

No.	Submission	Rottnest Island Authority (RIA) Response
1.	An organisation objects to the development proceeding.	Consent to publish submission not provided.
2.	Under the provisions of Section 73 of the Heritage Act 2018, the proposal as described below has been referred to the Heritage Council for its advice. Place Number P516 Place Name Thomson Bay Settlement, Wadjemup/Rottnest Island Referral date 21 September 2021 Proposal Description Rottnest Lodge Redevelopment The Heritage Council considered the proposal in the context of the identified cultural heritage significance of Thomson Bay Settlement, Wadjemup/Rottnest Island and the following advice is given: Findings • Collectively the individual components of Thomson Bay Settlement, Wadjemup/Rottnest Island form a cultural environment that possesses significant aesthetic qualities that are heightened by natural landscape and marine features. The place is unique with so many very significant cultural elements concentrated in a single place and is highly valued by the community for its social and recreational associations. • Although located outside the lease area of the proposed Rottnest Lodge, the Quod is the only purpose-built prison Aboriginal Prison in Australia, is a symbol of Aboriginal resistance to colonisation, and is a place that is still particularly significant to the Aboriginal people of Western Australia.	Supported. Specified conditions included as part of RIA's 'conditional' Development Approval.

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	• Together with the Quod, the former Boys' Reformatory and Garden Lake foreshore form a cultural environment comprising buildings, roads, paths, walls, engineering structures, plantings and archaeological sites that relate to various phases of development. The proposed Rottnest Lodge incorporates elements of this cultural environment, including the former Boys' Reformatory, 1980s Lodge development, and an undeveloped area of the Garden Lake foreshore west of Boreham Street. • The Lodge & Garden Lake Design Guidelines have informed the proposal, and overall the Rottnest Lodge development is compliant with and responds to the objectives of the guidelines. However, variations to the guidelines include heights of the new two storey accommodation to the northwest of the lease area, and new development height in relation to the former Boys' Reformatory ridge height. Whilst the former will have negligible impact on the setting, the height of the new development in proximity to the former Boys' Reformatory will have a negative impact. • The proposed use of a natural materials palette of high quality such as weathered timber cladding and local stone mitigates the impact of new built form within the setting. • Positive aspects of the proposal include the removal of intrusive elements, the conservation and refurbishment of the former Boys' Reformatory to contemporary standards, the approach to landscaping of the site, and the contemporary and understated architectural design of the proposed new development. • Overall the proposal will not have a detrimental impact on the cultural heritage significance of Thomson Bay Settlement. It potentially will negatively impact on archaeological evidence of earlier uses in the area; however, the location of the new development and relationship with the environment helps to mitigate any impact on the setting.	

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	Advice The proposal, in accordance with the plans submitted, is supported subject to the following conditions by the Heritage Council of WA: 1. An historical archaeologist is to be consulted regarding the impact on potential archaeological evidence in the lease area, and recommendations are to be implemented prior to ground disturbance works and during construction. This may include the need for additional archaeological excavations and an Archaeological Watching Brief. 2. Revised plans shall be submitted to the satisfaction of the Heritage Council that address the following: 2.1 Detail of the proposed junction of the reception entry with the former Boys' Reformatory. 2.2 The section of west wall to be removed to the lounge/dining area to the former Boys' Reformatory is identified as very significant fabric and should be clearly interpreted in the floor with a substantial section of down stand being retained. 3. The following is to be submitted to the satisfaction of the Heritage Council prior to the application for a building permit: 3.1 Schedule of conservation works for the former Boys' Reformatory, including a written specification and plans. 3.2 Further information on compliance with National Construction Code, as well as electrical, hydraulic and mechanical services. 3.3 Schedule of materials, colours and finishes. 3.4 Signage and lighting strategy.	

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	3.5A standard archival record according to the <i>Guide to Preparing an Archival Record</i>. 3.6 Interpretation Strategy. Please be reminded that you are required under r.42(3) of the Heritage Regulations 2019 to provide us with a copy of your determination within 10 days after making the decision.	
3.	Submission supports the development.	Consent to publish submission not provided.
4	I have been visiting Rottnest for 40 years. There have been some fantastic improvements over that time. Although disruptive I can understand that the infrastructure requires upgrading. I do have some concern about changing the island to become a rich person's playground. The recent Samphire development is hardly accessible to most working families at 600 to 750 a night. The glamping facility is similarly priced. I would not be surprised if the new development will be similar in pricing. Currently the Karma resort offers significantly cheaper options. I believe that the development will mean the end of the Gov's bar which I have enjoyed going to for many years. This is the popular go to venue for the local staff on the island and many visitors. It provides excellent live music and has a tremendous atmosphere. I remember the golf course when it was in dire condition with bare concrete greens. It was massively improved at some cost when the greens were grassed. The Quokkas then ate the greens. Fencing the course allowed the greens to recover.	Noted. RIA is investigating options for the relocation of Gov's Bar.

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	I spoke to Glen, the current manager (and keen golfer) who wants to try and "relocate" the Gov's to the golf course and for Karma to continue to manage it. I think that is a great idea and will be contacting the attached to suggest support this. Glen and his team have significantly improved the course by fencing it and maintaining it. I and many of my friends would love to see the Gov's bar "relocated" to this area and competent management of the golf course continue. Thank you for considering these comments.	
5	I want to express my support and excitement for the new Rotto Lodge Project. I believe it will add great value to the island helping address the accommodation shortage through a range of different types of rooms. I am excited to see how this development will address the lack of quality accessible food and beverage offerings too. As someone who loves to enjoy Rottnest throughout the year, I think this development is very exciting and will contribute to all of the Islands great offerings and adding to the visitor experience.	Noted.
6	I am writing in strong support of the above-mentioned application, based on the following considerations. The development application seems to be fully consistent with the public announcement shortlisting the successful proponent.	Noted.

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	The calibre of owners (especially the Fogarty family), developer and operators, all have a proven track record of delivering highly considered development, managed professionally. This development will deliver improved accommodation on Rottnest Island which is very much needed. The development will also deliver much needed and improved food and beverage on the island which is currently very unsatisfactory. The proposal appears to be relevant and inclusive of all visitors and will suit tourists, locals, guests or day trippers. The current condition and operation of the Lodge is in urgent need of an upgrade and this has been the case for many years. Such a quality development is very much needed on Rottnest and will definitely enhance the profile of the Island. The proponent should be commended for the apparent level of cultural engagement and consideration. I very much hope the Island Authority will view the proposal favourably.	
7	I strongly support the proposed development at The Lodge by Place Development Australia. The current accommodation offers on the island are very limited, and the majority of the options are dated. Rottnest Island is marketed as a world class tourist attraction (the quokka selfie speaks for itself), but the accommodation is anything but. The addition of the Samphire is a step in	Noted.

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	the right direction, but more options are needed. The lodge is tired and in serious need of development. The existing food and beverage offering is also quite limited and the addition of world class eateries available to guests and day trippers will be very beneficial. The proposal pays its respects to the origins of the lodge, not shying away from its heritage. The consultation with the indigenous Australian's is a crucial component of the development and I believe will lead to a respectful and open-minded space. And finally, the environmental considerations are a necessary inclusion into the development. Sustainability is more important than ever and it is encouraging to see this has been addressed. Each and every component of this development will contribute to Rotto reaching the world class level it wants and needs to be.	
8	As a long-standing visitor of Rottnest, visiting the island many times a year since childhood alongside family and friends, I am writing in support of the development application for the Rottnest Lodge. While I love Rottnest, it's fair to say that the current accommodation and food beverage offer has substantial room for improvement. The island's natural beauty is unrivalled and warrants improved, highly considered development to reflect one of the state's most iconic destinations. Tourists and locals expect more than what is currently on offer and I feel the proposed development will absolutely meet, if not exceed, expectations.	Noted.

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	The proposed development appears to capture the relaxed and welcoming nature of Rottnest. The design appears very respectful to both the landscape and settlement-built form in addition to the Quod. I appreciate community sensitivity exists due to the history of the Quod, and understand the proposal is highly respectful of this, however the settlement should not be forced to standstill or for building conditions to date further. I know of the developer and operator through projects such as The Westin, Alex Hotel, Quarter Acre Hotel and more recently Jetty Bar. Based on such projects, I have no doubt the development proposal has been thoroughly considered and is in great hands. Alongside many (if not all) West Australians, I wish to be proud of Rottnest for years to come. As such , I implore the Rottnest Island Authority to view the proposed Rottnest Lodge Redevelopment favourably and to proceed without delay.	
9	I'm fully supportive of the Place Development proposal for a multi-purpose development on Rottnest Island (Wadjemup). I believe a well-built and culturally appropriate development is just what Rottnest Island needs. There is huge shortage of suitable accommodation on the island that has been a frustration for myself and my business for many years. Furthermore, additional hospitality venues on the island will attract more visitors to the island each year. A precinct that provides for day travellers as well as those staying on the island. The island has so much to offer and I believe this development would bring new life to the island.	Noted.

