection vehicle will service the bins onsite, directly from the respective Bin Storage Area. The private contractor's rear loader waste collection vehicle will travel with left hand lane traffic flow and turn into the Proposal in forward gear and pull up adjacent to the respective Bin Storage Area for servicing.

Servicing may be conducted outside of normal operating hours to allow the waste collection vehicle to utilise the empty carpark for manoeuvring and mitigate impacts on local traffic movements during peak traffic hours.

Private contractor's staff will ferry bins to and from the rear loader waste collection vehicle and the respective Bin Storage Area during servicing. The private contractor will be provided with key/PIN code access to the Bin Storage Areas to facilitate servicing, if required.

Once servicing is complete the private contractor's rear loader waste collection vehicle will exit in a forward motion, turning onto the Future Road 3 or Azzurra Street moving with traffic flow.

### 4.1 Bulk and Speciality Waste

Bulk and speciality waste materials will be removed from the Proposal as they are generated on an 'as required' basis. A temporary skip bin could be utilised for collections, if required.

Adequate space may be allocated throughout the Proposal for placement of cabinets/containers for collection and storage of bulk and specialty wastes that are unable to be disposed of within the bins in the respective Bin Storage Areas. These may include items such as:

- Refurbishment wastes from fit outs;
- Batteries and E-wastes;
- White goods/appliances;
- Used Cooking Oil;
- Cleaning chemicals; and
- Commercial Light globes.

These bulk and specialty wastes will be removed from the Proposal as sufficient volumes have been accumulated to warrant disposal. Bulk and specialty waste collection will be monitored by building management who will organise their transport to the appropriate waste facility, as required.

## 5 Waste Management

Building management will be engaged to complete the following tasks:

- Monitoring and maintenance of bins and the Bin Storage Areas;
- Cleaning of bins and Bin Storage Areas, when required;
- Ensure all staff and tenants at the Proposal are made aware of this WMP and their responsibilities thereunder;
- Monitor staff and tenant behaviour and identify requirements for further education and/or signage;
- Monitor bulk and speciality waste accumulation and assist with its removal, as required;
- Regularly engage with staff and tenants to develop opportunities to reduce waste volumes and increase resource recovery; and
- Regularly engage with the private contractors to ensure efficient and effective waste service is maintained.

## 6 Conclusion

As demonstrated within this WMP, the Proposal provides sufficiently sized Bin Storage Areas for the storage of refuse and recyclables, based on the estimated waste generation volumes and suitable configuration of bins. This indicates that adequately designed Bin Storage Areas have been provided, and collection of refuse and recyclables can be completed from the Proposal.

The above is achieved as follows:

### **Café and Speciality Tenancies:**

- Six 660L refuse bins, collected once each week; and
- Five 660L recycling bins, collected once each week.

### **Retail / Commercial:**

- One 660L refuse bin, collected once each week; and
- One 660L recycling bin, collected once each week.

A private contractor will service the tenancies onsite, directly from the respective Bin Storage Area. The private contractor's waste collection vehicle will enter and exit the Proposal in forward gear via Future Road 3 or Azzurra Street.

Building management will oversee the relevant aspects of waste management at the Proposal.

## Figures

Figure 1: Locality Plan



**LEGEND**

- Site Boundary
- Cadastre

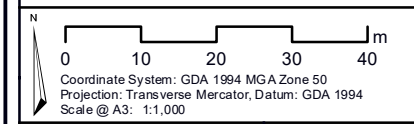
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**LOCALITY**

Woolworths Two Rocks  
Two Rocks, WA 6037

Fabcot Pty Ltd



Prepared: T Daymond	Date: 24/09/2021
Reviewed: D Patel	Revision: A
Project: TW21112	



Figure 01

Data source: Roads, Cadastre - Landgate, 2021. Imagery: Landgate, 2021.



Assets | Engineering | Environment | Noise | Spatial | Waste

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## Local Planning Policy 4.23 – Design Review Panel

The application was presented to DRP on two occasions being 25 March 2021 (DRP2021/2) and 22 July 2021 (DRP2021/6).

The below comments are taken from the most recent 22 July 2021 DRP and are considered to be the final and collective comments of the two meetings.

DRP Comment	Applicant Comment	City Comment
<p>Azzurra Street requires greater activation and opportunities for community interaction along the northern elevation of Woolworths and the open carpark to enable improved function as a Main Street.</p>	<p>The proportion and length of retail and commercial interface along Azzurra Street has been extended to facilitate greater activation opportunities. While a continuous built form was explored, ultimately this had a significant impact on the configuration of the site including car parking area. Further, given the level difference to the north and absence of two-sided development along Azzurra Street (given adjoining King Neptune sculpture and future public open space), it was considered the optimal outcome to maximize activation to the east and particularly the west of the site, closer to the existing town centre and future commercial development to the west.</p> <p>Back of house areas of Azzurra Street (at the north-east corner of the development) have been reconfigured and shifted away from the parklet to allow for potential future retail (specialty) expansion.</p>	<p>A review of the proposed development fronting the intended main street has revealed that of the approximate 178 metres of frontage to Azzurra Street, the application proposes approximately 45 metres (25.2%) of un-activated frontage comprising of amenities and car parking. A total of approximately 119 metres (66.8%) of frontage is considered to be activated through the use of tenancy frontages, parklet, playgrounds and open air alfresco areas. The remaining 20m is excluded from consideration as this relates to the crossovers provided along this frontage.</p> <p>Table 1, Part 2, Clause 2.4 (j) outlines the consideration for any Local Development Plans to indicate dedicated car parking areas to be unobtrusively located so as to not dominate the streetscape. Expansive car parking areas are recommended to be screened behind building, and screened from prominent communal space and accessed via laneways. Whilst the proposal still includes 38.5 metres of car park frontage towards the main street, this is considered to have a minimal impact on the proposed main street design and allows for the use of landscaping and the inclusion of the heritage statuses to screen and provide a level of</p>

