

**TABLE 2 – SHIRE OF JERRAMUNGUP LOCAL PLANNING STRATEGY
SUBMISSION NO. 18 - DEPARTMENT OF ENVIRONMENT AND CONSERVATION (DEC)**

Note: The DEC submission was 17 pages and makes detailed comments on each section and specific paragraphs in the Draft Local Planning Strategy.
Due to length and the nature of specific comments, a separate submission table for DEC has been compiled.

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
1.	Thank you for the opportunity for the Department of Environment and Conservation (DEC) to comment on the draft Local Planning Strategy (LPS) for the Shire of Jerramungup. The preparation of a strategy is strongly supported, particularly in view of the need to recognize the strategic location of Bremer Bay within the coastal vegetation corridor between Albany and Esperance (Attachments 1 & 2). The strategy will also be critical in the context of projections for local population growth which requires careful forward planning with regard to minimizing environmental emissions, in particular odour, noise and liquid/ solid waste.	Noted. No changes to the strategy text recommended. The Local Planning Strategy is an important strategic planning tool.
2.	DEC is very conscious that there are considerable conservation and departmental interests in the Shire with part of the outstanding Fitzgerald River National Park and several large nature reserves. DEC and its predecessors, the Department of Conservation and Land Management (CALM) and National Parks Authority, have all enjoyed a very long and harmonious relationship with the Shire since it was established in 1982. This has been largely through the presence of the Fitzgerald River National Park, the Shire's historical pioneer leadership in the land care movement (and natural resource management programmes), and through the South Coast Management Group which has always been strongly supported by the Shire.	Noted. No changes to the strategy text recommended.
3.	As a result of the above connections and other interactions, DEC has commented in detail on the draft LPS. The length of this submission should not be interpreted as a critical statement about the LPS but rather as a demonstration of the considerable interaction with the Shire over many years and the effort by DEC to provide positive input.	Noted. No changes to the strategy text recommended. The Shire welcomes constructive comments on the Draft Local Planning Strategy. The revisions made have been a compilation of work by Gray & Lewis and the Shire planner, Craig Pursey. Input into the revised strategy by other agencies is of paramount importance.

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4.	<p>Hopefully this will enhance the sound start provided by the current draft and in particular lead to a greater forward vision for the area's outstanding nature conservation and biodiversity values. Unfortunately, DEC did not exist at the time of preparation or endorsement of the previous Local Planning Strategy in 2006 and hence this is the first opportunity for the department to comment in a holistic manner on matters of conservation and environmental significance.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The original (existing) Local Planning Strategy was drafted by SJB Planners and then inherited by Gray & Lewis. Gray & Lewis finalised the existing Local Planning Strategy on the Shires behalf.</p> <p>The Shire only requires approval of the WAPC for the changes it has made to the 2006 Local Planning Strategy. Whilst it is unfortunate that DEC was not involved in the original 2006 Strategy, it needs to be recognised that the Shire has limited resources and budget which dictates the extent of the limited review. The Shire does not have an environmental officer however where possible, the revised strategy includes updated information that was readily accessible.</p> <p>The Shire has not made substantial changes to the environmental sections of the Strategy which were already approved in 2006. The Shire concentrated it's resources on refining mapping for long term growth, and updating the strategy to include recent scheme amendment proposals and approved subdivisions.</p> <p>Council has the ability to consider refinements to the Strategy with input by DEC.</p>
5.	<p><u>Structure of report</u></p> <p>The LPS is well structured and presented in a style which is easy to read. However, subject to the omissions mentioned below and the need to avoid some duplication, some further re-structuring may be necessary. Overall a good balance of content and detail appears to have been achieved in most sections, but in others there may be over-use of largely out-dated information and data. Figures 15, 18, 19, 20, 28, 29 and 30 are particularly useful as they show the contextual setting for the various town-sites and associated development zones.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The structure of the overall strategy was approved in 2006, and only a limited review of the Strategy was conducted in accordance with the Shires available resources. It needs to be recognised that the Shire is working with an existing approved document, which is different to writing a new Local Planning Strategy. The Structure has already been approved by WAPC and to a large degree has already been set.</p>

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6.	<p>Although there are intermittent references to vegetation 'corridor' linkages in the LPS, these are generally only made in a local context. The south west of Western Australia is the most important global biodiversity hotspot in Australia and reserves within the Shire of Jerramungup, including the Fitzgerald River National Park and Corackerup Nature Reserve, are hotspots within the larger south west global hotspot.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The Strategy focuses on the local context as it is a Local Planning Strategy; however it recognises that Fitzgerald River National Park is significant in both Australia and internationally. The Strategy recognises that Fitzgerald River National Park is one of the largest national parks in Australia, and that the park is an internationally recognised Biosphere Reserve under the UNESCO Man and Biosphere Program (section 5.6.1 of the Draft Local Planning Strategy).</p>
7.	<p>Significant macro corridors also occur within the Shire, notably the coastal corridor from Albany to Esperance, the Corackerup corridor which runs from just south of Jerramungup to the mouth of the Pallinup River and the Fitzgerald River corridor between the Fitzgerald River National Park and Lake Magenta Nature Reserve.</p>	<p>Upheld. It is recommended that the Strategy be modified to include this statement (G), under section 6.12.4.</p>
8.	<p>The coastal corridor is particularly important as it runs virtually unbroken except for the 'pinch point' and narrow break in continuity around Bremer Bay (Attachments 1 & 2). The LPS should therefore more prominently recognize or acknowledge:</p> <p>:</p> <ul style="list-style-type: none"> • The general biodiversity significance of the SW Land Division • The specific importance of major protected areas such as the Fitzgerald River National Park • The importance of conservation connectivity across the landscape especially when linking areas which have high conservation significance in their own right • The strategic location of Bremer Bay at the weakest point in the priority coastal corridor between Albany and Esperance, and • The resultant need to minimize further weakening of the coastal linkages and to enhance vegetation connectivity through and around Bremer Bay as a fundamental principle of the LPS 	<p>Noted. No changes to the strategy text recommended.</p> <p>The Strategy is a broad document and recognises the importance of establishing a representative system of conservation reserves, buffer areas and corridor links (in section 6.13.1).</p> <p>The DEC view is understood, however the level of detail on vegetation corridors may be more appropriate at a regional level. Issues such as corridor links and vegetation corridors are only one aspect of the Strategy that needs to be balanced with the permissible development in the relevant zone and need to accommodate population growth.</p> <p>It is considered that the Strategy does recognise the importance of Fitzgerald River National Park, and protection is intrinsic in the fact that it is a National Park reserved Recreation and Open Space in the Shires Local Planning Scheme No 3 ('the Scheme').</p>

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8.	8. continued.	<p>The majority of areas covered by the Local Planning Strategy maps are cleared and / or require Structure Plans. Vegetation links, protection and corridors can therefore be examined as part of the structure plan process. The Shire has a sound working relationship with DEC and will continue to liaise with DEC over these issues as part of the normal planning process.</p> <p>It is recommended that an additional point be included for Strategy 1 Bremer Bay under section 8.1.4 to state “<i>Maintain a high level of consultation with DEC over structure plans, and examine opportunities for vegetation corridors and conservation connectivity.</i>”</p>
9.	As indicated in the current draft, both Jerramungup townsite and especially Bremer Bay are anticipated to expand significantly during the 30 year projection period of the LPS. Since their original establishment, both centres have evolved in a rather <i>ad hoc</i> manner with minimal formal long term forward planning.	<p>Noted. No changes to the strategy text recommended.</p> <p>It is not agreed that Bremer Bay and Jerramungup have developed in an <i>ad hoc</i> manner and without forward planning. The Shire has developed a number of strategic planning documents including the Point Henry Limited Rural Strategy and then the 2006 Local Planning Strategy.</p> <p>The Shires existing Local Planning Strategy (2006) approved by the WAPC provides a sound strategic base for future planning, and informed the current zones in the Shire of Jerramungup Local Planning Scheme No 2 (“the Scheme”).</p> <p>The Shire has also developed a number of significant local planning policies to guide development.</p>
10.	If the two towns are to grow as predicted, it will be critical to address not only the location of land for further residential expansion but, more importantly, the location and standard of associated infrastructure and services required to enable expansion in a manner that embraces current day requirements for issues such as environmental emissions including odour, noise, liquid and solid waste management, as well as the aesthetics of community recreation and amenity.	<p>Noted. No changes to the strategy text recommended.</p> <p>The Local Planning Strategy examines areas for short, medium and long term residential expansion. The location of some existing infrastructure has been examined as part of the Strategy review. For example, the effluent ponds for Jerramungup are discussed in section 8.2.2.1.</p> <p>Servicing will have to also be examined as part of scheme amendments and structure plans for different areas.</p>