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10	As a proud West Australian and regular visitor of Rottnest Island I wished to provide my support and backing for the proposed Rottnest Island Lodge Project spearheaded by Place Development. With current lodge offerings becoming tired and outdated, I feel a refresh is long overdue and will assist in offering a modern and sustainable offering to a range of travellers and holiday makers with various price points whilst still maintaining the relaxed vibe that Rottnest offers. Further to this, what accommodation space is complete without a comprehensive food and beverage offering. The proposed restaurant, lounge and café again will provide a range of options for both guests and island visitors which I feel would be well received as a point of difference to what is currently on offer on the island. In conclusion I fully support the efforts of Place Development in their bid to create a revitalised site which will put WA's best foot forward in creating a warm and inclusive destination for all visitors whilst still paying homage to the history of the island.	Noted.
11	Rottnest Island has always been a special place to me. Growing up in Perth I remember the quintessentially WA family holidays to Rotto. Bike riding, fishing, swimming and just having fun. Rottnest Island offers a truly unique holiday destination. Something which I am fortunate to now share with my own children. However, despite the island's unique natural beauty and laidback vibe it is lacking in contemporary tourism infrastructure. Many of the things a	Noted.

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	tourist would expect to find at such a destination are either unavailable or in dire need of refurbishment / enhancement. Whilst a careful balance needs to be struck between tourism development and retaining Rotto's "paired back" lifestyle, I am strongly in favour for the redevelopment, refurbishment and enhancement of the existing infrastructure. Having viewed the development application I feel comfortable that this balance is being met and the proposed additional facilities will only enhance the Lodge and its offering to both locals and tourists alike. In closing I would like to state that I am familiar with the developer through their projects in the Perth CBD and Fremantle. As a local West Australian business, I have no doubt that they will deliver a project that all West Australian's can be proud off.	
12	I am sending this by way of committing my support for the redevelopment of the Rottnest Lodge. Over the past 20years, I have frequented Rottnest almost every year. Disappointingly, Rotto has only become more expensive and the facilities are dated - which prompts me to search for cheaper and more luxurious accommodation overseas. I see the development of the Lodge as being a driver to provide more accommodation, lowering costs for families and providing more luxurious facilities of which will be able to compete against international venues, which obviously keeps money within WA which is of significant benefit for all.	Noted.

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	Of significance to me, is seeing that Place has, from the outset, engaged Indigenous groups regarding the development plans from the outset - this is a unique opportunity to work towards creating an area of cultural remembrance and will hopefully help to pay respect and bridge the gap between a holiday destination and a place of remembrance. For the reasons above, I unreservedly support the plans at Wadjemup put forward by Place. I look forward to experiencing it.	
13	I would like to express my support for the Rottnest Lodge Redevelopment, I believe it is a great project with many positive impacts for the island. Rottnest is an awesome place to visit and spend time on, the additional accommodation will allow more people to experience what the island has to offer. The new quality food and beverage offerings will provide the public & guests with more variety whilst on the island which is a great addition as it is often difficult to find a spot in many venues. Part of the Rottnest experience I enjoy most is the history & learning more about the island. It is important to acknowledge & share the history of the island through this development and the involvement of Indigenous community leaders will ensure this is accomplished. Looking forward to seeing the progress of this development.	Noted.

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14	I want to express my support for the new proposed accommodation on the Karma site. Certainly amongst our family and friends it will be great to have additional places for stay and particularly new restaurant venues. As a family that loves Rottnest, I think this development is very exciting and will contribute to all of the Islands great offerings and add to the visitor experience.	Noted.
15	I'm writing this letter to express my full support of the Proposed Development of the current Rottnest Lodge, as detailed by Place Development in a recent West Australian news article. I'm a born and bred West Australian and frequent Rottnest Island quite regularly over the summer months. The current accommodation shortage on the island makes it quite hard to enjoy everything the Island has to offer. As it stands the food and beverage options are quite lean on the Island and the prices are exorbitant. Additional amenities would drive prices down therefore making it a more affordable holiday option. I believe it would be a welcomed approachable offer for both guests staying on the Island and day visitors. With the potential re-opening of the state of WA post COVID-19, it would be a fantastic addition to the Island and be a great kick-starter for Tourism back in the state of WA.	Noted.

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16	The following comments are provided to the Rottnest Lodge Redevelopment:- <u>Stormwater Drainage</u> • Catchments A, B and C identify the use of soakwells. Placement of the soakwells are not shown on the site plan. These should be located away from any road pavement area. Detailed plan to be submitted • The “Existing Catchment” areas have not been checked for compliance to new Average Recurrence Interval (ARI). These should be checked as there is evidence of stormwater runoff from the buildings causing scouring to road embankments and batters etc. <u>Boreham Way Road</u> • Site plan demonstrates re-alignment of Boreham Way. Can this be confirmed. • Any modification of Boreham Way in terms of axel loading, intended use, vehicle numbers etc. is to have Main Roads WA acceptance • Road Pavement design is to be submitted to Main Roads WA for acceptance • Have passing areas been identified along Boreham Way as there is evidence of shoulder damage on the island due to vehicles utilising the shoulders. <u>Waste Management</u> • It was noted that there are many new bin facilities created off Boreham Way. Appropriate pavement specifications to address screwing of the road pavement needs to be identified. • Waste turning movements – please advise if the appropriate vehicle has been chosen with correct swept paths as the truck identified	A condition is included as part of RIA’s ‘conditional’ Development Approval requiring the Developer to prepare and implement a Stormwater Disposal Management Plan. Boreham Way will be slightly realigned. A condition is included as part of RIA’s ‘conditional’ Development Approval requiring the Developer to construct Boreham Way to the satisfaction of the RIA. A condition is included as part of RIA’s ‘conditional’ Development Approval requiring the Developer to prepare and implement a Waste Management Plan.

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	seems sub-standard. Has future growth and larger trucks been investigated in line with RIA strategic plan?	
17	Thank you for the opportunity to provide the following input into the proposed Lodge re-development on Rottnest Island. The Authority should be congratulated for progressing with much needed additions to the tourism infrastructure of Rottnest Island, and in particular with an upgrade to the Lodge site which has been shamefully neglected in recent years reflecting poorly on the Authority and damaging to the reputation of Rottnest as a tourism destination. In recent years Rottnest has emerged as a truly recognisable icon for tourism in Western Australia. With this status has come national and international interest and attention with the opportunity that when our borders once again reopen, Rottnest will become a must visit destination for visitors to our State. Whilst the natural beauty of Rottnest is unsurpassed, visitors to our Island have an expectation of world class facilities, seamlessly integrating with the natural environment and respecting significant historical aspects of the area in which they are located. Regrettably, recent tourism developments on Rottnest have promised world class facilities but have fallen short in delivering to international (and local) expectations, most likely due to cost cutting and short-term thinking, or developing outside of the established guidelines for development on Rottnest.	

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	The proposed Lodge development appears to following a similar path and it will be regrettable that such an opportunity will be lost if this development proceeds in its current format. Specific Concerns that I have with the proposed development include: Re-purposing of 1980's built form. There is no architectural or cultural significance to the buildings constructed on this site in the 1980's. The reality is that these buildings tie the site to a period of architecture, both from a perspective of appearance and function, that will create a compromise to the future development reducing its ability to reach the full potential for the site. With so many of Rottnest's developments having been compromised in the past (usually due to cost) it will be disappointing to see that this trend is perpetuated in this "new" development. Disrespect for the recent past historical significance of the site location adjacent to the Quod and Aboriginal Burial Ground. The plans as presented appear to have maximised the building envelope as close as absolutely possible to the Quod with the developments' restaurant being the most significant function operating immediately adjacent to the Quod. Whilst it is understood that future plans for the Quod have not yet been finalised, it would be fair to assume that any future use of the Quod will encompass an area of quiet reflection, respecting the cultural significance of this site.	RIA supports the re-purposing of buildings. The Developer advised that its Aboriginal Consultant has been involved with the design of the Lodge proposal from the commencement of their EOI. A key objective for the group was to have views of the Quod preserved, which was acknowledged by the State Design Review Panel (SDRP), when the Developer's Aboriginal Consultant attended the second SDRP meeting. A condition is included as part of RIA's 'conditional' Development Approval requiring the installation of an acoustic screen between the Quod and the proposed restaurant prior to practical completion of the development.

