

Submission by the Rottnest Society to the Rottnest Island Authority in response to the proposal to develop 108 units for staff of the Samphire Hotel. The submission was made in September 2022.

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Samphire Staff Accommodation proposal

The Rottnest Society makes the following submission regarding the proposed development of 108 units in 67 buildings to accommodate 211 staff of the Samphire Hotel and Hotel Rottnest.

Main issues of concern:

Impacts

In summary, this submission objects to the proposal because it would result in:

- the elimination of 1.35 hectares of vegetated bushland.
- additional pressure on infrastructure (power, water and other community facilities).
- greater conflict between permanent residents and holiday makers.
- a precedent for all other Island operators to apply for massive privately operated settlements.
- a development the size of which could not have been contemplated by readers of the 2020-2024 Rottnest Island Management Plan.

In addition, the application lacks any serious analysis and rationale to justify such a major departure from the accepted arrangements for staffing on Rottnest.

Design

The development is comprised of prefabricated flat pack modules on elevated supports with skillion roofs. The development will look like a mining camp comprised of transportable units characteristic of Pilbara mining towns rather than Rottnest Island.

Clearing

According to the architect's report the RIA has already approved the clearing of the site. While it is stated in the FAQs that "a Native Vegetation clearing permit with the Department of Water and Environmental Regulation in relation to any vegetation clearing required", in Part 2 of the Development Application report it states: *The proposed lease area on Parker Point Road was determined in consultation with the Rottnest Island Authority who approved the area and a clearing permit for the purposes of staff accommodation for the islands hotel, resorts and tourism business developments.*

If this is the case, The Rottnest Society objects to this pre-emptive action without any consultation. It objects to the RIA acting in a cavalier fashion to sign away 1.3 hectares of mature Rottnest vegetation (pictured below). It demonstrates that the RIA is not taking consultation seriously as it treats the development as a fait accompli. Obviously if the RIA was serious about consultation it would accept that the development may not go ahead in which case it would be totally foolhardy to issue a clearing permit or even give the developer the impression that it was a formality.



Implications of extensive staff housing

The RIA moved away from the provision of extensive staff housing some years ago for good reasons. A review undertaken in the 1980s identified the numerous problems and confirmed the need to minimise the number of permanent residents on the Island. The recommendations were implemented resulting in staff housing being minimised. This proposal demonstrates that the lessons learnt in the past have been forgotten.

If large numbers of staff houses are provided it is necessary to provide infrastructure for permanent residents – schools, health services, community facilities. In addition, as we remember from the 1970s the staff accommodation became a source of anti-social and rowdy behaviour. Staff are predominantly young and are unlikely to meekly return to their accommodation each night to sleep. They will party!

Will the RIA be able to control the usage of the housing once approved? Will occasional vacancies be filled with friends and relatives? Will the company seek to supplement their hotel bookings with a cheaper option within the staff accommodation development? What sort of tenure will the developer have? How long will the lease be and what control will the RIA have over bad behaviour? There is no evidence that these matters have been thought through.

Precedent

Approval of this development will make it difficult to not approve similar requests to allow commercial facilities to house all their staff permanently on the Island. Clearly the recently approved Rottnest Lodge redevelopment will want the same. Approval has been granted for the 102 room hotel with no mention of staff housing – presumably the approval of the current Samphire staff accommodation proposal will give the green light to an even larger Karma staff housing development. Indeed, the Samphire Staff Accommodation architect's drawing DA-1001 clearly shows a one hectare site for Rottnest Lodge staff accommodation.

Similarly the Discovery development will seek to expand its 12 unit staff housing once it is accepted that such housing is not just for those who need to be there overnight but for the whole staff. It is noted that the application for the Discovery staff housing in 2021 for its 83 unit Glamping development resulted in approval for 12 units. This more modest proposal was allowed through without any suggestion that it would be the forerunner of a series of much larger developments.

One may ask why the RIA itself does not house all its staff on Rottnest, particularly those associated with the managing and maintenance of its 291 rental accommodation units, if the private developers see such a benefit in such an arrangement.