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10.	<p>10. Continued.</p> <p>Current waste or emission management systems such as effluent ponds and land fill sites will need to be re-thought and probably re-located to serve contemporary community expectations and public health standards over the coming decades. About 5 years ago Hopetoun experienced similar challenges and cross references to processes that occurred there may be of some value in the Jerramungup LPS.</p>	
11.	<p>Currently, there is a community driven process being instigated to formally expand the current Fitzgerald River National Park Biosphere Reserve (Man and the Biosphere Programme, UNESCO) to become a larger Fitzgerald Biosphere Reserve that would incorporate the Shire of Jerramungup and most of the Shire of Ravensthorpe.</p> <p>Whereas neither DEC nor the Jerramungup Shire Council have initiated this concept, both agencies have been involved in the initial discussions.</p> <p>If such a concept eventuates it would clearly occur within the early stages of the new LPS over the next few years. The LPS would certainly need to recognize and complement any such biosphere reserve status, not only in terms of natural biodiversity but also in the context of sustainable and healthy living for the community.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The Local Planning Strategy may require minor updates and reviews from time to time. Gray & Lewis does not recommend that the Strategy be a static document, as the Shire can continue to undertake minor reviews as required, to respond to changes in circumstances.</p>
12.	<p>There is no list of the references cited in the text. This list needs to be visible. Some additional references have been included towards the end of this letter.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>There is no set format for Local Planning Strategies and the existing 2006 Local Planning Strategy did not include a reference page. Any references in the Strategy are included as footnotes throughout the document. Substantial sections of the existing approved Strategy remain unchanged. As previously discussed, the 2006 Strategy was drafted by a different consultant so Gray & Lewis does not have a list of references.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
	DEC has provided specific comments on each section of the Strategy as follows:	
1.0 INTRODUCTION		
13.	As indicated above, the fundamental significance of the Jerramungup Shire in its context as part of a global biodiversity hotspot is currently omitted from the introduction. There is also no mention in the introduction of the globally significant Fitzgerald River National Park Biosphere Reserve, which is partially located within the Shire boundaries, or the current community aspirations for extension of the biosphere into the balance of the Shire. If the Shire of Jerramungup is supportive of that concept then a statement to that effect should be considered for inclusion in the LPS. (please note that DEC is not necessarily advocating such an extension but simply pointing out that this is an apparent omission from the LPS if the shire supports such a proposal).	<p>Noted. No changes to the strategy text recommended.</p> <p>The introduction to the Local Planning Strategy is deliberately brief and its main purpose is to (1) explain what a local planning strategy is and (2) explain the main catalyst for conducting a limited review of the existing approved Local Planning Strategy.</p> <p>It is not considered necessary to include reference to Fitzgerald National Park in the introduction to the Strategy, as it is discussed in other more relevant sections of the Strategy text. The importance of the Fitzgerald National Park is not diminished by this.</p> <p>It is noted that DEC has different priorities however the introduction of the document simply explains what the document is.</p>
14..	<p>1.1 Page 1 Paragraph 1. Add a sentence:</p> <p><i>This is especially important in the Shire of Jerramungup as it is located within one of the world's top biodiversity 'hotspots' and it contains within its boundaries numerous species of threatened or protected flora and fauna as well as around half of the internationally recognized Fitzgerald River National Park, a UNESCO Biosphere Reserve.</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>As per M above, environmental issues and the national park are discussed elsewhere in the document and do not need to be included in the introduction of the Local Planning Strategy. This does not diminish the importance of flora, fauna and national parks.</p>

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15.	<p>1.2 Page 1 List of important factors. Add a new first factor:</p> <p><i>1. Increased recognition of the international importance of the Shire in terms of its outstanding biodiversity, particularly in the Fitzgerald River National Park, other DEC managed reserves and the coastal vegetation macro-corridor connecting Albany and Esperance.</i></p> <p>The latter is a generic factor with relevance across the Shire and hence should be listed first. The other factors currently within the list are more specific eg industrial land, public drinking water, potential Wellstead mine development etc.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>Section 1.2 of the Draft Local Planning Strategy provides a brief explanation of some of the factors that necessitated a limited review of the Shires Local Planning Strategy, such as the need to identify industrial land and scheme amendments.</p> <p>The increased recognition of the Shires biodiversity was not one of the planning issues that instigated the limited review.</p> <p>The purpose of section 1.2 was just to provide some background information and context. It is not intended to encompass all issues.</p>
16.	<p>1.3 Page 2 Dot point 3 (add underlined words)</p> <ul style="list-style-type: none"> • <i>To protect and encourage the viable use and development of <u>cleared</u> land for traditional farming and agricultural purposes in ways which retain environmental and conservation values.</i> <p>'Development of land' with no reference to it being cleared could imply that the strategy encourages development of un-cleared native vegetation to achieve such objectives.</p>	<p>Upheld. It is recommended that dot point 3 under "the objectives of the Strategy" be modified to refer to cleared land.</p>
17.	<p>An additional objective with regard to protection of biodiversity and connectivity conservation eg. macro corridors, local scale corridors and stepping stones of remnant native vegetation, should also be considered for addition.</p>	<p>Upheld. The Strategy objectives include reference to providing for more intensive landuses in an environmentally suitable area and to accommodate development without environmental degradation.</p> <p>This could be strengthened by including a new objective "<i>To protect and enhance the key natural, cultural and biodiversity assets of the Shire.</i>"</p>
18.	<p>There is no prominent reference in the objectives to values of the coastal zone (which is generally is considered to be approximately 5 kilometres from the low water mark landward and seaward to the three nautical mile State limit, <i>Southern Shores 2009-2030 – Coffey Environments and South Coast Management Group, 2009</i>). Irrespective of land tenure the coastline is a significant resource and specialist skills are required to manage its use... and any abuse.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The coast in the Shire is described in section 6.9.2 and reference is made to the Jerramungup Coastal Management Plan.</p> <p>The Strategy cannot summarise all of the coastal documents, so instead makes reference to them under Section 6.9.1. The Southern Shores 2009-2030 document is listed and included in section 9.9.1.</p>

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		<p>It is considered that the Strategy makes sufficient mention of the coast, and it recognises that there is a wide range of groups and agencies involved in planning for aspects of the marine environment.</p> <p>These documents and references become outdated, revised and replaced from time to time, so it is considered adequate to simply list them. A similar approach has been taken with State Planning Policies which has been supported by WAPC. The Strategy would become too lengthy if every document relevant to the Shire had to be summarised.</p>
2.0 STATE AND REGIONAL PLANNING CONTEXT		
19.	<p>Under 'State and regional Planning Context' section 2.2 Pages 3/4. It is pleasing to note reference to the State Environmental Principle and the first relevant action in the State Planning Strategy for the Great Southern Region regarding environmentally significant areas. The comments made above with regard to sections 1.1, 1.2 and 1.3 refer.</p>	Noted. No changes to the strategy text recommended.
3.0 LOCAL GOVERNMENT CONTEXT		
20.	<p>Under Local Government Context 3.1 Page 5 final paragraph. It is good to see this vision including the natural environment. It would be improved by a simple addition:</p> <p><i>The Shire of Jerramungup will provide leadership to maintain our identity by promoting social and economic development whilst embracing <u>and protecting</u> our unique natural environment.</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>Section 3.1 lists the Key Focus Areas extracted directly from the Shires Strategic Plan. As the text simply reflects the existing strategic plan, the key focus area wording cannot be changed. Existing key focus area 2 of the strategic plan already has emphasis on the environment.</p> <p>The DEC comment is actually on the wording of the strategic plan, not the Strategy.</p>

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20.	<p>20. continued</p> <p>Under Local Government Context 3.2 Page 6. Key Focus Area Two Once again, more specific commitment to protect environmental values including biodiversity and conservation is missing. Suggest a new <i>Key Focus Area Two; Environment and Conservation</i> with 'Service delivery' being separate or amalgamated with Key Focus Area Three <i>Building and road infrastructure</i>.</p>	<p>Noted. No changes to the strategy text recommended. - aAs per above.</p> <p>The DEC comment is actually on the wording of the strategic plan, not the Strategy.</p>
4.0 PROFILE AND ISSUES		
21.	<p>Under 'Profile and Issues' section 4.1 Page 7 Paragraphs 1 and 2 might be better reversed in order.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>Gray & Lewis disagrees with DEC's suggestion. The first paragraph explains when the Shire was created and its area. The second paragraph explains the location and includes a location plan.</p> <p>The value of this level of detailed comment in terms of environmental issues is unclear.</p>
22.	<p>Under 'Profile and Issues' 4.2.1 Page 9 Para 2. Final sentence. There is reference elsewhere (page 10) to the Bark Hut near the estuary. If this is still standing, maybe the final sentence of paragraph 2 should be amended: <i>This is the only <u>substantial</u> building remaining etc...</i></p>	<p>Noted. No changes to the strategy text recommended as the existing strategy wording is correct. Section 4.2.1 provides a brief history of the Shire and has been carried over from the 2006 Strategy.</p> <p>The bark hut is only mentioned in a separate section 4.2.2 as it was on the Shires Municipal Inventory. Gray & Lewis is of the understanding that the bark hut no longer exists. The DEC interest in the history section of the Strategy is unclear.</p>
23.	<p>Under 'Profile and Issues' 4.4 Page 12</p> <p>There are some important generic issues in the subsections of Section 4.4 which need addressing at a more strategic level and these are associated with the projected 30 year growth particularly of Jerramungup and Bremer Bay.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>Section 4.4 provides background information on the settlement pattern and infrastructure for Jerramungup townsite, Bremer Bay townsite and some brief mention of other settlements. The majority of this section was carried over from the 2006 existing approved Local Planning Strategy.</p>