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	It is incomprehensible that the noisiest part of this new development has been planned to be built immediately adjacent to the Quod. It is quite possible that as the plans for the Quods future evolve, requests will be made for this area to be reconsidered, something which the developers must be informed of. I note also on the plan that the service area for the proposed development extends beyond the lease area of the Lodge to the north and towards the Aboriginal Burial Ground. In preparation of our own tender, we were advised by our consultants that there is evidence of ground disturbance in this area and development should be avoided. I would ask that additional investigation be undertaken in the northern extension of this lease area to ensure that it is not encroaching into a suspected area of possible aboriginal significance. Historic significance of Rottnest The lodge development provides an opportunity to create a tourism destination that does more than provide accommodation. It is an opportunity to tell the history of Rottnest, and in particular the aboriginal history, going back 60,000 years. This opportunity not only has the potential to positively contribute to the islands' reconciliation plan but it also has the potential to add another significant layer in its tourism appeal. It is disappointing that this proposal considers the aboriginal heritage of Rottnest as tokenism. A barrier to the lakes and the island beyond The proposed development has lost an opportunity to open up the lake vista to the general public, linking a sightline from Thomson's Bay through this site, to the lakes beyond. Instead, it has reinforced physical	The following conditions are included as part of RIA's 'conditional' Development Approval. Including: • The Developer shall implement the Cultural Heritage Framework (contained within Section 3 of the Development Application Package dated August 2021) outlining ongoing liaison with key Whadjuk Elders for the delivery, operation, and management of the development. • All excavation works or ground disturbing activity associated with development is required to have an Aboriginal Monitor present on site when excavation or ground disturbing activity is taking place. • Should any archaeological material or Aboriginal objects be unearthed or uncovered, a 'Stop Work' order shall be issued, in accordance with the Aboriginal Heritage Act 1972 (contact is to immediately be made with the Rottnest Island Authority Heritage Officer and Police). • Prior to the lodgement of a Building Permit, Aboriginal Cultural Heritage Management Plan must be submitted to and approved by the RIA including a comprehensive monitoring plan with particular reference to archaeological and skeletal remains and implemented at all times during construction works. A core design principal has been to create an inclusive public space at the centre of the site which affords a panoramic vista of the lake.

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	barriers creating an exclusive enclave for Lodge guests or “those in the know” who are able to navigate their way into the cloistered surrounds of the new development’s-built form barriers. This is short sighted thinking in the extreme. Regular visitors to Rottnest watch with concern as tourists congregate in the mall and look quizzically for “where else to go.” The result, as we have all seen, is extreme overcrowding in the mall at certain times of the day. The opportunity of removing non heritage buildings on the existing Lodge lease and extending Maley St through to the Lakes has been lost in this proposal. With this loss is also the lost opportunity of opening up new areas of focus where tourists can experience more of what Rottnest has to offer, whilst also reducing congestion in the main settlement area, particularly, the Mall. Development of the Museum precinct The museum precinct behind the general store has been an under-utilised area of the Rottnest main settlement as it is effectively wedged behind the mall and the barrier of the existing lodge infrastructure. It is disappointing that this proposed development does nothing to activate this area and instead reinforces the barrier with non-heritage buildings fronting Kitson Street being retained. Significant developments happen infrequently on Rottnest. When they do, every opportunity should be explored to ensure that they correct poor planning of the past and importantly encompass contemporary urban planning, creating places where people gather and interact.	The bar area, catering to guests and the general public alike, has specifically been designed to open up views to the Lakes, the lighthouse and sunset. This is a unique aspect to the development site and public access is encouraged RIA recommended to support the minor variation to the view corridor given the slight intrusion on the north side but the enhanced views on the southern side of the view corridor. A condition is included as part of RIA’s ‘conditional’ Development Approval to ensure not only a sightline from the Quod to Garden Lake, but also pedestrian access from the Quod to Boreham Way. The proposal is limited to the lease boundary, however considers its surrounds. The proposed gelato + coffee terrace activates the site towards Kitson Street and the new playground, museum and a natural extension to the activity that surrounds the Mall. The offering will be popular with visitors throughout the day and into the early evening.

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	This new development does not even attempt to interact with the spaces around it, thereby missing an enormous opportunity to activate the main settlement area of Thomsons Bay. Business and events market opportunity Whilst the proposal has restaurant areas, it is not evident that these can be suitably reconfigured to accommodate functions and events. I am assuming that this functionality is built into the plan. If not, it must be reconsidered as one of the keys to future success on Rottnest is for the island to be better able to manage corporate events. Height excess The tender requirements for this development asked all proponents to adhere to the Rottnest Island approved planning guidelines. I note a number of references in the plans submitted which would suggest that height limits have been exceeded in this proposal. Where height limits are exceeded, the Authority needs to provide absolute assurances that such increases will have absolutely no impact on sight lines to heritage buildings and natural surrounds. (This issue is expanded further in my consultants' comments below). Pool area servicing The pool area appears to be serviced by a bar but does not have ready access to food service. As a frequent guest at the new hotel development, I can only echo comments from poolside guests that the unavailability of food service at the pool "could only happen on Rottnest."	The proposal facilitates functions and events within the restaurant, pool area and at the Gathering Ground (refer to Page 38 of the Landscape Design Report which outlines capacity), with sufficient provision of toilets to meet capacities. The Design Guidelines required buildings to be lower than the Quod to preserve views and the significance of this building. No maximum heights are specified in the Design Guidelines. Since the highest new building is located towards the lake at the base of the sloping site, these views are preserved by the proposal. The Heritage Council of WA raised no concerns with this element of the design which has allowed for a good design outcome and reduced site disturbance during construction. The Developer has advised that the pool areas will have food and beverage offerings available.

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	The developers must be encouraged to ensure full poolside service if the Lodge is intended to meet international standards. Governor's Bar The name is not important however the function of an alternate bar on Rottnest has been appreciated by visitors and locals over time. It is not evident on the current plans where a replacement for Governors Bar is accommodated in this development. Staff Housing Staff housing remains a critical issue on Rottnest, and in the current environment where we are experiencing severe staff shortages, the ability to offer staff a reasonable standard of accommodation is paramount. There is no mention of the proposed staff housing that will be needed to service this development. What is proposed to accommodate staff for the Lodge when it is fully operational? Design Consultant Team Response Our design consultant team have reviewed the awarded submission and put forward the following design concerns for the RIA's consideration. We considered the design and the overriding review document Heritage Impact Assessment by Heritage Consultant Laura Grey has several inaccuracies and contradictions. The HIA may have been prepared on an earlier incarnation of the design and <u>not</u> prepared based on the Detailed Design scheme up for review and public comment which is understandable but not acceptable.	RIA is investigating options for the relocation of Gov's Bar. A condition is included as part of RIA's 'conditional' Development Approval requiring the Developer to construct staff accommodation off-site for all Island based staff required to operate the facility. The Heritage Council of WA raised no concerns with Heritage Impact Assessment. The proposed development complies with the view corridor recommendation and expands the corridor to a 'cone of view' sweeping to the southwest encompassing a greater viewing option to and from the Quod, Garden Lake and the Reformatory. The cone of view takes in

