

# Ningaloo Lighthouse Resort

## Development Application Report

May 2021 | 17-601

**element.**  
the art and science of place



We acknowledge the custodians of the Nynggulu Coast, the Baiyungu, Yinikurtura and Thalanyji people and their Elders past, present and emerging. We wish to acknowledge and respect their continuing culture and the contribution they make to the life of this region.

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# Executive Summary



This development application has been prepared by **element**, on behalf of Z1Z Resorts Pty Ltd, to facilitate the redevelopment of the existing Ningaloo Lighthouse Holiday Park into a contemporary tourism resort at Padjari Manu (Vlamingh Head) on the North West Cape, in accordance with the recently approved Local Development Plan (LDP) for the site.

Designed by internationally renowned Kerry Hill Architects, the proposed Ningaloo Lighthouse Resort represents a unique opportunity for the Shire of Exmouth and Western Australia, to establish a world-class tourism facility with direct access to the Ningaloo Marine Park and Cape Range National Park.

The proposal will deliver a high-quality redevelopment of the existing ageing tourism facilities on site and provide a range of accommodation options and amenities that will enhance the attractiveness of the region for both local and international visitors. In doing so, the proposal will support the economic development priorities identified in the Shire's Strategic Community Plan, contributing to the strengthening and growth of the visitor experience in the region.

The proposed development has been carefully designed to respond to the environmental and landscape character of Padjari Manu (Vlamingh Head) and represents a highly sustainable approach to the redevelopment of a semi-remote tourism facility. The proponent, a subsidiary of Tattarang, is committed to undertaking development in an environmentally responsible manner that ensures the proposal balances environmental and economic development priorities, whilst acknowledging that the site comprises an existing tourism facility that contains very little environmentally or aesthetically significant vegetation. This includes consideration of key issues such as the impact on significant flora and fauna, preservation of remote values and landscape character, management of coastal hazards and bushfire risk, and the implementation of on-site wastewater recycling and renewable power generation initiatives.

## About Tattarang

Tattarang is one of Australia's largest private investment groups and is owned by the Forrest family. Tattarang's investment portfolio spans across agri-food, energy, resources, property, hospitality, sport and entertainment. With a belief in investing for growth, Tattarang pursues opportunities with a long-term investment horizon. The group is made up of six business divisions: Fiveight, Harvest Road, SFM Marine, Squadron Energy, Wyloo Metals and Z1Z.

Fiveight invests in, develops and manages residential, commercial and industrial property across Australia, specialising in the restoration of important heritage assets. Pending approval processes, Fiveight will coordinate the construction of the Ningaloo Lighthouse Resort.

Delivering unique experiences across accommodation, food, beverage, sport and entertainment, Z1Z invests in lifestyle services and experiences that highlights Western Australia to its patrons. The tourism and hospitality requirements of the Ningaloo Lighthouse Resort will be managed by Z1Z.

The town of Exmouth, and the Ningaloo Coast sit mid-way along the Western Australian coastline. The local Baiyungu, Thalanyji and Yinikurtura people have called Nyinggulu home for tens of thousands of years. Recognised by UNESCO through World Heritage inscription, the Ningaloo Coast encompasses one of the world's longest near-shore reefs, Ningaloo Reef and Cape Range, with its hidden karst system and underground cave network.

Locals and visitors alike are attracted to the physical beauty of the region, the relaxed north-west feel and the area's significant biodiversity. Upon redevelopment, the Ningaloo Lighthouse Resort is destined to become one of Australia's leading aspirational leisure destinations providing a range of experiences to cater for many budgets and traveller types.

## Vision Statement

The iconic Ningaloo holiday experience is transformed, inviting guests to regenerate whilst immersed within a cultural and natural World Heritage landscape and engage through diverse experiences. With a strong sense of place and committed to sustainability, the Ningaloo Lighthouse Resort takes pleasure in welcoming travellers who value well considered and authentic Western Australian service.

## Planning Summary

This report has been prepared to demonstrate that the proposal is entirely consistent with the applicable local and State planning framework, and the Shire's stated desire to capitalise on the unique environmental and landscape characteristics of the region through the provision of high-quality tourist accommodation that will boost and support Exmouth's appeal as a tourism destination. This assessment concludes that:

- The proposal is entirely consistent with the vision for the area under the Shire's Local Planning Strategy, providing for the redevelopment of an existing, dated tourism facility in a manner that will capitalise on Exmouth's unique competitive advantages in the tourism market;
- The proposal is consistent with relevant State Planning Policies and strategies, which encourage the sustainable use of the Ningaloo Coast for tourism related activities;
- The design of the proposed development has been carefully considered to respect the unique environmental and landscape character of the area, and to retain the low-key, low-impact nature of tourism operations at Padjari Manu (Vlamingh Head);
- The proposal retains and conserves the heritage listed Vlamingh Head Lighthouse Keepers' Quarters on site as an integral part of the resort offering, ensuring its ongoing use and enjoyment by the community;
- The site forms the only freehold land in a semi-remote location where there is no possibility of land use conflict;
- The development will help drive sustained economic growth in Exmouth by creating year-round jobs and opportunities for local businesses; and
- The proposal represents a sustainable development outcome for the site that appropriately balances the Shire's environmental and economic development priorities, as identified in the Shire's Strategic Community Plan.

On the basis of the above, the proposed development is entirely consistent with the principles of orderly and proper planning, and therefore warrants approval. Accordingly, we respectfully request the Shire's support for this application, and the approval of the Regional Joint Development Assessment Panel (JDAP).

# 1. Introduction

This report has been prepared by **element**, in association with Kerry Hill Architects and on behalf of Z1Z Resorts Pty Ltd, in support of an application to redevelop the existing Ningaloo Lighthouse Holiday Park at Lots 2 and 557 Yardie Creek Road, North West Cape (the subject site), in accordance with the approved Local Development Plan (LDP) for the subject site.

The proposal, to be known as the Ningaloo Lighthouse Resort, seeks to provide a contemporary redevelopment of an existing tourism asset that will deliver a diverse range of accommodation options in a high quality, resort-style setting. The proposal comprises a mix of hotel rooms, villas, powered caravan park sites, fixed tents and lodge-style accommodation, along with a range of high quality guest amenities and facilities.

The proposed development will serve to boost and support local tourism, taking advantage of Exmouth's unique competitive advantages in the tourism industry, whilst respecting and celebrating the environmental and cultural characteristics of the locality. The design has been greatly influenced by the proponent's commitment to undertaking the redevelopment in an environmentally responsible manner, with a focus on minimising environmental impacts, respecting the connection to country and delivering a sustainable development outcome that appropriately balances environmental, cultural and economic priorities.

This report has been prepared to provide an overview of the subject site and the proposed development, as well as a detailed assessment against the relevant planning requirements and an examination of the planning merits of the proposal.

## 1.1 Project Team

Z1Z Resorts Pty Ltd, which is a wholly owned subsidiary of Tattarang Pty Ltd, has engaged a highly qualified planning and design consultant team that comprises:

Discipline	Consultant
Architect	Kerry Hill Architects
Landscape Architect	McGregor Coxall
Town Planning Consultant	<b>element</b>
Heritage Consultant	Griffiths Architects
Principal Environment and Bushfire Consultant	Strategen-JBS&G
Civil Engineer	Cossill and Webley Consulting Engineers
Hydraulic and Fire Engineer	Hydraulics Design Australia
Mechanical Services Engineer	Geoff Hesford Engineering
Structural Engineer	Hera Engineering
ESD and Access Consultant	Arup
Coastal Hazard Consultant	MP Rogers and Associates

Detailed plans and technical reports from the above consultant team have been appended to this report.

## 1.2 Planning Approvals Required

The proposed development has an estimated construction cost in excess of \$10 million and is therefore a mandatory Development Assessment Panel application. Accordingly, this application requires the determination of the Regional Joint Development Assessment Panel (JDAP), based on a report and recommendation prepared by the Shire of Exmouth (the Shire).

A separate referral to the Environmental Protection Authority (EPA) has also been submitted for the project by Strategen-JBS&G, in accordance with Section 38 of the *Environmental Protection Act 1986*.