## ATTACHMENT 9

		<p>activation. Through the Draft Precinct C LDP, the applicant also intends to include an 'activated frontage' requirement adjoining this space which would facilitate any future development over this portion of the lot to be consistent with the existing office/commercial and specialty tenancies. Whilst the supermarket still provides an eastern frontage, this is not considered to inhibit or detract from the main street uses and enabled the parking areas to still be predominantly located or screened behind built form.</p> <p>In balance, the City considers that the proposal has appropriately achieved a main street design through activation of tenancies and open spaces along the Azzurra Street frontage.</p> <p>The City has no objection to the location of the back of house services.</p>
<p>The Panel considered that the newly introduced parklet 05 was isolated, uninviting to use due to co-location with BoH, and with minimal passive surveillance opportunities from adjacent land uses.</p>	<p>The back of house area has been reconfigured and end-of-trip facilities relocated to encourage greater use and pedestrian movement towards the parklet fronting Azzurra Street. A Woolworths office now located on the corner of Azzurra Street and the parklet to allow for windows and passive surveillance to this corner.</p>	<p>Modification supported.</p> <p>It is recommended the parklet design be considered through detailed landscaping plans as to how to incorporate the sites history.</p>
<p>The Panel suggested relocation of parklet 05 to the entry and main square area 06, and extension of the existing specialty retail along the northern building frontage to provide greater activation to Azzurra Street.</p>	<p>The main square (public realm nose) has been reconfigured to integrate better with the specialty retail, café and main entry to the supermarket. Relocating the amenities to Azzurra Street and adding the 'triangle shape' to Specialty 4 allows the length of the elevation to be increased. The additional glazing to this elevation encourages greater activation of Azzurra Street.</p>	<p>The City agrees with the Design Review Panel advice, however acknowledges that Parklet 5 is intended to be an interim solution for the site, with the intent being that this area will include future retail tenancies. The use as a parklet area in the interim is accepted, with the current level of activation to the main street being supported.</p> <p>Refer also comments provided above.</p>
<p>Consider temporary pop-up offices/community type uses to help</p>	<p>Noted, this will be considered as part of the tenancy leasing process.</p>	<p>See above for recommendation of how the parklet / main square areas.</p>



## ATTACHMENT 9

<p>activate the northern facing Azzurra Street floor space if required.</p> <p>The Panel acknowledged the café and adjoining alfresco as contributors to activating Azzurra Street as a community place, together with the direct views to King Neptune and proposal to add works interpreting the local heritage.</p>	<p>Agreed – the café and surrounding high quality landscape will deliver a significant contribution to the creation of a community meeting place. Inclusion of reference to the site history (heritage plaque and potential future public art) will also deliver a sense of place and character.</p>	<p>Heritage interpretation is reflected within the proposal through the inclusion of heritage signage located within the landscaped area at the north of the site adjacent to the Café and Specialty 4 building. The café itself proposes an open alfresco area and key public realm node which allows full view to the north towards the King Neptune statue. The proposal has also incorporated the use of three statues along Azzurra Street which were historically used as part of the former Atlantis Beach Marine Park development and intended to form part of a 'heritage trail' which will link to adjoining sites and King Neptune statue to the north. Additionally, the site incorporates a number of Washington Robusta, which whilst not native to the area were utilised within the former marine park and have been incorporated through the broader landscaping of the site. Such inclusions are considered to be consistent with the recommendations of a Category 4 listing.</p> <p>The City considers that the incorporation of the abovementioned heritage components provides sufficient acknowledgement to the history of the site and surrounding area. Notwithstanding, it is recommended that a condition be imposed to allow further consultation with the City's Heritage Officer to ensure appropriate signage, information and detail is included within these features.</p>
<p>The additional trees in the carpark are supported.</p>	<p>Noted – these have been retained as part of the lodged proposal.</p>	<p>No further comments.</p>
<p>As per Principle 1, improve the northern open carpark interface with Azzurra Street with soft landscape and opportunities for activation and community interaction, such as</p>	<p>Significant attention has been given to this interface and includes a reconfigured café with alfresco seating. The Landscape Concept Plan (Appendix D) illustrates numerous soft and hard landscaping features including</p>	<p>See point 1 above.</p>

## ATTACHMENT 9

public space infrastructure including seating.	statement and shade trees, a small parklet with turf space and seating areas and built-in decked seating.	
Improve the scale and aesthetics of the independent retail/commercial building to reflect its designation as a 'landmark structure' at the gateway to the development.	The size and length of the retail/commercial tenancy on Lisford Avenue has been increased along Azzurra Street to address this comment. The façade height has also been increased proportionally to elevate this landmark corner.	No further comments.  The increased size and prominence of the retail/commercial building is supported.
Improve the function and the public interface of the independent retail/commercial building 'landmark structure'.	This retail/commercial building is subject to the activation/glazing requirements outlined in the Draft Precinct C LDP. Specifically, glazing has been increased to improve the public interface.	No further comments.  Level of glazing and interaction supported.
Principle 5 – Sustainability. No comment.	While no specific comments were made by the Panel, the development incorporates a variety of sustainability elements. This includes opportunities for solar panels, water-wise landscaping, end-of-trip facilities, efficient heating and cooling and local construction materials. The design has also had regard to protect from harsh prevailing winds and weather conditions.	No further comments.
The alfresco/town square concept is supported, however consider restoring the former larger and enclosed U-shape that is col-located with the northern building entry and for enhanced climate protection.	In response to this comment, the 'U-shape' principle has been reintroduced. Further in response to DRP #1 comments, additional trees have been added to the carpark area to soften the area of hardstand and provide additional shading.	No further comments.  Additions and changes supported.
Provide a large-scale detailed plan to indicate the proposed public amenity, including street furniture, lighting, heritage interpretation, and landscape.	The lodged development application plans together with the Landscape Concept Plan (Appendix D) provides greater detail with respect to the proposed soft and hard landscaping works and heritage interpretation.	The proposal has also sought to utilise Washingtonia Palms which whilst not native to the area, represent and reflect landscaping which was consistent with the historical use of the site. This inclusion is welcomed and supported by the City.