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	<i>Please find some of our comments from the design team:</i> Ms Grey's Heritage Impact Assessment [HIA]: - States on several occasions the removal of intrusive fabric around the Reformatory (which is a positive) however the scheme <u>does not</u> propose this. - States that the scheme removes the service areas to the east side of Boreham Rd between the Quod and the road, but the services area are located back in this location (albeit the perspective does not show this). - Does not pick up that the service road and access to the service shed is outside of the curtilage of The Lodge site and on the burial ground site; - Does not state the fact that the scheme does not comply with all the sight lines required. - States that the proposal is approx. 1.4m above the height levels allowed <u>but does not</u> state that this is intrusive and will affect views from Garden Lake to the Quod. In addition, it does not comply with the brief for all submissions - <i>The west facing suites to the lakeside path will be raised 2.2m above NGL.</i> The reason for this apparently is for universal access and cleaning. However, this increases the height of the development and also will create a walled boundary between the path along Garden Lake and the development not a built form graduation down to the lake. - The central multifunctioning gathering space will have 'views in all directions' which we believe is factually incorrect. - <i>The poolside suites are physically and visually distanced from the Quod and are not in the view corridor and despite the height encroachment are not affecting views to the Quod</i> which we believe is not correct.	the central gathering space providing a wider panorama from the Quod and Reformatory. The expanded cone includes the compliance zone. The stepped development of quality architecture stepped down the embankment to Garden Lake considerably less intrusive that the views to the east of the existing facility. The extra height is not intrusive as it is located at a considerably lower ground level. Views to the Quod are unrestricted from the proposed cone of vision. The western Poolside suites are not in the view corridor. The proposed height of the double-storey Poolside suites immediately west of Boreham Way (opposite the Quod) is 7.0 metres and is consistent with the design guidelines objective for new buildings to have a roof height below heritage buildings. The Poolside suites at the west end (northwest corner of the lease area) will be constructed on a plinth that gives a finished-floor level 1.20 metres above the ground level (lake foreshore), that creates an overall two-storey height from lake foreshore ground-level of 8.4 metres. No maximum heights are specified in the Design Guidelines. Since the highest new building is located towards the lake at the base of the sloping site, these views are preserved by the proposal. Details were noted in the HIS and includes: Level set at 2.00m and it matches the level of the existing Lakeside suites and is as proposed for the west Poolside suites at the shore of Garden Lake.

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	- <i>The proposed central f+b area is located in the space between Boys Reformatory and Quod at a double height space of 6.55m i.e. 340mm above reformatory.</i> We question if this level is taken from NGL or a proposed level as it looks higher which will incur obstructed sight lines to the Quad and will be to both the detriment of the Quod and Boys Reformatory. - On page 7 of her report Ms Grey states ‘...that the proposed development complies and expands the zones to enhance the view of the quod and public access and setbacks...exceeding the space and buffer around the quod. This is categorically incorrect...’ The space does not exceed the buffer rather it is either the same as it is now to the south and is more intrusive to the west. [We also query if in fact this becomes a barrier and a line in the sand for people leaving the Quod and going no further as you will be going into an exclusive ‘Spa Resort.’] - <i>The proposed development complies and expands the view corridor recommendation and expands the cone of view to south-west.</i> This is factually incorrect as there is a building and over-height walls intruding on this view corridor. In the Response to Design Guidelines (p8, 9 + 10) Ms Grey states and refers to: - <i>The 7m height-built form which we believe contradicts earlier commentary where she states the buildings are over height.</i> - <i>The construction is mainly modular/prefabricated construction however when our representative went to the public viewing the architect advised the main construction for public areas would be rammed earth. There is no mention in the report about rammed earth.</i>	The Poolside suites proposed at the west are located below the escarpment and are physically and visually distanced from the Quod. They are not in the view corridor, nor in any view from the Quod. The intrusive fabric to be removed includes the bar and restaurant, the pool area and the service area behind the hotel and restaurant. The central multifunctioning gathering space will have views in all directions - up to the Quod and the development, views south to the lake and to the new development and the existing development. Views also inform of accessways and transitions through the site. The panorama view angle from the Quod will be wider than the Design Guidelines requirement. A revised plan was submitted by the Developer to reduce the height of the roof over the central food and beverage area to be 60mm below the roof height of the reformatory buildings and 1240mm below the roof to the Quod. In the summary it is stated (page 10): <i>Although the height of the Poolside suites is not in accordance with the Design Guidelines recommendations, it is mitigated by the west end foreshore location at the base of the escarpment, and not obstructing, or in, any views of the Quod and more than satisfies the objective of not impacting the Quod.</i> <i>The difference between the height of the proposed restaurant and the Reformatory ridge height is negligible.</i>

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	- If this form of construction was preferred why use rammed earth which is known to cause significant ground disturbance? - <i>The removal of intrusive elements respecting the recognised heritage significance of the Quod and Boys Reformatory.</i> However, this is not part of the design scheme and is not on the design drawings for comment. - <i>Minimalist architectural form of central food and beverage</i> but this building will be dominating and will not be subservient to or demonstrate respect to the Quod or the Reformatory and will not support as stated in the report '<i>retain their quintessential historic presence in the context</i>'. - The justification for over height elements is counter intuitive. The main design element is over height in bulk and scale, is intrusive and demonstrates no respect to The Quod or the Boys Reformatory...a large, oversized wall that is more than likely there to hide a/c. - Our Noongar advisor requested that ground disturbance radar specifically stated that there was potential for bones in the northeast corner of the site and that we were to not disturb this area or build here. We are concerned that the design scheme does not address the following items from the brief: - There is no allowance or place for Aboriginal people to congregate after leaving the Quod to either the west or the south entrances from the Quod other than in the exclusive resort bar. The gathering space shown is in the resort and we question whether that will be open to people other than guests. - There is limited mention of aboriginal interpretation, engagement, and inclusion in the design process, build or future.	<i>Despite the height encroachment beyond the design guidelines, the building will visually read as 7.2 metres above the vegetation (ground plane) at the west end of the lease area at Garden Lake and meets the design objectives of not impacting the Quod.</i> No maximum heights are specified in the Design Guidelines. Since the highest new building is located towards the lake at the base of the sloping site, these views are preserved by the proposal. The entire Heritage Impact Assessment is in response to the significance of the Quod and the Lodge. Best conservation practice in line with the Burra Charter includes a philosophy that is to not mimic or copy places of heritage significance, the contemporary contrast accentuates the heritage places. The removal of the 1980s additions and the service area of the Reformatory will reveal views of the building, with the area to the northwest developed as the reception, restaurant and bar with open space to appreciate the form and fabric of both the Reformatory building and the Quod. The space also provides the opportunity from the connection with Kitson Street, through the site to the reception, bar and restaurant and to the central gathering space with views to Garden Lake. The Kitson Street "frontage" also highlights the Chapel (not in lease). The resort bar will be open to the public and provides unique lake vista views. The west and south of the Quod are public spaces where anyone can gather and leads to the central "Gathering Ground" space.

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	- There is no mention of how one accesses the hotel. Does the scheme promote access from the south or through the centre, how will guests arrive, where will bikes, cases etc be located? Thank you again for the opportunity to provide public comment on the proposed Lodge development for Rottnest. This is a once in a generation opportunity to add a significant piece of infrastructure on Rottnest that has significant tourism and cultural opportunities for the Island. Like all West Australians with a passion for Rottnest I am motivated to want to ensure that we achieve the very best outcome with this opportunity. I trust that my comments above will be received with the positive spirit with which they are intended.	Guests will be directed to access the reception from Boreham Way, although access is also available via Kitson Street. Luggage will be delivered to rooms and adequate bike parking has been provided in multiple locations. RIA resolved to support the height of the buildings as per the Development Application (DA) because the Quod will remain the highest building on the site when viewed from Garden Lake by 1.2 metres. The proposed building complies with the statement of the Design Guidelines since the overall roof height of the new development is lower than the heritage buildings RIA resolved to support the minor variation to the view corridor given the slight intrusion on the north side but the enhanced views on the southern side of the view corridor however, a condition has been placed on the development approval to ensure not only a sightline from the Quod to Garden Lake, but also pedestrian access from the Quod to Boreham Way.
18	As a frequent visitor to Rottnest Island over many years, I am writing in support of the proposed Lodge redevelopment on the Island. The proposed site has felt rundown for quite some time (no doubt the reason the RIA are looking at improving it). There is clear need for a strong food and beverage proposition on the Island and the premise of this being supported by more accommodation options (that seem suited to a range of travellers, including family-options for visitors like us) is very appealing and I'm sure will be well received by many friends and associates looking for something of the like to enjoy while there. The idea of being able to enjoy a day spa treatment and relaxed lunch or dinner in	Noted.