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24.	<p>There needs to be a Shire Waste Management Strategy which addresses in particular:</p> <ul style="list-style-type: none"> • Solid waste – including waste generation predictions, infrastructure such as transfer stations, site closures and consolidation (eg lifespan of existing Jerramungup land fill facility) • Liquid wastes – including sewage, sullage/pump outs, infrastructure such as ponds (existing ponds need to be assessed for current compliance and upgrades planned to meet future capacities) • Odour buffers which are critical and very hard to retro-fit to meet current day standards. Need to plan for future expansions as both town-sites and the smaller settlements grow or in-fill occurs • Expectations of new generations of residents regarding contemporary odour management and health standards <p>It is recommended that the proposed Shire Waste Management Strategy should be at least taken to advanced draft stage prior to further work on this draft LPS as it will need not only to ‘inform’ but in some cases ‘determine’ future residential and other land use expansion during the lifetime of the LPS. As suggested earlier, this issue needs to be raised in the Introduction Section 1.0. There is reference to a ‘regional waste management strategy’ on page 70 but it is not clear if that is for the Bremer Bay sub-region, the Shire or several shires.</p>	<p>Noted. No changes to the Strategy Text recommended.</p> <p>The Shire carefully and responsibly manages existing infrastructure such as the effluent ponds in Jerramungup which are independently audited, therefore it is not considered necessary for any waste management strategy to be incorporated into the Strategy.</p> <p>Issues such as odour buffers have already been discussed with Department of Planning, and relevant buffers are shown on the strategy maps (eg WWTP).</p> <p>New areas flagged in the Strategy for potential future zoning changes are mainly west of Bremer Bay and not located near any waste areas.</p>
25.	<p>Under section 4.4.1 Page 13. Paragraph 2. The strips of Parkland and Recreation Reserve also provide habitat for native wildlife (both flora and fauna).</p>	<p>Noted. No changes to the strategy text recommended.</p>

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26.	<p>Other comments relating to Section 4.4.1 are essentially addressed in the comments on Section 4.4 above. If the above advice to prepare a draft Shire Waste Management Strategy is <i>not</i> accepted then some of the issues requiring clarification and/or action within Section 4.4.1 include:</p> <ul style="list-style-type: none"> • Jerramungup currently has three DEC registered sewage oxidation ponds but only two are shown on the plan • Any expansion or other works on these ponds will require a DEC Works Approval • Re-defined buffers may need to be set for all ponds and any effluent disposal sites • Clarification is required between storm-water ponds, irrigation ponds and leachate evaporation ponds <p>If required, further clarification of the above list may be sought from Caron Goodbourn at the DEC Albany Office.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>Information on the ponds has already been included in section 4.4.1 in more detail than the 2006 Local Planning Strategy. This level of detail is considered sufficient for the Local Planning Strategy.</p> <p>If the Shire undertakes any works then any separate legislative requirements, such as works approval, would be met.</p>
27.	<p>4.4.2 Page 15. It is noted in paragraphs 8 and 9 that the population of Bremer Bay is expected to double and that seasonal holiday visitation is likewise expanding. Due to constraints on space available this could result in lengthening of the peak holiday period. Under both scenarios there are major ramifications for waste management and the questionable ability of the current facilities to adequately cope. The Bremer Bay Caravan Park is a case in point where upgrades are required regarding on-site sewage under a DEC Works Approval. This matter is currently under direct discussion between the Shire and DEC.</p>	<p>Noted. No changes to the strategy text recommended.</p>
28.	<p>Page 16. Paragraph 3. It is stated that the Education Department plans to expand the Bremer Bay Primary School in the near future. This will need to be done in the context of minimizing loss of the existing bushland linkages through and around the proposed future civic centre development, for example by extending southwards towards the old cleared oval.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The Shire may not have any control over development of the school, as it would likely be exempt from planning approval as a 'public work' under the Public Works Act 1902. Any clearing would come under jurisdiction of DEC and relevant environmental legislation.</p>

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29.	Dot points 5 and 6 of the final list on page 17 also refer. This issue will be discussed later in this letter in the context of Section 8.1.3.1.	Noted. No changes to the strategy text recommended.
30.	Page 17. Paragraph 2. The Bremer Bay waste transfer station is currently not registered with DEC, but may need to be. Any upgrades or expansion will require a DEC Works Approval. Council will need to confirm the design and waste throughput capacity. If there is a throughput of more than 500 tonnes per annum registration will be required.	Noted. No changes to the strategy text recommended. This is a separate issue to the Strategy.
31.	4.4.3, 4.4.4 and 4.4.5 Page 18. Solid waste/landfill issues need addressing at all three sites. Current DEC registered land fill sites exist but are not mentioned in the LPS. If such sites are now 'closed' formal requests to revoke their registration is required.	Noted. No changes to the strategy text recommended.
32.	4.4.6 At Miller's Point the Shire of Gnowangerup previously maintained one shack for a resident 'caretaker'. When the Shire of Jerramungup was created in 1982 this arrangement was continued. If such an arrangement still continues it should be mentioned in the LPS. Both Dillon Bay and Miller's Point settlements will also need to be addressed in the proposed Waste Management Strategy.	Noted. No changes to the strategy text recommended. These matters are already addressed through Local Planning Policy No 7.
33.	4.5 Page 19. In the 5 th paragraph there is reference to Point Ann. Whereas Point Ann is generally perceived to be integrated as part of the tourism and recreation options for Jerramungup, it is actually located well within the Shire of Ravensthorpe. Likewise the comment regarding extension of a coastal walk trail to Bremer Bay is also misleading as the section through the national park would also lie within the Shire of Ravensthorpe.	Noted. No changes to the strategy text recommended. The Strategy makes reference to Point Ann in context of the state government plans for road sealing, and is not implying point Ann is in the Shire of Jerramungup.

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34.	4.5 Page 19 Paragraph 5. Is the 'Leeuwin Way' still used as a concept? The 'Way' was promoted in the 1970's and early 1980's but probably not since. The only reference on <i>Google</i> is for a take away outlet of that name in Abbey, near Busselton.	Upheld. Recommend delete paragraph 5 as reference appears obsolete. Paragraph 5 currently states " <i>Bremer Bay is included on the 'Leeuwin Way' Tourist Route, which seeks to promote the South Coast as an alternative to the northern alternative through Kalgoorlie for east-west tourist traffic.</i> "
5.0 THE ECONOMY AND ENVIRONMENT		
35.	5.2 Page 23. The opening paragraph needs up-dating. The Department of Environmental Protection no longer exists but if the reference to 'DEP 2000' is to remain you should insert 'former' into the associated text. However, aquaculture is no longer licenced by DEC but rather by the Department of Fisheries.	Upheld. This information was carried over from the 2006 Strategy and it is recommended that the opening paragraph be deleted which currently states: "The <i>Referral of Aquaculture Proposals to the EPA</i> (DEP 2000) prepared by the Department of Environmental Protection provides guidance on aspects of aquaculture including: <ul style="list-style-type: none"> • referral of proposals for assessment under S. 38 of the <i>Environmental Protection Act 1985</i>, (EP Act); • when works approval and licences are required under Party V of the EP Act; • information required to assess proposals; and • guidelines to minimise environmental impacts" It can be replaced by the following: "The regulation of aquaculture activities is provided for in the <i>Fish Resources Management Act 1994</i> and the <i>Fish Resources Management Regulations 1995</i> and licences are administered by the Department of Fisheries. "
36.	5.2.2 Page 24. While proposals for on-farm aquaculture may be referred to DEC, the department would only comment on issues such as potential impact upon native vegetation, potential for emissions and visual impacts if located within the view shed of national parks. As indicated above, DEC does not formally licence such proposals.	Upheld. As per above the reference can be updated to explain that licences come under Department of Fisheries.

