



SHIRE OF
CHRISTMAS ISLAND

Phosphate Hill and Silver City Draft Structure Plans

Report to the Western Australian Planning Commission on Public Submissions

3 September 2025

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DISCLAIMER

This document follows the prescribed format of the **WAPC Panning Manual Guidance for Structure Plans August 2023**

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A - Executive Summary

This report has been prepared for the Western Australian Planning Commission by the SOCI's appointed team responsible for the formulation of the Draft Structure Plans at Phosphate Hill and Silver City (the Plans) under the Commonwealth Housing Support Program – Stream 1 and pursuant to the requirements of *Schedule 2 Part 4 cl.20 of the WA Planning and Development (Local Planning Schemes) Regulations 2015*.

The SOCI expresses its gratitude to all submitters who have dedicated time and effort to contribute to what must be seen as a starting point towards future conciliations rather than an end in itself irrespective of the positions offered. Overall, 16 submissions were received with 13 submitters originating from the island and 3 from the mainland. The 3 mainland submitters did not support the Plans alongside 6 island submitters whilst 6 island submitters supported the Plans. At least 8 out of the 9 opposing submissions, partly different in style and content from one another were displaying a range of statements with identical sentences and paragraphs giving a clear impression of originating from a common source.

The submissions have, for the large majority, acknowledged the importance and necessity to address housing needs / stress on the island. This said the pathway to achieve such objective differs with 8 submitters advocating the re-use of ex-mining areas, in-fill housing and density increase in established residential areas to avoid the forest clearing program required to implement the Plans. This without perhaps considering the magnitude and long-term strategic objectives of the Plans to provide for the planned relocation of the Kampong community, reach 5000 permanent population over the next 30 years and pivot sustainably the island economy.

These environmental conservation advocacy submissions, asserting the Plans' impact on endangered species and perceived lack of alignment with the SOCI *Strategic Community Plan*, did not acknowledge the comprehensive due diligence displayed in the Plans in the form of the Environmental Assessment Reports (EARs) whilst 5 submissions made reference to the Christmas Island mining focused *1988 Moratorium on Rainforest Clearing* long supplanted by the *EPBC Act 1999* governing Crown Land clearing conditions through referrals supported by EARs.

The recommended changes to the Plans for Council adoption were as follows:

- a) Include at section 2.2.1 page 27 of the Silver City Planning Report an additional paragraph: Whilst the cadastral boundary of Lots 48, 50 and 59 Seaview Drive will remain unchanged, the northern extension of Sunset place will require alteration of existing stormwater arrangements. The civil engineering detail design phase will need to ensure the protection of these lots against stormwater flooding;
- b) Add to Section 3.2 for both Plans the following paragraph: At the road detail design and or construction stage, the SOCI will consult with the National Park staff to ensure the design, and location of impact mitigation infrastructure for red crab migration is adequately provided;
- c) For both Plans rephrase the Part 2 Section 3.3.2 – Heritage section as follow: The possibility exists to provide street and or Public Open Space plantings of Mango and Avocado to reflect the Island's history of food insecurity and the added opportunity to bolster the survival of the critically endangered Christmas Island Flying Fox species and
- d) The statement in table 3.4 of the Phosphate Hill EAR is accurate (refer to page 28).

The SOCI's responses to the submissions and the recommended changes to the Plans were adopted unanimously by the councillors at the 22 July 2025 Ordinary Meeting of Council. The following synopsis table of key topics raised in the submissions provide an overview of all topics raised together with the position of the submitters.

B - Synopsis table of key topics raised in the submissions

[illegible]

C - 30 May and 18 June 2025 Public Notices



SHIRE OF CHRISTMAS ISLAND PUBLIC NOTICE

14/25

30 May 2025

Public comment on the Draft Phosphate Hill Structure Plan and the Draft Silver City Structure Plan

In accordance with Regulations (Schedule 2, cl.18) and (Schedule 2, Cl.87) of the Planning and Development (Local Planning Schemes) Regulations 2015, the Shire of Christmas Island is seeking public comment on the Draft Phosphate Hill Structure Plan and the Draft Silver City Structure Plan.

Those plans are available on the Shire's web site www.shire.gov.cx and available for public inspection at the Shire's front office at 2 Murray Road Christmas Island.

Public meetings to discuss these plans will be held:

- 6.30pm 9th July 2025 at the Christmas Island Recreation Centre
- 6.30pm 10th July 2025 at the Kampong Malay Club Christmas Island

Written submissions can be made by completion of the submission forms available on the Shire's web site www.shire.gov.cx and at the Shire's front office at 2 Murray Road Christmas Island.

Submission are open to 4pm Christmas Island time on the 14th July 2025 and made to the CEO via email at Shire.CEO@shire.gov.cx, or mailed to PO Box 863 Christmas Island 6798, or hand delivered to the Shire's front office 2 Murray Road Christmas Island.

David Price
Chief Executive Officer



SHIRE OF CHRISTMAS ISLAND PUBLIC NOTICE

19/25

18 June 2025

Additional Public Meetings for Draft Phosphate Hill and Silver City Structure Plans

The Shire of Christmas Island is adding additional public meetings for residents to provide input into the Draft Phosphate Hill and Draft Silver City Structure Plans.

These Structure Plans contain the design of proposed new neighbourhoods, parks, open space and road networks in the Silver City and Phosphate Hill precincts. The Shire seeks community input into these proposed designs.

These Structure Plans are available on the Shire's web site www.shire.gov.cx and also available for public inspection at the Shire's front office at 2 Murray Road Christmas Island.

Public meetings to discuss these plans will be held:

- 6.30pm, Monday 7th July 2025 at the CI Seniors Centre, Poon Saan Community Hall
- 6.30pm, Tuesday 8th July 2025 at the Christmas Island Recreation Centre
- 6.30pm, Wednesday 9th July 2025 at the Kampong Malay Club Christmas Island
- 6.30pm, Thursday 10th July at the Shire Chambers, George Fam Building

Written submissions can be made by completion of the submission forms available on the Shire's web site www.shire.gov.cx and at the Shire's front office at 2 Murray Road Christmas Island.

Submission are open to 4pm Christmas Island time on the 14th July 2025 and made to the CEO via email at Shire.CEO@shire.gov.cx, or mailed to PO Box 863 Christmas Island 6798, or hand delivered to the Shire's front office 2 Murray Road Christmas Island. The Shire is undertaking these consultations in line with Schedule 2, cl.18 and Schedule 2, cl.87 of the Planning and Development (Local Planning Schemes) Regulations 2015.

David Price
Chief Executive Officer

D - Agenda item
22 July 2025 Ordinary Meeting of Council



SHIRE OF CHRISTMAS ISLAND

| | |
|----------------------------|---|
| SUBMISSION TO | Ordinary Council Meeting 22 July 2025 |
| AGENDA REFERENCE | 10.5.3 |
| SUBJECT | CI Housing Futures Master Plan – Draft Structure Plans for Phosphate Hill and Silver City |
| LOCATION/ADDRESS/APPLICANT | N/A |
| FILE REFERENCE | 3.2.74 |
| INTEREST DISCLOSURE | Nil |
| DATE OF REPORT | 16 July 2025 |
| AUTHOR | Chris Su, Director Planning, Governance & Policy |
| SIGNATURE OF AUTHOR | SIGNED |
| SIGNATURE OF CEO | SIGNED |

RECOMMENDATIONS

That Council adopts the Submissions and Response Table to inform the Reports on the Draft Phosphate Hill and Silver City Structure Plans for submission to the WAPC pursuant to Schedule 2, cl.20 of the Planning and Development (Local Planning Schemes) Regulations 2015

BACKGROUND

The Shire of Christmas Island was successful in its application to the *2024 Housing Support Program Stream 1* grant for the Christmas Island Housing Futures Masterplan project.

This project included three major initiatives:

1. Development of Structure Plans in the Phosphate Hill and Silver City precincts
2. Engagement of environmental consultants for the necessary referrals under the Environment Protection and Biodiversity Conservation Act (EPBC Act) for future development on the sites
3. Engagement of civil engineering firm to assist with the design of the utilities network in the structure plan areas

In creating the Structure Plans for Phosphate Hill and Silver City, the Shire followed the requirements set in the WA Planning Commission's August 2023 *WA Planning Manual - Guidelines for Structure Plans* (the Manual).

The primary direction set out in the Manual requires proponents of a Structure Plan to genuinely engage with residents, take into account strategic directions from the local government, state and federal governments if any and to comply with necessary WA State Planning Policies

COMMENT

The Shire of CI presented an initial version of the Draft Structure Plans to the community in November 2024. These were based on the significant earlier bodies of work completed in the 2010s era *Commonwealth Christmas Island Strategic Assessment* under the EPBC Act in planning for future infill around the island.

In addition, the Structure Plans were developed with consideration of the Department of Home Affairs' 2020 publication *Land Use Planning for Disaster Resilient Communities*, which provides a contemporary best-practice framework for resilience planning. This guidance has informed the approach to ensure land use decisions on Christmas Island promote long-term safety, adaptability, and sustainability for our island community in the face of significant environmental change.

Council received a copy of the Draft Structure Plans at the Council Meeting of 27 May 2025 where town planning consultant Herve Calmy and Director for Planning Chris Su presented to the plans and the significant contributions the environmental and civil engineering vendors provided. Council resolved to advertise the Draft Structure Plans in resolution 40/25 in accordance to requirements of Schedule 2 Part 4 cl.18 of the Planning and Development (Local Planning Schemes) Regulations 2015.

Subsequently the statutory advertising of the two Draft Structure Plans began through Public Notice 14/25 on 30th May 2025 for the necessary 42 days minimum required through to July 14 2025. Public Notice 19/25 of 18 June 2025 provided the details for the four community workshops to be held the week of 7 July 2025 providing the community the opportunity to participate in critique and feedback.

Council also fulfilled the public consultation requirements set in the Manual being:

- 1- Publishing of the Structure Plans on the website (28th May 2025)
- 2- Providing copies of the Structure Plans for viewing at the Council offices during the period (28th May 2025)
- 3- Provided a pro-forma template submission form to be the manner and form in which one can provide a submission (28th May 2025)
- 4- Notified the community of when the last day of submissions would be accepted (done via Public Notice 14/25 of 30th May 2025).

Council furthermore went beyond the minimum set in the Manual through utilizing its *Elected Members 3: Community Consultation Policy* and also:

1. Created four public workshops the week of 7th July 2025 across various locations on the island (see Public Notice 19/25 of June 18 2025)
 - i) Poon Saan Community Hall, 6.30pm Monday 7/7/25
 - ii) Christmas Island Recreation Centre, 6.30pm Tuesday 8/7/25
 - iii) Malay Club, 6.30pm Wednesday 9/7/25
 - iv) George Fam Building, 6.30 Thursday 10/7/25
2. Engaged the local post office to conduct two post office box drops on 2 June 2025 and 19 June 2025 containing Public Notices 14/25 and 19/25 respectively as well as trilingual pro-forma template submissions for residents to complete.
3. Post Office box drops ensure that every resident with a PO box receives a copy of a notice through insertion by the local postal team. Each notice was trilingual.

4. SOCI created trilingual cover page stories on Islander editions 836 and 839 were on the public comment needed for the Draft Structure Plans. Public Notices 14/25 and 19/25 were published in The Islander editions of 836 and 838 respectively.
5. Engaged with the Dept. of Territories in Canberra 26 June 2025 to request their input, if any, into the Draft Structure Plans as key stakeholders in the process.

Council received 16 submissions from the public in the advertised period. 10.5.3.1 provides the response to each submission, with a notation of what was modified or added to in the relevant Structure Plan.

The staff notes a balanced range of submissions—some advocating for the environmental preservation of the already-gazetted Urban Development zones that comprise the Structure Plan sites, and others emphasising the urgent need to develop social, affordable, and resilient housing options in anticipation of potential future displacement of island residents from the Flying Fish Cove precinct.

The statutory EPBC referral process that the Shire must undertake following the WAPC Structure Plan application will provide essential guidance on whether and how a balanced approach to environmental preservation can be achieved throughout the development process. This process will help ensure that any future development is grounded in sound environmental considerations and aligns with national environmental standards.

STATUTORY ENVIRONMENT

Structure Plans are products of Schedule 2, Part 4 of the *Planning and Development (Local Planning Schemes) Regulations 2015* (Regulations). These regulations, along with the WAPC's August 2023 *WA Planning Manual - Guidelines for Structure Plans*, outline the requirements for preparing, submitting, and assessing structure plans. Structure plans guide future development and subdivision of land, providing a framework for zoning, land use, and infrastructure.

The four main requirements to be fulfilled to ensure the requirements of a Structure Plan are met in the *manner and form* required by WAPC are:

1. **Define the Purpose and Objectives:** Clearly identify the type of plan, matters to be addressed, and the targets to be achieved (pg.9, Manual).
2. **Conduct Site and Context Analysis:** Undertake thorough research, observations, and surveys to understand the site and its surrounding context, highlighting key issues, opportunities, and constraints (pg.9, Manual).
3. **Develop a Design Response and Outcomes:** Formulate a design response that addresses the identified issues and articulates expected outcomes, supporting implementation with plans and cross-sections (pg.9, Manual).
4. **Prescribe Implementation Measures:** Outline the specific measures for implementing the plan, including stages, land uses, infrastructure, staging, and controls (pg. 10, Manual).

Proponents must adhere to the *manner and form* required for Structure Plans as outlined in the WAPC's August 2023 *WA Planning Manual - Guidelines for Structure Plans (Manual)*.

The proponent is also required under 4.5.1 of the Manual to consult with the community constructively to enable them to help *shape and inform the proposal*. SOCI did this as described in the *Comments* section above.

Following the advice in the Manual regarding pre-lodgement guidance, the Shire engaged with DPLH officers in Perth on July 1st with the Draft Structure Plans to specifically request if the documents adhered to the *manner and form* and to take advice on next steps.

SOCI received confirmation on this through email from the DPLH Planning Manager on 11 July 2025.

SOCI has 60 days following the closing of the advertising period to prepare a report on the Structure Plans and submit to the WAPC under Schedule 2, cl.20 of the Regulations. The Manual advises the report must include:

- (i) a schedule of submissions made during the advertising period, together with the local government comments and recommendations in response to those submissions
- (ii) the local government's assessment on the proposed structure plan based on appropriate planning principles, including relevant policy and technical considerations; and the matters raised by submissions; and
- (iii) a recommendation to the WAPC as to whether the structure plan should be approved or not approved, including any recommendations for proposed modifications

Council will separate to the WAPC Structure Plan process receive notification from the Dept. of Planning, Lands and Heritage regarding its December 2024 Crown Land Enquiry Form application for the Unallocated Crown Land in the Silver City and Phosphate Hill Structure Plan sites.

The process to receive disposal of the land is separate again, pending a process involving the Dept. of Infrastructure utilizing the *Commonwealth Property Disposal Policy* held by the Dept. of Finance. Staff will keep Council informed of this process as it commences.

STRATEGIC IMPLICATIONS & MILESTONES

This resolution falls under the following areas of the Council's statutory 10 Year Strategic Community Plan and should be considered in this context:

Christmas Island Strategic Community Plan 'Our Island, Our Responsibility 2023-2033'

| | |
|---|------------------------------------|
| Planning 1: | A Community that Plans for itself |
| Community Development 1: | A Healthy, Aging Community |
| Community Development 2: | An Engaged Youth Community |
| Economy and Employment 1: | Sustainable Business Growth |
| Economy and Employment 2: | Diversified Economic Growth |
| Economy and Employment 3: | A Flowchart Forward |
| Infrastructure 1: | Managing Municipal Built Spaces |
| Infrastructure 2: | Planned and Facilitate Growth |
| Governance 2: | Have a Say |
| Governance 3: | Promote and Advocate for Islanders |
| Natural Environment and Climate Change 3: | Flying Fish Cove Housing Future |

In particular, the *Christmas Island Housing Futures Masterplan* seeks to address NE3: Flying Fish Cove Housing Future, the planning required to assist the relocation of residents from Flying Fish Cove in the event of any future necessity to permanently exit the precinct.

VOTING REQUIREMENTS

A simple majority is required.