## ATTACHMENT 9

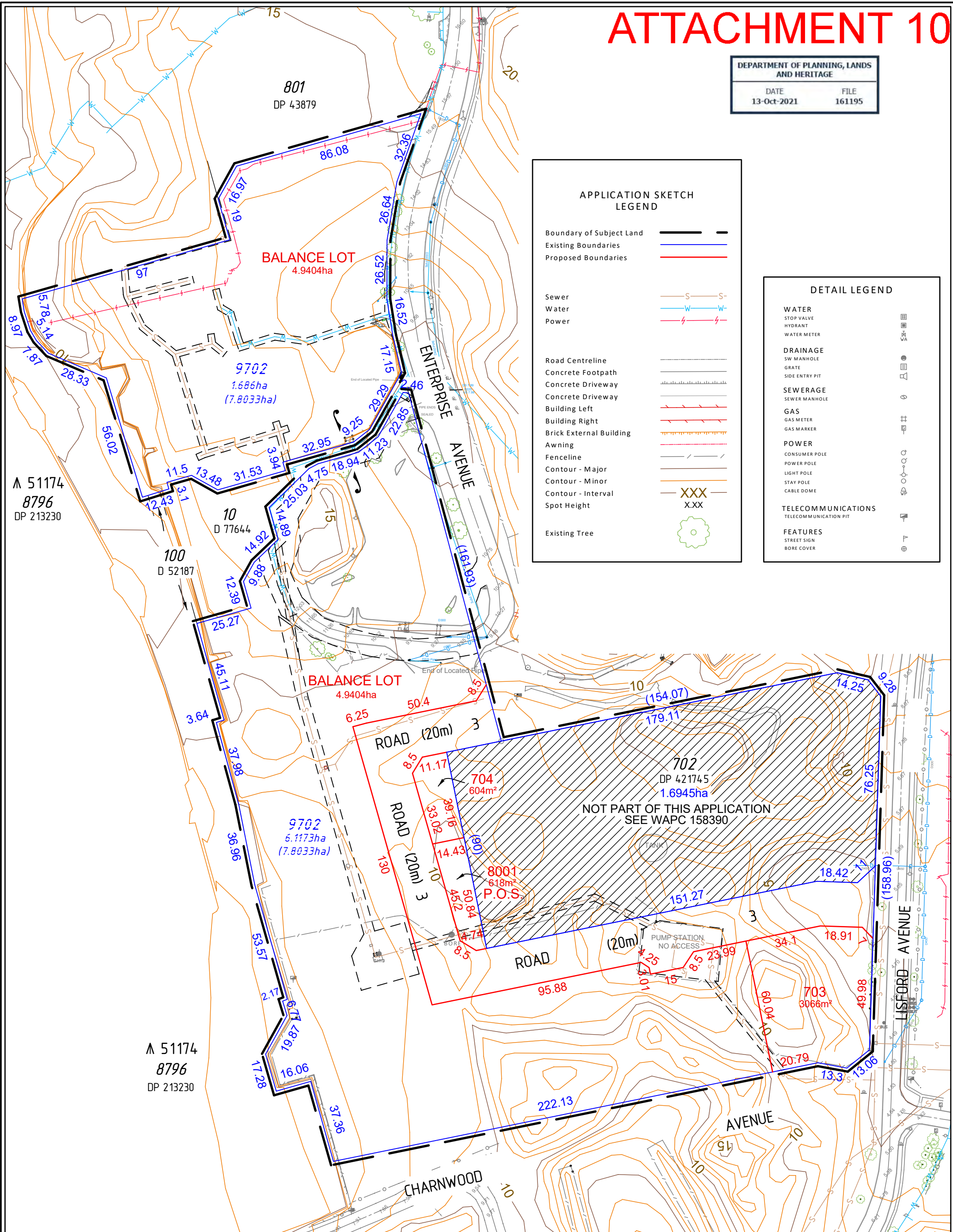
		The utilization of key public nodes and informal meeting spaces is supported, as is the inclusion of the heritage elements as explored in the comments above.
Improve pedestrian movement along the eastern side of Woolworths.	The footpath on the eastern side of the café has been reinstated to improve pedestrian movement.	No further comments. Inclusion supported.
Improve pedestrian movement along the eastern side of Woolworths.	A 'Shared Pedestrian/Vehicle' zone is shown on the development application plans. This is intended to be differentiated via surface treatment. While a variation to this level was explored to differentiate it from the car parking area, this variation is not ideal or suitable for safe trolley movement.	As above.
Reconsider the location of Parklet 05	This parklet has been reconsidered to improve the interface with Azzurra Street as well as the proposed future commercial development to the west of the site.	See point 3 above.
Improve the activation of Azzurra Street together with opportunities for community interaction.	The activation of Azzurra Street, particularly north-east of the supermarket has been significantly improved through the built form and landscaping response. This design is also mindful of the need to ensure safety for customers from vehicles entering/exiting the car parking area.	See points 1 and 3 above.
Engage a public artist to develop relevant local and coastal themes in an integrated and site-specific manner.	Noted – a potential location for a heritage plaque is shown on the development application plans. Opportunities to reference the local site history through Woolworth's public art contribution obligations are currently being explored. It is anticipated this will be confirmed through detailed design as a condition of development approval.	The City does not have any mechanisms to facilitate public art contributions for development applications.  Notwithstanding, and as outlined above, the proposal has appropriately considered and integrated heritage values into the design of the site. It is recommended that a condition be imposed to allow further consultation with the City's Heritage Officer to ensure appropriate signage, information and detail is included within these features.