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37.	<p>5.2.3 Pages 24/25. In other areas such as Margaret River where wine grapes are grown, the most contentious issues tend to be noise impacts, particularly from bird scaring devices and from night-time harvesting, and also water use. If horticulture and viticulture do expand in the Shire a specific Local Planning Policy may need to be developed to address emissions and noise as well as external impacts such as those mentioned in the LPS originating from agricultural spray drift as well as potential impacts from smoke resulting from prescribed burning on Crown lands. The latter potential impact is usually included along with other potential impacts in a Section 70A notification on new titles prior to formalisation of new sub-divisions.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The Strategy recognises this in the following ways:</p> <p>A. Paragraph 7 under section 5.3 states that horticulture and urban development are not compatible, with reference to EPA buffer requirements.</p> <p>B. There is recognition of a 500 buffer for the winery in Bremer Bay illustrated in Figure 19.</p> <p>In addition to the above, the Shire would have regard for landuse compatible as part of standard planning assessment for any development proposal.</p>
38.	<p>5.5 Page 26. Paragraph 2. As previously advised by DEC during the preparation of the Shire's Local Planning Policy on carbon sequestration plantations:</p> <ul style="list-style-type: none"> • A clear distinction needs to be made between such plantations and agro-forestry or harvest destined tree plantations. Carbon plantations for a minimum period of 70 years are essentially a permanent change of land use in the context of our lifetimes. This is more than twice the 30 year time frame of this LPS for example. • Whereas some environmental benefits may occur there are a number of issues that still require consideration and management. These include potential for weed spread including possible invasion by self seeding from the non-endemic plantation species, the harbouring of feral animals and the necessity for all fire protection measures to be undertaken within the plantation itself and not be assumed to be permissible on neighbouring properties or Crown lands. 	<p>Noted. No changes to the strategy text recommended.</p> <p>Gray & Lewis agrees with DEC comments that there are core differences between carbon plantations and traditional harvesting plantations, however the DEC does not appreciate that the Shire is somewhat fettered by the landuse definitions in the Model Scheme text. There is difficulty in trying to separate plantations which harvest and those which do not harvest. Many carbon sequestration applications keep the option of harvesting open.</p> <p>These landuse definition issues have been examined separately by the Shire and form part of omnibus scheme amendment number 5. Landuse definitions do not need to be incorporated into the strategy.</p> <p>Issues relating to carbon sequestration and plantations have been addressed through the Shires Local Planning Policy.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
39.	<p>Page 26 Paragraph 6. Suggest last line be amended to re-iterate the points made above: <i>‘...whilst looking towards the negative impacts, including impacts upon adjacent or nearby un-cleared public and private land as well as loss of population and the subsequent social issues for the Shire’.</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>This is already addressed through the Shires Local Planning Policy.</p>
40.	<p>5.6.1 Page 27 Fitzgerald River National Park. 1st sentence <i>‘...east of Jerramungup turning south along Quiss Road from the South Coast Highway.’</i></p>	<p>Upheld. Recommend minor change to better describe the road location of Fitzgerald River National Park.</p>
6.0 PHYSICAL FEATURES AND THE ENVIRONMENT		
41.	<p>6.2 Page 30 Paragraph 5. The reference to ‘economic yields of <i>Pinus pinaster</i>’ sounds to be quite dated. The following statement equating Bremer Bay with the Mount Barker area for vineyard production may also be overstated. In any case other factors than climatic similarity would apply including soil types, water quality, coastal proximity <i>etc.</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>This section of the Strategy has already been approved and no changes are proposed. The Strategy has been referred to DAFWA for comment.</p>
42.	<p>6.2 Page 31 Table 6. has no source or date references.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>As explained previously, the original 2006 Draft Strategy was conducted by a different planning consultant therefore the source of some information is not known by Gray & Lewis. The information is contained in the existing approved document and the review is limited.</p>
43.	<p>6.4 Page 32 Table 7. This is referenced as 17 years old. It may be necessary to check that the data is still valid.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The information is contained in the existing approved document and the review is limited.</p>
44.	<p>6.5 Page 33 There is some potential for Acid Sulphate Soils (ASS) in low lying areas adjoining inlets, for example adjacent to the Wellstead Estuary at Bremer Bay, and the lower reaches of rivers.</p>	<p>Noted. No changes to the strategy text recommended.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
45.	<p>6.5 Page 34. The first paragraph needs re-wording:</p> <p><i>The four large river systems previously mentioned all run through virtually continuous corridors of un-cleared native vegetation which in turn provide an important connectivity conservation function across the landscape. The Pallinup/Corackerup Creek system and the Fitzgerald River corridor which connects between Lake Magenta Nature Reserve and the Fitzgerald River National Park, are each recognized as strategic macro-corridors for the South Coast Region (Wilkins et al 2006). The Bremer and Gairdner Rivers do not provide linkages between conservation reserves however they provide the 'backbone' to an extensive network of tributaries with extensive land care and creek revegetation projects that have been steadily consolidated over several decades.</i></p>	<p>Upheld. Recommend include DEC's suggested paragraph under section 6.7.1.</p>
46.	<p>6.5 Pages 34/35. The source of Table 8 should be acknowledged and dated, in particular the subjective 'Condition' statements in column two.</p> <p>'Comment' column of table :</p> <ul style="list-style-type: none"> • Statements regarding Pallinup/Corackerup in sentence 1 need re-wording to clarify the comparative clearing in the main Pallinup and the Corackerup sub-catchment. Sentence 2 would be improved by inserting 'Corackerup' before creek. • The Hunter River lies mainly within Reserve 2454, <i>Minister for Water Resources</i>, partly within FRNP and partly within Reserve 32666. The section of Hunter River catchment within FRNP to the SE of the Bremer Bay – Gordon Inlet Road is proposed to be excised from the park as part of a series of boundary rationalizations. 	<p>Noted. No changes to the strategy text recommended.</p> <p>As explained previously, the original 2006 Draft Strategy was conducted by a different planning consultant therefore the source of some information is not known by Gray & Lewis. The information is contained in the existing approved document and the review is limited.</p> <p>The change suggested by DEC is minor however is considered unnecessary. The comments are based on insignificant wording and likely represent a different writing style.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
46.	<p>46. continued</p> <ul style="list-style-type: none"> • Kelly's Creek lies within Reserve 32666 which is not a 'nature reserve' as stated but rather an unvested Crown reserve. • Final box on Page 34 – All three <u>river catchments</u> are <u>completely within</u> the FRNP...etc • The comment box on page 35 could be improved by some editing. The second sentence would read better as follows: <i>The extensive lower portion of the river lies within the FRNP, much of which is in the adjoining Shire of Ravensthorpe.</i> 	
47.	<p>6.7.2 Page 35. Paragraph 1. Addition to final sentence:</p> <p><i>'...are largely undisturbed by human activity and are in good condition, as are some in unallocated Crown land and other Crown reserves'.</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>As explained previously, the original 2006 Draft Strategy was conducted by a different planning consultant therefore the source of some information is not known by Gray & Lewis. The information is contained in the existing approved document and the review is limited.</p> <p>The change suggested by DEC is minor however is considered unnecessary. The comments are based on insignificant wording and likely represent a different writing style.</p>
48.	<p>6.7.2 Page 35. Table 9 needs referencing and dating. Final sentence in Bremer River Comment box: <i>Several , including Yellilup Yate Swamp, are recognized...etc'</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>As explained previously, the original 2006 Draft Strategy was conducted by a different planning consultant therefore the source of some information is not known by Gray & Lewis. The information is contained in the existing approved document and the review is limited.</p> <p>The change suggested by DEC is minor however is considered unnecessary. The comments are based on insignificant wording and likely represent a different writing style.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
49.	6.7.3 Page 36 Paragraph 2. <i>A Wellstead Estuary management plan was developed and published in 2006 by the former Department of Water in partnership with the Wellstead Estuary Group and the Fitzgerald Biopsphere Group, and in liaison with the Shire of Jerramungup.</i> (You may wish to add the reference for this report).	Noted. No changes to the strategy text recommended. References are not proposed to be added.
50.	6.7.3 Page 36 Paragraph 3. The second sentence should include reference to the importance of such habitat for birds, some of which are protected under international agreements	Noted. No changes to the strategy text recommended. Flora and Fauna discussed elsewhere in Strategy.
51.	6.7.3 Pages 36/37 Table 10. Source and date should be referenced.	Noted. No changes to the strategy text recommended. As explained previously, the original 2006 Draft Strategy was drafted by a different planning consultant therefore the source of some information is not known by Gray & Lewis. The information is contained in the existing approved document and the review is limited.
53.	Comments column Box 2. The Wellstead Inlet does not lie in a 'nature reserve' but between Crown lands and the FRNP.	Noted. No changes to the strategy text recommended. As explained previously, the original 2006 Draft Strategy was drafted by a different planning consultant therefore the source of some information is not known by Gray & Lewis. The information is contained in the existing approved document and the review is limited.
	6.8 Pages 37/38. Add to list of dot point values: <ul style="list-style-type: none"> • Wetlands, rivers and estuaries are specially important as habitat and as refugia for water birds and shore birds 	Upheld. Recommend additional dot pint be added to recognise habitat attributes of wetlands etc