ATTACHMENTS

- 10.5.3.1 Submissions and Response Table (Appendix 3 in the Manual)
- 10.5.3.2 Public Notice 14/25
- 10.5.3.3 Public Notice 19/25
- 10.5.3.4 Pro-Forma Submission Templates for SC and PH Structure Plans
- 10.5.3.5 Islander articles from issue 836 and 837

E - Proposed Submission Forms

Note: The forms for Silver City were identical

All forms had translated versions in Chinese and Malay

PHOSPHATE HILL DRAFT STRUCTURE PLAN

Submission Form

Submissions are to be received by Chris Su at the Shire office or by email to chris@shire.gov.cx no later than 4:00 pm Friday 11 July 2025.

Submissions may address one or more of the following questions:

- 1) Do you support or oppose the vision and objectives of the Phosphate Hill Draft Structure Plan and why?



- 2) Are there any important constraints or opportunities not identified in the Phosphate Hill Draft Structure Plan that should be identified and why?

3) Are there any specific design outcomes and implementation requirements that you support or oppose and why?

A stylized map of the Iberian Peninsula, including Spain and Portugal, is shown in a light teal color. To the west of the peninsula, a bright yellow sun is rising over the Atlantic Ocean, with its rays extending across the water. The background is a solid light blue, representing the sky.

4) Is there any information depicted on the Phosphate Hill Draft Structure Plan Map that you support or oppose and why?


5) Is there a specific aspect of the Phosphate Hill Structure Plan that is of concern to you and why?

A stylized map of the United Kingdom, including Great Britain and Ireland, is shown in a light teal color. A bright yellow sun with a simple face is positioned over the English coast, partially obscured by the map's outline. The background is white with faint horizontal lines.

Optional:

Name -

Address -



| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--------------------|--|---|----------------|
| 1 | Eric Davies | Phosphate Hill Draft Structure Plan | | |
| | | <i>1) Do you support or oppose the vision and objectives of the Plan and why?</i> | | |
| | | 1) Yes and No Yes, lovely idea and certainly essential. But unless they (the government) rebuilt one for one, what we may be losing, we will not afford to leave and re-establish ourselves as the cost and time to rebuilt on the Island is prohibitive | The Plan provides sufficient land and housing types to ultimately accommodate the residents at risk of climate threats at the Kampong. The terms and conditions of relocation is outside the scope of the Plan. | No Change |
| | | <i>2) Are there any important constraints or opportunities not identified in the Plan that should be identified and why?</i> | | |
| | | 2a) Yes A new mosque and shop will need to be built to enable us not to lose what we already have in our community. | The Plan provides an 8,100m2 Civic and Community lot where a place of worship and ancillary amenities can be accommodated | No Change |
| | | 2b) It may not be possible to take our gardens that are established and consideration for a food garden to help support us as we do now is vital | The Plan provides 11 Ha. of POS and neighbourhood parks that could accommodate discreet community horticulture gardens. Such gardens can also be established as part of the Open Space requirement within the R40 and R60 lots. The average size of the R.17 lots is 850m2. This will provide sufficient space for domestic veggie gardens | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--------------------|--|---|----------------|
| 1 (cont.) | Eric Davies | <i>3) Are there any specific design outcomes and implementation requirements that you support or oppose and why?</i> | | |
| | | 3a) Greater disability access to what is an ever-ageing community is vital. | The Plan is aligned with the requirements of the WAPC <i>Liveable Neighbourhoods</i> policy. Access to and ease of use of the movement network for users with disabilities is an important emphasis of <i>Liveable Neighbourhoods</i> . All future housing developments will be further governed by the Disability (Access to Premises-Buildings) Standards 2010. | No Change |
| | | 3b) As is energy efficiency to help offset the high cost living where future body corporate lighting could be offset by community solar seems a simple yet effective thing that has been overlooked | The Plan has not overlooked the opportunity to implement a near zero carbon emission policy for the built form expected to take advantage of the natural breezes prevalent in this part of the Island, maximise the capture of solar energy on roofs and well exposed walls and set aside land assets for the establishment of medium scale vertical axis wind turbines as well as community batteries. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--------------------|---|--|----------------|
| 1 (cont.) | Eric Davies | 4) <i>is there any information depicted on the Plan map that you support or oppose and why?</i> | | |
| | | 4) No comments provided | | |
| | | 5) <i>Is there a specific aspect of the Plan that is of concern to you and why?</i> | | |
| | | 5) Increased traffic on the hill to and from the kampong area to launch boat and fish will see significant increase in crab deaths during their migration which is alarming. | Joint traffic management measures imposed by the SOCI and National Park for the prevention of crab death during the migration period must be adhered to irrespective of the amount of traffic involved. National Park will advise the SOCI on crab crossing requirements for the new roads servicing the area of the Plan. | No Change |
| | | 6) <u>Additional question:</u> Will there be any E-Vehicle Charging Stations at new location? as without them we are not planning for the future | <i>"Community batteries may be inserted in the built form at appropriate locations together with electric vehicle charging points."</i> (refer to Part 2 section 5.1 Urban Ecology at p. 64) | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|---|---|---|---|
| 2 | Kamal Borchart 50 Seaview Drive Silver City | Silver City Draft Structure Plan | | |
| | | <i>1) Do you support or oppose the vision and objectives of the Plan and why?</i> | | |
| | | 1) Support The extension of Sunset Place through to Murray Road provides one smooth, pothole free road to enter and leave Silver City | The extension of Sunset Place provides the Plan with increased interconnectivity for pedestrians, cyclists as well as private vehicles. It also enhances accessibility for rubbish trucks and emergency vehicles. | No Change |
| | | <i>2) Are there any important constraints or opportunities not identified in the Plan that should be identified and why?</i> | | |
| | | 2) The drainage on Sunset Place is effectively a large soak well. When this is full, water flows down a spoon drain and into my backyard at 50 Seaview Drive. I have not seen any indication on the Plans showing this problem to be rectified. Is there going to be a better drainage solution built into sunset place? | Appendix 3 section 2.3.1 page 5 of the Civil Engineering Report observes: <i>"Sunset Place is a steeply graded cul-de-sac that extends north from Seaview Drive. There is a side entry pit located at the northern end of Sunset Place which discharges stormwater runoff generated from Seaview Drive and Sunset Place via a channel to the northern rainforest area."</i> Section 2.4.4 Drainage Channels - Design Criteria at page 8 stipulates: | Recommended change Include at section 2.2.1 page 27 of the Planning Report an additional paragraph: Lots 48, 50 and 59 Seaview Drive Whilst the cadastral boundary of these lots will remain unchanged, the northern extension of Sunset place will require alteration of existing stormwater arrangements. The civil engineering detail design phase will need to ensure the protection of these lots against stormwater flooding. |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--------------------|--|--|----------------|
| 2 (cont.) | Kamal Borchart | | <i>"Stormwater drainage will be designed to convey a 1 in 5-year storm event and ultimately discharge into a controlled outflow channel drain. The controlled outflow channel drain will be designed to reduce the velocity of the stormwater, and ultimately discharge into a basin or channel drain which can retain stormwater runoff from a 1 in 100-year storm event. The dimensions of these basins and channel drains are to be reviewed at detailed design stage."</i> | |
| | | <i>3) Are there any specific design outcomes and implementation requirements that you support or oppose and why?</i> | | |
| | | 3) No comments provided | | |
| | | <i>4) is there any information depicted on the Plan map that you support or oppose and why?</i> | | |
| | | 4) On Sunset Place, (the future) Residential R60 (proposed lot 20 at page 55 of the Planning report) will overlook the cul-de-sac and residences at Seaview Drive. Can lot 20 be moved further north so that above the houses in the cul-de-sac will be Public Open Space (POS). | A physical separation between the lots facing Seaview Drive and the future R60 lot is achieved through the creation of the POS itself. The provision of POS for the urbanised area of the Plan is 12.52%, well above the 10% standard requirement for residential subdivisions. (WAPC Development Control Policy 2.3.) Any increase in POS will impact on housing yield and affordability. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--------------------|--|---|----------------|
| 2 (cont.) | Kamal Borchart | | The Local Planning Scheme No.2 Development Table imposes a minimum of 6m side boundary building setback that will be applicable to the proposed Lot 20 thus pushing the built form further north and away from the lots facing Seaview Drive. | |
| | | <i>5) Is there a specific aspect of the Plan that is of concern to you and why?</i> | | |
| | | 5) I saw a proposed sewerage line going down the side of Lot 50 Seaview Drive. This is solid rock. Perhaps the sewerage line/pipe should be moved further down Sunset Place away from residences. | <p>The main purpose of running the Plan's main sewer line at the back of lot 59 is to reach by gravity the existing Water Corporation Inspection Chamber SC0004 located outside the north east corner of lot 59. The majority of sewer work will encounter rock substrate at Silver City.</p> <p>The option of connecting the sewer line through Sunset Place to Seaview Drive was rejected by the civil engineering team because the Sunset Place current cul-de-sac is some 5m lower than Seaview Drive thus forcing the introduction of another pump station in the scheme. The proposed alignment has no impact on any lot facing Seaview Drive including lot 50.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--|---|---|----------------|
| 3 | Hayley Cook and Kylie Brereton 5 Highland Court | Phosphate Hill and Silver City Draft Structure Plans Submission provided outside the questionnaire format | | |
| | | 1) Thank you for the opportunity to provide feedback on the draft structure plans for Silver City and Phosphate Hill. It's encouraging to see a long-term planning process that seeks to address housing shortages on the island. We agree that the lack of available housing is putting real strain on the community, and we support the Shire taking action to find thoughtful solutions. That said, we have a few concerns about the proposed approach and hope they can be considered as part of this consultation process. | Noted | No Change |
| | | 2a) <u>Environmental concerns and forest clearing</u> The areas proposed for housing development in these plans include sections of native forest that provide critical habitat for species unique to Christmas Island. These closed-canopy forests are not just ecologically important they're part of what makes the island special. Given the decline in many of our native species and the ongoing environmental challenges we face, we're concerned that clearing these areas could cause long-term and irreversible damage. | In accordance with the requirements of the Environment Protection and Biodiversity Conservation (EPBC) Act 1999, an Environmental Assessment Report is attached at Appendix 3 for each Plan. These provide details in terms of applicable sections of the environmental legislation, an overview of existing fauna and flora attributes, the potential impact of the projects and the proposed management measures required at the construction stage and in the longer term. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--------------------------------|--|---|----------------|
| 3 (cont.) | Hayley Cook and Kylie Brereton | 2b) <u>Environmental concerns and forest clearing</u> We feel this risk (see above) isn't worth taking when other, less environmentally impactful options may still be on the table. | There are no viable alternative sites in proximity to amenities and essential services nor sufficient hectares of cleared land within the townsite that could possibly fulfil the Plans' land use planning obligations under the regulation, identify and reserve land assets for the orderly relocation of the Kampong entire community over time, address multiple housing objectives and supply sufficient land to meet the 5000 permanent residents target set in the Shire's 2015 Local Planning Strategy. | No Change |
| | | 3a) <u>Legacy commitments and policy alignment</u> The long-standing moratorium on clearing established rainforest has been a key part of land use expectations on the island for decades. It was introduced with the understanding that this ecosystem is finite and incredibly vulnerable. Clearing forest for new suburbs would run counter to this principle and would likely raise concern among many in the community, as well as at a national level. | To the SOCI's knowledge, there is no moratorium in force on clearing established rainforest on Christmas Island. Land use requirements on the island are established through the SOCI's active 2015 local planning strategy and the 2016 local planning scheme No.2 in force. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--------------------------------|---|---|----------------|
| 3 (cont.) | Hayley Cook and Kylie Brereton | 3b) <u>Legacy commitments and policy alignment</u> We also note that this proposal appears inconsistent with the Shire's own Strategic Community Plan 2023–2033, which includes a commitment to sustainably manage forests and halt biodiversity loss. The community has every reason to expect that these principles will continue to guide decisions into the future. | The citation taken from the Sustainability Principle 15 is a guiding preamble generated by the United Nation with a global focus. This aspirational preamble cannot be interpreted literally as a specific action adopted by the SOCI. The Plans provide a sustainable approach with the creation of 81.04 ha. dedicated to Environmental Conservation | No Change |
| | | 4a) <u>Exploring alternative housing pathways</u> We believe there are other ways to meet housing needs that should be more actively pursued before new forest areas are opened up. These might include: Redeveloping previously cleared or degraded areas, including ex-mining sites; | Ex-mining sites outside the township have no easy access public amenities, shops, water, power or sewerage systems. The WAPC requires the SOCI to increase density within the footprint of the essential services network and avoid urban sprawl. The Plans are consistent with such requirement. The proposed Phosphate Hill urbanisation area is a previously degraded area due to mining. | No Change |
| | | 4b) <u>Exploring alternative housing pathways</u> <ul style="list-style-type: none">Encouraging higher-density or infill development within existing residential zones; | The SOCI does not support such approach as it is aware of the general community opposition to infill development within the existing residential areas of the township. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 3 (cont.) | Hayley Cook and Kylie Brereton | <p>4c) <u>Exploring alternative housing pathways</u></p> <ul style="list-style-type: none"> Making better use of vacant housing or underutilised blocks; | <p>The SOCI cannot forcibly use any vacant housing (if any) or underutilised blocks held privately that for whatever reasons are not committing to development at this stage.</p> <p>The Plans deals with areas suitably zoned for Urban Development since 2016 under the local planning scheme No. 2.</p> | No Change |
| | | <p>4d) <u>Exploring alternative housing pathways</u></p> <ul style="list-style-type: none"> Working with the Commonwealth to explore land tenure reform, building incentives, or modular housing options on already-disturbed land. <p>By focusing on these alternatives, the Shire can address housing pressures while maintaining environmental stewardship.</p> | <p>Refer to SOCI's response above in 2b) and 4a).</p> <p>The SOCI is negotiating constructively with the Commonwealth to release in freehold to the Shire suitably located Crown Land assets to achieve the objectives of the Plans.</p> <p>The SOCI considers modular construction as an essential option to address logistic challenges, reduce construction costs, deliver housing affordability and consequently reduce pressure on the housing market to assist singles experiencing housing stress, young couples as well as seniors impacted by the housing crisis.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 3 (cont.) | Hayley Cook and Kylie Brereton | <p>5) <u>Capacity of existing services and infrastructure</u></p> <p>One additional concern we would like to raise is the apparent strain on current essential services. Waste services, namely the landfill, and general upkeep of public areas already feel stretched. If additional housing is to be delivered, we'd like to better understand how the Shire plans to support that growth with matching investment in services and maintenance. Any increase in population should be supported by infrastructure that is functional, reliable, and properly resourced.</p> | <p>The feasibility of providing essential services to accommodate the increase demand associated with the Plans is demonstrated at appendices 3 and 4 in each report.</p> <p>The Plans are designed to establish new standards in Urban Ecology as well as Waste management at the source.</p> <p>In addition, the Plans allows the SOCI to introduce mandatory rules for the systematic establishment of solar roofs and percentages of solar walls to reduce power cost and contribute to carbon emission reduction.</p> <p>The SOCI is actively pursuing funding options to deliver the necessary infrastructure for the developments including the Housing Support Program Stream 2 dedicated to such purpose.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 3 (cont.) | Hayley Cook and Kylie Brereton | <p>6) <u>conclusion</u> We support the need to address housing challenges, but we hope this can be done in a way that reflects the island's environmental values and strengthens—not compromises—our community infrastructure. It would be wonderful to see the Shire pause and revisit the structure plans with deeper consideration of ecological impacts and more creative exploration of alternative housing solutions. Thank you again for inviting public input. We appreciate the chance to share our perspective and remain open to further discussions as this important planning work continues.</p> | <p>The SOCI has worked very closely with public agencies, land owners and private stakeholders and engaged with the community through 6 public meetings since November 2024 to establish and finalise these plans. The appropriate town planning pathway to allow development on the subject sites was initiated in 2011 and the Urban Development zones was given Ministerial approval in 2016. The Plans represent an essential component to enable the economic transition of the island economy and in particular secure a sustainable future for the upcoming generation of Christmas Islanders.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 4 | Alexia Jankowski 6 Jalan Perak Silver City | Phosphate Hill and Silver City Draft Structure Plans | | |
| | | <i>1) Do you support or oppose the vision and objectives of the Plan(s) and why?</i> | | |
| | | 1) No Comments | | No Change |
| | | <i>2) Are there any important constraints or opportunities not identified in the Plan(s) that should be identified and why?</i> | | |
| | | 2a) I feel there is a lack of consideration of viable alternatives that prioritise development in previously cleared areas of the town site. | There are no viable alternatives sites within the townsite that could possibly fulfil the Plans' land use planning obligations, the vision, the multiple objectives and the 5000 permanent residents target to 2055. | No Change |
| | | 2b) Clearing primary, undisturbed and closed-canopy rainforest for urban development is unnecessary, irresponsible and not in line with the Shire's own Strategic Community Plan (SCP) 2023–2033: Our Island, Our Responsibility. In particular, Sustainability Principle 15: <i>"Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests... and halt biodiversity loss."</i> Approving the clearing of closed-canopy forest to make way for new housing directly contradicts this commitment. | The citation taken from the Sustainability Principle 15 is a guiding preamble generated by the United Nation with a global focus. The aspirational preambles for all principles of the SCP originate from the same source. Whilst the SOCI acknowledges the intent and merit of the preamble 15, it should not be interpreted literally as a commitment for a specific action by the SOCI. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 4 (cont.) | Alexia Jankowski | <i>3) Are there any specific design outcomes and implementation requirements that you support or oppose and why?</i> | | |
| | | <p>3) I am concerned with the new roads proposed for both developments: roads through the forest linking to Murray Road hill (Silver City development) and the road through the forest that cuts from the proposed Phosphate hill development down to the school.</p> <p>Both of these areas are extremely important red crab migration routes that support dense accumulations of crabs during the summer migration. Neither proposal documents how roads will be designed to reduce the impact during their construction or regular use. How will the impact to crabs be managed during this season? Underpasses and barriers and/or overpasses should be factored into the design of all new roads through forest to prevent mass casualties of crabs and significant resources needing to be applied to manage crabs during the season. It is a serious omission of the proposals to not address crab management in road design. The proposal mentions the retention of corridors and culverts; this is not sufficient to manage crab movement during migration. It is well known that crabs will migrate along roadways and roadsides and do not just remain within forest corridors.</p> | <p>Part 2 Section 3.2 Environment - Fauna at page 39 (Silver City) and page 50 (Phosphate Hill) are recognising the necessity to mitigate impacts on crab migration as follow: <i>"Red crabs are abundant in the Structure Plan Area and provision needs to be made for their annual migration. Culverts are proposed at strategic locations to facilitate red-crab movements during their annual migration."</i></p> <p>The SOCI also notes that the Senior Threatened Species Program Coordinator at Christmas Island National Park, continues to confirm that the yellow crazy ant is the biggest threat to red crabs on the island</p> | <p>Recommended Change:</p> <p>Add to Section 3.2 for both Plans the following paragraph: At the road detail design and or construction stage, the SOCI will consult with the National Park staff to ensure the design, and location of impact mitigation infrastructure for red crab migration is adequately provided.</p> |
| | | <i>4) is there any information depicted on the Plans maps that you support or oppose and why?</i> | | |
| | | 4) No comment | | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 4 (cont.) | Alexia Jankowski | <i>5) Is there a specific aspect of the Plan that is of concern to you and why?</i> | | |
| | | 5a) Concern with wind turbines The submission refers to the documented high cumulative mortality in birds and flying foxes globally associated with Horizontal Axis Wind Turbines and the potential high impact on local birds such as boobies and frigatebirds. | The Phosphate Hill plan does not encompass the inclusion of any Horizontal Axis Wind Turbines (HAWT). The Silver City Plan does not encompass the inclusion of any HAWT either. | No Change |
| | | 5b) Concern with wind turbines From a design perspective, the structure plan references Vertical Axis Wind Turbines (VAWTs), which may have a lower wildlife collision risk profile however, without specific information about the turbine model or design, it is difficult to assess the actual risk. | The authorship of the design, scale and specifications of the VAWTs envisaged for Phosphate Hill are illustrated in the report at Figure 18 page 75. | No Change |
| | | 5c) Concern with wind turbines Given the island's unique ecological context, where bird and flying fox species are already under pressure, I strongly believe that any wind turbine proposal must be subject to a thorough and species-specific environmental impact assessment (EIA). Collision risk is often the single most important consideration in EIA processes for wind energy developments, and this is especially true in a location as biologically sensitive as Christmas Island. Ensuring early clarity on turbine design is essential to inform meaningful risk assessments. | The commonly accepted view is that VAWTs generally pose a lower risk of bird strikes than HAWTs due to the absence of high-speed blade tips and placement closer to the ground. Flinders University and VAWT-X have signalled their willingness to collaborate with the SOCI, subject to grant funding, in deploying a pilot VAWTs trial at the Phosphate Hill oval. This evidence-based experimental approach is considered essential to gauge the impact in real time a medium size VAWT may have on volant fauna as well as the energy output delivered across the island's seasonal cycles. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 4 (cont.) | Alexia Jankowski | <p>5d) Concern with wind turbines I am very happy to see that renewable energy options are being considered but there is a lot of room for increasing solar electricity production over dangerous and hazardous wind turbines.</p> | <p>There are some options to Increase solar electricity production on the island but these will not be able to meet alone the island achieving net zero emission in particular when electric cars are factored in the demand equation. Solar array efficiency on the island drops considerably during the monsoon months. The output can be reduced to 10-20% of peak capacity on continuous rainy days whilst cloudy days can lower production down to 30-50%.</p> | No Change |
| | | <p>5e) Concern with clearing forest The areas identified for development in the draft structure plans include clearing ecologically important closed-canopy forests. These habitats are critical for the survival of many of Christmas Island's endemic and threatened species—many of which have already suffered severe population declines or have gone extinct. Clearing these areas for housing would undermine ongoing efforts to protect what remains of the island's functioning natural environment.</p> | <p>The areas identified for development in the Plans are included in the Urban Development Zone of the SOCI Local planning Scheme No.2 in force since 17 February 2016. The SOCI is following the appropriate regulatory procedure under the Environmental Protection & Biodiversity Conservation (EPBC) Act 1999 to facilitate the implementation of the Plans. Parks Australia was consulted during the establishment of the Plans and signaled no particular concern with the areas targeted for urbanisation notwithstanding the need for the EPBC process for environmental approvals to be followed.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 4 (cont.) | Alexia Jankowski | <p>5f) Concern with clearing forest</p> <p>The proposals lack sufficient consideration of the environmental impact to habitat and threatened species, and do not appear to have used all available data and information on species distribution, abundance and habitat critical to survival.</p> <p>Figure 3.7 in the Phosphate Hill proposal suggests that flying foxes are only present in the marked, isolated locations. This information is referenced from the 2014 Biodiversity Conservation Plan and Range to Reef surveys up until 2018. This data is over 7 years old and does not include significant new information on flying-fox distribution, abundance and habitat critical to survival identified by Annabel Dorrestein within her PhD on the species. Annabel found that flying-foxes utilised forest habitat across the entire island throughout the year – significantly this means that all rainforest remaining on the island is critical to the survival of this Critically Endangered species. This figure also does not include information from Parks Australia's acoustic surveys monitoring hawk owl presence, that indicates that hawk owls are present in habitat across the island.</p> | <p>According to the CSIRO Wildlife Research 2025 publication: <i>Factors affecting the detection probability of a critically endangered flying-fox: consequences for monitoring and conservation,</i> Surveys were conducted at four visits to 133 sites across Christmas Island, representing the environmental variation of the island, over a 2-month survey period. The survey was conducted in 9 years between 2006 and 2022. The survey map shows no bat occurrence within the area of the Plans with four occurrences outside the Phosphate Hill Plan coinciding with the Radio Frequency System clearing.</p> <p>Part 2 Section 3.3.2 – Heritage in the Plans report stipulates: <i>"The possibility exists to provide street (or POS) plantings of Mango and Avocado to reflect the Island's history of food insecurity."</i> Notwithstanding Parks Australia's acoustic surveys, the CI hawk-owl was identified as likely to occur in the Survey Area due to the presence of preferred habitat.</p> | <p>Recommended Change</p> <p>For both Plans rephrase the Part 2 Section 3.3.2 – Heritage section as follow:</p> <p>The possibility exists to provide street and or POS plantings of Mango and Avocado to reflect the Island's history of food insecurity and the added opportunity to bolster the survival of the critically endangered Christmas Island Flying Fox species.</p> |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 4 (cont.) | Alexia Jankowski | <p>5g) Concern with clearing forest Table 3.4 in the Phosphate Hill proposal identifies eight Vulnerable, Endangered and Critically Endangered listed species likely to be present within the forest habitat proposed for clearing. Furthermore, Table 3.4 suggests that there is no preferred habitat for Abbotts Booby in the proposed clearing area: this is not the case. There are many mature, tall emergent trees that may be utilised by this species.</p> | The SOCI is advised the Phosphate Hill fauna survey report specifically states that preferred habitat for Abbotts Booby occurs in the Survey Area. whilst this is inconsistent with the Table 3.4 in the Environmental Assessment Report (EAR). | <p>Recommended Change</p> <p>The table 3.4 of the EAR be amended to reflect that preferred habitat for Abbotts Booby occurs in the Survey Area.</p> |
| | | <p>RECTIFICATION Subsequent to Council adoption of the recommendations. The Table 3.4 referred above relates to the Silver City EAR instead of the Phosphate Hill EAR.</p> | <p>Table 3.4 in the Phosphate Hill EAR is correct in asserting that: “preferred habitat for Abbotts Booby occurs in the Survey Area”.</p> | <p>Recommendation withdrawn by SOCI's authorised officer No Change.</p> |
| | | <p>5h) Concern with clearing forest Clearing forest in close proximity to Christmas Island frigatebird nesting colonies (Silver City proposal) is not acceptable or in line with Australian Government plans. This species only nests on Christmas Island in a small area of habitat in the northwest of the Island due to habitat loss from clearing, and disturbance impacts from mining. The forest highlighted for clearing in the proposals provides a critical buffer to this nesting habitat and it represents some of the last forest available to frigatebirds to expand their current nesting area.</p> | <p>The Australian Government's recommended buffer to the Christmas Island Frigatebird roosts is 200m. The area within 200 m is considered critical habitat under the species' conservation advice. Crucially, there is a buffer of more than 200 m from the nearest urbanised area under the Plan to the nearest CI frigatebird record consistent with the Australian Government recommendation.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 4 (cont.) | Alexia Jankowski | <p>5i) Concern with clearing forest</p> <p>The Single Species Action Plan for the Conservation of the Christmas Island Frigatebird (SSAP) endorsed at the 14th Conference of Parties of CMS (Convention on the Conservation of Migratory Species) in 2023 notes that suitable breeding habitat is a limiting factor due to human settlement and pollution from phosphate mining, and that birds have limited options to relocate or recolonize. The SSAP notes that a key performance indicator for the species is that the extent and quality of habitat is maintained, increased or improved. The plan reports that activities that increase wind turbulence or weed invasion into nesting or roosting habitat (i.e. vegetation clearing associated with Silver city proposal) be prevented.</p> <p>Additionally, the Plan emphasises enhancing the protection of habitat outside the Christmas Island National Park, particularly in areas buffering nesting colonies from wind turbulence.</p> | <p>The Silver City Plan takes into consideration the advice provided by the Commonwealth environmental experts during the formulation of the (now paused) EPBC 2019/2023 <i>Christmas Island Strategic Assessment (CISA)</i>.</p> <p><i>This resulted in that urban development should be setback 110m from the National Park boundary to ensure better protection of the Christmas Island Frigate Bird habitat and fly path. The Structure Plan's proposed Environmental Conservation Area will preserve in perpetuity a buffer to critical habitat for the Frigate Bird</i></p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 4 (cont.) | Alexia Jankowski | <p>5j) <u>Concern with clearing forest</u></p> <p>The disturbance and removal of forest habitat associated with both projects will have significant impacts to habitat available to listed species. If there were no other viable alternatives then this impact may be negotiable, however there are many areas of cleared or heavily disturbed land available for development that have not been identified or considered in this proposal.</p> | <p>There are no viable alternative sites in proximity to amenities and essential services nor sufficient hectares of cleared land within the townsite that could possibly fulfil the Plans' land use planning obligations under the regulation, provide for the orderly relocation of the Kampong entire community over time, address multiple housing objectives and supply sufficient land to meet the 5000 permanent residents target set in the Shire's 2015 Local Planning Strategy.</p> | No Change |
| | | <p>5k) <u>Concern with clearing forest</u></p> <p>It is unacceptable to consider clearing forest habitat when it is utilised as habitat necessary to the survival of numerous threatened species. Sustainable planning must focus on minimising environmental impacts and safeguarding what remains of Christmas Island's unique biodiversity. Alternative locations for development that do not compromise high conservation value areas should be identified and prioritised.</p> | <p>The SOCI must follow the requirements of the EPBC Act 1999 and refer the proposed land clearing to the DCCEEW. The acceptability of the land clearing will be assessed in accordance with the DCCEEW guidelines. This will include a review of any impacts to critical habitat.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 5 | Nick Gan PRL 6 Thorogood St. Burswood WA | Phosphate Hill Draft Structure Plan | | |
| | | <i>1) Do you support or oppose the vision and objectives of the Plan and why?</i> | | |
| | | In principle we support the vision and objectives of the structure plan. We also understand that from a planning perspective these are generally considered to be visionary documents that portray a potential future or futures for Christmas Island. | Agree and noted | No Change |
| | | <i>2) Are there any important constraints or opportunities not identified in the Plan that should be identified and why?</i> | | |
| | | <p>2a) The current situation on Christmas Island with the declining population, inadequate infrastructure and supply chains, a high cost of living and beyond mining limited opportunities for economic development presents significant constraints to the Vision & Objectives of the plan that should be identified in the plan.</p> <p>Current investment initiatives underway by PRL (mining lease extension, GreenSpace Tech expansion), Google's Data Hub investment, the potential EOI for the CI Resort, Akers Gaze Road Resort project, Altitude Air's efforts with flights from the north and the RDO's CI Economic Development Working group as positive initiatives and opportunities to help support the Vision and Objectives.</p> | <p>The SOCI's central objective, through the Plan(s), is to advance the Planning, Engineering, Environmental and Land <u>approvals</u> to increase readiness for the deployment of social and affordable housing, provide a sensible framework for urban environmental conservation within the townsite and identify land assets to secure the orderly relocation, in due course, of a potential segment of the Kampong community. The identification of the limiting socio-economic factors on the Island are the domain of the Local Planning Strategy currently under review. PRL's investment initiatives on the island are noted.</p> | |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 5 (cont'd) | Nick Gan PRL | <p>2b) It's unclear in the plans where the priorities lay. Is it at Phosphate Hill or Silver City?</p> <p>We believe given the proximity to services, roads etc. It would make sense for the priority to be Silver City then later Phosphate Hill if and when the economy and demand grows. It's also, from what we understand the preferred location for resettlement of the Kampong community who are under threat from Climate Change at Flying Fish Cove. These constraints and opportunities should be identified in both plans.</p> | <p>Crown Land must first be transferred to the SOCI and funding for infrastructure agreed to before priorities can be established.</p> <p>The SOCI has conducted 4 public consultation sessions at the Malay Club focusing on the need to plan for the relocation of the Kampong. At this stage it appears that a good majority is considering Phosphate Hill with the understanding that a mosque can be established there.</p> <p>When considering the topography, geotechnical data, road construction, land preparation and connection to essential services, Phosphate Hill Stage 1A is far less challenging and more economical than Stage 1 at Silver City.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--------------------|---|---|----------------|
| 5 (cont'd) | Nick Gan PRL | <i>3) Are there any specific design outcomes and implementation requirements that you support or oppose and why?</i> | | |
| | | 3a) We believe the design outcomes are good and reflect well on the work, however there are challenges in the implementation of the plan, because of the limited availability of Commonwealth Funding and/or private investment to support the plans. Additionally temporary accommodation for a construction workforce that would be needed to implement both plans is not considered in either plan. | The Plan's main purpose is to establish land use locations, road alignments, essential services provisions, identification of public open spaces and public Reserves as the general vision to be ultimately inserted in the planning instruments. Concrete arrangements about public/private funding and implementation measures can only occur based on the Plan(s) being approved by all agencies involved. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 5 (cont'd) | Nick Gan PRL | 4) <i>is there any information depicted on the Plan map that you support or oppose and why?</i> | | |
| | | <p>4) <u>PRL expected changes to be made to Part 2 Section 4.3 Phosphate Resources Limited - page 60</u></p> <p>(Initial words in italic and additions in bold)</p> <p><i>PRL's main comments about the Structure Plan are as follows:</i></p> <ul style="list-style-type: none"> • <i>support the SOCI having secured funding HSP Stream 1 funding;</i> • <i>consider the creation of the Structure Plan as long overdue;</i> • <i>acknowledge the SOCI CLEF submission did not include mining lease land; other than land within the Phosphate Hill Structure Plan, did include land PRL was seeking through the stalled Christmas Island Strategic Assessment process.</i> • Will consider checking <i>product quality in stockpiles immediately to the south of Stage 1A precinct for possible early mining;</i> • <i>acknowledge the importance of the initiative to reduce housing shortage and improve Island amenity in the near future;</i> • <i>emphasised the longer-term benefit of encouraging investment into the island; and suggest that at the appropriate time, the company may explore investment opportunities once the land is subdivided.</i> | Acknowledge expected changes | Recommended Change: as shown. |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 6 | Nick Gan PRL 6 Thorogood St. Burswood WA | Silver City Draft Structure Plan | | |
| | | <i>1) Do you support or oppose the vision and objectives of the Plan and why?</i> | | |
| | | In principle we support the vision and objectives of the structure plan. We also understand that from a planning perspective these are generally considered to be visionary documents that portray a potential future or futures for Christmas Island. | Agree and noted | No Change |
| | | <i>2) Are there any important constraints or opportunities not identified in the Plan that should be identified and why?</i> | | |
| | | <p>2a) The current situation on Christmas Island with the declining population, inadequate infrastructure and supply chains, a high cost of living and beyond mining limited opportunities for economic development presents significant constraints to the Vision & Objectives of the plan that should be identified in the plan.</p> <p>Current investment initiatives underway by PRL (mining lease extension, GreenSpace Tech expansion), Google's Data Hub investment, the potential EOI for the CI Resort, Akers Gaze Road Resort project, Altitude Air's efforts with flights from the north and the RDO's CI Economic Development Working group as positive initiatives and opportunities to help support the Vision and Objectives.</p> | <p>The SOCI's central objective, through the Plan(s), is to advance the Planning, Engineering, Environmental and Land <u>approvals</u> to increase readiness for the early deployment of social and affordable housing, provide a sensible framework for urban environmental conservation within the townsite and identify land assets to secure the orderly relocation, in due course, of a potential segment of the Kampong community. The identification of the limiting socio-economic factors on the Island are the domain of the Local Planning Strategy currently under review. PRL's investment initiatives on the island are noted.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--------------------|--|--|----------------|
| 6 (cont'd) | Nick Gan PRL | 2b) It's unclear in the plans where the priorities lay. Is it at Phosphate Hill or Silver City? We believe given the proximity to services, roads etc. It would make sense for the priority to be Silver City then later Phosphate Hill if and when the economy and demand grows. It's also, from what we understand the preferred location for resettlement of the Kampong community who are under threat from Climate Change at Flying Fish Cove. These constraints and opportunities should be identified in both plans. | <p>Crown Land must first be transferred to the SOCI and funding for infrastructure agreed to before priorities can be established.</p> <p>The SOCI has conducted 4 public consultation sessions at the Malay Club focusing on the need to plan for the relocation of the Kampong. At this stage it appears that a good majority is considering Phosphate Hill with the understanding that a mosque can be established there.</p> <p>When considering the topography, geotechnical data, road construction, land preparation and connection to essential services, Phosphate Hill Stage 1A is far less challenging and more economical than Stage 1 at Silver City.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|-------------------|--------------------|--|---|----------------|