## ATTACHMENT 9

<p>Evolve the lighter coastal colour palette throughout the proposal.</p>	<p>The colour palette has been reviewed to emphasise the turquoise blue favoured by the Panel. However, this required the grey background in order to be effective.</p>	<p>The proposal has undertaken progressive iterations with respect to the proposed colours and materials proposed, however has maintained the use of a dark grey colour palette.</p> <p>As recommended by DRP in both instances, the application should develop the building aesthetic through use of the coastal-style lighter colour palette and engage a public artist to interpret and integrate local and coastal themes in a creative manner.</p> <p>The proposal subject to this assessment has failed to address the City's and DRP's recommendation in relation to the colour palette, maintaining the dark tones which are not considered appropriate in the context of the site or surrounding area.</p> <p>Whilst building materials and colours will be considered within the Draft Precinct C LDP, it is recommended that in order to address this matter, that should the proposal be supported, a condition of approval be imposed requiring the applicant to submit a schedule of colours and materials to the City for endorsement, and thereafter implemented and maintained to the satisfaction of the City.</p>
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# ATTACHMENT 10

DEPARTMENT OF PLANNING, LANDS AND HERITAGE	
DATE	FILE
13-Oct-2021	161195



### APPLICATION SKETCH LEGEND

Boundary of Subject Land	
Existing Boundaries	
Proposed Boundaries	
Sewer	
Water	
Power	
Road Centreline	
Concrete Footpath	
Concrete Driveway	
Building Left	
Building Right	
Brick External Building	
Awning	
Fenceline	
Contour - Major	
Contour - Minor	
Contour - Interval	
Spot Height	
Existing Tree	

### DETAIL LEGEND

<b>WATER</b>	
STOP VALVE	
HYDRANT	
WATER METER	
<b>DRAINAGE</b>	
SW MANHOLE	
GRATE	
SIDE ENTRY PIT	
<b>SEWERAGE</b>	
SEWER MANHOLE	
<b>GAS</b>	
GAS METER	
GAS MARKER	
<b>POWER</b>	
CONSUMER POLE	
POWER POLE	
LIGHT POLE	
STAY POLE	
CABLE DOME	
<b>TELECOMMUNICATIONS</b>	
TELECOMMUNICATION PIT	
<b>FEATURES</b>	
STREET SIGN	
BORER COVER	

Λ 51174  
8796  
DP 213230

Λ 51174  
8796  
DP 213230

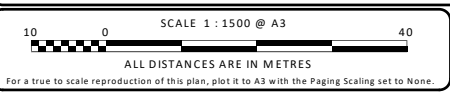
### SUMMARY

#10 Enterprise Avenue, Two Rocks	
Application Type	Subdivision
Parent Lot	9702
Parent Graphic	DP 402964
Certificate of Title	Volume Folio
Total Area	7.8033ha
Local Authority	City of Wannero
TPS	Marina
Zoning	N/A
Proposed No. of Lots	4

This plan, which was prepared by MNG for BLUEPORT DEVELOPMENT, shows the proposed subdivision of 9702 ON DP402964 and is intended to accompany an application to the Western Australian Planning Commission (WAPC) for approval to subdivide. All information relating to the subdivision, including lot dimensions and areas are subject to approval by the WAPC, the Local Authority and other servicing authorities having an interest in the land. Existing boundaries shown hereon are a graphical representation only, they have been extracted from Landgate's Spatial Cadastral Database, which is only a model of the cadastre, and has not been re-established by survey. MNG does not guarantee position unless stated otherwise. Existing easements, encumbrances and interests are not necessarily depicted on the plan and a current title search is recommended to check this information prior to sale and development of proposed lots. The use of this plan for other than the purpose for which it is commissioned is strictly prohibited. In particular, the information shown on the plan is not relied upon for financial dealings involving the land either in the whole or in the part. The contents of this plan are current and correct as of the date stated within the revision panel. All consultants and persons wishing to utilise this data should satisfy themselves of this plans currency by contacting the McMullen Nolan Group. Contours are compiled from MNG Survey Data and Landgate SLIP Data and are subject to change without notice. This plan is not to be distributed without this note, which is an integral part of the plan.



<b>PROPOSED SUBDIVISION</b>	
9702 ON DP402964	
#10 Enterprise Avenue, Two Rocks 6037	
CLIENT:	
<b>BLUEPORT DEVELOPMENT</b>	



FILES  
mncOGO-98401  
Control Register-98401  
File Name:-  
98401ap-013d.dgn



MC MULLEN NOLAN GROUP  
Level 1, 2 Sabre Crescent  
Jandakot, W.A. 6164  
PO Box 3126, Success  
W.A. 6964, Australia  
ABN 90 009 363 311  
Offices in: Broome, Bunbury, Kununurra, Newman, Port Hedland

Project Mgr:	Nigel Simpson	Datum:	PCG94
<b>98401 - 013 - C</b>			
Job Number	Plan Number	Version	



<b>NAME OF PLACE</b>	<b>Atlantis Marine Park (site)</b>
<b>Other names</b>	
<b>Address</b>	10 Enterprise Avenue
<b>Locality</b>	Two Rocks