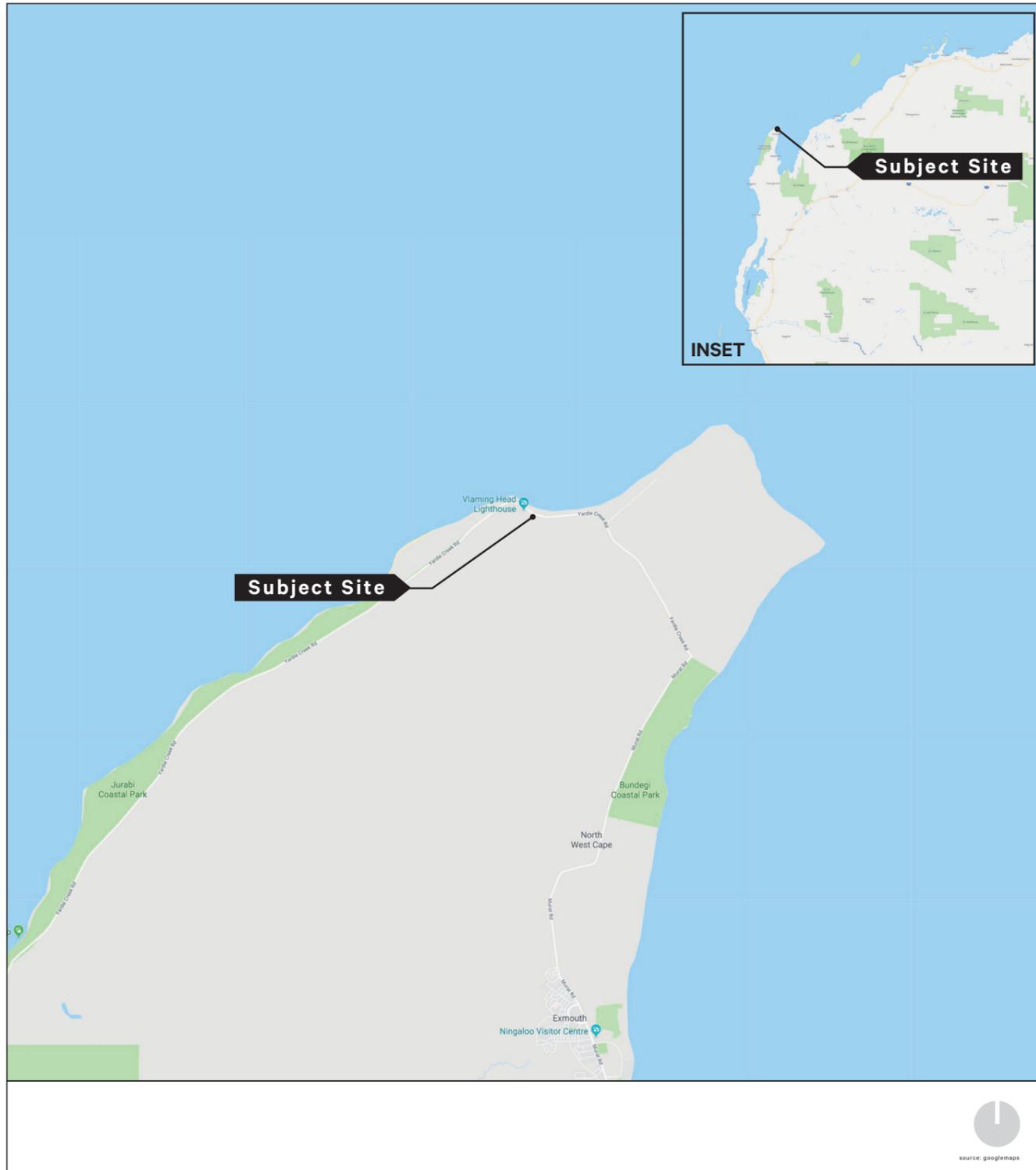


Figure 1. Location Plan

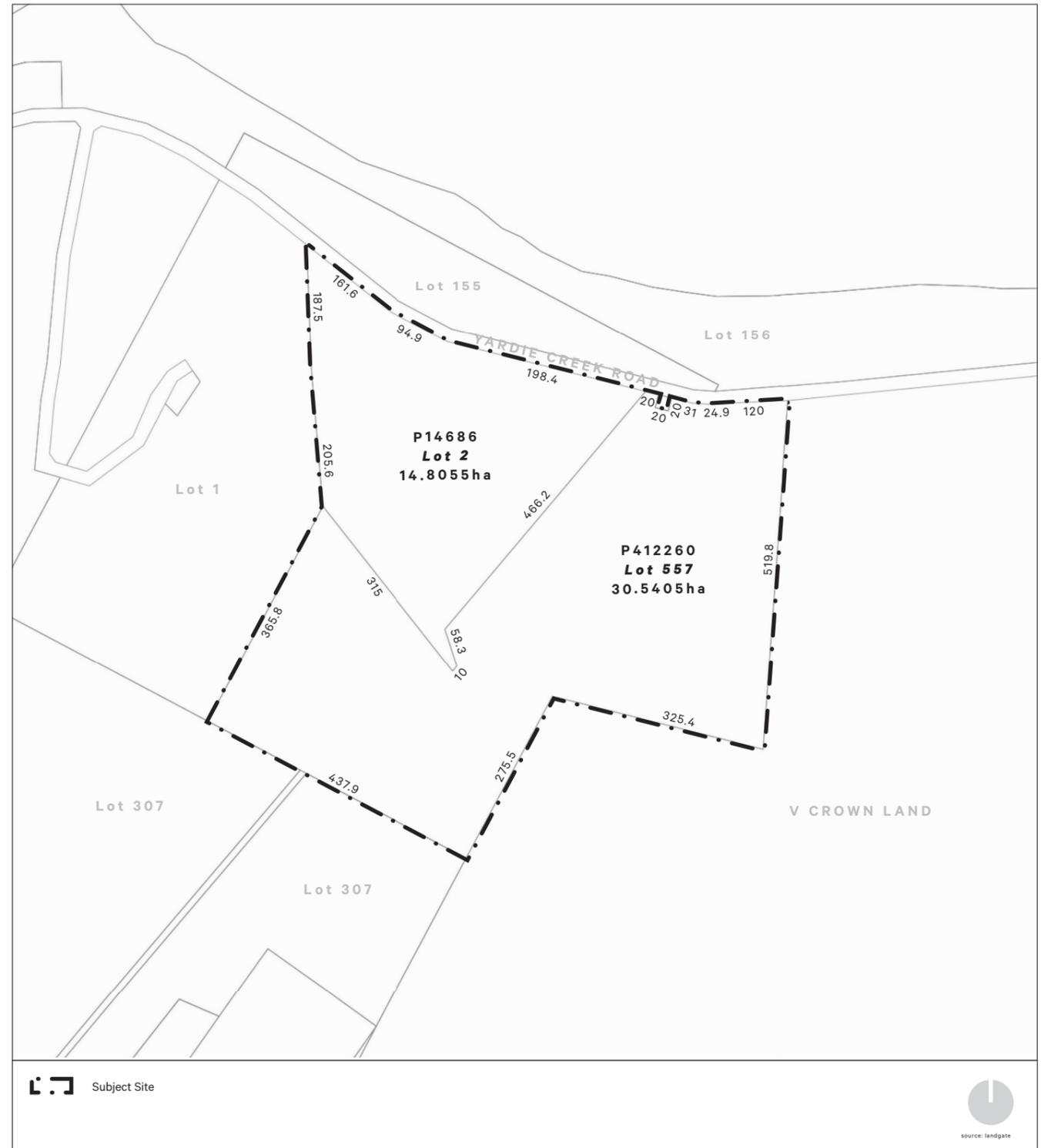


Figure 2. Site Plan

## 2. Subject Site

### 2.1 Property Description and Tenure

The subject site comprises freehold Lots 2 and 557 Yardie Creek Road, North West Cape, and is located within the Shire of Exmouth.

Refer to Figure 1 – Location Plan

The combined site comprises 45.346 hectares of land with direct road frontage to Yardie Creek Road to the north.

Refer to Figure 2 – Site Plan

The Certificate of Title details for the subject lots are summarised in the following table. Copies of the Certificates of Title are enclosed as Appendix A.

Lot	Plan	Volume/Folio	Area	Registered Proprietor
2	14686	1782/440	14.8055 ha	Northwest Resorts Pty Ltd
557	412260	2948/146	30.5405 ha	Northwest Resorts Pty Ltd

Lot 2 is subject to a Memorial under the *Heritage Act 2018*, which relates to the State heritage listing for the *Vlaming (sic.) Head Lighthouse Group* of buildings, as discussed below. There are no other easement burdens or encumbrances listed on the Certificates of Title that would impact the proposed redevelopment of the subject site.

Lot 2 contains the existing Ningaloo Lighthouse Holiday Park, which comprises a mix of camping and caravan park areas, cabin-based guest accommodation, and associated facilities and amenities, whilst Lot 557 is vacant, with the exception of an unsealed vehicle track. The natural environment is characterised by remnant native coastal heath vegetation and rocky outcrops, with a seasonal drainage line running through the centre of the proposed redevelopment of the subject site.

