

A Submission
from
THE ROTTNEST SOCIETY
to
THE ROTTNEST ISLAND
AUTHORITY



on the proposed hotel development at
Mt Herschel

Introduction

Rottneest cannot be all things to all people.

Time and again the public have come forward to protect Rottneest from the threat of ‘the developers’. They have argued for simplicity, lack of adornment and addition – they do not see it as a ‘world class tourist destination’. Its ours – hands off! A very large percentage of the 500,000 visitors annually are Western Australians and are repeat visitors. Young and old, rich and poor, judge or pensioner, newcomers and old hands, and even foreign tourists - it seems that there is a shared recognition of values which are not tied up in material goods, gyms or spas, which school one went to, or one’s status in town. Real or imagined, this is the image we have of Rottneest. Bikes and sandy feet, bathers and snorkel, a good book – what more could anyone want? Step foot on the island and feel the cares of the mainland dropping away. There are not too many places where this is left and it remains highly treasured. This is a key component of a resilient community. There are currently ongoing attempts by governments and social commentators to define our Australian values ad nauseum on the one hand and the wholesale giving away of that which we value on the other. Talk is just talk when it is not lived - and kids see through the hypocrisy of it whilst we despair.

The government, to its credit, has responded to the challenges identified on Rottneest by the Auditor General in 2003 and some of the solutions put forward by the subsequently set up Rottneest Island Taskforce (not all of them practical) have gone a long way to refurbishing and upgrading where required. However, there is a question mark hanging over this work – was it all with the intention of turning the island into that ‘world class tourist destination’? The government and the RIA trash this extraordinarily valuable community asset for the (in this case) dubious benefits of big business and tourism at the risk of increasing the already serious alienation from government. So many people don’t want this development, but believe that ‘they’ will just go ahead and do it anyway. There is anger in the community that they did not have the opportunity of a proper public consultation process about whether new accommodation was required, and if so what type. And of course it is happening in all sorts of favourite spots across the state as potential sites are ‘identified’ and ‘fast-tracked’ to become amorphous manicured pristine concrete piles that could be anywhere development. Gone is any scruffiness; designer stuff only. Caravan parks under threat to the ubiquitous developer!

There has been so much work done over the years by RIA staff, with input from groups like ours and many of the hundreds of thousands of Western Australian people with an abiding love for this scraggy little island, to define what Rottneest is, and should offer to visitors – and

what it cannot be and should not offer. There is in these quarters recognition that it cannot be all things to all people; that there is something indefinable but intrinsically valuable to the community in the simple, nature-based experience still possible on Rottnest. In spite of all of this we know now that our worst fears are being realised with this proposed development at Mt Herschel. Where we had given the Authority and the Minister the benefit of the doubt we see initial concept plans that show a development hopelessly out of touch with Rottnest's character. Frankly we feel betrayed.

Much to our sorrow we see a more dramatic breakdown of the egalitarian nature of the Rottnest experience with the advent of this development – and we see contraventions of the Rottnest Island Authority Act 1987 and the Rottnest Island Management Plan 2003-2008 (RIMP).

The Site

In general we felt that the site at Mt Herschel, because it was already degraded, was a more suitable site than the site proposed by the Rottnest Island Taskforce at South Thomsons for a 'low-impact eco-tourism' development. However we were always concerned about other aspects such as extra traffic, the possible size of any development and the impact of extra visitors on the area. It has to be said that it is hard to imagine a windier site than this one, situated as it is under the wind turbine. One wonders too whether the turbine noise, quiet though it may be, will be found to be offensive by guests and staff. Will it then be found to be not living up to expectations and abandoned? It is also hard to see why it is necessary to use any area that is not currently covered in bitumen for this development – when there is so much degraded site why tear up existing vegetation. We would prefer not to see this happen.

Extra overnight visitors

We have serious concerns about the impact the extra overnight visitors generated by this development will have on the ecology of the island and the "Rottnest experience" so valued by so many West Australian visitors. The RIA says on its website article *Mt Herschel Development* that the additional visitors attracted to this development will not have much impact. Managing recreational use of the island's fragile environment is a challenging task, and we are concerned that the current level of pressure is not being properly managed, nor restoration and conservation works adequately funded, to ensure that future visitors to Rottnest are able to enjoy a similar, or better, state of natural environment than we do. The prospect of increasing the number of overnight visitors by approximately 90,000 annually, when current levels of usage are not managed properly, is very alarming. In particular, the prospect of 90,000 extra visitors treading the beaches and headlands in the immediate vicinity is worrying when these are already badly degraded areas, and the RIA does not appear to have sufficient funds to repair and conserve these areas. Where is the research, meant to be carried out in 2005, into the impact of visitor numbers as required by Recommendation 115 of the Rottnest Island Management Plan 2003-2008 (RIMP)? Of course this was required even before the addition of a further 90,000 visitors annually.