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
54.	<p>Amendment to 2nd dot point on page 38:</p> <p>Third dot point. Department of Environment should be 'the former Water and Rivers Commission and Greenskills'.</p>	Upheld. Minor text change to update reference to DoE.
55.	<p>6.8.1 Page 38. Dot point 4. <i>'...has seriously affected many surface waters outside large areas of native vegetation such as the FRNP.'</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>Existing text considered adequate.</p>
56.	<p>6.8.2 Page 39 First dot point. Add: <i>'However, care needs to be exercised when using exotic perennial species near wetlands as these may invade such areas, increasingly compete with the native vegetation and start to impact upon fauna habitat.'</i></p> <p>The final dot point in this section is probably meant to be in reference to other areas of un-cleared Crown lands and not specifically 'nature reserves' as written.</p>	Upheld. Use of species has potential to invade wetlands. Recommend include as addition under section 6.8.2.
57.	<p>6.9 Page 39. This section entitled 'Coastal' requires some definition of what constitutes the coast in the context of the LPS. As indicated previously, the coastal zone is generally considered to be approximately 5 kilometres from the low water mark landward and seaward to the three nautical mile State limit (<i>Southern Shores, 2009-2030</i>). The two key components of the coastal zone are the marine component extending seaward from high water mark and the terrestrial component extending inland from the low water mark. There is obviously some degree of overlap within and adjacent to the inter-tidal zone. However, for the purposes of the LPS it would be useful to address the marine and terrestrial components of coast separately, or at very least to distinguish between them in an introductory section.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The section 6.9 in question is only general and provides sufficient detail for the purpose of the limited strategy review.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
57.	<p>57. continued</p> <p>In short, the terrestrial coastal component has been addressed over many decades now at both a local and regional scale, and to some degree the Shire of Jerramungup has taken a prominent and at times leading role in such activity. For example the Shire provided early chairmanship (through Robin House and then Charlie Hick) of the South Coast Management Group which addressed terrestrial coastal issues from Walpole to Eucla.</p> <p>By comparison, systematic study and assessment of the marine coastal component has been largely restricted to the past 10 years. Furthermore, it is only in the last two years that draft regional scale marine planning has been instigated in either State waters or in the adjacent Commonwealth waters which lie beyond 3 nautical miles.</p>	
58.	<p>6.9.1 Pages 39/40. The first paragraph needs re-wording in order to be able to understand what it is trying to say. The second paragraph appears to be an extract of documentation from the State marine planning process referred to above and is focused on marine issues only. The third paragraph on page 40 refers more specifically to the State South Coast Marine Strategic Plan area. The adjoining Figure 7 could be usefully modified to also indicate the currently advertised Commonwealth marine strategic proposals.</p> <p>The list of State documents after the map are mainly or totally focused on terrestrial coastal management only.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The section 6.9 in question is only general and provides sufficient detail for the purpose of the limited strategy review.</p>
59.	<p>6.9.2 Pages 40/41. As already indicated this section, is essentially local scale terrestrial planning and the Shire has produced a succession of coastal planning strategies for several decades.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The section 6.9 in question is only general and provides sufficient detail for the purpose of the limited strategy review.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
60.	<p>The final sentence of this section uses incorrect terminology. Almost all the Jerramungup coastline is in Crown ownership and in many cases has wide Crown lands adjoining the marine interface. These Crown lands are usually Unallocated Crown Land (UCL), unvested Crown reserves, some Shire managed reserve and a section of the FRNP coastline formally managed by DEC on behalf of the Conservation Commission of WA.. All UCL and otherwise unmanaged reserves (UMR) are managed for nature conservation issues (fire, weeds and feral animals) on a 'subject to resourcing basis' by DEC through a memorandum of understanding with the Department of Regional Development and Lands.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The Strategy is correct as it states that significant sections of the coast are adjacent to Recreation and Open Space reserves. It is referring to the Parks and Recreation zoning reservation under the Shires Scheme, and not implying that the land is comprised of reserves. The DEC use of 'reserve' is different to the use of the word 'reserve' in planning context.</p>
61.	<p>6.9.3 Pages 41/42. First paragraph: <i>"...falls under the South Coast Natural Resource Management Region and the "Southern Prospects 2011-2016" strategy has recently been released."</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The existing wording is considered sufficient as already recognises these documents. The DEC comments propose to alter 1-2 words in the sentence and represent a different writing style.</p>
62.	<p>6.9.3 Pages 41/42. 3rd Paragraph, 4th dot point: <i>" Under the CALM Act 1984, this plan remains current until it is either reviewed or replaced."</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The existing wording is considered sufficient and it is unclear where DEC seek to insert this comment.</p>
63.	<p>First line page 42: <i>"...from the Fitzgerald <u>River</u> National Park..."</i></p>	<p>Upheld. Correct typographical error to include the word 'River' in the text.</p>
64.	<p>6.11.1 Pages 43-45. Figure 8 could be improved by reference to Newbey's work (1979) which mapped vegetation systems in more detail than Beard.</p>	<p>Noted. No changes to the strategy text recommended.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
65.	Page 44 paragraph 7 3 rd line "... <i>eucalyptus species within mallee-heath, mallee...</i> "	Upheld. Recommend minor word change. Gray & Lewis cannot assess the environmental comments and species terminology so recommends use of DEC advice / corrections.
66.	Page 44 paragraph 10 – delete 'Mallee' from end of 3 rd sentence.	Upheld. Recommend minor word change. Gray & Lewis cannot assess the environmental comments and species terminology so recommends use of DEC advice / corrections.
67.	Page 44 paragraph 11 end of 2 nd line – use ' <i>Hakea</i> ' in full at first mention, thereafter ' <i>H</i> '.	Upheld. Recommend minor word change. Gray & Lewis cannot assess the environmental comments and species terminology so recommends use of DEC advice / corrections.
68.	Page 45 middle of paragraph 2 – ' <i>Dryandra quercifolia</i> ' should be ' <i>Banksia quercifolia</i> '.	Upheld. Recommend minor word change. Gray & Lewis cannot assess the environmental comments and species terminology so recommends use of DEC advice / corrections.
69.	Page 45 paragraph 3. Replace ' <i>Eucalyptus nutans</i> ' with ' <i>Eucalyptus cernua</i> '	Upheld. Recommend minor word change. Gray & Lewis cannot assess the environmental comments and species terminology so recommends use of DEC advice / corrections.
70.	Page 45 paragraph 8 – penultimate line <i>E platypus</i> (not <i>paltypus</i>)	Upheld. Recommend minor word change. Gray & Lewis cannot assess the environmental comments and species terminology so recommends use of DEC advice / corrections.
71.	6.11.2 Page 45/46. Final sentence on page 45 – add a reference Hopper and Gioia 2004	Noted. No changes to the strategy text recommended. As explained previously, the original 2006 Draft Strategy was initially conducted by a different planning consultant therefore the source of some information is not known by Gray & Lewis. The information is contained in the existing approved document and the review is limited.

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
72.	2 nd paragraph on page 46. <i>Australian Biodiversity Strategy 2010-2030</i> is correct title for 1 st line and the Commonwealth Department is now <i>Department of Sustainability, Environment, Water, Population and Communities</i>	Upheld. As the department name has changed it is recommended the last sentence under 6.11.2 be deleted so references do not become outdated.
73.	6.11.4 Page 46. Line 1 – Dieback is caused by the pathogen <i>Phytophthora...</i> <i>This infects, rots and often kills etc...</i>	Upheld. Recommend minor word change. Gray & Lewis cannot assess the environmental comments and species terminology so recommends use of DEC advice / corrections. Appears 'pathogen' is just replacing 'fungus'.
74.	2 nd paragraph line 2. <i>These pathogens are spread...</i>	Upheld. Recommend minor word change. Gray & Lewis cannot assess the environmental comments and species terminology so recommends use of DEC advice / corrections.
75.	4 th line. <i>The pathogens are also spread ...</i>	Upheld. Recommend minor word change. Gray & Lewis cannot assess the environmental comments and species terminology so recommends use of DEC advice / corrections.
76.	Final line of paragraph 2 ' <i>...and spread of these pathogens.</i> '	Upheld. Recommend minor word change. Gray & Lewis cannot assess the environmental comments and species terminology so recommends use of DEC advice / corrections.
77.	Add to penultimate paragraph <i>A more recent dieback strategy has been produced by South Coast Natural Resource Management (South Coast NRM, 2010).</i>	Upheld. Recommend add as new paragraph 8 under section 6.11.4.
78.	Final line of section ' <i>...containment and eradication <u>trials</u> at Pabelup...</i> '	Upheld. Recommend minor word change. Added one word – trials – to sentence.

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
79.	6.11.5 Page 47. Please check source and accuracy of reference to 100 weeds in the Fitzgerald River National Park. Mention might also be made of other key woody weeds such as <i>Acacia longifolia</i> (Sydney Golden Wattle).	Noted. No changes to the strategy text recommended. As explained previously, the original 2006 Draft Strategy was initially conducted by a different planning consultant therefore the source of some information is not known by Gray & Lewis. The information is contained in the existing approved document and the review is limited.
80.	6.12.1 and 6.12.2 Page 48. There are other important threatened fauna species including Black Cockatoos, Dibbler, Chuditch <i>etc.</i> The Ground Parrot is the <u>Western</u> Ground Parrot. The Western Whip bird is not threatened. All these figures need to be based on occurrence in the shire and not within the Fitzgerald River National Park. As already indicated above, Nature Map can clarify this for you.	Noted. No changes to the strategy text recommended. As explained previously, the original 2006 Draft Strategy was initially conducted by a different planning consultant therefore the source of some information is not known by Gray & Lewis. The information is contained in the existing approved document and the review is limited.
81.	6.12.2 Page 48. Malleefowl is now written as one word.	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient.
82.	6.12.3 Page 49. The last sentence of paragraph 2 would be better split off to create a 3 rd paragraph which addresses species other than the fox and the rabbit.	Noted. No changes to the strategy text recommended. The existing paragraph is considered sufficient.
83.	<i>Feral goats and cats have been present in the Fitzgerald River National Park and other areas of native vegetation. DEC is trialling the use of cat specific baits within the national park. There have also been domestic pig escapes in the Pallinup River/Corackerup Creek area.</i>	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient and mentions ferrel goats and cats.
84.	6.12.4 Pages 49/50. First paragraph. At end of 2 nd sentence add ' <i>...major roads, river foreshore corridors and an almost continuous wide strip of vegetation along the coastline.</i> '	Upheld. Recommend inserting DEC comment as an expansion of existing sentence and minor word change.