Refer to Figure 3 – Aerial Plan

Elevation levels vary significantly across the site, from a low point of RL 10 metres AHD at the northern edge of the site, adjacent to Yardie Creek Road, to high points of up to RL 35 metres AHD.

### 2.2 Heritage Significance

The North West Cape includes areas of world-renowned heritage significance. Whilst the project area falls predominately within previously disturbed land, the surrounding area is highly sensitive and culturally rich.

In this regard, it is noted that a desktop search of the Aboriginal Heritage Inquiry System indicates that the subject site is within the dithered public boundary of a Registered Aboriginal Site (Site 10381 – Vlaming Head), which is noted as a ceremonial and mythological site with no gender restrictions. However, the proponent has engaged with Traditional Owners and obtained separate consent for the proposed works from the Minister for Aboriginal Affairs under Section 18 of the *Aboriginal Heritage Act 1972*. A copy of this consent notice can be provided if required.

The existing Vlaming Head Lighthouse Keepers' Quarters (located on Lot 2 and constructed in 1912) is also listed on the Shire of Exmouth's Municipal Heritage Inventory and also forms part of the *Vlaming (sic.) Head Lighthouse Group* of buildings, which is listed as a Permanent Entry on the State Register of Heritage Places.

The Statement of Significance for the Vlaming Head Lighthouse Group states the Lighthouse Keepers' Quarters is a rare example of a duplex lighthouse keepers' residence, and the buildings as a whole were an important part of the development of coastal lights in Western Australia during the early 20th century.

The Lighthouse Keepers' Quarters takes the form of a rendered concrete duplex dwelling, with a corrugated iron roof and shuttered fibro clad verandahs. The building originally provided accommodation for the two keepers of the Vlaming Head Lighthouse and their families, and was most recently used as guest accommodation for the Ningaloo Lighthouse Holiday Park.

Given the identified heritage significance, this application is supported by a Heritage Impact Assessment (HIA) that considers the impacts of the proposed development on the identified heritage significance of the subject site. The findings of the HIA are discussed in detail in the following sections of this report.

### 2.3 Bushfire Risk

In addition to the above, it is noted that the subject site is also located within a bushfire prone area under the State Map of Bush Fire Prone Areas. As such, this application is supported by a Bushfire Management Plan (BMP) that addresses the requirements under State Planning Policy 3.7 – Planning in Bushfire Prone Areas and the associated Western Australian Planning Commission (WAPC) Guidelines for Planning in Bushfire Prone Areas.

The BMP is also supported by a Bushfire Emergency Evacuation Plan (BEEP), which is a requirement for 'vulnerable land uses' such as tourist accommodation, and a Bushfire Risk Management Plan (BRMP) for the proposed fuel station.

The contents of the BMP and accompanying documents are discussed in further detail in the following sections of this report.

### 2.4 Environmental Considerations

In accordance with the approved LDP for the subject site, and in recognition of the environmental significance of the area, this application is supported by a range of environmental studies, addressing matters such as:

- Coastal hazard risk management;
- Visual landscape impacts; and
- Potential light spill impacts.

In addition, Strategen-JBS&G has submitted a separate EPA referral that addresses the potential environmental impacts of the proposed development as a whole, including potential impacts on:

- Flora and vegetation;
- Terrestrial fauna;
- Subterranean fauna;
- Marine fauna (turtles);
- Inland waters; and
- Social surrounds.

The assessment undertaken by Strategen-JBS&G concludes that the proposed development will not have significant residual environmental impacts and as such, is considered environmentally acceptable if implemented in accordance with the management measures proposed within the EPA referral documentation.

The referral prepared by Strategen-JBS&G will be subject to assessment as part of the EPA process, separate to this development application.



Figure 3. Aerial Plan

### 3. Proposed Development

This application seeks approval for a redevelopment of the existing Ningaloo Lighthouse Holiday Park into a contemporary tourism development offering a range of accommodation types and associated guest amenities, to be known as the Ningaloo Lighthouse Resort.

Specifically, this application seeks approval for:

- The retention, conservation and adaptation of the heritage listed Lighthouse Keepers' Quarters on site;
- The demolition of all remaining buildings and structures on site; and
- The construction of a new integrated tourism development that comprises:
  - A two-storey, 60 key hotel;
  - Seven (7) four-bedroom lodge-style accommodation units, with a shared living and dining space;
  - 30 standard two-bedroom, self-contained villas, some of which have additional bunk-bed pods to accommodate families with children;
  - Four (4) larger two-bedroom villas, with an associated swimming pool;
  - 28 single-bedroom, fixed eco-tents, with shared central cooking and ablution facilities;
  - 62 powered caravan sites, with an associated fuel station to the south of the site;
  - Six (6) on-site staff accommodation units and one (1) general manager's accommodation unit;
  - Associated guest facilities and amenities, including food and beverage offerings, swimming pools, spa, tennis courts, recreation and leisure centre, children's playground, boat washdown and storage facilities, and a small surf shop tenancy at the main entry to the resort; and
  - Associated car parking, utilities and servicing infrastructure.

The main built form elements are located to the north of the subject site, within the main resort area fronting Yardie Creek Road, whilst the caravan park area is located to the south of the subject site, away from Yardie Creek Road.

The resort as a whole is designed to accommodate a peak occupancy of 726 people, comprising 623 overnight guests, 28 day time visitors and 75 staff, the vast majority of whom will be housed off-site and will commute from Exmouth.

For further details, please refer to the development plans prepared by Kerry Hill Architects and included as Appendix B.

The proposal also includes high quality landscaping throughout the subject site, with a focus on restoring site ecologies by bringing the surrounding native vegetation communities in and throughout the resort site, and limiting the impact that the built environment has on the ecology of the landscape.

For further details, please refer to the detailed landscaping plans and landscape architecture statement prepared by McGregor Coxall and included as Appendix C.

Outside the boundaries of the subject site, 40 additional public parking bays are proposed within the Yardie Creek Road Reserve. However, it is acknowledged that these will require separate engineering approvals from the Shire.





## 4. Architectural Statement

The site of the proposed Ningaloo Lighthouse Resort is located within a unique, ancient landscape on the edge of the Ningaloo coastline. The site contains Aboriginal and European heritage elements and is currently used as a caravan and camping ground with a number of fixed structures.

The vision of the project is to offer a variety of world class accommodation types to appeal to a broad range of travellers, providing the opportunity for them to experience the rugged beauty of the north west of Western Australia.

More specifically, the project comprises:

1. Refurbishment of existing heritage buildings.
2. Administration and village buildings including a restaurant, bar, spa, recreation centre, pool and pavilion.
3. Accommodation buildings (7 Types):
  - a. Hotel accommodation.
  - b. Caravan park.
  - c. Lodge style units.
  - d. Dual and single keyed villas.
  - e. High end villas.
  - f. Staff accommodation.
  - g. Eco tent camping ground.
4. Site Layout.
5. Service Buildings.

The Ningaloo Lighthouse Resort is divided into two main areas: the resort village and the caravan park.

### The Resort Village

The resort village is organised around a simple landscape concept.

The flat and disturbed parts of the subject site are reinstated as a north west garden, containing shady eucalypts and casuarinas. Within this 'oasis,' the larger buildings are designed to strongly reference the vernacular homesteads of the north west. The building language comprises large verandahs, eaves and shade structures with simple skillion and pitched metal sheet roofs. A refurbished Lighthouse Keeper's house is the centrepiece of the village and contains the reception.

### The Caravan Park

The caravan park is located in a small valley to the south eastern part of the subject site. It contains the infrastructure, logistics and boat storage buildings that support the village, including a fuel station. These functions are contained in simple, vernacular forms which are predominantly single storey. The caravan park is connected to the resort village with a network of bush paths.





## 5. Planning Assessment

### 5.1 Local Planning Framework

#### Shire of Exmouth Local Planning Strategy

The Shire's Local Planning Strategy acknowledges that tourism is a vital economic growth industry for the area and encourages the sustainable growth of tourism operations throughout the Shire. The Local Planning Strategy seeks to facilitate a diverse range of tourist accommodation and encourage development that provides a tourism experience that adds to the Exmouth area's unique competitive advantages in the tourism space.