The Development

The Rottnest Society recognises some environmentally friendly qualities in the design features demonstrated in the initial concept plans for this development as available on the Rottnest Island Authority website. We recognise also that adherence to their Sustainability Guidelines is required by the RIA. However, if the existing framework of laws, management plan and documents such as the Guidelines for Sustainability still allow for the building of a development that is too large for the location, is a high energy and water use design, the domination of the nearby settlements and bays, and will disrupt the peace for other current visitors in the immediate area then it is clear that these laws and documents don't mean much – although of course we recognise that it would be a lot worse without them. Is this really the best we can do in 2007?

The impact of the Broadwater proposal on the “Rottnest experience” and ethos of the island is a lot harder to quantify, as the most valuable aspects of visits to Rottnest are often intangible. We will try to make some constructive comments in the hope that they will be taken into account.

The proposed development, while adhering to the two storey limit, appears from the sketches to be four storeys high when viewed from Longreach Bay. The southern wings of the proposal appear to be on re-contoured dunes (to give extra height) and will stand out against the skyline since the treeline shown on the developer’s elevation images are mostly NOT actually there – which can be construed as deception. There will also be potential wind issues from at least the south, south-west and north-west. Without actually knowing the elevations it is also difficult to see what would protect the site from the east wind.

Given free reign by the EOI document to re-contour dunes, and no maximum AHD level stipulated, this development will impose itself over Longreach Bay, over the Longreach/Geordie settlements, probably the Geordie/Thomsons Bay Rd, and over the golf course. We do not know where else it will be visible from, however this is an unacceptable compromise of other people’s amenity and should be reduced wherever possible before any contract is signed. While this may mean that rooms have a limited ocean view, the appearance of the development will be more in sympathy with both the contours of the hill and existing accommodation at Longreach, where the second row of accommodation is tucked behind the first.

It is sincerely hoped that the footprint of the hotel does not extend down the foredune close to the cycle path along the top of Longreach Bay as indicated in one of the elevations provided by the developer in the public comment kit. We know that there has been/is serious concern for the future of the Longreach/Geordie villas and the same mistake should not be made again. Indeed, can we be sure even that State Coastal Planning Policy SPP No 2.6 calling for a minimum 100m setback from HSD will be adhered to in this case? If not, why not?

Another aspect that makes the development appear ‘in your face’ is the setting of the pool deck and restaurant over the beach. Whilst desirable for the guests, it again has the potential to impinge on the appeal of Longreach Bay. While “guests can... enjoy the sight of families swimming, building sandcastles or cycling”, how will those families feel? Developments in other locations, for example at Port Douglas, are set back so they are not visible from the beach. Just because the Geordie/Longreach villas are located on the beach does not mean that we should repeat the mistake. The proponent indicated at the public meeting on 3rd Feb 2207 at Swan Yacht Club that the site would be re-contoured to reinstate the primary dune, but this does not appear to tuck away the development as we would hope, but to raise the level of the rooms. Where is an illustration of the view of the proposed development from the beach, as required by the RFP stage?

There is a high likelihood of a significant noise component at night, particularly when there are functions, given the open aspect of the pool deck and restaurant area. Those that live within earshot of a venue which has regular functions know that a great deal of noise is made until midnight. Longreach and Geordie Bay accommodation is highly valued for the peace and quiet. What measures will be made to ensure that noise from the development does not impact on people staying in villas at Longreach/ Geordie and on boats in the bay?

There is a mixture of styles of architecture found on Rottnest, but we believe these initial sketches do not reflect the characteristics of the island. Rottnest is a unique place and the existing buildings have charm. The proposed buildings appear very modern, square and urban. The colours also appear dark. How does this fit with Rottnest’s colour policy, and could the development use colours similar to those already on the Longreach units?

