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Dear Katrina

Thankyou for agreeing to receive the Rottnest Society's submission on the Prendiville Group's development proposals for:

1. Construction of new worker accommodation on Parker Point Road for employees of Prendiville Group (Samphire Rottnest, Hotel Rottnest and Isola Bar e Cibo);
2. Enhancement of Samphire Rottnest hotel to construct 28 new guest suites, a new pool, wellness centre incorporating a day spa and gym, and an expanded reception area; and
3. Extension of Isola Bar e Cibo restaurant to include a retail space, outdoor dining, new entry, second bar and upgrades to back of house facilities.

1. WORKER ACCOMMODATION

The Society's September 2022 submission on proposed workers accommodation still has relevance.

Our submission objected to that 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.

It was pointed out that 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.

No clear rationale was provided in the information accompanying the advertised application. It was surmised that the intention was to provide for all staff, not just those needing to be there after the last ferry leaves. No costing of the current situation was provided, or evidence that the current situation could not be made to work. There was also no analysis of what the social benefits and costs would be. Those staff with families would have to spend more time away from them and those without would 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.

The 2022 proposal was absolutely against what the Rottnest Society was told when the extension to the Rottnest hotel was proposed. The proposed Samphire development approval gave no indication of this change in the philosophy for staffing the development.

The Samphire Rottnest hotel with its 80 rooms, apparently requires 108 units to accommodate 211 staff. This ratio of staff to room of 2.64:1 is excessive and nowhere justified. It was questioned whether we were to assume that the operation was that inefficient, or had the developers another motive for seeking more staff housing than they need?

Current proposal

These comments from our 2022 submission remain our view. The current proposal would appear to be the first stage of the earlier proposal. However, the supporting information does not explain this. Neither does it explain what happened to the 2022 proposal. The design is quite different from the 2022 proposal and provides few elevations.

The current proposal would appear to be for 31 identifiable units containing at least 99 bedrooms, although the larger units could clearly have more than one bed per room. The package states that 72 self-contained units are proposed, yet this does not appear to be reflected on the plan. The earlier plan was for 211 staff. How many will be accommodated in this proposal? It is very difficult to comment on the proposal if the key element (its potential population) is not disclosed. In addition it is unclear whether the 72 units will be the first stage or is the requested total, noting that the 2022 proposal was for 108 units. Do they now accept that the additional 36 units are no longer required?

It is unclear what the status of the current proposal is. It does not appear to be a development application, as it is described as a “development proposal package”. It appears that separate applications are anticipated, notably to the EPA.

Design

There are limited elevations provided to enable the Society to comment on the design. However, there are no objections to the principle Key design features which are stated to include:

- Accommodation Modules set at varying heights.
- Timber decks and shade structures for external communal spaces and amenity.

- Use of reinforced limestone pedestrian paths, paved areas, and bitumen roads.
- Corrugated raking roofs.
- High volume raking ceilings
- Aluminium framed glazing to all rooms for views to exterior and natural light.
- Alternating corrugated and CFC external wall panels to add visual interest and variety to the module elevations.
- Soft, natural-toned interior finishes to reflect the site's unique location.

Justification for permanent residents

It is of concern that it is the intention to provide for partners and their children. This will inevitably have ramifications for schooling and medical facilities on the Island. There is no justification or analysis of this.

There is no overall analysis of the need for staff to live permanently on the Island. As was pointed out in our submission in 2022, it appears that the developer is asking for all staff to be accommodated on the Island because it is more convenient for management. It should be considered that accommodation is a scarce commodity which should be judiciously rationed. Nowhere in the proposal is there an analysis of the numbers of staff needed to man the reception, the bars, restaurants etc. Nowhere is it acknowledged that the demand in winter is less than in summer. Nowhere is it acknowledged that during summer months a late ferry departs at 9pm. There is little point in the RIA encouraging, and subsidising at public cost, the ferry companies to run a late ferry if the main business on the Island simply ignores it.