The proposal directly responds to the above intent, and the identified tourism strategies under the Local Planning Strategy, by:

- Capitalising on the environmental and landscape characteristics of the surrounding area through the provision of high quality tourist accommodation that will boost and support Exmouth's appeal as a tourism destination;
- Redeveloping an existing, dated tourism facility in a manner that will provide a unique tourism experience, whilst retaining the low impact nature of tourism operations at Padjari Manu (Vlamingh Head);
- Providing a diverse range of accommodation options, including hotel rooms, self-contained villas, lodge-style accommodation, and the retention of a significant caravan park component, providing diversity, affordability and choice for patrons; and
- Providing a high standard of built form and landscaping that represents best practice tourism development and reflects the unique Exmouth environment.

Furthermore, the Local Planning Strategy also specifically encourages a review of the Vlamingh Head Masterplan (VHMP) to "re-assess the limitations on the scale of development permitted in the context of overall sustainability objectives and the changing supply and demand characteristics of the tourism market". This has been addressed in part through the recent adoption of the approved LDP, which varies a number of provisions in the VHMP. The submission of this development application builds on the recent adoption of the LDP and will provide a more diversified tourism offering that responds to the changing supply and demand characteristics of the tourism market.

In accordance with the above, the proposal is entirely consistent with the strategic planning direction established under the Shire's Local Planning Strategy.

#### Shire of Exmouth Local Planning Scheme No. 4

The Shire of Exmouth Local Planning Scheme No. 4 (LPS4) is the primary statutory control on the development and use of land throughout the Shire area.

The subject site is zoned 'Special Use – Zone 2' (SU2) under LPS4, whilst the surrounding lots and Unallocated Crown Land (UCL) are reserved for the purpose of 'Environmental Conservation'.

Refer to Figure 4 – Extract of LPS4

### Land Use Permissibility

In accordance with the applicable development requirements under Schedule 4 of LPS4, the following land uses can be considered for development approval within the SU2 zone:

- Tourist Development;
- Camping Ground;
- Caravan Park;
- Caretaker's Dwelling;
- Holiday Accommodation;
- Holiday House;
- Restaurant/Café;
- Shop.

However, Schedule 4 also allows for other land uses to be considered at the discretion of the decision-making authority, where consistent with the VHMP.

Having due regard to the above, it is noted that the proposal comprises the following land uses:

- 'Tourist Development', which is identified as a permitted ('P') use for the subject site under Schedule 4 of LPS4, and appropriately covers all accommodation offerings other than the caravan park component, including the ancillary staff accommodation and management facilities on site;
- 'Caravan Park', which is a discretionary ('D') use and represents a continuation of the existing land use at the subject site; and
- The following ancillary land uses:
  - 'Shop' and 'Restaurant/Café', which are identified as discretionary ('D') uses for the subject site;
  - 'Small Bar', which requires consideration against the VHMP and the exercise of discretion by the decision maker; and
  - 'Service Station', which requires consideration against the VHMP and the exercise of discretion by the decision maker, and can also be considered under the 'non-confirming use' provisions under Clauses 3.7 and 3.8 of LPS4.

In accordance with the above, the predominant 'Tourist Development' and 'Caravan Park' uses are considered entirely appropriate for the subject site, noting that these represent a continuation of the existing land uses at the subject site and are consistent with both the Shire's Local Planning Strategy and the VHMP.

The small scale 'Shop', 'Restaurant/Café' and 'Small Bar' land uses are also considered entirely appropriate as ancillary uses that provide a high level of amenity for guests, without undermining the role of the Exmouth townsite as the principal commercial centre of the region. As part of the broader 'Tourist Development' land use, these ancillary land uses are entirely consistent with the VHMP, which seeks to ensure that the subject site is retained for tourism related purposes, and specifically contemplates small-scale retail and hospitality land uses.

The 'Service Station' land use is also considered entirely appropriate on the basis that this provides an important service to a semi-remote tourism facility and represents a continuation of the existing 'Service Station' use at the subject site. This enables the 'Service Station' use to also be considered under the non-confirming use provisions under Clause 3.8 of LPS4, which allow for the alteration or rebuilding of a non-confirming use, subject to obtaining development approval.

In accordance with the above, the proposed land uses are considered entirely appropriate for the subject site and consistent with the provisions of LPS4.

### Car Parking

LPS4 also provides car parking requirements for each of the above mentioned land uses, which are addressed in the following table. The 'Shop', 'Restaurant/Café' and 'Small Bar' land uses have been assessed as part of the overall 'Tourist Development' land use, as they are ancillary to the 'Tourist Development' use and intended for use primarily by patrons of the resort.

Requirement	Provided
<p><u>Tourist Development:</u></p> <p>One (1) space for every bedroom.</p> <p>One (1) visitor space per twenty (20) bedrooms.</p> <p>One (1) additional bus space for every 40 persons which may be accommodated.</p> <p>One (1) additional space for every two (2) staff members.</p> <p>One (1) space for every four (4) seats in dining area if open to the public.</p> <p>One (1) space for every 6m<sup>2</sup> of bar area if open to the public.</p>	<p>Car parking for patrons of the 'Tourist Development' component has been allocated on the basis of one (1) space for every bedroom, as follows:</p> <ul style="list-style-type: none"> <li>• One (1) bay per hotel room key, with 60 bays provided for the 60 key hotel proposed;</li> <li>• Two (2) spaces for each two-bedroom villa, with 68 bays provided for the 34 villas proposed;</li> <li>• Four (4) bays for each four-bedroom lodge unit, with 28 bays provided for the seven (7) lodge units proposed; and</li> <li>• One (1) bay per single-bedroom eco-tent, with 28 bays provided for the 28 eco-tents proposed.</li> </ul> <p>Owing to the remote location of the subject site, it is not considered necessary to provide separate parking for the associated food and beverage offerings, as these will cater primarily for overnight visitors. However, 39 additional bays are provided close to the main entry to the resort, along with 40 additional public parking bays that are proposed to be delivered within the Yardie Creek Road Reserve. This provides more than adequate parking for daytime visitors to the subject site, based on the 184 bedrooms proposed within the integrated 'Tourist Development' component of the proposed development.</p> <p>A bus embayment is also provided at the main entry to the proposed resort, as indicated on the plans provided.</p> <p>With respect to staff parking, it is noted that the majority of staff will commute from the Exmouth Townsite via a shuttle bus system operated by the resort, whilst a number of staff will also be housed at the subject site. As such, demand for on-site private vehicle parking for staff will be low. Notwithstanding, eleven (11) staff parking bays are proposed at the service compound adjacent the caravan park component of the subject site.</p>
<p><u>Caravan Park:</u></p> <p>Two (2) spaces per chalet or cabin.</p> <p>One (1) additional space for every chalet/cabin that can accommodate more than six (6) people.</p> <p>One (1) additional space for every two (2) staff members.</p> <p>One (1) additional bus space for every 40 persons which may be accommodated.</p>	<p>The 'Caravan Park' component of the proposed development comprises of 62 powered caravan sites only.</p> <p>Given that there are no chalets or cabins, and that all guest will be staying in their own caravans, it is not considered necessary to provide any additional dedicated car parking spaces for the caravan park component. Each caravan site provides parking for one (1) caravan and one (1) associated towing vehicle.</p> <p>The staff parking requirement has also been assessed for the entire complex under the 'Tourist Development' land use, as per the above.</p> <p>Given that all patrons will be arriving in their own caravan, additional bus parking in the vicinity of the caravan park is also not considered necessary.</p> <p>Separate boat parking is provided as indicated on the plans provided.</p>
<p><u>Service Station:</u></p> <p>One (1) space per 20m<sup>2</sup> of NLA retail area.</p> <p>One (1) additional space for every two (2) staff members.</p>	<p>Three (3) dedicated parking bays are provided for the service station, which is more than sufficient, noting that the service station has a retail component of less than 40m<sup>2</sup> NLA.</p> <p>The staff parking requirement has also been assessed for the entire complex under the 'Tourist Development' land use, as per the above.</p>

### Development Standards

In addition to the above, LPS4 also establishes that development in the SU2 zone is to accord with the provisions of the VHMP and any LDP prepared under Part 6 of the Deemed Provisions contained within the *Planning and Development (Local Planning Schemes) Regulations 2015*. These provisions are addressed below.

## Ningaloo Lighthouse Holiday Park Local Development Plan

The Ningaloo Lighthouse Holiday Park LDP, as amended on 12 September 2019, seeks to facilitate the redevelopment of the subject site in a manner that is consistent with the vision established under the Shire's Local Planning Strategy.

The LDP defines new development envelopes for the subject site that supersede those under the VHMP, and also contains a number of development provisions that vary and augment the provisions under the VHMP and the Shire's LPS4.

An assessment of the proposal against the requirements under the approved LDP, as amended, is presented in the following table.