<b>LAND DESCRIPTION</b>			
Reserve No:	Lot No: Pt Lot 50	Plan 14500	Vol/Fol: 1892-740
<b>GPS:</b>	31.496647°S 115.585230°E		

<b>HERITAGE LISTINGS</b>	
<b>inHerit database No</b>	17523
<b>Other Listing</b>	

<b>PLACE TYPE</b>	Urban Open Space
<b>ORIGINAL USE</b>	Aquatic theme park / zoo
<b>CURRENT USE</b>	Vacant
<b>OTHER USE</b>	

<b>CONSTRUCTION DETAILS</b>	
<b>Construction Date</b>	1981
<b>Walls</b>	N/A

<b>Roof</b>	N/A
<b>Other</b>	N/A
<b>Architectural Style</b>	N/A
<b>Physical Description:</b> Few remnants of the former resort remain extant. The dolphin sculptures and two large palms together with other remnant stone fabric is all that remains on the elevated site above the Two Rocks foreshore.	
<b>Condition</b>	Poor
<b>Integrity</b>	Low
<b>Authenticity</b>	Low

**HISTORICAL INFORMATION****Historical Notes:**

In 1969 The Bond Corporation Pty Ltd purchased 19,600 acres of pastoral property previously owned by the Wydgee Pastoral Company and proceeded to develop Yanchep Sun City as a satellite city and premier tourist resort in Western Australia.

By 1972 residential development was well underway, beginning with 127 lots on the beachfront and this was followed by a marina in 1973/74 and a shopping and recreation centre at Two Rocks. In 1981, following the announcement by the WA government, work began on the construction of Atlantis Marine Park with a \$20 million budget over five years. As well as a tourist destination the park was to be used to research marine life.

Sun City Pty Ltd were granted a licence by the Department of Fisheries and Wildlife to catch and keep local dolphins. The Atlantis Marine Park (fmr) included a series of pools, aquariums, a theatre, stadium, crazy golf course, trampoline park, a playground and landscaping.

A feature of the park was the 10m sculpture of King Neptune which was designed by local artist Mark Le Buse. Le Buse was also contracted to construct a number other prominent sculptures of celebrities and animals. The opening of the park was held on 26 December 1981 and by 1982 over one million visitors went through the gates. In 1983 Atlantis Marine Park received the Sir David Brand Tourism Award and a marketing excellence award.

The park closed in 1990 due to reduced numbers of visitors. Also changes requiring larger pools for the dolphins meant that the place became no longer feasible. Since then the park has been unused and subject to vandalism although some structures have been removed from the site. In 2015, some public access to the site has been granted to enable viewing of the restored 'King Neptune' sculpture.

**Historic Theme:**

Social and civic activities: sport, recreation and entertainment  
People: Famous and infamous people  
Occupations: hospitality industry and tourism

**Associations:**

Alan Bond;  
The Bond Corporation

**STATEMENT OF SIGNIFICANCE:**

- The place has historic value for its association with the development of Two Rocks as a tourist destination and residential subdivision

**LEVEL OF SIGNIFICANCE**

Little

**MANAGEMENT CATEGORY**

Category 4

**MAIN SOURCES:**

City of Wanneroo, Municipal Heritage Inventory, 2006.

**ADDITIONAL PHOTOGRAPHS**







<b>NAME OF PLACE</b>	<b>King Neptune Sculpture</b>
<b>Other names</b>	
<b>Address</b>	10 Enterprise Avenue
<b>Locality</b>	Two Rocks

<b>LAND DESCRIPTION</b>			
Reserve No:	Lot No: Pt Lot 50	Plan 14500	Vol/Fol: 1892-740
<b>GPS:</b>	31.496435°S 115.586356°E		

<b>HERITAGE LISTINGS</b>	
<b>inHerit database No</b>	17935
<b>Other Listing</b>	

<b>PLACE TYPE</b>	Other Built Type
<b>ORIGINAL USE</b>	Public art sculpture
<b>CURRENT USE</b>	Public art sculpture
<b>OTHER USE</b>	

<b>CONSTRUCTION DETAILS</b>	
<b>Construction Date</b>	1981
<b>Walls</b>	N/A
<b>Roof</b>	N/A
<b>Other</b>	N/A
<b>Architectural Style</b>	N/A

**Physical Description:**

Large stone statue of King Neptune located to the south east of the shopping precinct in an elevated position overlooking the ocean. Prominent landmark.

**Condition**

**Integrity**

**Authenticity**

**HISTORICAL INFORMATION**

**Historical Notes:**

The Atlantis Marine Park (fmr) site included a series of pools, aquariums, theatre, stadium, crazy golf course, trampoline park, a playground and landscaping. A feature of the park was the 10m sculpture of King Neptune which was designed by local artist Mark Le Buse. Le Buse was also contracted to construct a number other prominent sculptures of celebrities and animals. The opening of the park was held on 26 December 1981 and by 1982 over one million visitors went through the gates. In 1983 Atlantis Marine Park was awarded the Sir David Tourism for Tourism and a Marketing excellence award.

The park closed in 1990 due to reduced visitor numbers and requirements of larger pools for the dolphins therefore the place became no longer feasible.

In Roman Mythology 'Neptune' is known as the 'god of the Sea' (identified with as 'Poseidon' from Greek Mythology). Like Poseidon, he was also the god of earthquakes and horses. Neptune is believed to have power over the sea and seafarers and married the sea nymph Amphitrite. He is usually shown as a bearded man holding a trident and standing in a shell chariot being drawn over the sea by dolphins.

The Two Rocks, Yanchep Residents Association, a group which has a keen interest in local history have particular interest in the future of the King Neptune sculpture has cleaned and restored the sculpture.

