

ATTACHMENT 8

Response to comments by the Department of Planning on the Draft Foreshore Management Plans for Karratha, 40 Mile Beach (Gnoorea) and Point Samson

Comment	Response
SPP2.6 was gazetted on 30 July 2013. Previous gazetted versions, 2003 and 2006, no longer apply. The FMPs reference previous versions of SPP2.6 and this is not supported. The FMPs should be updated to reflect and use the policy requirements of the current gazetted SPP2.6.	Agreed. FMPs updated to refer only to the recently gazetted version
Coastal nodes - The provision of coastal nodes is recognised as being beneficial to the broader public. Such nodes may be developed within the coastal foreshore reserve but should only be located where identified in a strategic plan (Section 7.5 of Schedule One, SPP2.6). It is unclear whether or not the specified nodes within the FMPs were identified in an overarching strategic plan. Where coastal nodes have not been previously identified in a strategic plan, the proponent must demonstrate that they are located in suitable and stable areas; create no negative impacts on the adjacent environment; and avoid areas of high natural landscape or resource value.	Reference has been added to the introduction that refers to each location as a coastal node as indicated in the scheme/LPS/Draft Coastal Management Strategy
Draft Karratha FMP	
<p>According to the Draft Karratha FMP, substantial amount of information was derived from the Mulataga Development Strategic FMP. It is important to note that the Mulataga Development Strategic FMP in its current form is not supported by the Department of Planning (DoP) due to unresolved issues. Delineation of the coastal foreshore reserve physical processes allowance for the proposed Mulataga development locality has been the subject of previous correspondence with DoP on a number of occasions, and has not reached agreement. The proposed Mulataga Development Plan will also remain unsupported until the issues are resolved.</p> <p>Section 3.1.1 (Access) of the Draft Karratha FMP restates a recommendation from the Mulataga Development Plan regarding protection of the primary foredunes from inundation during storm surge. It proposes to fill sections of the swale behind the foredune to a level of at least 7m AHD to eliminate the potential for breaching and subsequent inundation. This recommendation should not be required as the foreshore reserve should delineate an appropriate width that allows for the physical processes to occur and still provides a foreshore reserve at the end of the 100 year planning timeframe. Where the identified inundation is not contained within the foreshore reserve, coastal hazard risk management adaptation planning should be undertaken.</p>	<p>Noted. Text added to state that the Development Plan and Strategic FMP are yet to be endorsed by WAPC and that "Should any future changes be made to the foreshore reserve, these will need to be addressed in a revision to the foreshore management plan."</p> <p>References to filling behind the foredune removed. Paragraph changed to:</p> <p>"it is understood that resolution of the appropriate management response will occur as part of the process of obtaining endorsement of the Mulataga Development Plan by the Western Australian Planning Commission. As noted in section 1.5, any changes in the Mulataga Development Plan or Mulataga Strategic Foreshore Management Plan (UDLA, 2013) will need to be reflected in a revised version of this foreshore management plan."</p>
The study area identified in the Karratha FMP intersects with the study area outlined in the Mulataga Development Strategic FMP. It is not considered appropriate to have potentially two separate FMPs implemented in the same area, however if they share consistent information it may be permissible.	Both plans are consistent with each other.
Draft 40 Mile Beach (Gnoorea) FMP	
No specific comments other than those highlighted under the general comments heading above.	

Draft Point Samson FMP	
The study area is undefined on Figure 1 (Site location and study area) of the draft	Study area has been defined
Point Samson Stormwater and Coastal Management Strategy (Draft)	
<p>It is important to note that the information regarding determination of the coastal foreshore reserve in the Strategy was not supported by the Department of Planning (DoP). The Strategy did not identify an appropriate coastal foreshore reserve, as required in accordance with SPP2.6 section 5.9. The Strategy requires a reassessment of the coastal foreshore reserve to include an allowance for sea level rise of 90m over a 100-year planning timeframe, allowance for uncertainty (20m over the planning timeframe) and allowance for storm surge inundation. A recommendation from the Strategy states: "Minimum setback for permanent infrastructure should include allowance for erosion (including sea level rise) over 100yrs (55-150m)." This recommendation is reiterated in the draft FMP. For the abovementioned reasons, this recommendation is not supported and therefore any references made to specified coastal setback figures will need to be removed from the draft FMP.</p> <p>The final paragraph of section 3.2.1 (Protect townsites from coastal processes) in the draft FMP states that future decisions regarding the provision of infrastructure and location of uses within the foreshore reserve should consider the findings of the Strategy. Based on the current version of the Strategy that was commented on by the DoP, this statement is not supported and should be removed unless the Strategy is amended to reflect DoP comments.</p>	<p>Noted</p> <p>Reference to the distances has been removed</p> <p>Noted. Paragraph added as follows: It is recognised that the draft <i>Point Samson Stormwater and coastal management strategy</i> (Essential Environmental, 2013) has yet to be finalised and it is anticipated that this will occur in consultation with the Shire and the Department of Planning. Any future decisions regarding the provision of infrastructure and location of uses within the foreshore reserve should consider the findings of the final Point Samson Stormwater and coastal management strategy and manage the identified risks appropriately.</p>