Requirement	Comment	Compliance
<b>Bushfire Management</b>		
<i>The subject site is located within a designated bushfire prone area under the Western Australian State Map of Bush Fire Prone Areas (DFES 2019). All development applications for new habitable buildings shall be accompanied by a Bushfire Management Plan addressing the requirements under State Planning Policy 3.7 and the associated Guidelines for Planning in Bushfire Prone Areas.</i>	This application is accompanied by a Bushfire Management Plan (BMP) that addresses the requirements under State Planning Policy 3.7 and the associated Guidelines for Planning in Bushfire Prone Areas.  The BMP and accompanying Bushfire Emergency Evacuation Plan (BEEP) are enclosed as Appendix G.	Compliant.
<b>Environment</b>		
<i>Any buildings outside the defined development envelopes are to be designed to minimise alteration to the natural topography of the site, and to allow for the protection of areas containing significant flora and fauna.</i>	All habitable buildings are contained within the defined development envelopes of the LDP, as amended.	Compliant.
<b>Heritage</b>		
<i>The existing Vlamingh Head Lighthouse Quarters and associated access track are listed on the State Register of Heritage Places as part of the registered curtilage of the Vlamingh (sic.) Head Lighthouse Group of buildings. Any development that affects the State registered curtilage is to be accompanied by a Heritage Impact Statement prepared by a suitably qualified consultant.</i>	This application proposes the retention, conservation and adaptation of the heritage listed Lighthouse Keepers' Quarters, and is therefore accompanied by a Heritage Impact Assessment (HIA) prepared by Griffiths Architects and enclosed as Appendix H.  The HIA concludes that the proposed works will retain the place's core heritage values and result in a high quality conservation outcome.	Compliant.
<b>Development Envelopes</b>		
<i>All new development shall be contained within the identified development envelopes, unless of a minor nature (e.g. pathways, shade structures, lighting, service enclosures etc.) and otherwise approved by the responsible authority. In determining a proposal outside the development envelopes, consideration will be given to responsive design that minimises impact on the environmental and visual landscape character of Vlamingh Head (subject to reporting requirements of cl. 13 of this LDP).</i>	All habitable buildings are contained within the defined development envelopes of the LDP, as amended.  All landscaping and infrastructure outside the defined development envelopes has also been designed to respect the natural topography of the subject site, so as not to impact on the environmental and visual landscape character of Vlamingh Head.  Accordingly, the extent of development is considered entirely appropriate, having regard to the findings of the Visual Impact Assessment that is enclosed as Appendix I.	Compliant.
<i>The siting of development shall have regard to State Planning Policy 2.6: Coastal Planning.</i>	The siting of the proposed development has had regard for the provisions of SPP2.6, as discussed below, and is supported by a Coastal Hazard Risk Assessment prepared by MP Rogers and Associates and enclosed as Appendix J.  The Coastal Hazard Risk Assessment concludes that all of the proposed buildings are located outside the 100 year coastal hazard zone.	Compliant.

Requirement	Comment	Compliance
<b>Building Heights</b>		
<i>New buildings will generally be limited to a height of 2 storeys and 10.0 metres above the existing natural ground level below the midpoint of the proposed building (subject to cl. 13 of this LDP), unless otherwise approved by the responsible authority having due regard to Clause 67 of Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015. Heights of up to 3 storeys and 15.0 metres may be permitted within the main resort area fronting Yardie Creek Road, as indicated, subject to cl. 13 of this LDP.</i>	The majority of the proposed buildings are single-storey, with the exception of the two-storey hotel and associated guest amenity buildings to the north of the subject site, which have a maximum height of 7.8 metres above natural ground level.	Compliant.
<b>Setbacks</b>		
<i>Setbacks are required from sites of cultural heritage significance, including any identified Aboriginal heritage sites. Setbacks from sites of cultural heritage significance will be determined on a case-by-case basis.</i>	All main built form elements are setback at least 10 metres from the former Lighthouse Keepers' Quarters, which provides an appropriate setting for the retained heritage place, as noted in the HIA prepared by Griffiths Architects and enclosed as Appendix H.  As noted previously, the proponent has also obtained separate consent for the proposed works under Section 18 of the <i>Aboriginal Heritage Act 1972</i> .	Compliant.
<i>All new development shall be setback from Yardie Creek Road at the discretion of the responsible authority having due regard to Clause 67 of Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015.</i>	All main built form elements are setback a minimum of approximately 12 metres from Yardie Creek Road, which is broadly consistent with the setback of the previous development on site.  The setback provided is considered appropriate, having regard to the semi-remote nature of the site, and noting that there are no surrounding landholdings that would be adversely affected by the positioning of the proposed buildings on the subject site.  The layout and massing of the proposal is also supported by the Visual Impact Assessment that is enclosed as Appendix I.	Compliant.
<b>Building Design</b>		
<i>The design of all new buildings shall respond sensitively to the unique physical environment of Padjari Manu (Vlamingh Head).</i>	This application is supported by a Visual Impact Assessment that identifies the strategies that have been employed to reduce the visual impact of the proposed development and to preserve the scenic quality of the surrounding landscape. This includes the following: <ul style="list-style-type: none"> <li>• New buildings have been kept to a maximum of two storeys with the majority of buildings being single storey.</li> <li>• Where new buildings have been proposed, tree planting has been included in the areas adjacent new buildings to minimise visual impact.</li> <li>• Existing landforms have been utilised so that development is contained to areas that are naturally concealed from more distant views.</li> <li>• Service and infrastructure buildings have been consolidated and set within a natural 'hollow' in the landscape.</li> </ul> Accordingly, the development is observed to respond sensitively to the unique physical environment of Padjari Manu (Vlamingh Head), as detailed in the Visual Impact Assessment that is included as Appendix I.	Compliant.

Requirement	Comment	Compliance
<b>Landscaping</b>		
<i>Outside the defined development envelopes, any landscaping and other minor structures or infrastructure shall integrate with the natural landscape through the use of appropriate materials and local endemic species.</i>	All landscaping and infrastructure outside the defined development envelopes has been designed to respect the natural topography of the subject site.  The landscape design seeks to extend the surrounding ecologies into the resort site by utilising endemic species that complement the surrounding landscape.	Compliant.
<i>Landscaping shall have due regard to the requirements of State Planning Policy 3.7 and the associated Guidelines for Planning in Bushfire Prone Areas.</i>	All landscaping has been designed with due regard to the requirements of State Planning Policy 3.7 and the associated Guidelines for Planning in Bushfire Prone Areas, and to retain appropriate Asset Protection Zones and Bushfire Attack Level (BAL) ratings for the proposed buildings, as detailed in the BMP that is enclosed as Appendix G.	Compliant.
<b>Infrastructure and Servicing</b>		
<i>The use of renewable energy sources, and wastewater reuse is encouraged where feasible.</i>	The development proposes the use of on-site waste water recycling and solar based power generation, as indicated on the plans provided and detailed in the Sustainability Strategy that is enclosed as Appendix E.	Compliant.
<b>Development Application Requirements</b>		
As part of any significant redevelopment of the subject site, the following information will be required at the development application stage: <ul style="list-style-type: none"> <li>• A coastal hazard risk assessment;</li> <li>• A visual landscape impact assessment;</li> <li>• A lighting impact assessment, addressing the impacts of light spill on nesting turtle habitats;</li> <li>• A water extraction and pollution control plan, addressing potential impacts on subterranean fauna;</li> <li>• A servicing infrastructure report, addressing the provision of essential utilities and services;</li> <li>• An access management strategy;</li> <li>• An odour management plan, for any development within the 500 metre buffer around the existing sewage treatment ponds; and</li> <li>• Environmental assessment.</li> </ul>	This application is supported by the following technical reports, which have been discussed in detail throughout this report. <ul style="list-style-type: none"> <li>• A coastal hazard risk assessment;</li> <li>• A visual landscape impact assessment;</li> <li>• A lighting impact assessment, addressing the impacts of light spill on nesting turtle habitats;</li> <li>• A servicing infrastructure report; and</li> <li>• An access management strategy.</li> </ul> The associated EPA referral documentation also provides a detailed environmental assessment of the proposed development, including a water extraction and pollution control plan addressing potential impacts on subterranean fauna in the locality. This detailed environmental assessment will be subject to assessment as part of the EPA referral process, separate to this development application.  With respect to the requirement for an odour management plan, the proponent intends to decommission the existing sewerage treatment ponds to the south of the subject site and treat all sewerage generated in the on-site wastewater treatment plant that is proposed to the southeast of the subject site. As such, it is not considered necessary to submit an odour management plan as part of this application for development approval.	Compliant.