| 6 (cont'd) | Nick Gan PRL | <i>3) Are there any specific design outcomes and implementation requirements that you support or oppose and why?</i> | | |
| | | 3) We believe the design outcomes are good and reflect well on the work, however there are challenges in the implementation of the plan, because of the limited availability of Commonwealth Funding and/or private investment to support the plans. Additionally temporary accommodation for a construction workforce that would be needed to implement both plans is not considered in either plan. | The Plan's main purpose is to establish land use locations, road alignments, essential services provisions, identification of public open spaces and public Reserves as the general vision to be ultimately inserted in the planning instruments. Concrete arrangements about public/private funding and implementation measures can only occur based on the Plan(s) being approved by all agencies involved. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--------------------|--|------------------------------|--------------------------------------|
| 6 (cont'd) | Nick Gan PRL | <i>4) is there any information depicted on the Plan map that you support or oppose and why?</i> | | |
| | | <p>4) PRL expected changes to be made to Part 2 Section 4.3 Phosphate Resources Limited - page 47</p> <p>(Initial words in italic and additions in bold)</p> <p><i>PRL's main comments about the Structure Plan are as follows:</i></p> <ul style="list-style-type: none"> <i>• support the SOCI having secured funding HSP Stream 1 funding;</i> <i>• consider the creation of the Structure Plan as long overdue;</i> <i>• acknowledge the SOCI CLEF submission did not include mining lease land;</i> <i>• acknowledge the importance of the initiative to reduce housing shortage and improve Island amenity in the near future;</i> <p><i>emphasised the longer-term benefit of encouraging investment into the island; and</i></p> | Acknowledge expected changes | Recommended Change: as shown. |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|-------------------------------|---|--|----------------|
| 7 | Mark Bennett & Tegan Crandall | Phosphate Hill and Silver City Draft Structure Plans Submission provided outside the questionnaire format | | |
| | | a) Introduction We are writing to provide feedback on the proposed Silver City and Phosphate Hill Structure Plans, currently open for community consultation. We commend the Shire of Christmas Island for recognising and acting on the very real issue of housing stress and limited housing availability on the island. The community has long called for a thoughtful response to this challenge, and it is encouraging to see the Shire take steps to initiate long-term planning for new housing. | Noted. | No Change |
| | | b) Introduction However, we are concerned that the current proposals lack sufficient environmental due diligence and strategic evaluation of alternatives, particularly with respect to the ecological importance of the land proposed for clearing. The biodiversity of Christmas Island is already under significant pressure, and further loss of native forest, even in small increments, will place additional strain on an ecosystem that is already facing serious challenges. | Each Plan (Phosphate Hill & Silver City) include comprehensive Environmental Assessment Reports (EARs) pursuant to the requirements of the Environmental Protection & Biodiversity Conservation (EPBC) Act 1999. These EARs represent the expected environmental due diligence effort. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 7 (cont.) | Mark Bennett & Tegan Crandall | 1) <u>Environmental concerns & closed forest habitat</u> The areas identified in the draft structure plans include closed-canopy forest, which is ecologically significant. These forests serve as critical habitat for a range of endemic and threatened species. Many species on Christmas Island have already experienced severe population declines or extinction, and the cumulative effect of continued habitat fragmentation increases ecological vulnerability. Clearing these areas for housing would directly contradict the island's efforts to preserve what remains of its functioning terrestrial ecosystems. | <p>The quantified and specific ecological importance of the areas subject to urbanisation within the Plans is addressed in accordance with the requirements of the EPBC Act 1999 through the EARs at Appendix 3 for each Plan. These provide details in terms of applicable sections of the environmental legislation, an overview of existing fauna and flora attributes, the potential impact of the projects and the proposed management measures required at the construction stage and in the longer term.</p> <p>The rigour of the EPBC Act assessment provides the highest level of assurance that any proposed development is subject to nationally recognised environmental scrutiny, offering the strongest possible sanction of sustainability through the oversight and approval of the Minister for the Environment.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|-------------------------------|---|--|----------------|
| 7 (cont.) | Mark Bennett & Tegan Crandall | <p>2a) <u>Longstanding Moratorium on Rainforest Clearing</u></p> <p>It is also important to acknowledge the Hawke Government's 1988 moratorium on clearing established rainforest on Christmas Island. This policy was introduced to prevent further degradation of the island's unique rainforest systems and has been reaffirmed by successive governments, including through a 2003 Senate motion calling for its continuation.</p> | <p>The SOCI notes the 2003 relevant Senate Hansard illustrating that the purpose and intent of the initial motion was specifically designed to prevent further rainforest clearing associated with mining activities.</p> <p>Since 2018 until now successive governments sought EPBC referrals and Strategic Assessment for Crown Land on CI thus displaying the absence of active Moratorium on rainforest clearing applicable to the island.</p> | No Change |
| | | <p>2b) <u>Longstanding Moratorium on Rainforest Clearing</u></p> <p>This moratorium forms part of the legacy environmental framework guiding development on the island. While not enshrined in statute, it has underpinned expectations around land use for over three decades. Any proposal that seeks to clear rainforest areas would be inconsistent with this longstanding commitment and would likely raise serious community, political, and environmental concerns.</p> | <p>The regulated instruments in force that are guiding land use and development on the island are the SOCI 2015 local planning strategy that underpins the 2016 Local Planning Scheme (LPS) No.2 approved and released at the time by the Minister responsible for the IOT. The urbanised areas in both Plans are contained within the Urban Development zone of the LPS No.2 requiring the formulation of Structure Plans.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 7 (cont.) | Mark Bennett & Tegan Crandall | <p>3) Alignment with the EPBC Act</p> <p>Although we are not suggesting that the Shire must immediately refer these proposals under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), it is important to recognise that proceeding with forest clearing will ultimately trigger a referral if a significant impact on matters of national environmental significance cannot be avoided. This risk can and should be avoided through early-stage strategic reconsideration of alternative development locations.</p> | <p>Under the terms of the Housing Support Program Stream 1, the SOCI will proceed with the EPBC referrals for the Plans at the earliest opportunity.</p> <p>There are no viable alternative sites in proximity to amenities and essential services nor sufficient hectares of cleared land within the townsite that could possibly fulfil the Plans' land use planning obligations under the regulation, provide for the orderly relocation of the Kampong entire community over time, address multiple housing objectives and supply sufficient land to meet the 5000 permanent residents target set in the Shire's 2015 Local Planning Strategy.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 7 (cont.) | Mark Bennett & Tegan Crandall | <p>4) Inconsistency with the Strategic Community Plan</p> <p>The proposals also appear inconsistent with the Shire's own Strategic Community Plan 2023– 2033 ('Our Island, Our Responsibility'). Notably, Sustainability Principle 15 commits the Shire to: <i>"Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests... and halt biodiversity loss."</i></p> <p>Clearing closed-canopy forest to build new housing estates directly conflicts with this commitment. It also risks undermining the public's trust in the Shire's long-term vision of sustainable development.</p> | <p>The SOCI has the duty to balance in a sustainable manner the needs of the island population and environmental protection initiatives.</p> <p>The citation taken from the Sustainability Principle 15 is a guiding preamble generated by the United Nation with a global focus. The aspirational preambles for all principles of the SCP originate from the same source.</p> <p>Whilst the SOCI acknowledges the intent and merit of the preamble 15, it should not be interpreted literally as an overarching commitment for a specific action by the SOCI.</p> <p>The Shire notes UN Sustainable Development Goal 11 <i>"Make cities and human settlements inclusive, safe, resilient and sustainable."</i></p> <p>To this end the Shire has designed these Structure Plans closely guided by the WAPC's State Planning Policies.</p> <p>Furthermore a key goal in the SCP is 'Natural Environment and Climate Change 3: Flying Fish Cove Housing Future'</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 7 (cont.) | Mark Bennett & Tegan Crandall | | Since the 2010s CI Strategic Assessment process through the Commonwealth, the Shire has documented the unwavering position from Flying Fish Cove residents to be relocated elsewhere on-island should the call be made that Flying Fish Cove be abandoned. The Shire has identified infill opportunities in Silver City and Phosphate Hill for this. | |
| | | <p>5a) <u>Viable Alternatives Exist and Should Be Prioritised</u></p> <p>There are many viable and less environmentally damaging ways to address housing needs on Christmas Island. These include: _</p> <ul style="list-style-type: none"> • Infill development and densification within the existing urban footprint. • Redevelopment of previously cleared, degraded, or brownfield sites, including disturbed ex-mining areas. | <p>SOCI does not support infill development and density increase within the existing residential areas.</p> <p>Ex-mining sites outside the township have no easy access public amenities, shops, water, power or sewerage systems. The WAPC requires the SOCI to increase density within the footprint of the essential services network and avoid urban sprawl. The Plans are consistent with such requirement.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|-------------------------------|---|---|----------------|
| 7 (cont.) | Mark Bennett & Tegan Crandall | <p>5b) <u>Viable Alternatives Exist and Should Be Prioritised</u></p> <ul style="list-style-type: none"> Better utilisation of existing unoccupied blocks and housing stock. | <p>There are not many unoccupied blocks in the townsite, they are privately held with no regulated prospect for the SOCI to force their development.</p> <p>Most unoccupied housing stocks are held by commonwealth agencies with little prospect to meaningfully meet current and future housing needs.</p> | No Change |
| | | <p>5c) <u>Viable Alternatives Exist and Should Be Prioritised</u></p> <ul style="list-style-type: none"> Working in partnership with the Commonwealth Government to explore innovative approaches (such as targeted housing incentives, land tenure reform, or subsidies for sustainable construction) that stimulate development where it is most appropriate. <p>These options could meet housing demand while protecting the island's most valuable natural assets, maintaining compliance with environmental commitments, and fostering a more regenerative model of development.</p> | <p>The SOCI has and continue to work closely with the commonwealth to obtain the necessary disposal of Crown Land to facilitate the implementation of the Plans. Targeted housing incentives, housing subsidies and innovative construction models will be vigorously pursued by the SOCI once the Plans are approved and the Crown Land disposal materialises.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|-------------------------------|--|--|----------------|
| 7 (cont.) | Mark Bennett & Tegan Crandall | <p><u>6) Reconsideration is the Economically Sound Path Forward</u></p> <p>Given the strong likelihood that these proposals would not pass either the EPBC Act assessment or the broader “pub test” of community acceptability, it would be fiscally and administratively unwise to continue down this path.</p> <p>The planning, legal, and reputational costs associated with pushing forward development that is both contentious and environmentally risky could be far better directed toward enabling the success of already-cleared or low-impact alternatives.</p> <p>There is an opportunity here to lead by example, by investing Shire and Commonwealth resources into solutions that align with both ecological integrity and community trust.</p> | <p>The SOCI cannot comment on speculative assertions and acknowledges the professionalisms displayed by the environmental team responsible for the formulation of the Plans' EARs.</p> <p>The SOCI advertised regularly the progress of the Plans with</p> <ul style="list-style-type: none"> articles in the Islander in July 2024, November 2024 and May 2025; 3 debates at public meetings; briefings to PRL/CIP; presentations to Councilors on-going collaboration with the CI Women's Association; consultation with private businesses; consultation with water and power providers and briefings to the Administrator. <p>This engagement has revealed a sustained support for the Plans from the Christmas Island residents.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 8 | Malay Association of CI I | Phosphate Hill and Silver City Draft Structure Plans Submission provided outside the questionnaire format | | |
| | c/o MACI Committee PO Box 329 Christmas Island WA, 6798 | <p>The WA SPPs do not address the red crab granularity within road design, nor does the WAPC have this in the Guidance for Structure Plans August 2023. However, it is a necessity for Christmas Island planning needs.</p> <p>We look forward to detailed road designs when that stage is needed to ensure crab protection is maximised in the road network creation.</p> <p>We expect the Shire to seek guidance from National Parks and other stakeholders as needed to ensure the new developments can be in harmony with the migration; we expect also the Shire to continue and expand where necessary their man hours in crab traffic management and road closures during the appropriate times in the migration season.</p> <p>We see this as fundamentally the most 'crab saving' effort that humans can do – the shutting down of roadways during the migration coupled with man hours sweeping and caring for movements.</p> | <p>Noted.</p> <p>SOCI agrees that road design alone is not optimal to reduce crab death – manned personnel on duty during dawn and dusk movements in the season significantly contribute to reducing crab mortality rates.</p> <p>SOCI will ensure that detailed road designs will include traffic control measures and proven crab mortality reduction designs (ie gates, possibly bridges) as recommended after consulting National Parks.</p> <p>Separate to the Structure Plan, SOCI will ensure that sufficient manpower will be allocated in these new and the existing precincts during crab migration for traffic management.</p> | <p>Recommended Change:</p> <p>Add to Section 3.2 for both Plans the following paragraph:</p> <p>At the road detail design and or construction stage, the SOCI will consult with the National Park staff to ensure the design, and location of impact mitigation infrastructure for red crab migration is adequately provided.</p> |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 8 (cont.) | MACI | <p>MACI would need to consider the density and block allocations should the Shire be unsuccessful in either of its CLEF applications for Phosphate Hill and Silver City precincts.</p> <p>MACI sees the design of both Structure Plans as complementing each other; should one be approved for development and not the other, MACI would expect the Council to make this known to residents as soon as possible for the community to be able to inform itself of options around development.</p> | Noted | No change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--|--|--|----------------|
| 9 | Dr. Flossy Sperring Monash University | Phosphate Hill Draft Structure Plan | | |
| | | <p>1a) We commend the Shire of Christmas Island for recognising and acting on the issue of limited housing availability on the island and support the objective of the plan.</p> <p>1b) We oppose the current vision of the Phosphate Hill Draft Structure Plan, specifically, the intent to clear extensive areas of rainforest. Extensive habitat alteration across the island has already resulted in severe population declines of many species on Christmas Island, including species occupying area within the proposed Structure Plan. The impact of continued habitat fragmentation increases ecological vulnerability and the risk of extinction for these species.</p> | <p>Beyond responding to the island's current housing crisis, the objectives of the Plan's are to identify and reserve land assets for the orderly relocation of a substantial segment of the Kampong community over time, provide a sustained source of affordable housing and supply sufficient mixed-use land to meet the 5000 permanent residents target set in the Shire's 2015 Local Planning Strategy.</p> <p>The quantified and specific ecological importance of the area subject to urbanisation within the Plan is addressed In accordance with the requirements of the EPBC Act 1999 through the EAR at Appendix 3</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|------------------|---------------------|---|--|----------------|
| 9 (Cont.) | Dr. Flossy Sperring | <i>2) Are there any important constraints or opportunities not identified in the Plan that should be identified and why?</i> | | |
| | | <p>2a) There are significant constraints that have not been identified in the Phosphate Hill Draft Structure Plan. These relate to the environmental impact of land clearing on endemic species. We are particularly concerned about the impact on three endemic species of which we have been and continue researching; the Critically Endangered Christmas Island Flying-fox, the Endangered Christmas Island Goshawk, and the Vulnerable Christmas Island Hawk-owl.</p> <p>These species are matters of national environmental significance, and a potential significant impact on these species may trigger a referral to the Environment Protection and Biodiversity Conservation Act (EPBC Act). This risk can and should be avoided through early-stage strategic reconsideration of alternative development locations.</p> | <p>Pursuant to the SOCI's Housing Support Program Stream1 program the Plan will be subject to a referral under the EPBC Act 1999 to be submitted to the DCCEEW.</p> <p>The Conservation Advice for these species do not consider clearing of this scale to be a threat to these species (TSSC, 2016a; TSSC, 2016b; TSSC, 2015).</p> <p>There are no alternative sites appropriately zoned Urban Development within the townsite that could possibly accommodate the multiple objectives of the Plan in the short, medium and long term. (refer to the Plan Executive Summary)</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 9 (cont.) | Dr. Flossy Sperring | 2b) While the Environmental Assessment Report (EAR) acknowledges that these species occur in the Survey Area, no strategies are identified to minimise or mitigate the impact, nor are the species mentioned in the Structure Plan itself. Maintaining connectivity between adjacent forests via a corridor is identified as one strategy. However, the island's highly mobile raptors and flying-foxes, which are often seen flying over urban areas, are not aided by corridors. The substantial clearing of vegetation proposed in this plan will result in the loss of critical habitat for these species. | The Urban Ecology spatial approach is presented in the Plan at Figure 4 page 20 and demonstrates a genuine intention to minimise the absolute fragmentation of the natural ecosystem within the area to be urbanised. While these taxa may not benefit from connectivity, insectivorous birds and raptors are known to benefit from forest edges (Terraube, et al., 2016; Mirski & Väli, 2021; Petty, 1998; J.A. Sánchez-Zapata, 1999). Supplemental plantings of fruit trees have been incorporated into the Structure Plan which will provide another food source for the Christmas Island Flying-fox. | No Change |
| | | 2c) Pre-clearing fauna inspections as well as trapping and relocation of fauna are the only other mitigation strategies mentioned. These strategies will not benefit the flying-foxes or raptors, as these species are highly mobile. Furthermore, as territorial species, relocation will be extremely difficult for hawk-owls and goshawks, since surrounding habitat will likely already be occupied by other individuals. | Additional management measures for mitigating the impact to listed fauna species can be incorporated into the EPBC Act referral and approval conditions as required. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 9 (cont.) | Dr. Flossy Sperring | 2d) Our research has found that the land identified for clearing in the Plan is occupied by flying-fox, goshawks, and hawk-owls. Preliminary analysis suggests that up to 14 goshawks and 20 hawk-owls may occupy the 139 hectares proposed for clearing. Future research funded by the National Environmental Science Program (NESP) will investigate important habitat features for breeding across the island for both raptors. Forested habitat and any trees greater than 50 m in height that are identified in the proposed area, are expected to be of importance. | The SOCI cannot comment on research not presented or future research. As shown in the Executive Summary table at page 6 some 66 Ha. of the Plan are dedicated to Environmental Conservation thus limiting clearing to a maximum of 73 Ha. In addition, any tall tree found within the POS and ecological connectors shown at Figure 4 page 20 are expected to be preserved at the time of clearing | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 9 (cont) | Dr. Flossy Sperring | <p>2e) The EAR is missing critical information on the Christmas Island Flying-fox. Our research has shown that the species' distribution spans a much larger area than is shown in Figure 3.7. The methodology of the survey conducted for the EAR is unclear. The inaccurate results presented in the EAR may be due to temporal changes in flying-fox abundance throughout the day/night and between seasons.</p> <p>In previous research, closed canopy evergreen forest, the predominant vegetation type in the area proposed to be cleared, has been identified as important foraging habitat for Christmas Island Flying-foxes. Further, the vegetation that is proposed to be cleared is in pristine or excellent condition. The flying-fox has a large permanent roost site near the proposed clearance site, rendering it highly likely for the species to use this nearby vegetation as a foraging resource. Additionally, it is likely that gestating and lactating female flying-foxes use this vegetation type, especially tall trees, for roosting. Consequently, clearance of this vegetation would result in a considerable reduction in foraging habitat and potentially important roosting habitat for this Critically Endangered species.</p> | <p>According to the CSIRO Wildlife Research 2025 publication: <i>Factors affecting the detection probability of a critically endangered flying-fox: consequences for monitoring and conservation</i>, Surveys were conducted at four visits to 133 sites across Christmas Island, representing the environmental variation of the island, over a 2-month survey period. The survey was conducted in 9 years between 2006 and 2022. The survey map shows no bat occurrence within the area of the Plan and four occurrences immediately to the south of the Plan coinciding with the Radio Frequency System clearing.</p> <p>Part 2 Section 3.3.2 – Heritage in the planning report stipulates: <i>“The possibility exists to provide street (or POS) plantings of Mango and Avocado to reflect the Island’s history of food insecurity.”</i></p> | <p>Recommended Change Rephrase the Part 2 Section 3.3.2 – Heritage section as follow:</p> <p>The possibility exists to provide street and or POS plantings of Mango and Avocado to reflect the Island’s history of food insecurity and the added opportunity to bolster the survival of the critically endangered Christmas Island Flying Fox species.</p> |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 9 (cont.) | Dr. Flossy Sperring | <p>2f) There are many viable and less environmentally damaging ways to address housing needs on Christmas Island. These include:</p> <ul style="list-style-type: none"> • Infill development and densification within the existing urban footprint. • Redevelopment of previously cleared, degraded, or brownfield sites, including disturbed ex-mining areas. | There is general community opposition to infill development and density increase within the existing residential areas of the township and the SOCI does not support it. Ex-mining sites outside the township have no easy access to public amenities, shops, water, power or sewerage systems. The WAPC requires the SOCI to increase density within the footprint of the essential services network and avoid urban sprawl. The Plan is consistent with such requirement. | No Change |
| | | <p>2g)</p> <ul style="list-style-type: none"> • Better utilisation of existing unoccupied blocks and housing stock. | There are not many unoccupied residential blocks in the townsite, they are privately held with no regulated prospect for the SOCI to force their development. Most unoccupied housing stocks are held by commonwealth agencies with little prospect to meaningfully meet current and future housing needs. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 9 (cont.) | Dr. Flossy Sperring | <p>2h)</p> <ul style="list-style-type: none"> Working in partnership with the Commonwealth Government to explore innovative approaches (such as targeted housing incentives, land tenure reform, or subsidies for sustainable construction) that stimulate development where it is most appropriate. <p>These options could meet housing demand while protecting the island's most valuable natural assets, maintaining compliance with environmental commitments, and fostering a more regenerative model of development.</p> | <p>The SOCI has and continue to work closely with the commonwealth to obtain the necessary disposal of Crown Land to facilitate the implementation of the Plan.</p> <p>Targeted housing incentives, housing subsidies and innovative construction models will be vigorously pursued by the SOCI once the Plans are approved and the Crown Land disposal materialises.</p> | No Change |
| | | <p>2i) It is highly likely that the proposal outlined in the Phosphate Hill Structure Plan would not pass the EPBC Act assessment. In light of this issue, we respectfully urge the Shire to:</p> <ul style="list-style-type: none"> Pause progression of the Silver City and Phosphate Hill Structure Plans until comprehensive ecological and planning alternatives have been fully assessed. Engage with the community, Commonwealth agencies, and independent experts to identify more sustainable housing solutions. Ensure that any future land development is fully aligned with the island's ecological values and legal responsibilities. | <p>The SOCI is not in a position to pre-judge the outcome of the EPBC Act assessment.</p> <p>As stated in sections 2a) 2g) and 2h) There is little land opportunity that could possibly fulfil the objectives of the Plan as described in the Executive Summary at pages 4 and 5 of the planning report.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 9 (cont.) | Dr. Flossy Sperring | <i>3) Are there any specific design outcomes and implementation requirements that you support or oppose and why?</i> | | |
| | | <p>3a) In addition to our concerns relating to land clearing, we are also concerned about the lack of environmental assessment relating to the development of wind turbines. Horizontal axis wind turbines have an immense detrimental impact on volant fauna, i.e. birds and bats, worldwide, partly due to collisions. Among birds, raptors are disproportionately negatively impacted by wind turbines. This is likely due to their hunting method and consequent failure to notice the turbines. Further, their flight style gives them little manoeuvrability to avoid collision at the last minute.</p> <p>On mainland Australia, wind turbine collisions have resulted in large numbers of flying-fox fatalities. Flying-foxes fly at rotor height, and are active at low-light hours, when the wind turbines are less visible. Additionally, the placement of the turbines is proposed to be near a large flying-fox roost site and nearby foraging habitat, increasing the likelihood of collisions.</p> | <p>The SOCI is aware of the significant impact of Horizontal Axis Wind Turbines (HAWT) on volant fauna. The Phosphate Hill Plan does not encompass the inclusion of HAWTs. The Silver City Plan does not encompass the inclusion of any HAWTs either.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|---------------------|--|--|----------------|
| 9 (cont.) | Dr. Flossy Sperring | <p>3b) We commend the use of Vertical Axis Wind Turbines (VAWTs), as these are hypothesised to have a lower risk of collisions. However, there is very little empirical evidence to support this thus far. Further, when considering such small populations as the raptors and flying-foxes on the island, even 'some' collisions can have a detrimental impact on the species' survival. Therefore, we suggest Christmas Island, with its threatened species, should not be one of the first to test the impacts (or lack thereof) VAWTs, as this could potentially result in significant impacts for EPBC-listed species that are of great importance to Christmas Island's ecosystems. If wind turbines are needed for sustained energy provisions, we recommend researching and including mitigation measures, such as smart curtailment.</p> | <p>The commonly accepted view is that VAWTs generally pose a lower risk of bird strikes than HAWTs due to the absence of high-speed blade tips and placement closer to the ground.</p> <p>Flinders University and VAWT-X have signalled their willingness to collaborate with the SOCI, subject to grant funding, in deploying a pilot VAWTs trial at the Phosphate Hill oval.</p> <p>This evidence-based approach is considered essential to gauge the impact in real time a medium size VAWT may have on wildlife as well as the energy output delivered across the island's seasonal cycles.</p> <p>The VAWT type and broad specifications envisaged for such trial is shown at Figure 18 page 72 of the planning report</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 9 (cont.) | Dr. Flossy Sperring | <p>3c) It is also important to acknowledge the Hawke Government's 1988 moratorium on clearing established rainforest on Christmas Island. This policy was introduced to prevent further degradation of the island's unique rainforest systems and has been reaffirmed by successive governments, including through a 2003 Senate motion calling for its continuation.</p> <p>This moratorium forms part of the legacy environmental framework guiding development on the island. While not enshrined in statute, it has underpinned expectations around land use for over three decades. Any proposal that seeks to clear rainforest areas would be inconsistent with this longstanding commitment and would likely raise serious community, political, and environmental concerns.</p> | <p>The SOCI notes the 2003 relevant Senate Hansard illustrates that the purpose and intent of the initial motion was specifically designed to prevent further rainforest clearing associated with mining activities. Since 2018 until now successive governments sought EPBC referrals and Strategic Assessment for Crown Land on Christmas Island thus displaying the absence of an active moratorium on rainforest clearing applicable to the island.</p> <p>The SOCI advertised regularly the progress of the Plan with</p> <ul style="list-style-type: none"> • articles in the Islander in July 2024, November 2024 and May 2025; • 3 debates at public meetings; • briefings to PRL/CIP; • presentations to Councillors • on-going collaboration with the CI Women's Association; • consultation with private businesses; • consultation with water and power providers and • briefings to the Administrator. <p>This engagement has revealed a sustained support for the Plan from the Christmas Island residents.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 9 (cont.) | Dr. Flossy Sperring | 4) <i>is there any information depicted on the Plan map that you support or oppose and why?</i> | | |
| | | No Comments | | |
| | | 5) <i>Is there a specific aspect of the Plan that is of concern to you and why?</i> | | |
| | | No Comments | | |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|----------------|--|---|--|----------------|
| 10 | Dr. Flossy Sperring Monash University | Silver City Draft Structure Plan | | |
| | | <i>1) Do you support or oppose the vision and objectives of the Plan and why?</i> | | |
| | | <p>1a) We commend the Shire of Christmas Island for recognising and acting on the issue of limited housing availability on the island and support the objective of the plan.</p> <p>1b) We oppose the current vision of the Silver City Draft Structure Plan, specifically, the intent to clear extensive areas of rainforest. Extensive habitat alteration across the island has already resulted in severe population declines of many species on Christmas Island, including species occupying area within the proposed Structure Plan. The impact of continued habitat fragmentation increases ecological vulnerability and the risk of extinction for these species.</p> | <p>Beyond responding to the island's current housing crisis, the objectives of the Plan's are to identify and reserve land assets for the orderly relocation of a substantial segment of the Kampong community over time, provide a sustained source of affordable housing and supply sufficient mixed-use land to meet the 5000 permanent residents target set in the Shire's 2015 Local Planning Strategy.</p> <p>The quantified and specific ecological importance of the area subject to urbanisation within the Plan is addressed In accordance with the requirements of the EPBC Act 1999 through the EAR at Appendix 3</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
|-------------------|---------------------|---|--|----------------|
| 10 (Cont.) | Dr. Flossy Sperring | <i>2) Are there any important constraints or opportunities not identified in the Plan that should be identified and why?</i> | | |
| | | <p>2a) There are significant constraints that have not been identified in the Phosphate Hill Draft Structure Plan. These relate to the environmental impact of land clearing on endemic species. We are particularly concerned about the impact on three endemic species of which we have been and continue researching; the Critically Endangered Christmas Island Flying-fox, the Endangered Christmas Island Goshawk, and the Vulnerable Christmas Island Hawk-owl.</p> <p>These species are matters of national environmental significance, and a potential significant impact on these species may trigger a referral to the Environment Protection and Biodiversity Conservation Act (EPBC Act). This risk can and should be avoided through early-stage strategic reconsideration of alternative development locations.</p> | <p>Pursuant to the SOCI's Housing Support Program Stream1 program the Plan will be subject to a referral under the EPBC Act 1999 to be submitted to the DCCEEW.</p> <p>The Conservation Advice for these species do not consider clearing of this scale to be a threat to these species (TSSC, 2016a; TSSC, 2016b; TSSC, 2015).</p> <p>There are no alternative sites appropriately zoned Urban Development within the townsite that could possibly accommodate the multiple objectives of the Plan in the short, medium and long term. (refer to the Plan Executive Summary)</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 10 (cont.) | Dr. Flossy Sperring | 2b) While the Environmental Assessment Report (EAR) acknowledges that these species occur in the Survey Area, no strategies are identified to minimise or mitigate the impact, nor are the species mentioned in the Structure Plan itself. Maintaining connectivity between adjacent forests via a corridor is identified as one strategy. However, the island's highly mobile raptors and flying-foxes, which are often seen flying over urban areas, are not aided by corridors. The substantial clearing of vegetation proposed in this plan will result in the loss of critical habitat for these species. | The Urban Ecology spatial approach is presented in the Plan at Figure 4 page 20 and demonstrates a genuine intention to minimise the absolute fragmentation of the natural ecosystem within the area to be urbanised. While these taxa may not benefit from connectivity, insectivorous birds and raptors are known to benefit from forest edges (Terraube, et al., 2016; Mirski & Väli, 2021; Petty, 1998; J.A. Sánchez-Zapata, 1999). Supplemental plantings of fruit trees have been incorporated into the Structure Plan which will provide another food source for the Christmas Island Flying-fox. | No Change |
| | | 2c) Pre-clearing fauna inspections as well as trapping and relocation of fauna are the only other mitigation strategies mentioned. These strategies will not benefit the flying-foxes or raptors, as these species are highly mobile. Furthermore, as territorial species, relocation will be extremely difficult for hawk-owls and goshawks, since surrounding habitat will likely already be occupied by other individuals. | Additional management measures for mitigating the impact to listed fauna species can be incorporated into the EPBC Act referral and approval conditions as required. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 10 (cont.) | Dr. Flossy Sperring | 2d) Our research has found that the land identified for clearing in the Plan is occupied by flying-fox, goshawks, and hawk-owls. Preliminary analysis suggests that up to 4 goshawks and 4 hawk-owls may occupy the 28 hectares proposed for clearing. Future research funded by the National Environmental Science Program (NESP) will investigate important habitat features for breeding across the island for both raptors. Forested habitat and any trees greater than 50 m in height that are identified in the proposed area, are expected to be of importance. | The SOCI cannot comment on research not presented or future research. As shown in the Executive Summary table at page 6 some 14.8 Ha. of the Plan are dedicated to Environmental Conservation thus limiting clearing to a maximum of 13.4Ha. In addition, any tall tree found within the POS system are expected to be preserved at the time of clearing | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 10 (cont.) | Dr. Flossy Sperring | <p>2e) The EAR is missing critical information on the Christmas Island Flying-fox. Our research has shown that the species' distribution spans a much larger area than is shown in Figure 3.7. The methodology of the survey conducted for the EAR is unclear. The inaccurate results presented in the EAR may be due to temporal changes in flying-fox abundance throughout the day/night and between seasons.</p> <p>In previous research, closed canopy evergreen forest, the predominant vegetation type in the area proposed to be cleared, has been identified as important foraging habitat for Christmas Island Flying-foxes. Further, the vegetation that is proposed to be cleared is in pristine or excellent condition. The flying-fox has a large permanent roost site near the proposed clearance site, rendering it highly likely for the species to use this nearby vegetation as a foraging resource. Additionally, it is likely that gestating and lactating female flying-foxes use this vegetation type, especially tall trees, for roosting. Consequently, clearance of this vegetation would result in a considerable reduction in foraging habitat and potentially important roosting habitat for this Critically Endangered species.</p> | <p>According to the CSIRO Wildlife Research 2025 publication: <i>Factors affecting the detection probability of a critically endangered flying-fox: consequences for monitoring and conservation</i>, Surveys were conducted at four visits to 133 sites across Christmas Island, representing the environmental variation of the island, over a 2-month survey period. The survey was conducted in 9 years between 2006 and 2022. The survey map shows no bat occurrence within the area of the Plan and four occurrences immediately to the south of the Plan coinciding with the Radio Frequency System clearing.</p> <p>Part 2 Section 3.3.2 – Heritage in the planning report stipulates: <i>“The possibility exists to provide street (or POS) plantings of Mango and Avocado to reflect the Island’s history of food insecurity.”</i></p> | <p>Recommended Change Rephrase the Part 2 Section 3.3.2 – Heritage section as follow:</p> <p>The possibility exists to provide street and or POS plantings of Mango and Avocado to reflect the Island’s history of food insecurity and the added opportunity to bolster the survival of the critically endangered Christmas Island Flying Fox species.</p> |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 10 (cont.) | Dr. Flossy Sperring | <p>2f) There are many viable and less environmentally damaging ways to address housing needs on Christmas Island. These include:</p> <ul style="list-style-type: none"> • Infill development and densification within the existing urban footprint. • Redevelopment of previously cleared, degraded, or brownfield sites, including disturbed ex-mining areas. | There is general community opposition to infill development and density increase within the existing residential areas of the township and the SOCI does not support it. Ex-mining sites outside the township have no easy access to public amenities, shops, water, power or sewerage systems. The WAPC requires the SOCI to increase density within the footprint of the essential services network and avoid urban sprawl. The Plan is consistent with such requirement. | No Change |
| | | <p>2g)</p> <ul style="list-style-type: none"> • Better utilisation of existing unoccupied blocks and housing stock. | There are not many unoccupied residential blocks in the townsite, they are privately held with no regulated prospect for the SOCI to force their development. Most unoccupied housing stocks are held by commonwealth agencies with little prospect to meaningfully meet current and future housing needs. | No Change |