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
85.	<p>After the three dot points insert reference to the 1999-2002 macro-corridor project (Wilkins <i>et al</i>, 2006). The existing references being used are around 20 years old.</p> <p><i>'These three vegetation corridors were recognized as strategic in a regional study of 'macro-corridors' across the South Coast Region from Walpole to Cape Arid National Park beyond Esperance. Additional, but more broken, linkages were also recognized between the Stirling Range National Park and the Fitzgerald River National Park, largely through the Peniup area (Wilkins et al, 2006).</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The existing wording is considered sufficient and recognises corridors.</p>
86.	<p>6.12,4,1 Page 50. 2nd paragraph. Also include reference to the support and assistance from the Department of Agriculture and Food ?</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The existing wording is considered sufficient and it is unclear how DAFWA fit in to this section.</p>
87.	<p>6.13 Pages 50/51. 2nd list of dot points:</p> <ul style="list-style-type: none"> • <i>Dieback control and fire protection</i> • <i>Co-ordinated fox, rabbit and other pest control programmes</i> 	<p>Upheld. Minor word changes recommended as shown in underline by DEC comment.</p>
88.	<p>3rd list of dot points (the listed dot points below with suggested improved wording are extracts only from the complete list currently given): Add the word 'special' to the introductory sentence before 'conservation value'.</p> <ul style="list-style-type: none"> • <i>Reserve 29500 (proposed Peniup Nature Reserve)...</i> • <i>Reserve 26793 (Corackerup Nature Reserve)...</i> • <i>Fitzgerald, Bremer and Sussetta Rivers</i> • <i>The Coastal corridor from Albany to Esperance where it passes through the Shire between the Pallinup River and Gordon Inlet</i> • <i>Other major corridor links and 'stepping stones' between the Stirling Range National Park and the Fitzgerald River National Park</i> • <i>The Fitzgerald River corridor link between Lake Magenta Nature Reserve and the Fitzgerald River National Park</i> 	<p>Upheld. The first three dot points are covered adequately in the existing strategy text under 6.13. It is recommended that the DEC last three dot points be included under section 6.13.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
89.	<p>Page 51 2nd paragraph</p> <p>The Fitzgerald River National Park and nature reserves are vested in the Conservation Commission of Western Australia and managed by the Department of Environment and Conservation. Other areas of Crown land which are either Unallocated Crown Land (UCL) or unmanaged reserves (UMR) are partially managed by DEC for protection of conservation values (mainly fire management, weed control and feral animal control) subject to available resources through a memorandum of understanding with the Department of Regional Development and Lands. Some areas of Crown land are vested in or under the management control of the Shire. Other areas are under private ownership but conservation protection may be enhanced through arrangements between Government agencies and landowners. The primary State act for the protection of flora and fauna (the <i>Wildlife Conservation Act 1950</i>) applies across all lands and State waters.</p>	<p>Upheld. Recommend replace the existing paragraph which states “<i>Some of these are Crown Land and so have some level of protection. Others are under private ownership and could be protected through arrangements between government and landholders.</i>” To be replaced by paragraph provided by DEC.</p>
90.	<p>Page 51 3rd paragraph: <i>The Fitzgerald <u>River National Park Biosphere Reserve</u> <u>has been recognised...</u></i></p> <p>Subject to the Shire position, maybe include: <i>Consideration of community aspirations to nominate additional areas within the Shires of Jerramungup and Ravensthorpe into a larger ‘Fitzgerald Biosphere Reserve’ are currently being developed.</i></p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The existing wording is considered sufficient.</p>
91.	<p>6.13.1 Page 51. There is significant overlap and duplication with the previous section above. Similar comments apply to those already given. The comments regarding landscape impacts upon national parks and other reserves are good but may need to be recast depending on how the abovementioned duplication is addressed.</p>	<p>Noted. No changes to the strategy text recommended. As explained previously, the original 2006 Draft Strategy was initially conducted by a different planning consultant therefore the source of some information is not known by Gray & Lewis. Gray & Lewis does not seek to major format changes.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
92.	6.13.1 Page 51. Paragraph 3 Line 2 <i>Fitzgerald River National Park</i> In Line 4 include reference to the fact that the project is located within both the Jerramungup and Ravensthorpe Shires.	Upheld. Minor word changes recommended.
93.	6.13.1 Page 51. Dot point 5. <i>The Shire would be supportive of further extension of this walk towards Bremer Bay in the future.</i>	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient.
94.	6.13.3 ...CALM Act (1984) and are...	Upheld. Minor word change recommended to include year of the Act.
95.	6.13.4 ...secondary dune systems, <u>is</u> of major concern. Last line ...dieback <u>disease</u> ..	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient.
96.	6.14 Page 53 3 rd paragraph. <i>Western Ground Parrot</i> <u>Malleefowl</u> Final paragraph add <i>Barrett et al 2009</i>	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient.
97.	6.15.1 Page 54. Final paragraph: <i>Wherever practicable, the Shire will require that extraction of gravel be from private land and on areas within such land where native vegetation has already been removed or is highly degraded.</i>	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient. Extractive industry requires planning approval and issues such as vegetation clearing and need for clearing permits are all assessed as part of development.
98.	6.16.2 Page 55 (a) line 1. 'Department of Environment' is incorrect (no longer exists). The reference is probably meant to be the 'Department of Water'.	Noted. No changes to the strategy text recommended. The Department of Water lodged a separate submission (No 13) and has provided updated information on water supply which has been recommended for inclusion. This is discussed and addressed for the DoW submission 13(j) in Table 1.

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
99.	Page 56 (b) paragraph 2 line 2. This reads as if the Hunter River is within the national park – mostly it is not. The reference to the ‘Department of Environment’ is again incorrect and likewise the reference to the Hunter River being within the national park. See comments under Section 6.5 (pages 34/35) above.	Noted. No changes to the strategy text recommended. The Department of Water lodged a separate submission (No 13) and Gray & Lewis recommended deletion of the said paragraph. This is discussed and addressed for the DoW submission 13(k) in Table 1.
100	Page 56 (c) paragraph 2 more incorrect references to ‘Department of Environment’. The second such reference requires further clarification. Native vegetation clearing is administered through the Department of Environment and Conservation statewide. If there are additional controls through the Department of Water these need to be specified more clearly.	Noted. No changes to the strategy text recommended. The Department of Water lodged a separate submission (No 13) and Gray & Lewis recommended modifications to the strategy to include updated information on Department of Water. This is discussed and addressed for the DoW submission 13(l) in Table 1.
7.0 STRATEGIC PLANNING CONSIDERATIONS		
101	7.2.1 Page 59. Final sentence of 3 rd paragraph. There should be no adverse impact downstream either (liquid waste/fertilizer run-off).	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient. These uses are permitted in the Rural zone.
102	7.2.2 Page 59. Examination of GIS data has failed to locate any private lots that directly abut the coast (<i>ie</i> that do not have a coastal strip or wider area of foreshore reserve or UCL). The example of the former Dillon Bay leases on Lots 2118 and 2117 is dated as these leases no longer exist.	Upheld. Semantics – recommend changing the word ‘abut’ with ‘adjacent’ to the coast. The example in Figure 10 is recommended to be retained as it is simply an example of a Rural zone with additional uses under the Shires Scheme, and makes no reference to leases. The DEC comment on leases is unclear and does not appear relevant.
103	Page 60. First paragraph. The private landholding on the Doubtful Island peninsula is not ‘adjacent to the Fitzgerald River National Park’ but is bounded on both its NW and SW sides by Reserve 32666 an unvested Crown reserve. The private land in question does not have coastal frontage as there is a continuous strip of UCL or Crown reserve between the land and the ocean on both sides of the peninsula.	Upheld. Recommend changes to the Strategy text to state that Doubtful Island is located south and south east of the Fitzgerald River National Park and west of Doubtful Island Bay.

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
104	Page 60. Paragraph 4. Last line <i>'...have any implications for adjoining public lands or the nearby Fitzgerald River National Park.'</i>	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient as the strategy clearly requires any development to address environmental issues and specifically any environmental implications for management of Fitzgerald River National Park.
105	7.3.1 Final paragraph page 63. Clustering is generally supported by DEC where it may reduce impacts upon native vegetation either by direct clearing or by modification of native vegetation through regular fuel modification in fire 'hazard separation zones'. See also dot point 12 of the next section 7.3.2 below.	Noted. No changes to the strategy text recommended.
106	7.3.2 Dot point 6. Possibly add erosion and acid sulphate soils (ASS) to the list?	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient as acid sulphate soils are dealt with under state planning policy.
107	Dot point 12. Add a third point. Where significant native vegetation or significant species are involve fire hazard separation zones (HSZ) should be minimized by applying BAL 19 or BAL 29 standard housing construction standards. The HSZ can be progressively reduced in width by requiring increasingly higher fire protection standards for the building materials and design.	Noted. No changes to the strategy text recommended. Fire management is comprehensively dealt with by WAPC/FESA Planning for Bushfire Protection which may be subject to further review. It is not recommended that the strategy detail acceptable BAL constructions standards for housing as this information is too specific and has to be assessed individually for each fire management plan.
108	7.4.1 Page 64 Paragraph 3. Final sentence. There is some degree of control over design of future buildings where conditional sub-division approval requires it. For example, use of non-reflective materials and fire protection safety standards to reduce HSZ widths.	Noted, however it is unclear how DEC has concluded this. No changes to the strategy text recommended. In most cases there is little or no control over the built form outcome as part of subdivision. A condition about roof materials cannot be imposed as part of the subdivision process. In most cases the lots are created, sold and then developed for single dwellings. Planning approval is not required for a single house in the residential zone unless the proposal involves a variation to the residential design codes.

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
109	Paragraph 4. The SW corner of Lot 771 could be critical in ensuring cross-street connectivity with the proposed vegetation corridor along the east side of the future town centre.	Noted. No changes to the strategy text recommended. This issue would be examined as part of any subdivision.
110	Paragraph 5. DEC has consistently proposed that a robust vegetation linkage is retained to connect the western boundary (conditional subdivision) revegetation of Lot 109 with the SW corner of the UCL to the NW of Bremer Bay. This latter area is shown as area 7 on Figure 19.	Noted. No changes to the strategy text recommended. The strategy states that it has high fauna values.
111	<p>7.4.2 Pages 65/66. The landscape around Jerramungup is almost totally cleared of native vegetation and the most significant remnant native vegetation lies within the townsite area. Furthermore the townsite is in the upper catchment of the Corackerup/Peniup/Hegarty Creek system which along with the lower reaches of the Pallinup River, comprises a highly significant macro corridor linkage between the south coast and the southern boundary of Jerramungup town site. Any proposals to clear native vegetation within the townsite will need to be subjected to a high degree of scrutiny. A preferred strategy from DEC's perspective would be to retain currently consolidated areas of native vegetation within the townsite and instead to pursue re-zoning of more surrounding land which is already cleared for future residential and associated development. Such a strategy will also positively enhance on-going amenity and conservation values within the current townsite – a vision on a much smaller scale but nevertheless not dissimilar to the setting aside of Kings Park and the Reabold Hill areas in Perth many decades ago.</p> <p>Naturally, appropriate bush fire protection measures would be required, however by using larger lot sizes adjoining bush land, by maximising building envelope set-backs from the reserves and by building housing to higher bush fire protection standards, hazard separation zones can be largely accommodated within the private lots.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The DEC submission relates to comments on potential for lots south of Sydney Street in Jerramungup. The DEC view is understood and is acknowledged by the strategy which states "<i>in the past DEC has opposed clearing of any vegetation</i>".</p> <p>The strategy clearly requires a vegetation report and notes any scheme amendment would require referral to the EPA. The EPA would consult with DEC over any zoning changes, so this issue would be dealt with as part of the normal amendment process.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
112	7.5 Pages 67/68. The comments supportive of DEC's management of the Fitzgerald River National Park are most appreciated. Thank you. Regarding the first dot point please see comments above under Section 4.4.2.	Noted. No changes to the strategy text recommended.
113	7.6 Page 68. Noise should be included in the list. See comments above under Section 5.3.	Noted. No changes to the strategy text recommended. Noise is covered by reference to emissions. Emissions include noise, dust, odour etc.
114	7.7 Page 68 First paragraph; <i>'...There are also a number of <u>nature</u> reserves such as Corackerup Nature Reserve.'</i> The other two paragraphs are pleasing to note.	Upheld. Minor word change recommended to clarify it is a nature reserve.
8.0 THE STRATEGY – FUTURE TOWNSITE EXPANSION		
115	8.1.1 Page 69. Paragraph 2: <i>'...beauty), the <u>nearby</u> Fitzgerald River National Park, <u>its significance as a narrow section of the South Coast Macro Corridor, its popularity...</u></i>	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient as already mentions the Fitzgerald River National Park, and vegetation corridors are discussed elsewhere in the strategy.
116	Paragraph 3: <i>'...character, <u>its conservation connectivity, its culture...etc'</u></i>	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient.
117	8.1.2 Page 69. Add <i>'Wellstead Estuary to the north'</i> .	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient.