We appreciate that these are initial concept plans only, but it is difficult to know what the different green areas, and even buildings, are in the Site Layout figure. We would like to

have the public have the opportunity to make informed comment, which is challenging with the limited information provided.

We commend the architects for taking advantage of the passive solar opportunities for building design and for incorporating grey water recycling into the development. While there are some good sustainable building features for the staff quarters, such as the lack of air-conditioning and installation of photovoltaic cells, however, why is this not evident for the guest quarters? On an island where utilities are a precious resource, and in an era of accelerated man-made global warming, how does the choice to air-condition rooms contribute to Rottnest as a “model of sustainability”?

In addition, how does the provision of spa baths in rooms, plus the availability of a swimming pool and plunge pool encourage guests to limit their water use? We would much prefer that this was truly a ‘low-impact’ development with no air conditioning, spa baths or swimming pool, and failing that would strongly encourage that guests be made aware of the value of this resource at every opportunity, such as signs by the outdoor showers.

We understand that this development may have a day spa and a gym – again this is moving right away from the nature-based self-directed activities embraced by the RIMP and is to be thoroughly discouraged. This kind of additional facility is exactly what so many people of all ages are concerned about – that this kind of development will bring more and more requests for additional services and facilities which will turn Rottnest into everywhere else. We are happy with self-directed and guide-led activities which take people into the natural and cultural wonders of Rottnest and help them to build a relationship with the island.

The RIA infers on its website article *Mt Herschel Development* that there will be no additional bus services required to cater for approximately 120 extra visitors (360 beds with say each staying an average of 2 nights) in and the same number out (without staff or goods delivery) the Longreach/Geordie area each day. However, the Norman Disney Young Report says that "It is anticipated that develop (sic) would be responsible for the movement of luggage to and from the facility and would likely be incorporated into the collection of guests from the ferry and or airport for both arrivals and departures". This report also indicates that there will likely be a similar situation to that currently in place with the Lodge – which has its own courtesy bus. The *Mt Herschel Development* document is shoddy with not just inadequate information but poorly presented, in that some pages cannot be read, and misleading information such as this.

We commend the proponent for their use of native vegetation in their landscaping, although we do not support the use of exotic flora, including lawns, in the formal planting zone. All vegetation should be native.

We encourage the proponent to choose the most environmentally sensitive materials, and commend the choice to construct pieces on the mainland for assembly on the island.

Viability and winter visitor numbers

The Minister and the Rottnest Island Authority (RIA) continue to tell us that this new 4 1/2 star development will boost winter numbers with its conference facilities and its appeal to overseas and interstate visitors, and that this will help to keep other accommodation affordable for the rest of us. They say it will also contribute to the financial viability of other island businesses (by bringing more winter visitors) and that it won't change the 'Rottnest ethos'. However there is no evidence to demonstrate that the natural barrier of winter gales and high seas will not deter conference and function organisers from using this facility in sufficient numbers to make this a reality. It does not seem realistic that large numbers of international or interstate visitors would choose to visit Rottnest in the middle of winter and Perth people are probably more likely to be seeking warmer climates in our winter.

- Does the viability of the proposed hotel depend on a significant increase in winter visitor numbers compared to other accommodation facilities on the island? If so, what percentage increase?
- What research does the Minister and RIA have to demonstrate their confidence that the proposed boutique hotel can overcome the natural barrier of winter gales and big seas to attract sufficient winter visitors to be viable?
- What research does the Minister and the RIA have to demonstrate their belief that conference and function organisers will overcome the natural barrier of winter gales and big seas to use the proposed hotel in sufficient numbers in winter to make it viable?
- In the event that the proposed hotel cannot attract sufficient winter visitors to be viable what safeguards to protect the RIA and the taxpayer will the RIA have in place?
- What length is the lease for the new hotel likely to be (twenty year limit under the Act)
- Will the RIA assure us that they will resist the inevitable call for other services and facilities to service this new type of visitor to the island and which are likely to substantially change the nature of the 'Rottnest Ethos'?

Impact of Mt Herschel on Rottnest's Utilities

The Norman Disney Young Report estimated the power requirement for the development at 800kVA if fully air conditioned and 500kVA for a 'more ecological type facility.' The RIA's own Guidelines for Sustainable Development at Rottnest Island say "Future development on Rottnest Island must be low impact in nature and adopt the ethos of ecotourism." Given the above why did the Minister and the RIA choose a development model with air conditioning, spa baths and swimming pools?