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| 10 (cont.) | Dr. Flossy Sperring | <p>2h)</p> <ul style="list-style-type: none"> Working in partnership with the Commonwealth Government to explore innovative approaches (such as targeted housing incentives, land tenure reform, or subsidies for sustainable construction) that stimulate development where it is most appropriate. <p>These options could meet housing demand while protecting the island's most valuable natural assets, maintaining compliance with environmental commitments, and fostering a more regenerative model of development.</p> | <p>The SOCI has and continue to work closely with the commonwealth to obtain the necessary disposal of Crown Land to facilitate the implementation of the Plan.</p> <p>Targeted housing incentives, housing subsidies and innovative construction models will be vigorously pursued by the SOCI once the Plans are approved and the Crown Land disposal materialises</p> | No Change |
| | | <p>2i) It is highly likely that the proposal outlined in the Phosphate Hill Structure Plan would not pass the EPBC Act assessment. In light of this issue, we respectfully urge the Shire to:</p> <ul style="list-style-type: none"> Pause progression of the Silver City and Phosphate Hill Structure Plans until comprehensive ecological and planning alternatives have been fully assessed. Engage with the community, Commonwealth agencies, and independent experts to identify more sustainable housing solutions. Ensure that any future land development is fully aligned with the island's ecological values and legal responsibilities. | <p>The SOCI is not in a position to pre-judge the outcome of the EPBC Act assessment.</p> <p>As stated in sections 2a) 2g) and 2h) There is little land opportunity that could possibly fulfil the objectives of the Plan as described in the Executive Summary at pages 4 and 5 of the planning report.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| | Dr. Flossy Sperring | <i>3) Are there any specific design outcomes and implementation requirements that you support or oppose and why?</i> | | |
| 10 (cont.) | | <p>3a) In addition to our concerns relating to land clearing, we are also concerned about the lack of environmental assessment relating to the development of wind turbines. Horizontal axis wind turbines have an immense detrimental impact on volant fauna, i.e. birds and bats, worldwide, partly due to collisions. Among birds, raptors are disproportionately negatively impacted by wind turbines. This is likely due to their hunting method and consequent failure to notice the turbines. Further, their flight style gives them little manoeuvrability to avoid collision at the last minute.</p> <p>On mainland Australia, wind turbine collisions have resulted in large numbers of flying-fox fatalities. Flying-foxes fly at rotor height, and are active at low-light hours, when the wind turbines are less visible. Additionally, the placement of the turbines is proposed to be near a large flying-fox roost site and nearby foraging habitat, increasing the likelihood of collisions.</p> | The SOCI is aware of the significant impact of Horizontal Axis Wind Turbines (HAWT) on volant fauna. The Phosphate Hill Plan does not encompass the inclusion of HAWTs. The Silver City Plan does not encompass the inclusion of any HAWTs either. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 10 (cont.) | Dr. Flossy Sperring | <p>3b) We commend the use of Vertical Axis Wind Turbines (VAWTs), as these are hypothesised to have a lower risk of collisions. However, there is very little empirical evidence to support this thus far. Further, when considering such small populations as the raptors and flying-foxes on the island, even 'some' collisions can have a detrimental impact on the species' survival. Therefore, we suggest Christmas Island, with its threatened species, should not be one of the first to test the impacts (or lack thereof) VAWTs, as this could potentially result in significant impacts for EPBC-listed species that are of great importance to Christmas Island's ecosystems. If wind turbines are needed for sustained energy provisions, we recommend researching and including mitigation measures, such as smart curtailment.</p> | <p>The commonly accepted view is that VAWTs generally pose a lower risk of bird strikes than HAWTs due to the absence of high-speed blade tips and placement closer to the ground.</p> <p>Flinders University and VAWT-X have signalled their willingness to collaborate with the SOCI, subject to grant funding, in deploying a pilot VAWTs trial at the Phosphate Hill oval.</p> <p>This evidence-based approach is considered essential to gauge the impact in real time a medium size VAWT may have on wildlife as well as the energy output delivered across the island's seasonal cycles.</p> <p>The VAWT type and broad specifications envisaged for such trial is shown at Figure 18 page 72 of the planning report</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 10 (cont.) | Dr. Flossy Sperring | <p>3c) It is also important to acknowledge the Hawke Government's 1988 moratorium on clearing established rainforest on Christmas Island. This policy was introduced to prevent further degradation of the island's unique rainforest systems and has been reaffirmed by successive governments, including through a 2003 Senate motion calling for its continuation.</p> <p>This moratorium forms part of the legacy environmental framework guiding development on the island. While not enshrined in statute, it has underpinned expectations around land use for over three decades. Any proposal that seeks to clear rainforest areas would be inconsistent with this longstanding commitment and would likely raise serious community, political, and environmental concerns.</p> | <p>The SOCI notes the 2003 relevant Senate Hansard illustrates that the purpose and intent of the initial motion was specifically designed to prevent further rainforest clearing associated with mining activities. Since 2018 until now successive governments sought EPBC referrals and Strategic Assessment for Crown Land on Christmas Island thus displaying the absence of an active moratorium on rainforest clearing applicable to the island.</p> <p>The SOCI advertised regularly the progress of the Plan with</p> <ul style="list-style-type: none"> • articles in the Islander in July 2024, November 2024 and May 2025; • 3 debates at public meetings; • briefings to PRL/CIP; • presentations to Councillors • on-going collaboration with the CI Women's Association; • consultation with private businesses; • consultation with water and power providers and • briefings to the Administrator. <p>This engagement has revealed a sustained support for the Plan from the Christmas Island residents.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 10 (cont.) | Dr. Flossy Sperring | 4) <i>is there any information depicted on the Plan map that you support or oppose and why?</i> | | |
| | | No Comments | | |
| | | 5) <i>Is there a specific aspect of the Plan that is of concern to you and why?</i> | | |
| | | No Comments | | |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 11 | Nigel Hayes 16-18 Gaze Road Christmas Island WA 6798 | Phosphate Hill and Silver City Draft Structure Plans Submission provided outside the questionnaire format | | |
| | | <p>I support the vision and objectives of the Phosphate Hill Draft Structure Plan for reasons as follows.</p> <p>1\ The proposal provides a solution for the local population whose homes are affected by the effects of global changes.</p> <p>2\ Ensuring infrastructure and homes for families especially Islanders is essential to maintain the 'heart beat' of Christmas Island through a robust local population. Whether our Island's future for a tourist hub or military base.</p> <p>I believe the Phosphate Hill Structure Plan and the Silver City Draft Structure Plan (are) sensible and necessary for the long-term health of Christmas Island moving into the future.</p> | Noted | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 12 | CIWA PO Box 134 Christmas Island WA 6798 | Phosphate Hill and Silver City Draft Structure Plans Submission provided outside the questionnaire format | | |
| | | Rehousing Flying Fish Cove Residents The Christmas Island Women's Association (CIWA) has participated in recent engagements with the Shire regarding Flying Fish Cove coastal hazard planning. We acknowledge that there are stressors from the ocean and the rear cliffs that one day may require the permanent relocation of Flying Fish Cove residents. We urge the Shire and Commonwealth to undertake all engineering possible in the protection of the sea wall and the rear rockfall fencing, noting the tens of millions assigned to both projects in the last five years and going forward. Relocation of residents from their homelands should only be an ultimate last resort with a yet to be discussed relocation package to assist. | Noted. SOCI is committed to the rehousing of Flying Fish Cove residents as a last resort, after engineering solutions have been exhausted regarding the sea wall and rear rockfall fence assets to be able to credibly protect human life in the precinct. | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 12 | Lin Gaff 64 Gaze Road Christmas Island WA 6798 | Phosphate Hill and Silver City Draft Structure Plans | | |
| | | <i>1) Do you support or oppose the vision and objectives of the Phosphate Hill Draft Structure Plan or Silver City Draft Structure Plan and why?</i> | | |
| | | <p>While I understand and support the Shire's efforts to address housing needs, I believe the proposed structure plans risk causing unnecessary harm to sensitive native ecosystems and our endemic wildlife.</p> <p>The proposed clearing of intact, closed-canopy rainforest for development is deeply concerning particularly when viable alternatives exist in already cleared or disturbed areas. It's disappointing to see the draft plans fail to explore options that would avoid impacting such high conservation value habitats.</p> <p>This approach seems inconsistent with Sustainability Principles outlined in Shire of Christmas Island's Strategic Community Plan 2023–2033:</p> <p><i>“Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests... and halt biodiversity loss.”</i></p> <p>Clearing primary rainforest, especially when less destructive alternatives are available, directly contradicts this principle and risks undermining community trust in our long-term planning.</p> | <p>The lands identified in the Structure Plans are zoned Urban Development through the Local Planning Scheme 2, signed by the Minister for Territories. These lands are eligible for urban development subject to the necessary clearances under the Commonwealth EPBC Act process and any WA EPA process with DWER.</p> <p>The statutory EPBC referral process ensures a balanced approach to environmental preservation is maintained throughout the development process should one be possible.</p> <p>The Shire's Strategic Community Plan 2023-2033 adopts the 'UN Sustainable Development Goals.' The SOCI has the duty to balance in a sustainable manner the needs of the island population and environmental protection initiatives.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 13 (cont.) | Lin Gaff | | <p>The citation taken from the Sustainability Principle 15 is a guiding preamble generated by the United Nation with a global focus. The aspirational preambles for all principles of the SCP originate from the same source. Whilst the SOCI acknowledges the intent and merit of the preamble 15, it should not be interpreted literally as an overarching commitment for a specific action by the SOCI.</p> <p>The Shire notes UN Sustainable Development Goal 11 <i>"Make cities and human settlements inclusive, safe, resilient and sustainable."</i> To this end the Shire has designed these Structure Plans closely guided by the WAPC's State Planning Policies.</p> <p>Since the 2010s CI Strategic Assessment process through the Commonwealth, the Shire has documented the unwavering position from Flying Fish Cove residents to be relocated elsewhere on-island should the call be made that Flying Fish Cove be abandoned. The Shire has identified infill opportunities in Silver City and Phosphate Hill for this</p> | |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 13 (cont.) | Lin Gaff | 2) <i>Are there any important constraints or opportunities not identified in the Phosphate Hill Draft Structure Plan or Silver City Draft Structure Plan that should be identified and why?</i> | | |
| | | <p>There are viable and less destructive ways to meet housing demand that have not been considered in these plans. Such as redevelopment of cleared or disturbed land (e.g. ex-mining areas); development of vacant or underused areas within the existing urban footprint and collaborative land planning with the Commonwealth for low-impact solutions. For example, repurposing of the now empty accommodations previously associated with the immigration detention centre.</p> <p>These options should be prioritised to protect remaining high-value ecosystems.</p> | <p>A Structure Plan under the WAPC regulations requires the proponent to produce a neighbourhood design taking into account the requirements of the WA State Planning Policies and any other relevant document, in this case the Home Affairs' Land Resilience Planning for Communities, 2020.</p> <p>As such the Structure Plan cannot make comment on utilisation existing Commonwealth housing assets on Christmas Island under the Home Affairs portfolio, reserved in contingency for standing up in the event of the Immigration Detention Centre being activated again. It is outside the WAPC and local government's remit to be able to do this in developing a Structure Plan under the <i>WA Planning and Development (Local Planning Schemes) Regulations 2015</i></p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 13 (cont.) | Lin Gaff | 3) <i>Are there any specific design outcomes and implementation requirements that you support or oppose and why?</i> | | |
| | | <p>3a) Road Access The area proposed for access roads through both the Silver City and Phosphate Hill developments pose a serious threat to red crab migration routes. Crabs don't just stay within narrow forest corridors, they crossover roads and use open areas during their mass migration events.</p> <p>Yet, the draft structure plans fail to adequately address this. The mention of culverts and green corridors is not sufficient. Intelligent road designs that consider both terrain and crab migration routes and include crab underpasses, overpasses, and exclusion fencing to minimise crab deaths (due to human impacts) and management burdens on the community and local authorities.</p> | <p>The Shire and National Parks presently manage the red crab migration management in conjunction with community co-operation. This entails road closures during the thickest of the crab migration movements and moreover, manning of the roads with council staff, Parks staff and community volunteers to sweep during the needed times.</p> <p>The Shire has confidence that it can expand this practice into new precincts that are developed – the ratepayers would expect us to, and so would National Parks.</p> <p>In addition, the Shire has the opportunity to implement crab migration infrastructure into these new roads that we control. We will seek guidance from National Parks, Main Roads WA to implement road calming measures and necessary crab installations borrowing on the success of bridges and underpass grills elsewhere on island.</p> | <p>Recommended Change:</p> <p>Add to Section 3.2 for both Plans the following paragraph:</p> <p>At the road detail design and or construction stage, the SOCI will consult with the National Park staff to ensure the design, and location of impact mitigation infrastructure for red crab migration is adequately provided.</p> |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 13 (cont.) | Lin Gaff | 3b) This area also supports mature emergent trees used by Abbott's Boobies, a species already under threat. Any clearing or road construction through this area would compromise a key ecological pathway and permanently alter a place that connects residents to the island's natural heritage. | The rigour of the EPBC Act assessment provides the highest level of assurance that any proposed development is subject to nationally recognised environmental scrutiny, offering the strongest possible sanction of sustainability through the oversight and approval of the Minister for the Environment. | No Change |
| | | <p>3c) <u>Wind Turbine</u> I'm also concerned about the inclusion of wind turbines in the Phosphate Hill plan. While renewable energy is essential, the lack of detail on the turbine design, especially in an environment home to flying foxes, seabirds, and migratory birds, makes it difficult to assess the full risk. Species like frigatebirds and boobies are known to be poor at avoiding moving turbine blades and could suffer significant collisions. Any wind energy proposal must be accompanied by a species-specific environmental impact assessment and should not proceed until those risks are clearly understood. Frankly, I would prefer to see the island prioritise solar energy, which can be expanded more safely and with far fewer ecological risks.</p> | <p>Noted the preference for prioritisation of solar energy.</p> <p>The commonly accepted view is that VAWTs generally pose a lower risk of bird strikes than HAWTs due to the absence of high-speed blade tips and placement closer to the ground.</p> <p>Flinders University and VAWT-X have signalled their willingness to collaborate with the SOCI, subject to grant funding, in deploying a pilot VAWTs trial at the Phosphate Hill oval. This evidence-based experimental approach is considered essential to gauge the impact in real time a medium size VAWT may have on volant fauna as well as the energy output delivered across the island's seasonal cycles.</p> <p>.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 13 (cont.) | Lin Gaff | 4) <i>Is there any information depicted on the Phosphate Hill Draft Structure Plan Map or Silver City Draft Structure Plan Map that you support or oppose and why?</i> | | |
| | | <p>4a) The structure plans rely on outdated information from wildlife surveys (from 2014–2018) and omit recent findings such as Dr. Annabel Dorrestein's PhD research showing that flying foxes use forested areas across the entire island year-round. This means that the forest proposed for clearing isn't just important, it is essential for the continued survival of this critically endangered species.</p> <p>The draft plans also fail to acknowledge recent acoustic survey data from Parks Australia, which shows that Christmas Island hawk owls are also present across many forested sites, including those targeted for development.</p> | <p>Pursuant to the SOCI's Housing Support Program Stream1 program the Plan will be subject to a referral under the EPBC Act 1999 to be submitted to the DCCEEW.</p> <p>The Conservation Advice for these species do not consider clearing of this scale to be a threat to these species (TSSC, 2016a; TSSC, 2016b; TSSC, 2015).</p> <p>There are no alternative sites appropriately zoned Urban Development within the townsite that could possibly accommodate the multiple objectives of the Plan in the short, medium and long term. (refer to the Plan Executive Summary)</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 13 (cont.) | Lin Gaff | <p>4b) The <u>Silver City development</u> encroaches on the buffer area for the Christmas Island frigatebird's only known nesting colony, located in the island's northwest. This forest buffer is critical to minimising wind turbulence, disturbance, and invasive weed spread into the nesting zone.</p> <p>This directly conflicts with the Single Species Action Plan (SSAP) for the frigatebird, endorsed in 2023 by the Convention on the Conservation of Migratory Species. The SSAP calls for habitat outside the national park to be protected and for nesting buffers to be maintained or improved not cleared for housing. The proposed development puts this important species and biodiversity in jeopardy.</p> | <p>The Australian Government's recommended buffer to the Christmas Island Frigatebird roosts is 200m.</p> <p>The area within 200 m is considered critical habitat under the species' conservation advice.</p> <p>Crucially, there is a buffer of more than 200 m from the nearest urbanised area under the Plan to the nearest CI frigatebird record consistent with the Australian Government recommendation.</p> | No Change |
| | | <p>4c) The plan to construct a road connecting the <u>Phosphate Hill site</u> to the school cuts through steep terrain that already causes drainage issues. I'm concerned that this will worsen erosion and runoff problems, potentially impacting the school and the surrounding crab migration routes even further. See above.</p> <p>Without a full hydrological assessment and erosion management strategy, this proposal may create more problems than it solves. We should be looking to protect these sensitive transition zones, not put more pressure on them.</p> | <p>The Civil Engineering appendix 3 in the Phosphate Hill Structure Plan addresses drainage matters ensuring consistency with best practice.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 13 (cont.) | Lin Gaff | <p>4d) I urge the Shire to pause and reconsider the Silver City and Phosphate Hill proposals in their current form. Christmas Island is home to species and habitats found nowhere else on Earth. Once we remove this important habitat, it is impossible to replace.</p> <p>Please prioritise development in already cleared or degraded areas, or repurpose existing housing resources before considering clearing even more land for our future generations to repair.</p> | <p>The Structure Plans are set in areas zoned for Urban Development gazetted in the Local Planning Scheme No.2 signed by the Minister for Territories as WA Planning Minister on Christmas Island.</p> <p>As such, development on those sites is permissible should permission stemming from a referral to the EPBC Act be granted, with relevant WA EPA requirements followed.</p> <p>The Shire notes that a Structure Plan cannot provide input into existing housing resources in a township.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 14 | Island Care ci.islandcare @mail.com | Phosphate Hill and Silver City Draft Structure Plans Submission provided outside the questionnaire format | | |
| | | <p>1. Clearing of Closed-Canopy Rainforest</p> <p>The areas proposed for development include undisturbed, closed-canopy rainforest that provide essential habitat for endemic and threatened species. These include the Critically Endangered Christmas Island flying fox, Christmas Island hawk owl, Abbott's booby, and the Christmas Island frigatebird. Clearing these areas would:</p> <ul style="list-style-type: none"> • Fragment and degrade vital habitat; • Contradict the long-standing 1988 rainforest clearing moratorium; • Undermine Sustainability Principle outlined in the Shire's own Strategic Community Plan 2023–2033. | <p>The lands identified in the Structure Plans are zoned Urban Development through the Local Planning Scheme 2, signed by the Minister for Territories.</p> <p>These lands are eligible for urban development pending necessary approvals through the Commonwealth EPBC Act process and any WA EPA process with DWER.</p> <p>The statutory EPBC referral process that the Shire must undertake following the WAPC Structure Plan application will provide essential guidance on whether and how a balanced approach to environmental preservation can be achieved throughout the development process. This process will help ensure that any future development is grounded in sound environmental considerations and aligns with national environmental standards.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 14 (cont.) | Island Care | | <p>Shire notes there is no '1988 moratorium' on rain forest clearing. There was a position made by the Government of the day that should mining be re-introduced to Christmas Island, that it should take place on already disturbed land.</p> <p>SOCI's 10 Year Plan in regards to 'Sustainability Principles' is a holistic approach to waste management, reduced use of resources, increased focus on renewable energy, transitioning from fossil fuels and an orderly, sanctioned development of land through environmental clearances obtained from the Commonwealth after rigorous assessment.</p> <p>The Shire does not agree with the position that utilising Urban Development land after the Minister for Environment provides permissions as to how it can be done so in a manner aligning to the EPBC Act standards can be 'undermining the sustainability principles' in our SCP 2033-2033</p> | |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 14 (cont.) | Island Care | <p>2. Viable and Less Destructive Alternatives Exist</p> <p>There are more sustainable ways to meet the housing demand, including:</p> <ul style="list-style-type: none"> • Redevelopment of cleared or disturbed land (e.g. ex-mining areas); • Infill development within the existing urban footprint; • Utilisation of vacant or underused lots; • Collaborative land planning with the Commonwealth for low-impact solutions. <p>These options should be prioritised to protect remaining high-value ecosystems.</p> | <p>The WAPC State Planning Policies resolve to introduce 'in-fill' as the underlying planning principle to promote greater density within settled areas. This ultimately prevents 'urban sprawl' in the outer fringes of a settled area. Subsequently this saves land from being disturbed.</p> <p>'Ex-Mining areas' as suggested exist outside the township; there is no water, sewerage or power to those sites. It would take extraordinary funds to bring utilities to those sites which would only increase the development costs of the precinct which would put Islanders in further financial pressure to meet the costs of building.</p> <p>The Structure Plans are located within Urban Development Zones of the Local Planning Scheme 2, enforced in 2016.</p> <p>In terms of <i>collaborative land planning with the Commonwealth for low-impact solutions</i>, the Shire has followed the process available for it as such.</p> <p>This involved nominating land for disposal and a Structure Plan design informed by the relevant WA State Planning Policies 7.0 <i>Design of the Built Environment</i> and 7.2 <i>Precinct Design</i>.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 14 (cont.) | Island Care | <p>3. Red Crab Migration Corridors at Risk</p> <p>Proposed new roads through forested areas would cut directly across critical red crab migration routes, leading to likely mass mortality events and ongoing management burdens. While the plans mention culverts and corridors, these measures are insufficient without the inclusion of effective crab underpasses, overpasses, and exclusion barriers.</p> | <p>The Shire and National Parks presently manage the red crab migration management in conjunction with community co-operation. This entails road closures during the thickest of the crab migration movements and moreover, manning of the roads with council staff, Parks staff and community volunteers to sweep during the needed times.</p> <p>The Shire has confidence that it can expand this practice into new precincts that are developed – the ratepayers would expect us to, and so would National Parks.</p> <p>In addition, the Shire has the opportunity to implement crab migration infrastructure into these new roads that we control. We will seek guidance from National Parks, Main Roads WA to implement road calming measures and necessary crab installations borrowing on the success of bridges and underpass grills elsewhere on island.</p> | <p>Recommended Change:</p> <p>Add to Section 3.2 for both Plans the following paragraph:</p> <p>At the road detail design and or construction stage, the SOCI will consult with the National Park staff to ensure the design, and location of impact mitigation infrastructure for red crab migration is adequately provided.</p> |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 14 (cont.) | Island Care | <p>Section omitted in the OMC agenda</p> <p>4. Wind Turbine Risks to Aerial Wildlife</p> <p>Island Care are concerned about the inclusion of wind turbines in the Phosphate Hill plan. The Phosphate Hill plan references wind energy infrastructure without disclosing turbine design details. Without this, we cannot adequately assess the collision risk to birds and flying foxes, many of which already face population decline.</p> <p>We strongly urge that any wind proposal be:</p> <ul style="list-style-type: none"> • Subject to a species-specific environmental impact assessment; • Evaluated against safer renewable alternatives, such as solar energy, which already have a proven track record on the island. • Reassessed for viability in the long term, due to the necessity for highly-skilled installation and maintenance of this technology and capacity of local technicians. | <p>Refer to submissions 4, 9, 10 and 13 with similar concerns</p> <p>The commonly accepted view is that VAWTs generally pose a lower risk of bird strikes than HAWTs due to the absence of high-speed blade tips and placement closer to the ground.</p> <p>Flinders University and VAWT-X have signalled their willingness to collaborate with the SOCI, subject to grant funding, in deploying a pilot VAWTs trial at the Phosphate Hill oval.</p> <p>This evidence-based experimental approach is considered essential to gauge the impact in real time a medium size VAWT may have on volant fauna as well as the energy output delivered across the island's seasonal cycles.</p> | No Change |