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	a more contemporary venue amongst our usual Rotto activities is also ideal. From the development plans we can see, the laid-back approach of the development seems conducive to the Rotto feel that we all know and enjoy on a regular basis, so I thought it important to vocalise this support and hope the development goes ahead as planned.	
19	I am providing this letter on behalf of both my family and I in support of the re-development proposal for the Rottnest Lodge, which we believe is very much needed and will be an asset to the island. My family and I enjoy a strong connection to both the Island and the Lodge. Our family has both worked as well as enjoyed the majority of its down time in the Island's unique & pristine surrounds for generations. My great great grand-mother, Mrs Rose Ann Keogh (aka Ma Keough) was the first lessee of the Rottnest Island Hostel (now the Karma Rottnest 'Lodge') from 1917 to 1928. Ma's son and my great grandfather, Gladstone, also managed the Hostel which meant my grandmother, Ethel Hawtin (nee Keough), was for much of her youth raised on the island with her children and descendants remaining well connected the island. I, like, my father, uncles, cousins and grandfather (deceased) are current and long standing members of the Winnit Club on Rottnest. The Winnit Club of Rottnest is a voluntary & social organisation that does construction work and fundraising for the Island for the benefit of visitors and the island environment. It has been running since 1931. Given our family's connection, we are quite familiar with Rotto's quirks especially when it comes to accessing the island and supporting infrastructure, however we often have unfamiliar guests and friends	Noted.

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	attend the island with us for holidays or events. Here the Island can be found lacking. We believe the 'Lodge' as it currently stands has been allowed to decline terribly, especially from its hey days in the 1980's and early 1990s. Back then it provided a real quality alternative to the RIA standard housing and the Quokka Arms hotel for those looking for quality and/or shorter term accommodation alternative with fully supportive food, beverage and entertainment infrastructure. Even with the recent developments on the Island in this area outside the Lodge, we firmly believe that these have not met the mark and that there remains a niche for a well-considered, purpose-built and quality managed accommodation and food and beverage facility. Having recently relocated interstate for a period, I have more recently experienced first-hand the difficulties that come with trying to access the island as a short term visitor to WA. On the frequent returns to my home state of WA I have made over the past 2 years, often with interstate guests, I have been unable to access the island on several occasions due to it either being booked out, or, more specifically due to a lack of shorter term, supportive accommodation options. Instead we have been forced to look at alternative short break options such as Margaret River or Dunsborough. My partner and I even looked at holding our wedding on the Island, but again limited suitable and flexible accommodation and food and beverage options meant bookings were very limited, inflexible & expensive. In the end we decided it was unviable and the wedding will proceed this November elsewhere. The proposed development appears very well considered, capturing Rottnest's unique relaxed holiday vibe whilst paying respect to both the unique amalgam of pristine surrounding environment and considerate heritage matters, all whilst offering to enhance with its own quality	

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	bespoke tourism features. We firmly believe all these considerations must be well balanced so that the Island's settlement & support infrastructure wins support and is not stifled by these considerations so that it can be permitted to grow to match demand from both tourism as well as the community's ESG requirements in a pragmatic manner that enhances rather than detracts from the iconic destination. I feel the proposed development will absolutely meet, if not exceed, these expectations. Just as family before us, we wish to be able to continue to enjoy Rottnest's unique offerings as for years to come. As such, we believe the proposed Lodge redevelopment will not only meet the abovementioned requirements but be a fantastic asset to the island. On this basis we respectfully request that the Rottnest Island Authority assess the proposed Rottnest Lodge Redevelopment and grant approval at its earliest convenience.	
20	I have reviewed the documentation would like to issue a letter of support for the Rottnest Lodge Redevelopment proposal for the following reasons; • The addition of new accommodation options to the island is clearly needed and especially prevalent given the recent boom in intra-state & regional tourism. • I am well-versed with the proposed developers and operators behind the project and feel the local team bringing it together will pay warranted respect to the importance of delivering a quality development on the Island.	Noted.

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	• The 'Gathering ground' inclusion seems to be a well-considered and respectful (yet contemporary way) of acknowledging the Island's indigenous history. • There is a clear gap for this kind of approachable offering on Rottnest, that will be available to both guests and day visitors. I very much look forward to the proposal moving forward and taking my family to the new venues once open.	
21	We welcome the opportunity to make a submission on the proposed redevelopment of the Rottnest Lodge, However, it is disappointing that little advance warning was provided before the community information session (three days which presumably accounts for hardly any interested individuals or community groups attending. We are concerned that sufficient contact and consultation will be made and continue to be made with a range of Aboriginal groups and indigenous individuals in WA, male and female, who will be impacted by the development but might not visit it. Rottnest Island, we must always remember, contains Australia's largest site of indigenous deaths in custody. Tourists and other visitors will be interested in this and relevant information should be displayed in the museum. According to the information provided the proposal includes 102 accommodation rooms (an additional 46), food and beverage facility, café, wellness centre, pools and service areas within a 1.5 hectare lease area. Comment:	Noted. RIA has followed a process in relation to consultations with Traditional Owners (Whadjuk People) through South West Land and Sea Council (SWALSC) and site investigations in line with the Noongar Standard Heritage Agreement which included: • December 2018 - Director Aboriginal Heritage, Department of Planning, Lands and Heritage briefing • February 2019 - Whadjuk Working Party briefing • March 2019 – Wadjemup Aboriginal Working Group (WARG) briefing • March 2019 – Activity Notice submitted to South-West Land and Sea Council (SWALSC) • July – Sept 2019 – Lodge Design Guidelines developed in consultation with WARG • October 2019 – Ethnographic, Archaeological and Ground Penetrating Radar completed with Aboriginal Elders and leaders • Sept 2020 – Heritage Council conditional approval of Design Guidelines

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	Pools While it is clear from the plans that the existing pool is to be removed and another constructed – it appears that the other pool would be proposed within the existing Lakeside units and is described at 6.2.6 in the Report as “possible additional pool”. There is concern within the Society that swimming pools should not be a part of the Rottnest experience and while the replacement of the existing pool with another of modest dimensions could be supported, the provision of two pools would appear to be excessive and the second “possible additional pool” should not be proceeded with. Height It is noted that the Heritage Council have provided conditional approval of the Design Guidelines. Accordingly, it would be assumed that the proposal conforms with all elements of the Design guidelines. However, there are some discrepancies to the height limits of 7m outlined in the Guidelines. There are a number of reasons for the architectural drawing showing the buildings so high. The design is raised above natural ground level to separate the public from the private land facing the Lake, the accommodation units are proposed to be on one level rather than following the fall of the land and the rooms are provided with an unusually high ceiling height of over 3 metres. While there may be a case for establishing some distinction between the public and private realm on the western extremities of the site, this could be done with a lesser amount than the one shown – say 0.5m. It is	There is no design basis for restricting the number of swimming pools. The intended guest experience and the number of rooms supports the provision of two swimming pools. A condition is included as part of RIA’s ‘conditional’ Development Approval requiring a Water Management Plan for the pools, including water use, backwash management and filtration systems. The Design Guidelines required buildings to be lower than the Quod to preserve views and the significance of this building. No maximum heights are specified in the Design Guidelines. Since the highest new building is located towards the lake at the base of the sloping site, these views are preserved by the proposal. The Heritage Council of WA raised no concerns with this element of the design which has allowed for a good design outcome and reduced site disturbance during construction. RIA resolved to support the height of the buildings as per the Development Application (DA) because the Quod will remain the highest building on the site when viewed from Garden Lake by 1.2 metres. The proposed building complies with the statement of the Design Guidelines since the overall roof height of the new development is lower than the heritage buildings.

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	certainly not understood why the 7m height limit cannot be applied to the poolside accommodation within the development . The additional 1.9m height over the 7m height specified in the Design Guidelines is excessive and unnecessary and not supported. Observing the North elevations it would appear that the additional height has been used to save having to cut the eastern portions of the development into the ground and deliver rooms with higher ceilings than those characteristic of Rottnest. It is suggested that the height limit be retained by one or combination of the following: 1. The development could be sunk a small amount in its eastern extremities; 2. The development could be stepped to follow the contours; or 3. The room sizes could be reduced in height. Refurbishment The refurbishment of the Boys Reformatory rooms and Lakeside Villas is supported in principle. Building material/colours The elevations display predominantly grey coloured buildings. The materials specified are predominantly weathered timber cladding. The Report indicates that there will be ‘a preference for locally referenced materials and finishes is reflected in the built form and endemic species within the landscape plantings’. There are a few references to the commonly regarded Rottnest Colours of reddish-brown ochre or the stone and brick used in the original buildings. While the development proposal is an improvement on the	Noted. A condition is included as part of RIA’s ‘conditional’ Development to submit a schedule of materials, colours and finishes to RIA prior to making application for a building permit.