In accordance with the above, the proposal is entirely consistent with the approved LDP, which was adopted to provide a specific set of development criteria to facilitate the redevelopment of the subject site for ongoing tourism uses, as proposed.

## Vlamingh Head Masterplan

The Vlamingh Head Masterplan (VHMP) was prepared by the WAPC in 2008, to act as a guiding document for the development and use of land at the subject site, and also gives consideration to the adjoining Lot 1 Yardie Creek Road and Lot 4 Johnson Road.

The VHMP seeks to retain the use of the Vlamingh Head node for tourism purposes, with a particular emphasis on retaining the low impact nature of tourism operations in the locality. This includes specifying development envelopes and requirements, many of which have since been superseded by the approved LDP, and the imposition of a 1020 person cap on overnight visitor numbers.

However, at the start of this project, it was identified that the VHMP is over 10 years old and has not been subjected to the 5 yearly reviews that are required by the 'Implementation and Review' section of the document. As such, it was identified that the Masterplan is out of date and inconsistent with contemporary best practice for remote coastal tourism assets. Consequently, it was agreed with both the Shire and the WAPC that the preparation and adoption of an LDP was the appropriate way to explore a set of contemporary development provisions for the subject site that remain consistent with the intent of promoting the sustainable use of the Vlamingh Head area in a manner that appropriately balances environmental and heritage conservation with the desire to promote sustainable tourism and economic development. This has resulted in the adoption of the approved LDP for the subject site, which varies and augments the provisions of the VHMP and the Shire's LPS4, effectively superseding the VHMP as the primary control on the development of the privately held land at Vlamingh Head.

In accordance with the above, the identified development envelopes under the VHMP have been superseded by those in the approved LDP, as have the other various provisions of the VHMP relating to built form, setbacks, environmental and landscape protection, infrastructure provision, resource efficiency and access control. Accordingly, the only key provision of the VHMP that is considered to remain relevant to development on the subject site is the continued presence of the 1020 person cap on overnight visitor numbers, which is not proposed to be exceeded, with the development designed to accommodate a peak occupancy of 623 overnight visitors through the provision of:

- A 60 key hotel;
- A total of 34 two-bedroom, self-contained villas, some with additional bunk pods;
- Seven (7) four-bedroom, self-contained lodge-style units;
- 28 single bedroom, fixed eco-tents; and
- 62 powered caravan sites.

Given that the proposed development remains consistent with the cap on overnight visitors, the proposal is observed to be consistent with the intent of the VHMP in terms of retaining the low-impact and semi-remote visitor experience at Vlamingh Head, whilst providing a diversity of accommodation options for guests.

The key environmental and landscape protection principles that underpin the VHMP have also been considered as part of the adoption of the approved LDP, as well as in the supporting technical reports that accompany this application and the associated EPA referral, which identify that an appropriate outcome will be achieved with respect to environmental and landscape protection.

## 5.2 State Planning Framework

### State Planning Policy 2.6 – State Coastal Planning

State Planning Policy 2.6 – State Coastal Planning (SPP2.6) sets out a range of policy measures to ensure that development in coastal locations appropriately takes into account coastal risk and environmental considerations. This includes considerations relating to coastal hazard risk management and the sustainable use of the Western Australian coastline that are relevant in the context of this development application.

SPP2.6 places particular emphasis on the need for adequate coastal hazard risk management and adaptation planning, which has been addressed through the preparation of the Coastal Hazard Risk Management and Adaptation Plan (CHRMAP) that is enclosed as Appendix J. This report has informed the layout of the proposed resort redevelopment, to ensure that no development is proposed within the 100 year coastal hazard zone, so as to mitigate the risk of inundation. This is consistent with the preferred approach established under SPP2.6, which indicates a preference for no new development to occur within vulnerable coastal areas.

Furthermore, the proposal is observed to be entirely consistent with the intent to promote the sustainable use of coastal areas, on the basis that:

- The proposal seeks to facilitate the redevelopment of a pre-existing tourism asset in a sustainable manner, without increasing overnight visitor numbers;
- The proposal maintains public access to the foreshore immediately abutting the subject site; and
- The environmental and landscape values of the coastal environment have been duly considered in the design of the proposed development, as detailed in the various technical studies that are appended to this report and the associated EPA referral.

As such, the proposal is considered appropriate in the context of the objectives and policy measures of SPP2.6.

### State Planning Policy 6.3 – Ningaloo Coast

State Planning Policy 6.3 – Ningaloo Coast (SPP6.3) sets out a range of policy measures and guiding principles to ensure the protection and sustainable use of the Ningaloo coast environment into the future. The four key objectives of the policy are to:

- *Provide state agencies, local government, community and proponents with clear guidance regarding acceptable and sustainable development on the Ningaloo coast.*
- *Maintain the Ningaloo coast as an all-seasons recreation and nature-based tourism destination and limit growth with managed staged development, to ensure that the community continues to enjoy a remote and natural experience.*
- *Preserve and protect the natural environment and enhance and rehabilitate degraded areas within the environment.*
- *Consolidate future residential, commercial, higher-impact tourism and industrial development in the towns of Carnarvon and Exmouth and provide strategic directions for their future growth.*

In order to achieve the above, SPP6.3 establishes 11 Guiding Principles that are to be used to assess all future planning and development on the Ningaloo coast to ensure the protection and sustainable use of the environment for the future. These Guiding Principles are addressed in the following table.

Guiding Principle	Comment
Sustainable Development	The proposal is observed to appropriately balance environmental, cultural and economic development priorities, consistent with the desire to promote the sustainable development of the Ningaloo coast, as set out below.
Community Aspirations	The proposal is consistent with the vision of retaining the Ningaloo coast as an all-seasons recreation and nature-based tourism destination, to ensure that the community continues to enjoy a remote and natural experience.
Aboriginal Heritage	As noted previously within this report, the proponent has obtained separate consent for the proposed works from the Minister for Aboriginal Affairs under Section 18 of the <i>Aboriginal Heritage Act 1972</i> . A copy of this consent notice can be provided if required.
Economic Development	The proposed development will contribute to the economic development of the region by boosting and supporting local tourism in a manner that takes advantage of Exmouth's unique competitive advantages in the tourism industry, whilst respecting and celebrating the unique environmental characteristics of the locality.
Interdependence	The detailed technical studies that are appended to this report and the associated EPA referral submitted by Strategen-JBS&G demonstrate that there are no threats of serious or irreversible environmental damage as a result of the proposed development, and that the proposal will not significantly interfere with current natural ecological processes. This includes a focus on respecting the natural topography of the subject site, protecting significant flora and fauna, utilising renewable energy, and managing wastewater in an environmentally responsible manner.
Limits of Acceptable Change	The proposal seeks to facilitate the redevelopment of a pre-existing tourism asset in a sustainable manner, without increasing overnight visitor numbers, and is therefore entirely within the limits of acceptable change.  The siting of development has also been carefully considered having regard to a range of environmental factors, as discussed throughout this report and in the associated EPA referral submitted by Strategen-JBS&G.
Precautionary Principle	As noted previously within this report, the associated EPA referral submitted by Strategen-JBS&G indicates that there are no threats of serious or irreversible environmental damage as a result of the proposed development. The environmental impacts of the proposed development will also be assessed in detail as part of the EPA process, separate to this development application.
Cumulative Impacts	Given that the proposal seeks to facilitate the redevelopment of a pre-existing, remote tourism asset, without increasing overnight visitor numbers, the impact of the proposal is comparable to that of the existing land use at the subject site.  The proposal therefore does not result in the ad hoc establishment of new developments along the Ningaloo coast, and will not unduly impact on the remote and environmental values of the area over time.
Protection of High-Conservation Values	The siting and design of the proposed development respects the unique landscape character of this portion of the Cape Range National Park coastline, as detailed in the Visual Landscape Assessment at Appendix I. Resort management will also encourage and facilitate environmentally responsible behaviour and activities, and provide environmental education for guests through on-site activities and courses.
Protection of Remote Values	The proposal seeks to maintain the semi-remote visitor experience at Padjari Manu (Vlamingh Head), in accordance with the provisions of the VHMP. The proposal represents a prime example of a low-key, low-impact tourism development that has been designed with due regard for the unique environmental and landscape character of the Ningaloo coast.
Protection of Biodiversity	The proposed development has been designed with due regard for the protection of local biodiversity, with particular regard for site-specific issues such as the protection of significant subterranean flora and the impact of lighting on nesting turtle habitats. This is addressed in detail in the associated EPA referral submitted by Strategen-JBS&G, which will be subject to assessment as part of the separate EPA referral process.