The RIA website also tells us that an impact study conducted by Norman Disney and Young concluded "that with the exception of a slight increase in power generation (5%), existing water and sewage treatment capability is sufficient to cater for the new development". The conclusions reached by this report (Appendix 2) are more substantial and presumably much more costly than this and we are concerned about the cost to the RIA and/or the taxpayers of implementing the required works as we understand from the EOI document that the RIA is to provide utilities to the site.

- The Mount Herschel development will have an impact on the island utilities and the following items will need to be considered.
- Investigation into the existing electrical network to establish if the network is capable of transmitting the increased load to Mount Herschel.
- Installation of a separate high voltage feeder from the power station to the Mount Herschel site and upgrade of the settlement feeder to create a High Voltage ring from the north section of the island.
- Relocate and redesign the power station to meet the future demands of undertake an investigation into supplying the island with mainland power.
- Redevelop the electrical high voltage network particularly within the settlement areas of the island.
- Installation of a new sewage pumping station either for the Mount Herschel development or upgrade the existing Geordie Bay and Longreach pumping station to incorporate the outflow from both the hotel and existing facilities.

- Installation of a new dedicated potable water gravity feed to the Mt Herschel development. The current water production system will meet the new developments demand by a combination of desalination production and storage.
- The sewage treatment plant can process the outflow from the new Mt Herschel development.
- The South Thompson bay will have a very low impact on the utilities.

We would like to know whether the RIA has a Business Plan which takes into account the cost of carrying out the above as well as the income from the development. We would like to know how much this will cost and who will pay. And we would like to know whether such redesign and upgrading work would be necessary in the near future without the development.

The Rottnest Society takes issue with the target market

It does not make sense to us to be providing expensive accommodation, which excludes many regular visitors (not wealthy enough and/or who have families) in the hope of attracting people who currently do not go to Rottnest. They may very well not go even with this kind of accommodation if they are the kind of people who are seeking wineries and night clubs or a host of other attractions not available on Rottnest.

We understand that a market for singles and couples has been identified and we can understand that. However, couples and singles can actually use the existing accommodation whereas families cannot use the proposed hotel. This decreases flexibility.

Conferences

The Rottnest Society has never supported the concept of Rottnest as a serious conference destination because in our view this type of activity in any concentrated form is at odds with the Rottnest 'ethos'.

The Process

It is evident on rereading the EOI document and back-tracking the process that the major motivating principle for this development is tourism, tourism, tourism and the 'big' end of town. This development is, as we know, a Landbank initiative, strongly supported by Tourism WA and Ministers for Tourism. This heavy focus on the needs of the tourism industry and/or the 'big' end of town for Rottnest is at odds with decades of public opinion, gathered through various public comment processes related to the island, as well as the RIA's own social research (the TNS Report); indeed it is in conflict with the express purpose for which Rottnest is managed as set out in the Rottnest Island Authority Act 1987. Neither is it what the Rottnest Island Taskforce recommended – it recommended a 'low-impact eco-tourism' development, which this is not. The original Taskforce recommendation has also morphed into a 4 1/2 star hotel from a 3 1/2 star model. Indeed one wonders what pressures from what quarters were brought to bear between when the Taskforce recommendations were accepted by Cabinet, and the decision to go ahead with a hotel of this magnitude was announced by the Minister Mark McGowan on 5th November 2005. What pressures were brought to bear, and by whom, to transform the 'low-impact eco-tourism' development into a 'boutique' hotel even against the RIA's own social research which found a much smaller boutique hotel than this was perceived by respondents to have a significantly higher negative impact on Rottnest and to be considerably less appropriate for the island than any of the four models offered. In our view:

- The proposed development is a major addition to this 'A' Class Reserve and should be treated as an amendment to the RIMP as required by the Act [see Part IV(22)].
- Since this proposal has not been incorporated into the RIMP it contravenes RIMP 6.5.3.3 to limit construction of accommodation.

- The Expressions of Interest document called for the provision of accommodation for “singles, couples and conferences”. At the recent public meeting at Swan Yacht Club on 3rd February 2007 the CEO of Broadwater Consortium told the audience that the hotel was not catering for families. Whilst there does appear to be a need for accommodation for singles and couples this contravenes the Act [Part III(12)(a)].
- Since the proposed development is firmly aimed at the wealthier market, it contravenes the Act Part 111(12)(2) by excluding the large number of visitors for whom it will always be too expensive.