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	recently completed Samphire Rottnest development its colour scheme and materials are somewhat similar. The development would be improved with the inclusion of more stone and brick elements using iconic Rottnest colouring. Landscaping The retention of nearly all of the mature trees is supported. Boreham Way The improved environment around Boreham Way is supported. However, there may be some conflicts that could arise in view of the two licenced areas either side of Boreham Way resulting in the intrusion of alcohol related activities impinging on the public road reserve. The Quod and Burial Grounds The provision of a clearer separation and definition between the Quod and the Lodge development is supported. The exclusion of the Quod from this development is also supported. However, the RIA needs to be certain that a comprehensive range of indigenous elders of both genders are in favour of what is to happen. Without this, it is not culturally appropriate to develop the area before the future of the Quod and the Aboriginal Burial Grounds are thoroughly known and properly implemented. The Quod and the completion of the Burial Grounds should be given absolute priority in the redevelopment of the whole proposal. “Gathering Ground” The provision of the Gathering Ground as a “flexible multi-purpose space” for such uses as Aboriginal ceremony and culture sharing is noted.	Noted. Noted. A condition is included as part of RIA’s ‘conditional’ Development Approval requiring an Aboriginal Cultural Heritage Management Plan. A condition is also included to implement the Cultural Heritage Framework outlining ongoing liaison with key Whadjuk Elders for the delivery, operation and management of the development. The gathering ground was designed in collaboration with the Developers Indigenous Heritage consultant. Refer to Section 3.0

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	While the Society would accept the advice of the Aboriginal Groups, it would appear that the space, central within the private development, would be difficult to easily use for this purpose. Increase in Infrastructure demands There is no information provided in the documents relating to the additional services required by the development of the ability of the Island's infrastructure to service the additional development. Power and water in particular appear to be under severe constraints and the provision of additional accommodation will strain this further. The Society asks what provision is being made to provide additional and more secure power and water supply?	Cultural Heritage Framework within the DA package. This space was specifically designed to be a publicly accessible area capable of supporting multiple event formats including Indigenous ceremonies. Provision of utilities such as water, power and sewerage disposal will be provided by RIA to service the development.
22	Feedback includes: Doesn't mind the overall design – wants a memorial wall on the quod and for people to reflect – doesn't want a bar where the gelato café is Not very happy about alcohol. Want to be included in conversations moving forward – Happy to attend the 6 November wants Casey to pick up Leave the bush as pristine as possible and no new plants keep original vegetation – not happy about the gelato bar area – areas – wants a place	Notes the comment and advises: • opportunities for a memorial wall may be possible within the Wadjemup Project which is outside of the scope of this project. • The bar design has been amended and is now a 'beverage dispense area'. RIA has conditioned the use of the area to restrict its use to a 'beverage dispense area'. Beverages will be served within the existing building however, outside the 6m Quod buffer zone and limited to table service, patrons are not permitted to sit / stand around drinking. • RIA will continue to update relevant cultural groups on the redevelopment and consult on matters such as interpretation, Whadjuk name and removal of the intrusive additions on the burial ground (staff housing, laundry and gas bullet). • The bar design has been amended and is now a 'beverage dispense area'. RIA has conditioned the use of the area to restrict its use to a 'beverage dispense area'. Beverages will be served within the

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	of reflection for Quod/Burial Ground - supports the other Elders comments and doesn't want any new vegetation put in.	existing building however, outside the 6m Quod buffer zone and limited to table service, patrons are not permitted to sit / stand around drinking. RIA has conditioned that only native plants be planted within the site consistent with RIA's environmental policies.
	No Bar by the quod wall – café gelato ok – no native planting as per the discussion at the last meeting.	- The bar design has been amended and is now a 'beverage dispense area'. RIA has conditioned the use of the area to restrict its use to a 'beverage dispense area'. Beverages will be served within the existing building however, outside the 6m Quod buffer zone and limited to table service, patrons are not permitted to sit / stand around drinking. - RIA has conditioned that only native plants be planted within the site consistent with RIA's environmental policies.
	Doesn't want bar by gelato happy with restaurant being licenced.	The bar design has been amended to a 'beverage dispense area' located outside of the 6m buffer zone. RIA has also conditioned the Development Approval restricting the serving of beverages to table service and patrons are not permitted to sit / stand around drinking.
	* Interesting in the report – Richard listed as Wadjemup Elder?? In the report is says Richard Walley is the Wadjemup Elders this needs to be amended/acknowledged – as this may cause upset. Feels like the design is laid out already – Richard Walley is listed in the design report as a Wadjemup Elder this is incorrect and will cause harm. 6.0 Palm tree – don't put palm tree there – use appropriate imagery – would like to see final drafts – one layout in the design then architect drawings show something different – and the opening of the Quod	- RIA has advised the Developer to update the report. - Only native plants will be planted within the site consistent with RIA's environmental policies, there are existing palm trees on site.

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	doesn't reflect in the pics – misleading some of the Elders are confused now about the layouts. Comments are on the architect design the "report" shows a different configuration. Given that there is a drive to ensure Cultural Heritage is developed – the report contradicts environment ensuring that plants and trees are maintained and there is no introduced species, however there are palm trees in the report. Gelato/Bar – needs to have no license – the two designs are misleading. We need to see the final layout to provide detailed feedback. The Contradictions between the drawings and the report – made it difficult for constructive comment. If it's the architect design the bar needs to be removed and cafe/gelato can be a reflection to connect to the entrance of the Quod which is important to connect the buildings and evoke emotion and learning. In the report it says Wadjemup Elder this needs to be amended/acknowledged – this may cause upset.	• The bar located in the existing building (shared with the Gelato use) is to service the outdoor restaurant area. The design of the building has been amended to be a 'beverage dispense area' outside of the 6m Quod buffer zone. RIA has conditioned the Development Approval to ensure all beverages are table service and patrons are not permitted to sit / stand around drinking.
	• Who and when people were consulted would like to see a list of names? Was the outcomes of the consultation reported to the WARG to ensure consistency? what was their feedback? Has questions – who and when people were consulted would like to know? Was the outcomes of the consultation reported to the Reference Group to ensure consistency? Eg WARG what was their feedback? • Buffer zone – is really small. The Quod and the usage as the prison there was significant events where the redevelopment is proposed. What do we know about significant events that occurred adjacent to the Quod? Was ground penetrating surveying performed through the whole area and not just sections? • Want to be part of discussions moving forward. Having a bar so close is disrespectful.	RIA has followed a process in relation to consultations with Traditional Owners (Whadjuk People) through South West Land and Sea Council (SWALSC) and site investigations in line with the Noongar Standard Heritage Agreement which included: • December 2018 - Director Aboriginal Heritage, Department of Planning, Lands and Heritage briefing • February 2019 - Whadjuk Working Party briefing • March 2019 – Wadjemup Aboriginal Working Group (WARG) briefing • March 2019 – Activity Notice submitted to South-West Land and Sea Council (SWALSC) • July – Sept 2019 – Lodge Design Guidelines were developed in consultation with WARG which established the 6m buffer zone around the Quod.

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	• Where is the consultation with the WEC – this would help with transparency and help to build on previous concerns and make sure all parties are informed. • Want be part of the conversations moving forward.	• October 2019 – Ethnographic, Archaeological and Ground Penetrating Radar completed with Aboriginal Elders and leaders over Lodge lease area. • Sept 2020 – Heritage Council conditional approval of Design Guidelines • The bar design has been amended to a ‘beverage dispense area’ located outside of the 6m buffer zone. RIA has also conditioned the Development Approval restricting the serving of beverages to table service and patrons are not permitted to sit / stand around drinking. • RIA will continue to update and consult relevant cultural groups on the Rottnest Lodge Redevelopment, regarding matters such as interpretation, Whadjuk name and removal of the intrusive additions on the burial ground (staff housing, laundry and gas bullet).
	Makes me feel sick reading it – the original timeframe was short – white colonial construct – doesn’t reflect the cultural values – doesn’t reflect the things important for Whadjuk Noongar people aimed at tourism Question for response – will there be an Acknowledgement of the Whadjuk within the redesign? Would like a response. Would like to be part of the conversations moving forward. Where is the cultural Narrative in the design?	RIA will continue to update and consult relevant cultural groups on the Rottnest Lodge Redevelopment, on matters such as interpretation, Whadjuk name and removal of the intrusive additions on the burial ground (staff housing, laundry and gas bullet). The Developer has engaged an Indigenous Consultant and in accordance with the Development Approval conditions shall implement the Cultural Heritage Framework (contained within Section 3 of the Development Application Package dated August 2021) outlining ongoing liaison with key Whadjuk Elders for the delivery, operation, and management of the development. RIA has also conditioned the Development Approval to require the preparation of an Aboriginal Cultural Heritage Management Plan for the