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| 14 (cont.) | Island Care | <p>5. Frigatebird Nesting Buffer Zones Under Threat</p> <p>The Silver City proposal encroaches on vital buffer habitat surrounding the only known nesting site of the Christmas Island frigatebird. This directly conflicts with the 2023 Single Species Action Plan, which calls for protection and enhancement of nesting habitat and surrounding forest to reduce wind turbulence and human impacts.</p> <p>The wind turbine proposal further threatens the Christmas Island Frigatebird population as there has been no species-specific impact assessment conducted to rule out negative impacts.</p> | <p>The Draft Silver City Structure Plan provides a 110m buffer from the north-east face of the precinct before buildings are to be erected in the 'environmental buffer zone.'</p> <p>This is designed this to mitigate impact on the National Park and the frigate bird nesting sites to the north east of Silver City.</p> <p>The Shire will defer to the EPBC Act assessment panel in providing any directions as to further mitigation or offset requests in order to provide for sustainable development in the area.</p> <p>Similarly the Shire will defer to the necessary government approvals and assessment processes on its consideration of vertical wind turbines when they come to be erect.</p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 14 (cont.) | Island Care | <p>6. Outdated and Incomplete Species Data</p> <p>The plans rely on ecological data that is more than seven years old and does not incorporate recent findings on species distribution particularly for the flying fox and hawk owl. For example:</p> <ul style="list-style-type: none"> • Dr. Annabel Dorrestein's PhD research confirms year-round island-wide use of forest by flying foxes; • Parks Australia's acoustic data shows hawk owl presence across a wide range of forested areas, including those slated for clearing. | <p>According to the CSIRO Wildlife Research 2025 publication: <i>Factors affecting the detection probability of a critically endangered flying-fox: consequences for monitoring and conservation</i>, Surveys were conducted at four visits to 133 sites across Christmas Island, representing the environmental variation of the island, over a 2-month survey period. The survey was conducted in 9 years between 2006 and 2022. The survey map shows no bat occurrence within the area of the Plans with four occurrences outside the Phosphate Hill Plan coinciding with the Radio Frequency System clearing.</p> <p>Part 2 Section 3.3.2 – Heritage in the Plans report stipulates: <i>"The possibility exists to provide street (or POS) plantings of Mango and Avocado to reflect the Island's history of food insecurity."</i></p> <p>Notwithstanding Parks Australia's acoustic surveys, the CI hawk-owl was identified as likely to occur in the Survey Area due to the presence of preferred habitat.</p> | <p>Recommended Change</p> <p>For both Plans rephrase the Part 2 Section 3.3.2 – Heritage section as follow:</p> <p>The possibility exists to provide street and or POS plantings of Mango and Avocado to reflect the Island's history of food insecurity and the added opportunity to bolster the survival of the critically endangered Christmas Island Flying Fox species.</p> |