Rottnest Island Management Plan (RIMP)

The 2020-2024 RIMP never warned of this dimension of staff accommodation. The relevant section from page 26 is copied below:

KEY INITIATIVE: STAFF ACCOMMODATION The development of new approaches to accommodation for the Island workforce is an example of the new directions to be taken during RIMP 2020-24. Staff housing availability is especially constrained during the peak summer season and is under increasing pressure throughout the year, including when there is a need for staff and contractors to support major construction and infrastructure

maintenance projects on the Island. Historically, the approach has been for RIA to provide premises to businesses and RIA staff under the framework of the Residential Tenancies Act 1987 or, in the case of some Island businesses, to issue ground leases for the purpose of constructing staff accommodation. Under RIMP 2020-24, RIA will progress a commercial approach to seek third parties to invest in the provision of staff housing on the Island. Options to be investigated will include cluster housing for business staff, where residential premises will be grouped for most efficient use of space and services while providing access to more extensive common areas. RIA will also work with the ferry companies to develop enhanced commuting options to reduce the pressure on Island accommodation.

It does not appear there has been any investigation of options in its leap to massive permanent staff housing as the only option considered. There is no evidence of an attempt get ferry companies to “develop enhanced community options” whatever that means.

Rationale for staff housing.

No clear rationale has been provided in the information accompanying the advertised application. It can be surmised that the intention is to provide for all staff, not just those needing to be there after the last ferry leaves. No costing of the current situation, or evidence that the current situation is not and cannot be made to work. There is also no analysis of what the social benefits and costs will be. Those staff with families will have to spend more time away from them and those without will develop a social pattern not dissimilar to those of a mining camp with its associated issues subject of much recent media attention and Human Resources activity.

This proposal is absolutely against what the Rottnest Society was told when the extension to the Rottnest hotel was proposed over two years. The proposed Samphire development approval gave no indication of this change in the philosophy for staffing the development.

The Samphire Rottnest hotel has 80 rooms, yet it now requires 108 units to accommodate 211 staff. This ratio of staff to room of 2.64:1 is excessive and nowhere justified. Are we to assume that the operation is that inefficient, or have the developers another motive for seeking more staff housing than they need?

It is suspected that the manner in which the development has been planned was to estimate the maximum possible housing demand for all staff in peak season, ie Christmas, as an ambit claim. The consequence of this would be that for most of the year a high proportion of the units would be empty or put to alternative commercial use.

Existing staff development

It is proposed that the development will free up accommodation currently leased to the Prendiville Group. Nowhere is it stated how much existing accommodation the developer currently has allocated. It would certainly be modest compared with the proposed 108 units.

Proper assessment

This application bears witness to the incapability of the RIA to undertake a proper planning assessment for matters of this significance. There is no assessment of social or

environmental impact. Moreover, this proposal can clearly not be seen in isolation as it is the forerunner of staff housing for the Rottnest Lodge, yet the public is being asked to comment on an application in isolation without being told that it is in effect an application for something twice the size.

The RIA has a clear conflict of interest and because of their lack of in-house expertise they are heavily reliant on the developers and their consultants. Independent assessment should be undertaken by such a body as the Department of Planning, Lands and Heritage.

The RIA's legislation needs to be amended to prevent it from unilaterally determining such an application with such dire implications.

There is certainly confusion as to whether a clearing permit has been issued suggesting that the developers have been given to understand it is a mere formality. It should not be a formality, clearing should be subject to the process used in the Metropolitan Region prior to bushland clearing involving the Bush Forever process and assessment should be provided by the Department of Water and Environmental Regulation.

This application has uncovered something seriously wrong with the administration of Rottnest Island. It would appear to be easier to clear bushland on Rottnest than in the Shire of Serpentine-Jarrahdale!

In the interest of transparency, The Rottnest Society requests that the assessment report for this application be made public, as is the case with other statutory decision makers such as the West Australian Planning Commission and local governments.

THE ROTTNEST SOCIETY