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		site. A comprehensive monitoring plan with particular reference to archaeological and skeletal remains must be implemented at all times during construction works.
	In respect of the HIA my first take is that it wasn't prepared based on this DA proposal. It does mention for example: - The removal of intrusive fabric around the Reformatory (a good thing) but the scheme does not propose this. - Removing service areas to east side of Boreham Rd between the Quod and the Road however this is not in the curtilage and then they have put the services area back in this location (albeit the perspective does not show this). - It doesn't pick up that the service road and access to the service shed is off site and on the burial ground site or the fact that the scheme doesn't comply with all the sight lines required if you take into account the height of the building. It also states: - That the proposal is approx. 1.4m above the height levels allowed (which is a minimum I think they are higher). But doesn't say this is a problem with views from Garden Lake to the Quod. - The writer goes outside her scope when talks about garden under plinths of new buildings (which will be non compliant with fire regs) - The west facing suites to the lakeside path will be raised 2.2m above NGL. The reason for this apparently is for universal access (but ramps could have been used) and cleaning (the real reason) - The central multifunctioning gathering space with 'views in all directions' is factually incorrect. - The poolside suites are physically and visually distanced from the quod and are not in the view corridor and despite the height	The Rottnest Lodge development has been designed to demolish the existing Gov's Bar and relocate the existing swimming pool away from the Quod. A new food and beverage facility will be building setback 6m from the Quod in accordance with the Design Guidelines for the precinct. Services areas are required to ensure the operational functionality of the Rottnest Lodge. The design allows for two sperate service areas one for the food and beverage operations and another to service the accommodation offering. The service areas have been design to be screened from public view and RIA has conditioned the Development Approval to ensure these areas are kept neat and tidy. The Design Guidelines address building height on page 5, whereby the legend requires <i>"Building mass outlined to top of wall. Height based on relative datum. Roof height to be below heritage buildings"</i>. This is accompanied by a section image which indicates massing of development west of Boreham Way is to be 7m above existing ground level, although no maximum is stated. The new building located in the north-west corner of the proposed Lodge design, achieves the intent of the Design Guidelines and is below the height of heritage buildings.

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	encroachment are not affecting views to the Quod which is not correct. - The proposed central f+b area are located in the space between reformatory and quod at a double height space of 6.55m ie 340mm above reformatory ...I don't believe this is correct when looking at perspectives and question if 6.55m is taken from NGL or the new level. - On p7 that the proposed development complies and expands the zones to enhance the view of the quod and public access and setbacks...exceeding the space and buffer around the quod. This is categorically incorrect. In fact the space is or reduced and if generous the same as it is now. In fact this becomes a buffer and a line in the sand for people leaving the quod and going no further as you will be going into the spa resort. - The proposed development complies and expands the view corridor recommendation and expands the cone of view to sw....there are walls in the way for this..... Response to Design Guidelines p8: This section is interesting(not in a good way) - Height 7m - ah no - Low maintenance mainly prefab construction - no rammed earth with some prefab maybe but when Richard asked the architect he said it was rammed earth. Hmmm - Proposed to demolish 1980's intrusive additions ...this is mentioned at least three times on this page alone and yet it is not on the drawings. Response to Design Guidelines p9:	The subject site slopes down to Garden Lake, the building with a roof height greater than 7m is closest to Garden Lake, at the lowest point of the site and is significantly lower than the heritage buildings with a top of roof of 8.9 whereas the Quod's top of roof is 13.64 and Boys Reformatory top of roof is 14.6. The design provides for view corridors from both the Quod and Boys Reformatory exceeding those shown on page of 5 of the Design Guidelines for the Precinct. The proposal is intended to be constructed with lightweight materials. The demolition of the intrusive additions relate to the staff accommodation directly north of the Quod which RIA will remove as recommended by the archaeological and ethnographical report. This work is not shown on the Development Application drawings as the works will be undertaken by RIA and are outside of the new Lodge lease area.

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	- The mention of expanse of services west of the Quod gate removed is interesting as this is now the service area of the f+b so will have service vehicles there etc. - Minimalist architectural form of central f+b is dominating, too high etc does not respect the Quod or the Reformatory and will not support or 'retain their quintessential historic presence in the context' - Justification for over height is laughable - Again that mention of removal of intrusive elements respecting the recognised heritage significance etc is not correct... - Justification for over height elements is just that and is just not necessary when you look at the design element that is over height...a large oversized wall that is more than likely there to hide a/c Response to Design Guidelines p10 Conclusion All of the following elements in the conclusion are not correct - Removal of intrusive elements - Height not an issue - View corridors met - Prefab construction to pool side suites minimises environmental impacts (but rammed earth used in main areas) - And Finally ...The proposed development addresses 1 of the 4 strategic pillars!!!! <i>There was no mention of:</i> - Potential Aboriginal bones in north east corner where Karen asked us not to build	In October 2019, ground penetrating radar (GPR) was undertaken over the area identified as the new lease area for the Rottnest Lodge. The GPR did not identify any unexplained anomalies within the site.

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	- No mention of providing space for Aboriginal people being able to gather (other than in an overpriced exclusive bar), songlines, etc - View Corridors are not close to being met. - Access to hotel?? Where is it... - Service access to shed store is not on site curtilage/on burial ground side	The main access to the Rottnest Lodge is via Boreham Way, although access is also available via Kitson Street.
	Supportive except for the location of the bar/gelato area being so close to the Quod (the bar has never been mentioned in previous meetings).	The bar design has been amended and is now a 'beverage dispense area' located outside of the 6m Quod buffer zone. RIA has conditioned the use of the area to limit only table service for alcohol and patrons are not permitted to sit / stand around drinking.
	Happy with the proposal as long as it doesn't encroach on existing elements – grateful for the opportunity to have a say and would like to be part of the conversations moving forward on the journey of healing that the Elders and RIA are heading on. Will there be any Aboriginal Artwork – if so this needs to come back to this group to decide on who. Happy with it go ahead. Not supportive of the bar would like a place of reflection instead of the bar – gelato/café is fine.	• RIA will continue to update and consult relevant cultural groups on the Rottnest Lodge Redevelopment, on matters such as interpretation, Whadjuk name and removal of the intrusive additions on the burial ground (staff housing, laundry and gas bullet). • The bar design has been amended and is now a 'beverage dispense area' located outside of the 6m Quod buffer zone. RIA has conditioned the use of the area to limit only table service for alcohol and patrons are not permitted to sit / stand around drinking. • RIA is unable to mandate the developers tender process for art and interpretation consultants.
	Aboriginal Engagement and Participation plans are important to be done now. Noongar language on the walls and within the building – lets tell the stories. Can every prisoner's name be put on the walls of the Quod noting heritage listing. Take the time to engage allow for feedback in different ways and in culturally appropriate ways.	• RIA will continue to update and consult relevant cultural groups on the Rottnest Lodge Redevelopment, on matters such as interpretation, Whadjuk name and removal of the intrusive additions on the burial ground (staff housing, laundry and gas bullet).

No.	Submission	Rottnest Island Authority (RIA) Response
		• The Wadjemup Project has the ability to facilitate storey telling and engage with the public, this is outside of the scope of this project.
	Supportive except for the location of the bar/gelato area being so close to the Quod (upset that the bar has never been mentioned in previous meetings with Place Development).	The bar design has been amended and is now a 'beverage dispense area' located outside of the 6m Quod buffer zone. RIA has conditioned the use of the area to limit only table service for alcohol and patrons are not permitted to sit / stand around drinking.
	Need to engage Aboriginal People to do design there are lots of people that are capable can this go out to full tender and to keep transparency. Need to engage surveys and monitors (know that RIA are good at that anyway) – no bar by the café. Need to preserve as much history as we can. Elders need to be part of all of the processes.	• The Developer engaged an Aboriginal Consultant on the design of the Lodge, RIA is unable to mandate the tender process undertaken. • RIA will continue to update and consult relevant cultural groups on the Rottnest Lodge Redevelopment, on matters such as interpretation, Whadjuk name and removal of the intrusive additions on the burial ground (staff housing, laundry and gas bullet). • RIA has conditioned the Development Approval to require monitors on site during excavation works consistent with the recommendations of the archaeological and ethnographical survey (October 2019).
	Plants – no introduction of other plants – no bar by Quod Wall – any grass bought in has potential to be catastrophic – would like to see a list of proposed plants. Does not want to change the natural habitat. Would like to be part of conversations moving forward.	• RIA has conditioned the Development Approval to require a detailed Landscape Management Plan for the site, consistent with RIA guidelines only native species will be permitted to be planted. • RIA will continue to update and consult with relevant cultural groups on the Rottnest Lodge Redevelopment, on matters such as interpretation, Whadjuk name and removal of the intrusive additions on the burial ground (staff housing, laundry and gas bullet).