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| 14 (cont.) | Island Care | Recommendations We respectfully urge the Shire to: 1. Pause the current progression of the Silver City and Phosphate Hill plans; | The Shire is bound by the Housing Support Program Stream One funding agreement to proceed with submissions of the SC and PH Structure Plans to the WAPC for assessment. | No Change |
| | | 2. Re-evaluate and identify alternative development sites that avoid high conservation value areas; | The Shire notes that the SC and PH sites are not 'high conservation value areas' – they are zoned Urban Development through the Local Planning Scheme No.2 and ready for development should DCCEEW be satisfied with the EPBC referrals. | No Change |
| | | 3. Ensure alignment with both the EPBC Act and the Shire's own Strategic Community Plan. | This is not a relevant comment to the formulation of a Structure Plan (bound by the EPBC Act.) | No Change |
| | | 4. Undertake a comprehensive ecological impact assessment using current data. | The Shire has engaged a specialised environmental consultant team with expertise in formulation of Environmental Assessment Reports. | No Change |
| | | 5. Engage with local stakeholders, conservation experts, and federal agencies to align future development with community values and biodiversity protection | The SOCI advertised regularly the progress of the Plans with: a) articles in the Islander in July 2024, November 2024 and May 2025; b) debates at 3 public meetings; c) briefings to PRL/CIP; | No Change |