**Historic Theme:**

Social and Civic activities: Sport, recreation and entertainment  
 People: famous and infamous people

**Associations:**

Mark Le Buse;  
 Alan Bond

**STATEMENT OF SIGNIFICANCE:**

- The sculpture is a landmark in the community of Two Rocks since 1982.
- The sculpture has historic value for its association with the development of Two Rock marina and the Atlantis Marine Park.

**LEVEL OF SIGNIFICANCE**

Considerable

**MANAGEMENT CATEGORY**

Category 2

**MAIN SOURCES:**

City of Wanneroo, Municipal Heritage Inventory, 2006.

**ADDITIONAL PHOTOGRAPHS**





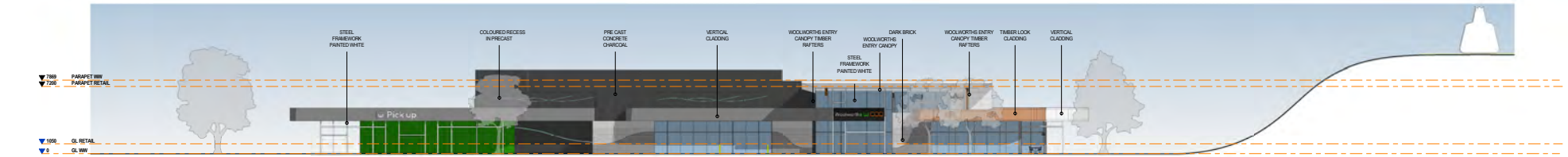
Section 03  
Drawings:  
Site Plan

DRP 25 March 2021

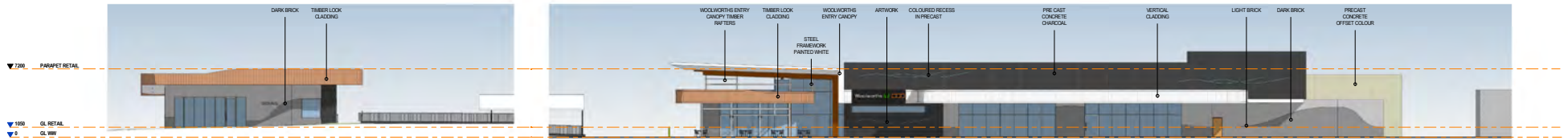


WOOLWORTHS SITE - STAGE 1	
--- SITE AREA	16829m <sup>2</sup>
WOOLWORTHS	3200m <sup>2</sup>
FUTURE EXPANSION - WOOLWORTHS	700m <sup>2</sup>
BWS	200m <sup>2</sup>
CAFE	120m <sup>2</sup>
SPECIALITY	240m <sup>2</sup>
<b>TOTAL AREA</b>	<b>4460m<sup>2</sup></b>
<b>PARKING REQUIRED</b> WV - 5 BAYS/100m <sup>2</sup> GLA	<b>223 BAYS</b>
<b>PARKING PROVIDED</b>	
GENERAL	213 BAYS
STREET PARKING	7 BAYS
PICKUP	6 BAYS
<b>TOTAL</b>	<b>226 BAYS</b>
LISFORD AVENUE DEVELOPMENT - STAGE 1	
--- SITE AREA	1451m <sup>2</sup>
RETAIL / COMMERCIAL	358 m <sup>2</sup>
<b>PARKING REQUIRED</b> 5 BAYS/100m <sup>2</sup> GLA	<b>18 BAYS</b>
<b>PARKING PROVIDED</b>	
GENERAL	15 BAYS
STREET PARKING	3 BAYS
<b>TOTAL</b>	<b>18 BAYS</b>
FUTURE DEVELOPMENT SITE	
--- SITE AREA	2516m <sup>2</sup>
ESTIMATE COMMERCIAL AREA	775 m <sup>2</sup>
ESTIMATE PARKING REQUIRED PARKING 5 BAYS/100m <sup>2</sup> GLA	39 BAYS
ESTIMATE PARKING PROVIDED	39 BAYS

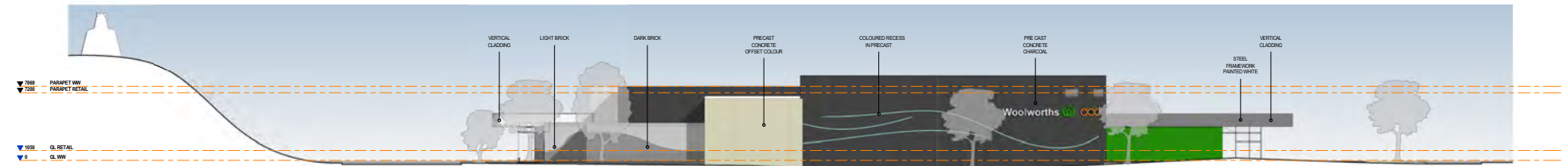
# Section 03 Drawings: Elevations



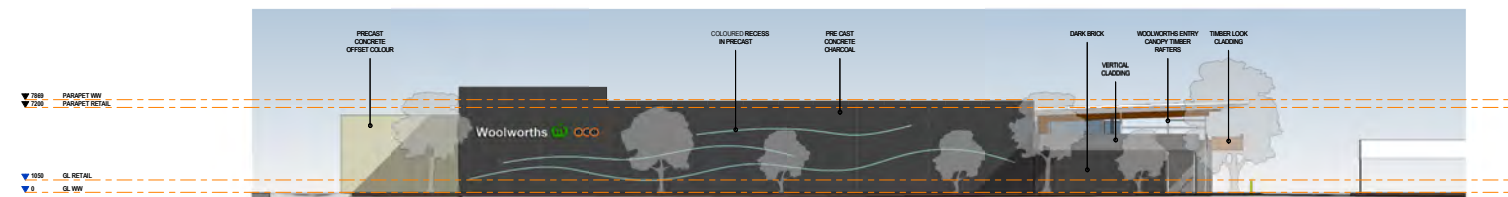
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2 - NORTH ELEVATION S2  
1:200