In accordance with the above, the proposal is observed to be entirely consistent with the objective of promoting the sustainable development of the Ningaloo coast, which includes a specific focus on promoting the upgrading of tourism infrastructure to improve the attractiveness of the region as a natural and remote place for visitors.

### State Planning Policy 3.7 – Planning in Bushfire Prone Areas

State Planning Policy 3.7 – Planning in Bushfire Prone Areas (SPP3.7) sets out the policy measures that apply to development in identified bushfire prone areas under the State Map of Bush Fire Prone Areas.

As the proposed development is located within an identified bushfire prone area, and proposes the development of a vulnerable land use (tourist accommodation) as defined under SPP3.7, this application is supported by a BMP and BEEP prepared by Strategen-JBS&G, copies of which are enclosed as Appendix G. The BMP addresses the requirements under SPP3.7 and the associated WAPC Guidelines for Planning in Bushfire Prone Areas (the Guidelines), and concludes that the bushfire risk to the site can be appropriately managed through the implementation of the BMP and BEEP.

The BMP includes specific consideration of the WAPC's position statement on tourism land uses in bushfire prone areas. This position statement specifically acknowledges the social and economic importance of tourism to the State, and recognises the need to provide a bushfire assessment framework that facilitates the development of short stay tourism land uses.

The policy statement also recognises that many tourism proposals are intrinsically linked to the natural landscape values of an area and often the remoteness of the location, as is the case with this proposal, which makes it difficult for many tourism proposals to meet the current provisions of SPP3.7 and the associated Guidelines.

In accordance with the above, the position statement has been duly considered in the BMP, particularly where full compliance with the Bushfire Protection Criteria under the Guidelines cannot be achieved. This includes a particular focus on early evacuation and the provision of contingency refuge options.

The above approach is considered entirely appropriate, noting that the proposal represents a unique tourism opportunity for the Shire and the State that warrants a flexible approach to the application of SPP3.7, having due regard to the desire to deliver a development that minimises impact on the unique environmental and visual landscape character of Padjari Manu (Vlamingh Head).

Further details can be found in the BMP that is enclosed as Appendix G.

## 6. Other Considerations

### 6.1 Coast Hazard Risk Management and Adaptation Plan

Owing to the coastal location, this application is supported by a Coast Hazard Risk Management and Adaptation Plan (CHRMAP) prepared by MP Rogers and Associates, which is enclosed as Appendix J.

The CHRMAP considers the risks posed to the subject site from coastal hazards both now and into the future, including coastal processes, landform stability, coastal hazards, climate change and biophysical criteria related to the adjacent shoreline at Lighthouse Bay.

The CHRMAP identifies that the majority of the built assets associated with the proposed resort development avoid both inundation and erosion coastal hazard risks over the 100 year planning timeframe to 2119, including all habitable buildings proposed on the subject site.

In accordance with the above, the only assets within the 100 year erosion hazard line are the proposed foreshore access track and a portion of Yardie Creek Road, which is a Shire asset. The risks to both of these assets are considered to be tolerable, however an As Low As Reasonably Practicable (ALARP) approach is proposed to minimise any potential impacts, which includes designing the foreshore access track as a formal pathway to discourage access through the Coastal Dunes.

It is also expected that the design life of the foreshore access track will be limited to around 25 years, which is typical for such assets. During this period, the track will be appropriately designed to accommodate the expected conditions, including potential minor and short term inundation during severe cyclone events. This may involve for instance ensuring that the end of the track (if paved) is sufficiently founded so that the potential loss of sand material wouldn't cause undermining. If not paved, this may involve managing potential scarps to ensure that no unsafe drop offs or steep sections remain following a severe event.

Beyond the 25 year design life, it is expected that the condition will be such that the foreshore access track will need to be replaced. At this time, an assessment of the current coastal hazard risk would dictate whether the track is abandoned (with removal), replaced at the same location or relocated further landward (termed managed retreat).

In addition to the above, the CHRMAP also provides recommendations for:

- Review and replacement of the foreshore access track at the end of its service life, which would be undertaken by the proponent; and
- Ongoing monitoring and review to track changes to the shoreline over time, to be undertaken by the proponent at ten yearly intervals.

The CHRMAP also notes that the results of the coastal hazard assessment are conservative and that aerial photography of the beach fronting the proposed resort development, documenting coastal processes since 1969 and covering a period when several cyclones and many severe storm events would have influenced the shoreline, indicates that this is a relatively stable coastal environment.

In accordance with the above, the CHRMAP does not identify any fundamental concerns that would inhibit the development as proposed.

### 6.2 Lighting Management Plan

The application is also supported by a lighting management plan addressing the potential impact of light spill on nesting turtle habitats. The report, prepared by Pendoley Environmental, addresses the potential impact of artificial lighting associated with the proposed development on both the nearby nesting habitats for marine turtles and the US owned, and Department of Defence operated, Space Surveillance Telescope (SST) located approximately 15 kilometres south of the subject site. This includes:

- A description of the SST and the marine turtle species nesting within 20 kilometres of the proposed developed, being the recognised distance at which a potential impact to marine turtles could occur;
- A viewshed analysis indicating the visibility of proposed development related light sources at marine turtle nesting habitats and the SST;
- A description of light sources associated with the proposed development;
- An impact assessment of identified light sources on marine turtles and the SST;
- Details of best practice lighting design principles and mitigation measures that could be applied to eliminate or minimise project related lighting impacts to marine turtles and the SST; and
- Recommendations for marine turtle and light monitoring for pre-construction, construction, and operations phases of the project.

The range of mitigation measures identified in the report will be adopted throughout the design, construction and operational phases of the proposed development, to ensure that the proposal does not have any unacceptable impact on nesting turtle habitats or SST. This includes physical infrastructure measures, management measures, the use of lighting with long wavelengths, providing training for staff and educational information for visitors, and provision for ongoing monitoring of artificial light impacts. The implementation of these recommendations will ensure that the nesting habitat rockeries remain productive and safe for continued use by marine turtles, and that the function and utility of the SST will not be compromised.

Further details can be found in the Lighting Management Plan that is enclosed as Appendix K, and it is noted that the environmental impacts of artificial lighting will be thoroughly considered as part of the separate EPA referral.

### 6.3 Servicing Infrastructure

This application is accompanied by an Engineering Servicing Report prepared by Cossill & Webley (CW) that summarises the civil engineering and servicing requirements for the proposed development. This includes consideration of the following:

- The provision of internal vehicle access ways and footpaths throughout the subject site;
- The management of stormwater runoff from new access ways and buildings through the use of swales and natural infiltration;
- Potable water, which is to be satisfied through groundwater extraction bores, to be located off-site;
- Treatment and storage of groundwater to meet the requirements of the Australian Drinking Water Guidelines;
- Wastewater treatment and reuse for open space irrigation and toilet flushing; and
- Electricity demand, gas supply and telecommunications.

The report concludes that the subject site is capable of being serviced with key infrastructure including potable water supply, wastewater and power, subject to the required infrastructure upgrades identified in the report.

Promoting greater environmental sustainability is a key aspect of the proposed infrastructure servicing strategy, with a particular focus on on-site wastewater recycling and solar power generation. This will also be supported by programs aimed at reducing waste production, such as minimising the use of single use plastic throughout the resort.

Further details can be found in Engineering Servicing Report that is enclosed as Appendix D, and the preliminary Sustainability Strategy that is enclosed as Appendix E.

### 6.4 Access Management Strategy

This application is also accompanied by an Access Management Strategy prepared by Arup and enclosed as Appendix F.

The Access Management Strategy includes:

- Identification of the primary circulation routes in and around the proposed resort;
- Identification of the primary entries to the subject site and the associated vehicle sight lines that will be required;
- Design requirements for the construction of internal circulation roads and car parking areas; and
- Swept path analysis for heavy vehicle accessing the subject site.

The Strategy also suggests a reduction in the road speed environment along Yardie Creek Road in the vicinity of the subject site to 60km/h, so as to improve road safety. This will require separate approvals from the Shire and Main Roads WA.

The Strategy also acknowledges the vision for the establishment of a new public road to the rear of the subject site, which would provide a bypass road to enable modifications to the portion of Yardie Creek Road that directly abuts the subject site. This proposed road realignment would enable the redirection of through traffic, retaining the portion of Yardie Creek Road that directly abuts the subject site as a reduced speed road environment that terminates in a cul-de-sac arrangement to the northwest of the subject site, which would improve safety for pedestrians and vehicles within the proposed resort. This matter has been discussed with Main Roads WA, and is presently being considered by State Government with funding having been allocated and concept design actively progressing. The proposed redevelopment has been designed having regard to, but not reliant upon, the alignment of this proposed new public road, but it is acknowledged that this is subject to separate approval processes and timeframes.