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| 14 (cont.) | Island Care | | <p>d) presentations to Councillors</p> <p>e) on-going collaboration with the CI Women's Association;</p> <p>f) consultation with private businesses;</p> <p>g) consultation with water and power providers and</p> <p>h) briefings to the Administrator.</p> <p>This engagement has revealed a sustained support for the Plans from the Christmas Island residents.</p> <p>The Structure Plans fully align with the community values and aspirations documented in the Shire of Christmas Island 10 Year <i>Strategic Community Plan "Our Island, Our Responsibility 2023-2033."</i></p> <p>There was an extensive community consultation process as mandated by the Local Govt Act in the creation of the SCP</p> | |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 15 | Damon Kirkpatrick 6 Jalan Perak | Phosphate Hill and Silver City Draft Structure Plans Submission provided outside the questionnaire format | | |
| | | 1. Overall Vision and Objectives I offer no direct comment on the stated vision and objectives of either structure plan. | Noted | No Change |
| | | 2. Constraints or Opportunities Not Addressed Neither plan appears to consider alternative development options that prioritize previously cleared land. The proposed clearing of primary, closed-canopy rainforest conflicts with the Shire's Strategic Community Plan 2023–2033 , particularly Sustainability Principle 15, which commits to protecting and restoring terrestrial ecosystems and reducing biodiversity loss. Expanding into intact rainforest is unnecessary and contrary to these commitments. | <p>The Shire's Strategic Community Plan 2023-2033 adopts the 'UN Sustainable Development Goals.' The SOCI has the duty to balance in a sustainable manner the needs of the island population and environmental protection initiatives.</p> <p>The citation taken from the Sustainability Principle 15 is a guiding preamble generated by the United Nation with a global focus. The aspirational preambles for all principles of the SCP originate from the same source.</p> <p>Whilst the SOCI acknowledges the intent and merit of the preamble 15, it should not be interpreted literally as an overarching commitment for a specific action by the SOCI. The Shire notes SDG 11 <i>"Make cities and human settlements inclusive, safe, resilient and sustainable."</i></p> | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 15 (cont.) | Damon Kirkpatrick | | <p>To this end the Shire has designed these Structure Plans closely guided by the WAPC's State Planning Policies which thematically encourage infill at density to reduce urban sprawl which delivers significant negative impact on lands.</p> <p>Furthermore a key goal in the SCP is 'Natural Environment and Climate Change 3: Flying Fish Cove Housing Future'</p> <p>This requires that Council to ensure that "<i>Christmas Islanders in Flying Fish Cove are given adequate information about relocation plans in the event climate change makes the area unsafe for habitation</i>"</p> <p>Since the 2010s CI Strategic Assessment process through the Commonwealth, the Shire has documented the unwavering position from Flying Fish Cove residents to be relocated elsewhere on-island should the call be made that Flying Fish Cove be abandoned.</p> <p>The Shire has identified infill opportunities in Silver City and Phosphate Hill for this.</p> | |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 15 (cont.) | Damon Kirkpatrick | <p>3. Design Outcomes and Implementation Requirements</p> <p>I have significant reservations about the proposed road layout through forested corridors—both the Silver City connection to Murray Road Hill and the Silver City-Phosphate Hill Road route to the school. These coincide with dense red crab migration corridors during the summer breeding season. No documentation details how impacts to crab movement or mortality will be addressed. Mere retention of corridors and culverts is insufficient: red crabs are known to migrate along roads and edges, not exclusively through designated forest strips. I strongly suggest that road design incorporate wildlife underpasses, barriers, or overpasses to fully mitigate mortality risk and avoid resource-intensive seasonal crab management.</p> | <p>Council acknowledges the communities' expectations around crab management. Currently the Shire, National Parks and community volunteers co- ordinate for crab sweeping during the necessary times in the migration period.</p> <p>The Shire, in conjunction with input from National Parks, also co- ordinate the road closures necessary in the migration period. These are the two standing methods that SOCI and National Parks co-ordinate on to reduce crab mortality with great efficacy. SOCI will also have the chance in the more detailed road network design plans with National Parks put in crab infrastructure elements such as grills, fencing and gates.</p> <p>SOCI agrees with the submission that road design incorporate wildlife underpasses, barriers, or overpasses to fully mitigate mortality risk and avoid resource-intensive seasonal crab management but that moreover, SOCI commits to adequately providing manpower at the necessary locations informed by National Parks during the migration to sweep and close roads as necessary.</p> | <p>Recommended Change:</p> <p>Add to Section 3.2 for both Plans the following paragraph: At the road detail design and or construction stage, the SOCI will consult with the National Park staff to ensure the design, and location of impact mitigation infrastructure for red crab migration is adequately provided.</p> |

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| 15 (cont.) | Damon Kirkpatrick | 4. Map Depictions No comment on map presentations. | | No change |
| | | <p>Section omitted in the OMC agenda</p> <p>A Wind Turbine Proposal (Phosphate Hill) Wind turbines—particularly traditional horizontal-axis turbines (HAWTs)—pose substantial collision risks to birds and flying foxes, which is especially concerning on Christmas Island given the prevalence of EPBC-listed seabirds, forest birds, and critically endangered flying foxes.</p> <p>The proposal's reference to vertical-axis turbines (VAWTs) lacks sufficient model-specific detail. Certain VAWTs (e.g. egg-beater designs) also create extensive collision zones. Given the island's sensitive ecological context, early clarity on turbine specifications is essential to conduct a species-specific collision risk assessment.</p> <p>I welcome exploration of renewable energy options; however, solar generation offers a safer alternative and could be further prioritized over turbines.</p> | <p>Refer to submissions 4, 9, 10 and 13 with similar concerns</p> <p>The commonly accepted view is that VAWTs generally pose a lower risk of bird strikes than HAWTs due to the absence of high-speed blade tips and placement closer to the ground.</p> <p>Flinders University and VAWT-X have signaled their willingness to collaborate with the SOCI, subject to grant funding, in deploying a pilot VAWTs trial at the Phosphate Hill oval.</p> <p>This evidence-based approach is considered essential to gauge the impact in real time a medium size VAWT may have on wildlife as well as the energy output delivered across the island's seasonal cycles.</p> <p>The VAWT type and broad specifications envisaged for such trial is shown at Figure 18 page 72 of the planning report</p> | No change |

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| 15 (cont.) | Damon Kirkpatrick | <p>Section omitted in the OMC agenda</p> <p>B. Forest Clearing and Impacts to Threatened Species Both plans propose clearing ecologically valuable closed-canopy rainforest—critical habitat for endemic and threatened species, including the Critically Endangered Christmas Island flying-fox, which has declined by significantly and continues to face severe decline pressures DCCEEW+5Lab of Animal Ecology+5NESP Threatened Species+5.</p> <p>The plans rely on outdated distribution data (from 2014 and earlier) and omit more recent findings—such as those from PhD research by Dorrestein—indicating that flying-foxes utilise forest habitat island-wide year-round. Hawk owls too are broadly distributed according to recent acoustic monitoring.</p> <p>Similarly, Abbott's booby nests in plateau rainforest on Christmas Island, and forest buffers outside the national park are vital for nesting expansion and mitigating turbulence impacts from land clearing NESP Threatened SpeciesChristmas Island National Park. Given the presence of at least eight threatened species within proposed clearance zones, and the existence of suitable cleared or disturbed land elsewhere, it is unacceptable to prioritise primary rainforest for urban expansion without thoroughly evaluating lower-impact sites.</p> | <p>Refer to submissions 4, 9, 10, 13 and 14 with similar concerns</p> <p>Pursuant to the SOCI's Housing Support Program Stream1 program the Plan will be subject to a referral under the EPBC Act 1999 to be submitted to the DCCEEW.</p> <p>The Conservation Advice for these species do not consider clearing of this scale to be a threat to these species (TSSC, 2016a; TSSC, 2016b; TSSC, 2015).</p> <p>There are no alternative sites appropriately zoned Urban Development within the townsite that could possibly accommodate the multiple objectives of the Plan in the short, medium and long term. (refer to the Plan Executive Summary)</p> | No Change |

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| 15 (cont.) | Damon Kirkpatrick | <p>Section omitted in the OMC agenda</p> <p>Summary of Key Concerns</p> <ul style="list-style-type: none"> • Forest clearing undermines biodiversity commitments and damages habitat for multiple threatened species. • Red crab migration routes are not adequately protected through current road design proposals. • Wind turbine proposals lack sufficient technical detail for proper wildlife impact assessment. | <p>Refer to submissions 4, 9, 10, 13 and 14 with similar concerns</p> <p>Part 2 Section 3.2 Environment - Fauna at page 39 (Silver City) and page 50 (Phosphate Hill) are recognising the necessity to mitigate impacts on crab migration as follow: <i>"Red crabs are abundant in the Structure Plan Area and provision needs to be made for their annual migration. Culverts are proposed at strategic locations to facilitate red-crab movements during their annual migration."</i></p> | <p>Recommended Change:</p> <p>Add to Section 3.2 for both Plans the following paragraph: At the road detail design and or construction stage, the SOCI will consult with the National Park staff to ensure the design, and location of impact mitigation infrastructure for red crab migration is adequately provided.</p> |

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| | | Recommendations <ul style="list-style-type: none"> • Re-assess development alternatives that utilise previously cleared land rather than intact forests. • Integrate robust crab-safe road infrastructure (underpasses, overpasses, barriers) in any forested corridor. • Provide detailed turbine specifications at an early planning stage and pursue a transparent, species-specific environmental impact assessment. • Update habitat and distribution data for threatened species to include post-2018 surveys and Dorrestein's forest-wide findings. • Prioritise solar generation over wind turbine conceptualization unless newer designs are proven low-impact. | The response to these points are illustrated in sections above. | |

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| 15 (cont.) | | I appreciate the Shire's initiative to address housing needs under the Housing Support Program (Stream 1) in line with WAPC guidance. For these proposals to succeed sustainably, the draft plans must fully integrate conservation planning and ecological data to minimise harm to Christmas Island's remaining forest-dependent biodiversity. | Noted | No Change |

| Submission No. | Submitter/ Address | Submission full text | SOCI's Response | Recommendation |
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| 16 | Nick Mooney Birdlife Australia Raptor Group | Phosphate Hill Draft Structure Plan Submission provided outside the questionnaire format | | |
| | | <p>I understand the impending need to plan for relocation of elements of infrastructure from Flying Fish Cove to elsewhere and have read the Phosphate Hill Draft Structure Plan.</p> <p>However, the inclusion of conventional wind energy production is most concerning from the environmental aspect of bird strike.</p> <p>This is presented in part 4. of the plan as "...4.1.3. ENVIRONMENTAL AND WILDLIFE CONSIDERATIONS</p> <ul style="list-style-type: none"> • Flora and Fauna Assessment: Assess the impact on local ecosystems, particularly on birds, bats, and other wildlife. Studies must be conducted to identify any protected species in the area and potential risks from wind turbines...." <p>The standard assessments done for windfarms using the usual large, horizontal axis turbines (as depicted in the graphic Fig 1., Appendix 5.) in Australia is woefully inadequate for birds, Tasmania included. Basically it has relied on so-called bird utilisation surveys involving people across the habitat estimating (NOT measuring) flight directions, heights and distances of birds in an attempt to work out collision risk.</p> | <p>The commonly accepted view is that VAWTs generally pose a lower risk of bird strikes than HAWTs due to the absence of high-speed blade tips and placement closer to the ground. Flinders University and VAWT-X have signalled their willingness to collaborate with the SOCI, subject to grant funding, in deploying a pilot VAWTs trial at the Phosphate Hill oval.</p> <p>This evidence-based approach is considered essential to gauge the impact in real time a medium size VAWT may have on wildlife as well as the energy output delivered across the island's seasonal cycles.</p> <p>The VAWT type and broad specifications envisaged for such trial is shown at Figure 18 page 72 of the Phosphate Hill planning report</p> | No Change |

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| 16 (cont.) | Nick Mooney Birdlife | <p>Modelled collision risk based on these estimates of unknown accuracy is therefore unreliable and where investigated, more eagles (for example) have been found dead windfarms than predicted. What is found dead under turbines of course is only a minimum since not all turbines are searched under, searching is periodic and any bird that is injured and lands outside a search radius (often less than the height of the turbine) is not counted. In effect, what is found in mortality searches is an uncalibrated index and NOT a total.</p> <p>Therefore, the wind industry is increasingly reliant on offsets for killed eagles and, in an effort to reduce such, automated curtailment where 'intelligent' camera arrays recognise an oncoming target bird (typically an eagle) and slow/stop a turbine(s) in its path. When on flat land where sight lines to target birds, cameras and turbines are clear and camera arrays are at high density (say an array to turbine ratio of 1:4) they appear to be effective for eagles for example. However, the cameras can be 'confused' by flocks or congregations of birds resulting in many false positives and consequent curtailments (e.g. Wild Cattle Hill, Tasmania managed by Goldwind).</p> <p>Such attempts at engineering solutions are necessary because these types of turbines are by their nature bird and bat killers. The hub heights mentioned (20m and 50m, Appendix 5.) could not be more problematic for bird/bat strike.</p> | | |
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| 16 (cont.) | Nick Mooney Birdlife | <p>Collision of birds with turbine blades has of course other impacts than the death/injury to those individuals. If breeding, birds' nests may of course fail if an adult has been killed.</p> <p>Seabirds in general are so-called k-selected and rely heavily on low mortality (not high productivity) for population survival. If mortality is artificially increased (say by anthropogenic reasons) then every possible nesting must succeed. This applies in particular to large, long-lived seabirds such as frigate birds and boobies and its why windfarms are so problematic to eagles.</p> <p>I have had the privilege of visiting Christmas Island many times, mainly to study birds. A feature of the island is the plethora of seabirds criss-crossing the island at every height from sea and ground level to extreme altitudes. Frigate birds, boobies and tropic birds all use the air columns, as do Christmas Island goshawks. Christmas Island fruit bats are of course unusual for their diurnal activity and, more pertinently, their soaring habits. An unfortunately high proportion of these species are both endemic and endangered, some critically endangered and conventional turbines can only make them more so.</p> | | |

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| | Nick Mooney Birdlife | <p>Certainly I understand the temptation to use Christmas Island's renowned wind and the proposed development may be a great chance to break with precedent and consider some (more) smaller, vertical-axis wind turbines of which there are many designs. Some of these designs are relatively bird safe and have the added advantage of being more resilient at very high wind speeds. Yes, they are not so economically efficient as large scale horizontal axis turbines but this resolves as their net advantages are considered. Indeed with the best of these vertical axis machines windfarms per se can be perhaps avoided since they can be in many locations more local to their users.</p> <p>In any case, modern battery storage will be necessary with such a hybrid array as proposed and maximised storage may mean less 'on demand' power from wind is needed with less consequent risk for birds and bats.</p> | | |
| | | End of submissions | | |