It is unacceptable that the developer puts forward a proposal clearly aimed to satisfy their every whim without any attempt at justification or impact analysis. At a minimum they should explain which staff could not be managed via the last ferry.

While it can be acknowledged that there needs to be some permanent staff presence on the Island, the current proposal appears to seek to accommodate all staff on the Island. All the arguments they present for this is: "a shortage of staff housing has the potential to limit business growth and visitor service quality. A lack of suitable staff housing also places undue pressure on existing island workers and limits the islands' ability to attract top-end talent to deliver quality guest services". This is all hypothetical and unproven. Certainly there is no evidence presented. It is hardly surprising that some workers and their families may want to live on the Island, and it is not surprising that the commercial operator would seek to gain a competitive edge. But the RIA should only approve that essential and then only when fully supported by evidence.

While some workers may welcome the opportunity to permanently live on the Island, many of the workers on the Island spoken to by our members voice a preference to not live on the Island. They believe the benefits in socialising with friends, playing competitive sport, having access to wider educational opportunities for themselves and family and being closer to family members far outweigh the benefits of living on the Island. The RIA should not be persuaded by the commercial operators that providing workers accommodation would benefit most workers. A survey of workers should be undertaken to establish this.

The Society has repeatedly requested detailed analysis of the case being made by commercial interests on the Island. Moreover, no evidence is provided regarding the actual staff activities that need to be covered during the night. The Samphire developers in particular appear to simply want all their staff to have the fringe benefit of living on the Island. Yet when the average West Australian seeks holiday accommodation on the Island they have to book up months in advance for a product that is scarce and escalating in cost every year.

2. SAMPHIRE PHASE 2 PROJECT

The proposal for 28 additional hotel rooms upon the Samphire hotel footprint is not objected to in principle. The design is unimaginative and does nothing to supplement the Rottnest character. However, the design of the proposed units is consistent with that already developed.

It is considered that the proposed large units are totally inappropriate for Rottnest. Units of 100m² would be more appropriate for an episode of The White Lotus than for Rottnest Island and would send a message to the West Australian public that the Island has become a playground for the rich and famous that excludes them.

Swimming pools on Rottnest are inappropriate. Fresh water is relatively scarce and should be used wisely. In view of the hotel already having two pools and it having a beachfront location, additional pools should be resisted.

There is no objection to the gym and movement studio or the spa and wellness facility or the proposed extensions to the reception area. It is noted that they will be open to the general public.

3. ISOLA BAR E CIBO EXPANSION

It is difficult to calculate how many additional customers can be accommodated in the proposed extension. From scrutinising the plans it would appear that there are currently seats for 268 users of the restaurant and bar. Extensions to the restaurant, bar and tastings area would potentially accommodate an additional 120. However, the application is deficient in providing these details or providing sufficient justification for the proposal.

While it is acknowledged that the old Governor's Bar in the Lodge had an open fireplace, to include one within the Isola Bar may send out the wrong message when the proposal includes phrases such as "Environmental Stewardship", and "sustainability and conservation principles".

The external finishes, facades and materials would appear to be acceptable and blend in with the sandy Thomson Bay environment.

It is queried whether the proposed small retail area would be appropriate. The main retail area for Rottnest is around the main square and it may prove difficult to manage the proposed small retail facility with its inevitable desire to place advertising signs outside to

drag in passing trade and control stock from spilling out into the surrounding areas. Such a facility would create an undesirable precedent.

Conclusion

The main concern of the Rottnest Society is the proposed workers accommodation, which is seen as excessive and unjustified and would result in a host of infrastructure and social issues that have been raised before.

It is unclear whether the proposal advertised is actually a development application or just a rough proposal. If the former, it is noted that the lack of detail and supporting evidence is of concern and certainly would not be accepted as sufficient by any other planning authority on the mainland.

Ian MacRae
Chairperson
The Rottnest Society

22nd February 2025