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
118	8.1.2.1 Page 69/70. In the top paragraph on page 70 there is reference to a 'regional waste management strategy'. Please see comments above regarding Section 4.4.	Noted. No changes to the strategy text recommended. The existing wording is considered sufficient.
119	Figure 15. The area marked 'Reserve 31737 to the SW of Bremer Bay is an isolated portion of Fitzgerald River National Park (A 31737). For clarity it could be titled 'Pt Fitzgerald River National Park' (in small size writing) above Reserve 31737.	Noted. No changes to the strategy text recommended. For the purpose of broad strategy mapping this is not considered necessary and would invoke small unreadable text due to available space.
120	8.1.3 Pages 72/73. List of factors at the bottom of page 72. Add <i>'Maximising vegetation connectivity between un-cleared lands to the south of Borden-Bremer Bay Road and the Fitzgerald River National Park and adjacent Crown reserves to the north'</i> .	Noted. No changes to the strategy text recommended. The dot points in section 8.1.3 describe the factors that will inform the order of rural residential development to be dealt with in a local planning policy. Reference to vegetation connectivity seems out of context in this section as it deals with broad considerations including land capability and environmental value. Vegetation assessment and links would normally form part of a land capability report.
121	8.1.3.1 Pages 73/74. Paragraph 3. This is a really important issue from a conservation and biodiversity perspective. The currently largely un-cleared Crown reserve forms the most secure linkage through Bremer Bay with coastal vegetation to the south and the Fitzgerald River National Park to the north. This coastal vegetation corridor extends from Albany through to the east of Esperance and Bremer Bay is at the weakest point in this linkage. It is therefore critical that a significant part of the proposed town centre reserve be retained as a fauna corridor. The inherent values of the vegetation within the reserve have already been demonstrated by Craig (2008). DEC has been in direct liaison with the Shire on this issue for the past year. A sentence or two need to be added to paragraph 3 to cover this point. Comments regarding the primary school are made in Section 4.4.2 above.	Upheld partially. It is understood this is an important issue for DEC and it will be examined as the structure plan for the town centre continues to develop. This land is already zoned 'Town Centre' under the Shires Local Planning Scheme. Retention of native vegetation already has to be addressed as part of the structure plan and is a statutory requirement in Schedule 4 – Special Use zones. The Scheme is a higher level document therefore the issue does not need to be replicated or embedded in the Strategy. It is however recommended that the strategy be modified to include a statement that <i>'The Shire will continue to liaise with DEC and the community over vegetation retention as part of the structure plan process. The importance of examining remnant vegetation in the Town Centre is recognised by the Shire.'</i>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
122	<p>8.1.3.4 Page 75. As indicated in Section 7.4.1, paragraph 4 above, the SW corner of Area 4 will need to include a cross-street link with the vegetation retained within the proposed town centre area. This needs to be recognized in Paragraph 2 of this section.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>Already discussed in commentary on the school site.</p>
123	<p>8.1.3.6 Pages 77/78. DEC does not support the use <i>in toto</i> of the northern strip of Lot 109 (Area 6). Following conditional approval of WAPC Application No 142080 the land owner has now commenced the implementation of re-vegetation plans for the SW sector of Lot 109 and for a minimum 15-20 meter wide strip extending along the western boundary of the property. This was a significant compromise from the much wider 50m linkage sought by DEC in its advice to the WAPC. However, when lot widths were re-drawn to only 47m this obviously became impractical. The revised condition and subsequent works programme were accepted on the clear understanding that this western vegetation strip would extend to the NW corner of Lot 109 and then dog-leg back east to a point approximately 30 metres beyond the SW corner of the Crown land marked as Area 7 on Figure 19. This would then continue as a direct linkage to the Fitzgerald River National Park about 800m to the north. Provision for this conservation linkage should be acknowledged in regard to Area 6 and Area 7. Furthermore, in both instances it is important that this fauna linkage strip is not impacted by incremental clearing or regular prescription burning. Therefore all lots backing onto the vegetation corridor should be of such size as to allow for a sufficiently wide building envelope setback distance that avoids any need for fire protection within the nature strip. The same principles will need to apply to the adjoining lots to the west and north-west (Area 8) so that a 30-40m combined width nature strip can be achieved in time.</p>	<p>Upheld.</p> <p>Recommend an additional statement be included for Lot 109 Bremer Bay Road (8.1.3.6 Area 6 and 8.1.3.9 Area 9) that <i>“A condition of subdivision approval requires revegetation along the western boundary with local native species. The Department of Environment and Conservation has identified opportunities for a vegetation corridor to be extended to the north.”</i></p> <p>Recommend an additional statement be included for Area 8 that <i>“Opportunities for a native vegetation corridor may be identified as part of structure planning”</i>.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
124	<p>8.1.3.7 Pages 78-80. To date DEC has not, in the past few years, been consulted about the conservation values of this area or its potential future development. As indicated above in Sections 7.4.1 and 8.1.3.6, the SW corner of this area (apparently already zoned for short term residential – without DEC consultation) needs to provide conservation connectivity between Lot 109 to the south – west and the Fitzgerald River National Park to the north.</p> <p>With regard to the balance of the area, larger lots allow for much more flexibility for retention of higher priority native vegetation and any special fauna habitat. DEC would welcome the opportunity to be consulted with regard to the previous studies and any future proposals. There is some reference to this in the second paragraph at the top of page 80, however this is stated to be in the context of vegetation clearing and proximity to the national park.</p> <p>It should also be in the context of the inherent conservation and biodiversity values of the area as well as its significance in securing the South Coast Macro Corridor linkage through Bremer Bay and around the Wellstead Estuary.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>Area 7 relates to Reserve 25216 Mary Street in Bremer Bay. This information was already included and approved as part of the 2006 Local Planning Strategy, and the south west portion is already zoned Residential under the Shires Scheme (which cannot be overridden by the Strategy).</p> <p>The fact that DEC was not involved in the first 2006 Local Planning Strategy does not negate the fact that it was approved by the Shire and WAPC therefore has significance status for strategic planning. DEC needs to recognise that some of the areas in the Strategy, including Area 8, are not new proposals.</p> <p>No zoning changes or significant changes are proposed for Area 8 in the revised Strategy, and the majority of this information has been carried over from the approved 2006 Strategy.</p> <p>Given no changes are proposed, the existing wording is considered sufficient as it recognises that consultation with DEC would need to occur for any clearing, and that parts of the reserve have high conservation value.</p> <p>Any future subdivision of the Residential zoned land would entail referral to DEC by WAPC. At that point DEC would have an opportunity to comment on issues such as vegetation or corridors.</p>
125	<p>The final paragraph of this section on page 80 is pre-emptive. DEC needs to be consulted with regard to the broader issues above including connectivity conservation which was not previously considered.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The paragraph in question essentially recommends that a portion of the reserve (Reserve 25216 Mary Street Bremer Bay) continue to be protected under the existing 'Parks and Recreation' zone under the Scheme. The Strategy does not need to nominate every circumstance under which DEC will be consulted.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
125	125 continued...	The Shire undertakes a high level of consultation with all scheme amendments, structure plans, and development. The WAPC would be responsible for examining any subdivision conditions for vegetation corridors, which should not be pre-empted by the broad local planning strategy, especially when dealing with land already zoned. DEC has other mechanisms and controls over issues such clearing.
126	8.1.3.8 Pages 80/81. The eastern boundaries of this area will need to have a similar re-vegetation fauna corridor established to complement the current work within Lot 109 adjoining and that already referred to for the balance of Lot 109 and for Area 7 above.	Noted. No further changes to the strategy text recommended. Note: This was already discussed in Point 123 of the DEC submission. To address the matter Gray & Lewis has recommended an additional statement be included for Area 8 that “ <i>Opportunities for a native vegetation corridor may be identified as part of structure planning</i> ’.
127	8.1.3.10 Pages 81/82. The comment re consideration of connectivity conservation/ Lot 109 is noted and appreciated.	Noted. No changes to the strategy text recommended.
128	8.1.3.11 Page 82. There has already been frequent reference to Lot 109 above but mainly in the context of Area 6.	Noted. No changes to the strategy text recommended. It is not clear what DEC is commenting on as this appears to be an observation.
129	8.1.3.12 Page 82. Again liaison with DEC early in the planning process would be appreciated in the context of coordinating with other re-vegetation corridors.	Noted. No changes to the strategy text recommended. These comments relate to Area 12 earmarked for long term rural residential. The Strategy already recognises that there needs to be adequate protection to remaining pockets of vegetation. No changes are recommended as the Strategy does not need to go into detail for each area on which authorities should be consulted.
130	8.1.3.13 Page 83. Area 13 has significant remnant vegetation in its SE sector which links through neighbouring land into the portion of Fitzgerald River National Park around Dillon Bay. There may be potential for re-vegetation of an extension of this remnant to join (across the road) with vegetation within Area 14 to the north.	Noted. No changes to the strategy text recommended. The Strategy notes any scheme amendment will be referred to the EPA, and they will consult with DEC. A land capability assessment will be required and these would normally examine vegetation and potential revegetation areas. This issue can be examined as part of the scheme amendment process.