An indicative masterplan showing the proposed road realignment is included in the development plans that are enclosed as Appendix B.

## 7. Heritage Considerations

As noted previously in this report, the existing Vlamingh Head Lighthouse Keepers' Quarters is listed on the Shire's Municipal Heritage Inventory and also forms part of the *Vlaming (sic.) Head Lighthouse Group* of buildings, which is listed as a permanent entry on the State Register of Heritage Places.

Accordingly, this application is accompanied by a Heritage Impact Assessment (HIA) prepared by Griffiths Architects, which identifies that the Vlamingh Head Lighthouse Group is one of the earliest European inhabited sites on the North West Cape. The lighthouse and associated buildings, completed in 1912, were an important part of the development of coastal lights in Western Australia during the early 20th century when the increased population of the State and the development of the North West resulted in a greater number of shipping movements.

The State heritage listing encompasses the Vlamingh Head Lighthouse and associated store, the Lighthouse Keepers' Quarters on Lot 2, the grave of Joseph Frank Reddy, the Exmouth 31 Radar Station and associated features. However, the HIA primarily focuses on the Lighthouse Keepers' Quarters, as this is the only historically significant structure that will be impacted by the proposed works.

The Lighthouse Keepers' Quarters are located centrally within the existing Ningaloo Lighthouse Caravan Park and originally consisted of a duplex residence for two lighthouse keepers and their families. Each duplex half comprised a living room, two bedrooms, kitchen, bathroom and store room, with a spacious verandah back and front, and a breezeway between the bedroom and living rooms and the remainder of the house. Separate stabling and washhouses were also provided.

The original timber framed hipped roof of the Lighthouse Keepers' Quarters has since been re-clad with zincalume and all external perimeter verandahs have been enclosed with fibre sheet dado walls. The setting of the place has also been impacted by the construction of a store and office in close proximity to the original Quarters, and the overall caravan park development.

The HIA, included as Appendix H, has been prepared to detail the conservation and adaptation works proposed to the Lighthouse Keepers' Quarters as part of this application, and to provide an assessment of the impact of the proposal on the identified heritage significance of the subject site. A summary is also provided below.

### Scope of Heritage Works

#### Demolition Works

The scope of demolition works for the Lighthouse Keepers' Quarters includes the following:

- Removal of tiles and concrete screed on timber verandah floor.
- Removal of existing timber verandah flooring which is in poor condition.
- Removal of enclosing lining to the verandah balustrade.
- Removal of shutters to outside line of the verandah.
- Removal of steel channels to the outside face of existing timber posts.
- Demolition of part of one dividing internal wall to the west wing, with nibs to be retained.
- Demolition of all internal walls and the fireplace to the central block of the Quarters, with nibs to be retained.
- Interpretation of original wall layouts by leaving the walls above the openings and interpreting them in the floor patterns.
- Widening and extending windows to the south wall of the central block to form a compliant double door access.
- Removal and/or fixing of doors to the central block.

#### Construction and Adaptation Works

The scope of construction and adaptation works for the Lighthouse Keepers' Quarters includes the following:

- Enclosure of doors and sidelights to each end of the breezeways.
- New toilet facilities to east wing at the southern end.
- New external ramp.
- New windows to existing openings where required.
- New double doors to the south elevation of the central block.
- New timber verandah at higher level to provide compliant access to doorways.
- Internal cabinetry fitout to the central block.
- New services throughout.
- Provision of new steel support frame for the existing roof structure.

#### Conservation Works

The following conservation works seek to enhance the Lighthouse Keepers' Quarters present deteriorated state through the conservation of existing elements to the extent that is possible with the adaptation requirements, and to present and interpret the existing building to a high standard. The scope of conservation works includes:

- Reinstating original St. Andrews Cross balustrading;
- Reinstating timber flooring to the verandah and interior spaces;
- Installing external storm battens to roof, based on documentary evidence;
- Restoring render to external walls and reinstating quoining around openings;
- Repairing and repainting retained windows;
- Repairing and repainting retained doors;
- Repainting originally painted surfaces with colours based on investigations of original colour schemes.
- Interpretation of removed walls in the ground plane by retaining nibs, finishing the removed section of wall flush with the floor and polishing the concrete floor finish.

### Assessment of Heritage Impact

The HIA provides a detailed assessment of the proposal against the identified heritage significance of the site and concludes the following:

*The development takes into account the existing topography, connections to the beach, views to the development from the immediate environs and the experience of approaching the heritage elements, with a view to creating a well-mannered visitor environment with high class accommodation types to appeal to a broad range of travellers, providing the opportunity for them to experience the rugged beauty of the north west of Western Australia.*

*The development approach follows sound conservation principles by keeping significant and new structures separate, minimising impact on significant fabric, providing interpretation of removed fabric and telling the stories of the development and construction of the light station and remote living to provide the service to shipping.*

*This assessment concludes that there are no significant negative impacts on the heritage values of the place.*

The primary heritage impact arises out of the internal demolition required to successfully adapt the Lighthouse Keepers' Quarters for use as a reception, guest lounge and function centre for the proposed resort development. However, this has been mitigated through:

- The retention of nibs and provision of a ground plane indication for removed walls;
- The maintenance of the established symmetry in the new works; and
- The reinstatement of verandah elements and conservation of the building exterior.

As such, the proposed works represent an appropriate outcome with respect to the identified heritage significance of the subject site. Further details can be found in the HIA that is enclosed at Appendix H.





## 8. Planning Merit

In addition to the specific assessment and justification provided in the preceding sections of this report, the principles of orderly and proper planning require that new development is a logical and efficient extension of existing development in the locality, and consistent with the planning vision for the area. The key points regarding the proposal are as follows:

- The proposal represents a unique tourism opportunity for the Shire and the State of Western Australia, with direct access to the Ningaloo Marine Park and Cape Range National Park, and will enhance the attractiveness of the region for both local and international visitors;
- The development will help drive sustained economic growth in Exmouth by creating year-round jobs and opportunities for local businesses;
- The proposal is entirely consistent with the vision for the area under the Shire's Local Planning Strategy, providing for the redevelopment of an existing, dated tourism facility in a manner that will provide a unique tourism experience that capitalises on Exmouth's unique competitive advantages in the tourism market;
- The proposal is consistent with relevant State Planning Policies and strategies, which encourage the sustainable use of the Ningaloo coast for tourism related activities;
- The design of the proposed development has been carefully considered to respect the unique environmental and landscape character of the area, and to retain the low-key, low-impact nature of tourism operations at Padjari Manu (Vlamingh Head);
- The proposal retains and conserves the heritage listed Vlamingh Head Lighthouse Keepers' Quarters on site as an integral part of the resort offering, ensuring its ongoing use and enjoyment by the community;
- The subject site forms the only freehold land in a semi-remote location where there is no possibility of land use conflict; and
- The proposal represents a sustainable development outcome for the subject site that appropriately balances the Shire's environmental and economic development priorities, as identified in the Shire's Strategic Community Plan.

On the basis of the above, the proposed development represents an appropriate and desirable use for the subject site, and therefore has significant planning merit.



## 9. Conclusion

This report has been prepared by **element**, in association with Kerry Hill Architects and on behalf of Z1Z Resorts Pty Ltd, in support of an application to redevelop the existing Ningaloo Lighthouse Holiday Park at Lots 2 and 557 Yardie Creek Road, North West Cape.

The proposed development, to be known as the Ningaloo Lighthouse Resort, will provide for a high quality redevelopment of the existing tourism facilities at the subject site, catering for a diverse range of visitors to the region. In doing so, the proposal will support the economic development priorities identified in the Shire's Strategic Community Plan, contributing to the strengthening and growth of the visitor experience in the region.

This report has demonstrated that the proposal is consistent with the applicable local and State planning framework, and the Shire's stated desire to capitalise on the unique cultural, environmental and landscape characteristics of the region through the provision of high quality tourist accommodation that will boost and support Exmouth's appeal as a tourism destination.

The proposal has also been carefully designed to respond to the unique environmental and landscape character of Padjari Manu (Vlamingh Head), and represents a highly sustainable approach to the redevelopment of a semi-remote tourism facility. The proponent's commitment to undertaking development in an environmentally responsible manner ensures that the proposal appropriately balances environmental and economic development priorities, and minimises impact on the natural environment.

On the basis of the above, the proposed development is entirely consistent with the principles of orderly and proper planning, and therefore warrants approval. Accordingly, we respectfully request the Shire's support for the application, and the approval of the Regional JDAP.