Concerns with public comment process

On 5th November 2005 the then Tourism Minister, Mark McGowan, announced the Mt Herschel project and said that the concept plans for any such development would go out for public comment. In a number of subsequent meetings with Paolo Amaranti, CEO of the RIA, through 2006, Rottnest Society committee members were given to understand that the concept plans would go out for public comment. The Society understood (apparently mistakenly) that this meant a public comment process would be held as per the requirement of the Act.

The Society acted in good faith, advising members via its Newsletter on a number of occasions that the public would have a chance to comment on the proposed development when the concept plans went out for public consultation.

Late in 2006 it became apparent that a public consultation process may not be held and we commenced corresponding with the Tourism Minister, Sheila McHale, in an attempt to confirm if this was to be the case. On 10th January 2007 Minister McHale announced the preferred proponent and released the initial concept plans for the proposed new hotel development at Mt Herschel - without a public comment process.

The Rottnest Society immediately launched a campaign for a public comment process and on 24th January 2007 a number of stakeholders were advised by the RIA by email that there would be a public comment period of one month from that date. The RIA included this information on a ¼ page ad in the ‘The West Australian’ on that day on page 46, but the call for public comment on the hotel was buried in other text (six days later, no journalists and very few members of the public contacted by the Rottnest Society knew about this, and indeed, very few people are aware of it five weeks later. This is appalling on a matter of this import.

Given that the panel has given no undertaking to take account of any of the comment received in this wholly inadequate process will you ensure that such comments are analysed and released to the public?

Accountability for Rottnest/ Conflict of Interest

There is a serious question as to who is accountable for the management of Rottnest. The Act clearly states that the RIA is the managing authority and that it will manage Rottnest according to the RIMP. However, in 2004 the state government accepted 101 recommendations from the Rottnest Island Taskforce (set up by then Tourism Minister Bob Kucera to investigate the problems previously identified by the Office of the Auditor-General). To date, the implementation of the Taskforce recommendations has had a big impact on the island. However, the Taskforce recommendations have never been incorporated into the RIMP and never been subjected to a comprehensive public consultation process as required for major amendments to the RIMP by the Act.

We note too that the reporting on the implementation of the Rottnest Island Taskforce recommendations takes precedence in the RIA’s Annual Report over the reporting of the implementation of the RIMP recommendations.

The current RIMP is an extremely detailed management document covering every possible aspect of the management of Rottnest Island and was subjected to a comprehensive, widely

advertised public comment process; more than 700 public submissions were received by the RIA, which were subsequently analysed and published, and many of them taken into account in the final plan.

In 2003, a public comment process was held for a proposed redevelopment of the existing Rottnest Hotel (affectionately known as the Quokka Arms). That redevelopment proposed 100 rooms and swimming pool, and attracted ~200 submissions (many of which were highly critical of size and swimming pool). As a result of the public feedback, the RIA went back to the drawing board. This proposal was abandoned by the Taskforce soon afterwards as it reviewed the island's situation.

And then there is Landbank and the WA Tourism Commission. The Mt. Herschel development is an initiative of Landbank, an offshoot of Tourism WA. It was the first of potential tourism development sites identified. Landbank is an agency established "to ensure an adequate supply of tourism development sites to meet the future needs of the tourism industry in Western Australia" and to:

- Identify potential tourism development sites across the state;
- Accelerate the release of investor-ready land in strategic locations;
- Remove up-front uncertainty and reduce the time it takes for developers to commence construction on tourism zoned sites; and
- Safeguard the environment by ensuring any developments are in keeping with the location's environmental values and ensure relevant environmental approvals are gained.

Whilst these may be perfectly legitimate objectives for tourism-centred agencies they conflict with the recreational and holiday focus of Rottnest as expressly stated in the Act and the RIMP [Part 111(2)(a)]. This focus has been supported time and again by members of the public.

We expressed concern at the time about the relationship of the Taskforce and its recommendations to the RIMP and the Minister and it is clear that we have not properly understood what is happening. We believe it is important for the future management of this island that these issues are thoroughly aired, and clear guidelines for any future development that is not in the RIMP current at the time to be incorporated in that document by way of amendment, following proper scrutiny by the public as required by the Act.

Sue Folks
Convenor

21st February 2007