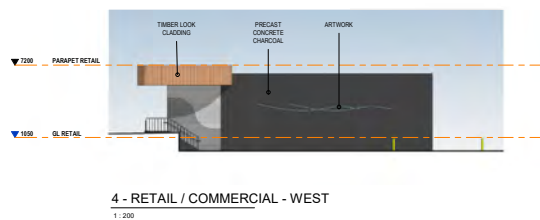
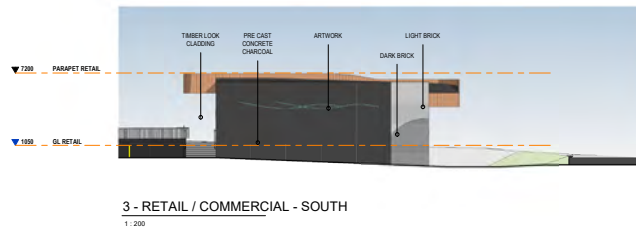
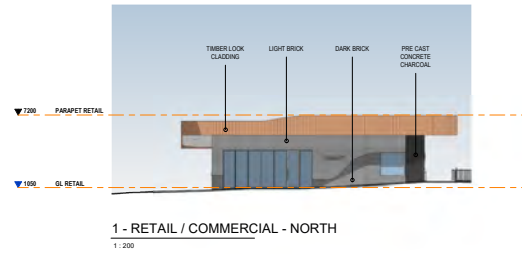


4 - WEST ELEVATION  
1:200



3 - SOUTH ELEVATION  
1:200

Section 03  
Drawings:  
Corner Retail-Commercial  
Elevations



Section 03  
Drawings:  
View from North East Corner









Section 03  
Drawings:  
View of Corner Retail/Commercial





Section 03  
Drawings:  
Site Plan



DRP 22 July 2021



**WOOLWORTHS SITE - STAGE 1**

WOOLWORTHS (WITH EXPANSION)	3600m <sup>2</sup>
WOOLWORTHS (WITHOUT EXPANSION)	2506m <sup>2</sup>
FUTURE EXPANSION - INCL OFFICE MEZZANINE	1100m <sup>2</sup>
CAFE	200m <sup>2</sup>
SPECIALITY 1	120m <sup>2</sup>
SPECIALITY 2	240m <sup>2</sup>
TOTAL AREA	4226m <sup>2</sup>
PARKING REQUIRED WV - 5 BAYS/100m <sup>2</sup> GLA	212 BAYS
PARKING PROVIDED	
GENERAL	219 BAYS
STREET PARKING	7 BAYS
PICKUP	6 BAYS
TOTAL	232 BAYS

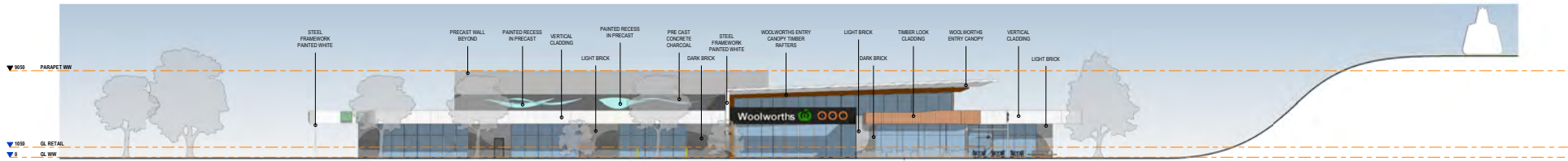
**LISFORD AVENUE DEVELOPMENT - STAGE 1**

RETAIL / COMMERCIAL	350 m <sup>2</sup>
PARKING REQUIRED 5 BAYS/100m <sup>2</sup> GLA	18 BAYS
PARKING PROVIDED	
GENERAL	15 BAYS
STREET PARKING	3 BAYS
TOTAL	18 BAYS

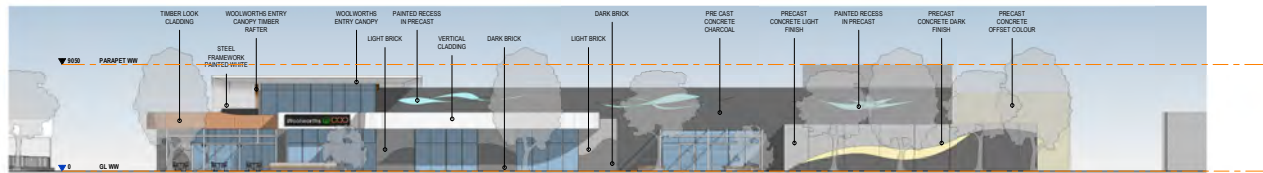
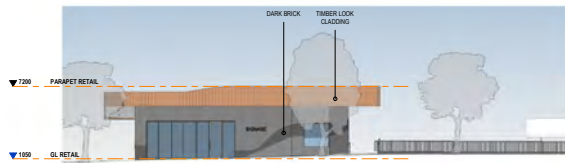
**FUTURE DEVELOPMENT SITE**

ESTIMATE COMMERCIAL AREA	775 m <sup>2</sup>
ESTIMATE PARKING REQUIRED PARKING 5 BAYS/100m <sup>2</sup> GLA	39 BAYS
ESTIMATE PARKING PROVIDED	39 BAYS