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	Supportive except for the location of the bar/gelato area being so close to the Quod.	The bar design has been amended and is now a 'beverage dispense area' located outside of the 6m Quod buffer zone. RIA has conditioned the use of the area to limit only table service for alcohol and patrons are not permitted to sit / stand around drinking.
	I like the design and how the development has taken sensitively into account the Aboriginal history and quod. Definitely the removal of the Quod from being part of the development is instrumental in its acknowledgement and development of the Lodge. I truly believe the statement on page 16 "The design also acknowledges the history and legacy of the neighbouring Quod building and Wadjemup Aboriginal Burial Ground to the north. Although these are both beyond the lease area, they are very much respected by the use of the lease site. It was supported by David Collard and Nyungar Elders to restore visibility to The Quod and as such the site planning has responded by firstly removing the unsympathetic pool, planters and back of house compound that crowd the south and west of The Quod, allowing it to have free surrounding space from which it can be perceived and appreciated. All proposed back of house facilities are proposed to be concealed inside the new built form".	• Noted.
	Also please see below specific questions that were raised in the feedback: Can we see a list of proposed plants?	RIA have required the Developer to prepare a Landscape Management Plan consistent with RIA guidelines and only with native species. Once prepared RIA can update relevant cultural groups on plant species.

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	Will Aboriginal engagement and participation plans be developed? Will there be Acknowledgement of Whadjuk within the design? Will there be acknowledgement of the past? How can the Elders be involved moving forward? If there are tenders for artwork can this be transparent?	RIA have conditioned the Development Approval to require: • The Developer shall implement the Cultural Heritage Framework (contained within Section 3 of the Development Application Package dated August 2021) outlining ongoing liaison with key Whadjuk Elders for the delivery, operation, and management of the development. • Prior to the lodgement of a Building Permit, Aboriginal Cultural Heritage Management Plan must be submitted to and approved by the RIA including a comprehensive monitoring plan with particular reference to archaeological and skeletal remains and implemented at all times during construction works. • In accordance with the Ethnographic and Archaeological Assessment in November 2019, and RIA's Reconciliation Action Plan the development be renamed to include a Whadjuk/Noongar name. • All excavation works or ground disturbing activity associated with development is required to have an Aboriginal Monitor present on site when excavation or ground disturbing activity is taking place. • Should any archaeological material or Aboriginal objects be unearthed or uncovered, a 'Stop Work' order shall be issued, in accordance with the Aboriginal Heritage Act 1972 (contact is to immediately be made with the RIA Heritage Officer and Police). RIA will continue to update and consult relevant cultural groups on the Rottnest Lodge Redevelopment, on matters such as interpretation, Whadjuk name and removal of the intrusive additions on the burial ground (staff housing, laundry and gas bullet). RIA is unable to mandate the developers tender process for art and interpretation consultants.

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	Is it possible to remove edit the bar area near Gelato/Café – can this be a place of reflection – is there an opportunity to negotiate with the developer’s possibility of memorial wall within the design to synergise the buildings? Richard Walley listed as Wadjemup Elder – can the report be edited to reflect this amendment please? All respondents offer their thanks for the opportunity to provide feedback.	Opportunities for a memorial wall may be progressed within the Wadjemup Project. The bar design has been amended and is now a ‘beverage dispense area’ located outside of the 6m Quod buffer zone. RIA has conditioned the use of the area to limit only table service for alcohol and patrons are not permitted to sit / stand around drinking. RIA has passed this advice on to the Developer for amending of the report. RIA appreciates the time taken to review and provided feedback on the proposed Rottnest Lodge Redevelopment.
23	A private submission objects to the development.	Consent to publish submission not provided.
	Advice from state government agency received after the public consultation period. 1. Water Supply and Wastewater Disposal The development is required to connect to reticulated sewerage and be in accordance with the Government Sewerage Policy 2019. It is noted that the proposed changes will increase the wastewater volume generated by the development and resultantly this may affect the capacity of Rottnest Island's wastewater treatment plant and recycled water quality management plan. The proponent must submit detailed calculations of the increase in waste generated by the above proposal. The volumes used to calculate the size of a wastewater treatment plant required can be found on the links below: Apply to install a wastewater system (health.wa.gov.au)	Condition included as part of RIA’s ‘conditional’ Development Approval.

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	Supplement to Regulation 29 and Schedule 9 - Wastewater system loading rates (health.wa.gov.au) Potable water must be of the quality as specified under the Australian Drinking Water Quality Guidelines 2011. The necessary requirements may be referenced and downloaded from: http://ww2.health.wa.gov.au/Articles/A E/Drinking-water-quality-management http://ww2.health.wa.gov.au/Articles/A E/Drinking-water-guidelines-and-standards 2. Aquatic Facilities A separate DOH approval is required prior to the construction of the proposed swimming pool and any upgrades or amendments made to any other existing swimming pools. Aquatic Facilities (Swimming Pools) are to comply with the Code of Practice for the design, operation, management and maintenance of aquatic facilities, available for download at: https://ww2.health.wa.gov.au/Articles/J M/Management-of-aquatic-facilities-in-Western-Australia 3. Public Health Impacts All food related areas (kitchen, preparation areas, etc.) are to comply with the provisions of the Food Act 2008 and related code, regulations and guidelines. Details available for download from: https://ww2.health.wa.gov.au/Articles/S T/Starting-a-food-business-in-WA All public access areas (dining areas, etc.) are to comply with the provisions of the Health (Miscellaneous Provisions) Act 1911 and related regulations and guidelines, particularly 'Part VI - Public Buildings'.	Condition included as part of RIA's 'conditional' Development Approval. Included as Advice Note as part of RIA's 'conditional' Development Approval. Copy of advice and requirement provided to the Developer.

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	A final inspection will be required by DOH officers on completion before the additional and renovated areas are reopened to the public. This is to assess compliance with the Health (Public Buildings) Regulations 1992, the Food Act 2008 and related code, regulations and guidelines. 4. Medical Entomology The risk of mosquitoes and mosquito-borne diseases such as Ross River (RRV) and Barmah Forest (BFV) virus disease is largely unknown for this area. There may be seasonal freshwater mosquito breeding habitat within proximity to the subject land. Additionally, there is the potential for mosquitoes to breed in on-site infrastructure and constructed water bodies if they are poorly designed. As the risk of exposure to these diseases for future workers or visitors is unknown it is recommended the proponent liaises with the Environmental Health Directorate to determine the likelihood and the extent of this risk. The proponent must ensure proposed infrastructure and site works do not create additional mosquito breeding habitat as follows: • Changes to topography resulting from earthworks (e.g. the installation of pipelines, footpaths, roads etc) must prevent run-off from creating surface ponding as it may become mosquito breeding habitat; • Water tanks and other water-holding containers must be sealed or screened to prevent mosquito access and breeding. Regular monitoring for mosquito larvae and treatment with larvicide may also be required; • Waste items (tyres, drums and other water holding receptacles) should be filled with sand/soil; kept undercover or punctured to reduce the	Included as Advice Note as part of RIA's 'conditional' Development Approval.

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	chances of these items holding water and becoming mosquito breeding habitat; • Constructed water bodies (drainage infrastructure, infiltration basins and swales, settling ponds, wetlands, etc) must be located, designed and maintained so they do not create or contribute to mosquito breeding. Further details on mosquito management may be downloaded from: http://ww2.health.wa.gov.au/Articles/J M/Mosquito-management Stormwater management infrastructure such as culverts, road drainage systems, etc. are to be in accordance with the Department of Water publication Stormwater Management Manual for Western Australia. http://www.water.wa.gov.au/ data/assets/pdf file/0020/4772/44217.pdf	