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
131	<p>8.1.3.15 Pages 83/4. Reference has already been made earlier (Sections 4.4 and 4.4.2) to the need to upgrade waste management at the existing caravan park. Any additional development may require increased visitor capacities to be considered.</p> <p>This area is also in an area likely to contain acid sulphate soils (ASS) and hence surveys and ASS management plans may well be required for any ground disturbing activities. Section 6.5 above refers.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>This comment relates to Area 15 which is an existing caravan park in Bremer Bay. As explained in the Strategy text, future development is already well controlled by existing Scheme provisions and any expansion requires referral to EPA.</p>
132	<p>8.1.3.17 Pages 84-86. It is appropriate that no further residential development of Point Henry peninsula should occur. The recently processed final stages of the original scheme (Lot 9007) would have been unlikely to be environmentally acceptable within contemporary standards. The biological surveys on which the scheme was based are several decades old and were only undertaken over a few days and at a very limited level in comparison with today's more stringent requirements. DEC had a number of concerns with the most recent subdivisional process, including a request for contemporary biological survey, but most advice provided was not accepted.</p>	<p>Upheld. Modifications recommended to the Strategy by Gray & Lewis.</p> <p>This DEC comment supports the Strategy which shows Point Henry as Area 17 on the Strategy map. The Strategy notes that no further infill subdivision will not be supported for Point Henry beyond existing approved subdivision guide plans.</p> <p>Gray & Lewis recommends changes to the Strategy to clarify that there are still lots on the peninsular with subdivision potential under the Shires Limited Rural Strategy, however they have to address matters such as land capability, environmental issues, visual impact etc. These lots are shown on Figure 20 with an astrix & referral to the Limited Rural Strategy.</p> <p>The DEC submission highlights that the strategy text requires modification to clarify that any future zonings, structure plans or subdivision for lots on the Peninsular which are outside of Area 17, will be guided by the existing Limited Rural Strategy.</p> <p>Gray & Lewis recommends this be clarified through notes at the end of Section 8.1.3.17 for Area 17. This intention has been conveyed on Figure 20 however needs to be re-enforced in the text.</p>
133	<p>8.1.4 Pages 87-89. This summary of strategies and actions is disappointingly silent on most environmental matters. It needs an additional strategy added to address these issues:</p>	<p>Upheld partially. The Strategy has a strong planning focus in the 'Strategies and Actions' which could be balanced by also including additional environmental statements.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
133	<p><i>Maintain and enhance the environmental attributes of Bremer Bay including protection of native vegetation and vegetation corridors, strategic re-establishment of native vegetation, forward planning to improve critical infrastructure and minimize environmental impacts of waste and emissions.</i></p>	<p>Many of the environmental matters are discussed in the broad strategy text, so could be re-enforced in the 'actions and strategy' sections.</p> <p>It is recommended that a new Strategy 5 be included for Bremer Bay as follows:</p> <p><u>Strategy 5:</u></p> <p>Protect, conserve and enhance the environmental values and visual natural landscape of Bremer Bay for the benefit of current and future generations while providing appropriate development opportunities to promote the local economy.</p> <ul style="list-style-type: none"> • Require vegetation, flora and fauna reports where appropriate for Scheme Amendments, structure plans, and significant subdivision or development proposals. Such reports should be provided at the earliest possible stage in the planning process. • Special environmental features are to be identified at the rezoning or structure planning stages. Larger lot sizes and / or building envelopes may be required to allow for protection of the special environmental features. • Encourage revegetation where practical as part of the planning process and establishment of vegetation corridors and links. • Generally support land use change and development that demonstrates positive environmental outcomes or reduces the degree of negative impact on the environment (balanced against the objectives of the relevant zone and compliance with any relevant Local Planning Policy). • Give due consideration to land capability and suitability when making decisions about the future use and development of land within the Shire that has potential to have environmental impacts. • Support community involvement in environmental groups and rehabilitation of the natural environment. • Maintain a high level of consultation with relevant agencies over specific issues and future strategic planning.
134	<p>8.2.1 Page 89. Paragraph 1. Jerramungup is not on the 'edge of the Fitzgerald River National Park' but rather about 30km to the west.</p>	<p>Upheld. Recommend modifying the strategy text to refer to Jerramungup being strategically located '<i>west of the Fitzgerald River National Park</i>'.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
135	<p>An additional vision could be to retain its current position at a key highway intersection providing supplies and services for travellers as well as its function as a sub-regional supply centre for the surrounding farming community.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>It is important that the strategies and actions are sourced from the Council and community. The current position of Jerramungup is locked in through zonings.</p>
136	<p>8.2.2.1 Pages 89/90. The general comments made above with regard to Section 4.4 Page 12 apply. Furthermore, reference is made in Paragraph 2 to the Shire investigating construction of a second pond '<i>...to achieve 'best practice' as operating two ponds allows them to be rotated...</i>'. The term 'best practice' requires clarification, in particular what best practice standard is being referred to? A DEC Works Approval will be required for any upgrades or new ponds and the expectation would be that such works would have to conform to current standards and guidelines for wastewater ponds.</p> <p>The management and disposal of sludges from 'dried out' effluent ponds would also need to be considered, for example, conditions on lined sludge drying beds. Once again odour is an important consideration during any de-sludging process.</p> <p>The current absence of odour complaints is no justification to omit buffer distance considerations altogether as they are difficult to retrofit later. Maintenance work de-sludging ponds always has the potential to generate significant odour omissions, hence Environmental Protection Authority (EPA) separation distances should be used and any reductions in these distances would have to be justified. DEC would apply these requirements for any new ponds or upgrades of existing ponds.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>These matters are already discussed in sufficient detail in the Strategy.</p>
137	<p>8.2.3.1 Page 90 Paragraph 2. For any significant increase in infill development the system or method of sewage treatment and disposal may need to be reconsidered to meet current standards.</p>	<p>Noted. No changes to the strategy text recommended.</p>

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
138	<p>8.2.3.7 and 8.2.3.8 Page 91. Development of Areas 7 and 8 would involve the removal of significant areas of native vegetation. They are also in close proximity to an existing and a potential additional future effluent pond . DEC favours the use of land that is already cleared of native vegetation outside the current town site for any additional housing expansion.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The strategy notes that it requires investigation and vegetation assessment.</p>
139	<p>8.2.3.9 Pages 91/92. Area 9 outside the current town site is strongly favoured by DEC provided that the existing corridor of vegetation which connects Corackerup/Peniup/Hegarty Creek system with the other native vegetation in the southern sector of the current town site is excluded from development and widened through additional re-vegetation and protection. It is unfortunate that the current draft LPS makes no reference to this important conservation asset within the area and the need to protect and enhance it.</p>	<p>Noted. No changes to the strategy text recommended.</p> <p>The strategy notes that land capability is required which would normally include examination of soils, vegetation etc</p>
140	<p>8.2.4 Page 92. As with Section 8.1.4 (Bremer Bay) above, the summary of strategies and actions is disappointingly silent on most environmental matters. It needs an additional strategy:</p> <p><i>Maintain and enhance the environmental attributes of Jerramungup including protection of native vegetation within the townsite and enhancement of vegetation corridors which extend south along Hegarty, Peniup and Corackerup Creeks as a major regional corridor linkage to the Pallinup River and coast. Forward planning is also required to improve critical infrastructure and minimize environmental impacts of waste and emissions.</i></p>	<p>Upheld partially. The Strategy has a strong planning focus in the ‘Strategies and Actions’ which could be balanced by also including additional environmental statements. Many of the environmental matters are discussed in the broad strategy text, so could be re-enforced in the ‘actions and strategy’ sections.</p> <p>It is recommended that a new Strategy 6 be included for Jerramungup as follows:</p> <p><u>Strategy 6:</u> Protect, conserve and enhance the environmental values and natural landscape of Jerramungup for the benefit of current and future generations while providing appropriate development opportunities to promote the local economy.</p> <ul style="list-style-type: none"> Require vegetation, flora and fauna reports where appropriate for Scheme Amendments, structure plans, and significant subdivision or development proposals. Such reports should be provided at the earliest possible stage in the planning process.

No.	Summary of DEC Submission	Gray & Lewis (Consultant Planner) Comment
140 Cont		<ul style="list-style-type: none"> • Special environmental features are to be identified at the rezoning or structure planning stages. Larger lot sizes and / or building envelopes may be required to allow for protection of the special environmental features. • Encourage revegetation where practical as part of the planning process and establishment of vegetation corridors and links. • Generally support land use change and development that demonstrates positive environmental outcomes or reduces the degree of negative impact on the environment. • Give due consideration to land capability and suitability when making decisions about the future use and development of land within the Shire that has potential to have environmental impacts. • Support community involvement in environmental groups and rehabilitation of the natural environment. • Maintain a high level of consultation with relevant agencies over specific issues and future strategic planning.

Note: A complete copy of the DEC submission is available to Councillors on request.