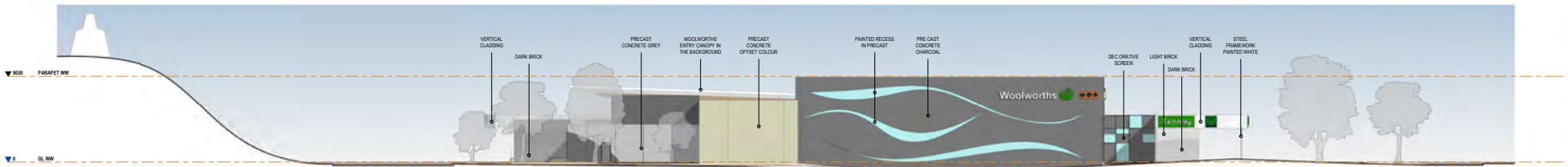
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Drawings:  
Elevations



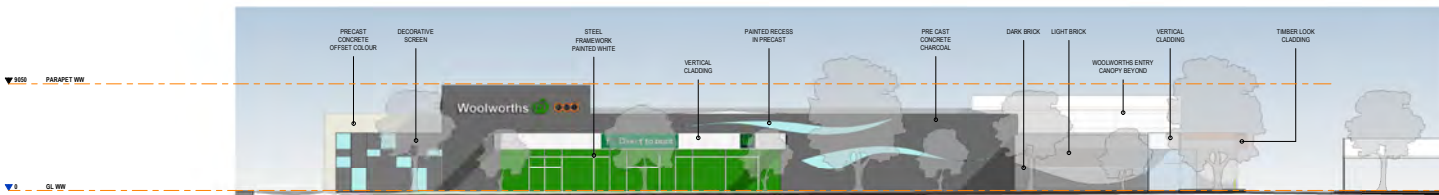
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2 - NORTH ELEVATION S2  
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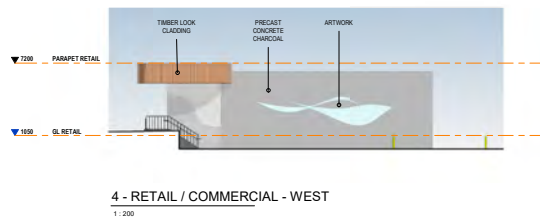
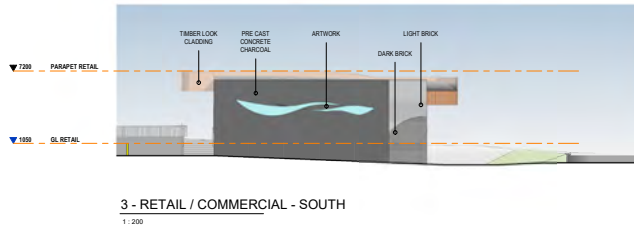
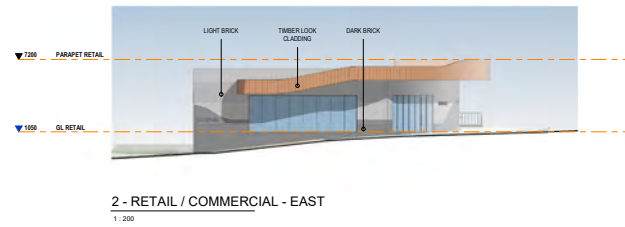
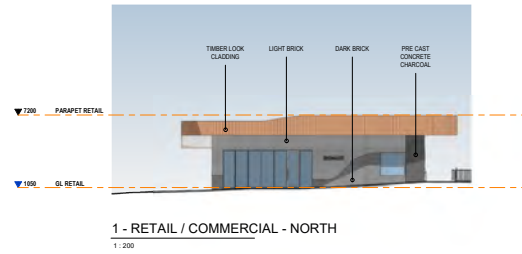


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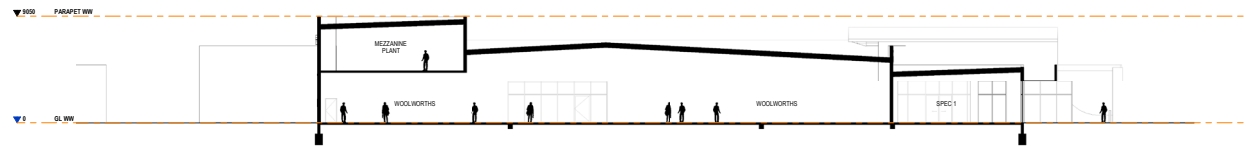


3 - SOUTH ELEVATION  
1:200

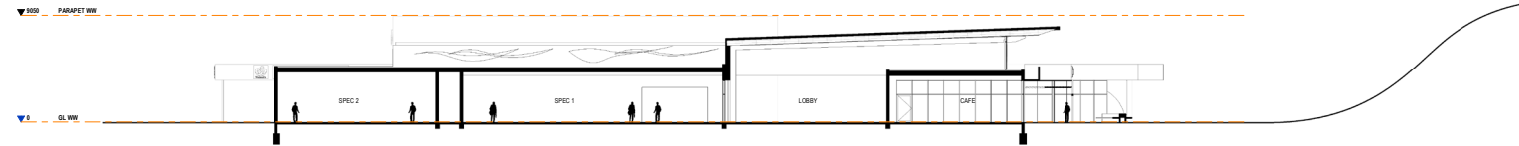
Section 03  
Drawings:  
Corner Retail-Commercial  
Elevations



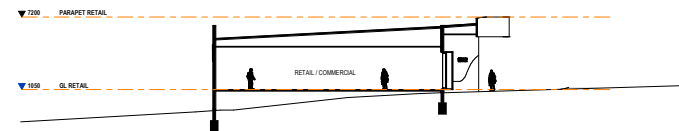
Section 03  
Drawings:  
Sections



SECTION A  
1:200



SECTION B  
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SECTION C  
1:200

Section 03  
Drawings:  
View from North East Corner









Section 03  
Drawings:  
View of Corner Retail/Commercial







