

NAME OF DOCUMENT - Schedule of Submissions		
Summary of Comments Received	Officer Response	Officer Recommendation
1. SUSAN STANDEN		
1.1 The proposed development does not fit with the residential area.	The proposed development is currently a Permitted use under the Local Planning Scheme. The Premier has publicly stated that the State will negotiate a lease for the proposed development. City officers have been working with representatives of the proponent to improve the external appearance of the development and fit the development into its surrounds.	Note
1.2 Occupants of the proposed development will not contribute anything to town businesses.	The City is very conscious of the relative community loss that is incurred through the continuation of large-scale FIFO workforces instead of residential. Since the Premier's announcement, the City has been working with the proponents to maximise local employment, contracting and community support through the life of this proposed development. While a more removed camp (like the previous Gap Ridge Village) would have less negative impacts on residents, it would also reduce the potential for community integration and expenditure at local businesses. The City is trying to increase the level of community integration and local expenditure that is achieved. The proposed development is one third the size of the previous Gap Ridge Village.	Note
1.3 Increased traffic at all hours, reversing beepers and the general operation of a 700 bed FIFO camp will disturb peace and quiet.	A Traffic Management Plan forms part of the application. An Operational Environmental Management Plan is recommended as a condition of development approval and this will need to address offsite impacts, including those raised here.	Note
1.4 Negative effect on property values. Will be seeking compensation for any loss in value if it goes ahead.	There is no evidence to indicate the effect of this proposal on property values. The City's expectation is that the proposed development would be well designed, landscaped, managed and maintained.	Dismiss
1.5 Undermine the "liveable cities" vision for Karratha.	Refer to response at 1.2 above.	Note
2. PAUL BESWICK		
2.1 Already had discomfort and inconvenience of dust and constant rock breaker noise from removing previous camp. Not fair to have to go through this again.	Proposed new development would not require the use of a rock breaker. Management of noise and dust (including procedures for addressing complaints) will be addressed via preparation of a Construction Environmental Management Plan.	Note
2.2 Camp should be built on outer parts of town, not in the suburbs. Why is 'Gap Ridge Village' site not being considered as it has all the infrastructure and is far enough out of town to not inconvenience or disrupt residents. Residents should take priority over FIFO.	Refer to response at 1.2 above.	Dismiss call for camp to be built further away from town.

NAME OF DOCUMENT - Schedule of Submissions		
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2.3 It was stated that previous camp was outdated after 10 years. Will that happen to new camp as well?	The proposed development includes in-situ buildings (assembled onsite) as well as transportable buildings (assembled offsite). The in-situ buildings are proposed to be located around the most prominent edges of the site and to address those frontages to improve the external appearance of the development. City officers have been working with representatives of the proponents to improve the external appearance of the proposed development. The latest adopted version of Council's Workforce Accommodation Policy only allows a maximum approval period of 10 years for workforce accommodation developments unless they achieve a higher level of community integration. The City has already advised the proponents and the State Government of the type of development (or more particularly the type of site) that would justify a longer-term approval.	Note
2.4 Concern over potential crime.	Security is being factored into the design and management of the proposed development. Residents of the proposed development would be under strict behavioural conditions while in Karratha. There is no apparent link between the introduction of the proposed development and an increase in the incidence of crime.	Dismiss
2.5 Increased noise in the area.	Refer to response at 1.3 above.	Note
2.6 Potential property price drop.	Refer to response at 1.4 above.	Dismiss
3. RFF PTY LTD (OWEN HIGHTOWER) ON BEHALF OF ASPEN, CHERATTA & DISCOVERY		
3.1 Western Australian Planning Commission Position Statement on Workforce Accommodation articulates the following as within control of decision maker in considering workforce accommodation proposal: a) Terms of approval relating to timeframe, setbacks, landscaping, parking and access; location and appearance of buildings, integration with surrounding areas; any other land use planning matters relevant to the site. b) Ability to approve/refuse a proposal considering local planning scheme requirements. Submission made cognisant of Position Statement.	The Planning Application appropriately addresses each of the matters relevant to the decision maker (as referenced in the referred Position Paper), with the relevant report references provided below. a. Timeframe (refer Section 3.1); b. Setbacks (refer Section 3.2 and Attachment 2); c. Landscaping (refer Section 3.5); d. Parking and Access (refer Sections 3.1 and 6); e. Location and Appearance of Buildings (refer Section 3.2); f. Integration with surrounding areas (refer Section 3.1 and 3.2); g. Any other land use planning matters relevant to the site (addressed in report to Council). An officer recommendation and other options are contained in the report relating to this matter for Council's and the Development assessment Panel's consideration.	Note

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<p>3.2 Strongly recommend City should seek direction from WAPC as to whether Structure Plan should be required prior to making recommendation to JDAP, as provided for by <i>Planning and Development (Local Planning Scheme) Regulations 2015</i>. Scheme Amendment No.39 was finally adopted by Council on 11 December 2017 and would remove the Workforce Accommodation zone. Have been informally advised Amendment will be recommended for adoption with only minor modifications. Unclear why Amendment has not been presented to Minister for final approval consideration. Department has advised it considers proposed Scheme Amendment to be seriously entertained. Supported by principles set out by State Administrative Tribunal in Nicholls case. Most appropriate means to address implications of proposed Amendment is to seek direction first from Commission on requirement to first prepare Structure Plan prior to determination of application.</p>	<p>The submitter's comments are not considered to be in accordance with the intent of Structure Plans as per the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>. Specifically, it is noted that the WAPC Structure Plan Framework notes the purpose of a structure plan being as follows:</p> <p><i>A structure plan provides a basis for zoning (including residential density) and subdivision of land.</i></p> <p>The proposed application does not require a further planning "layer" for the coordination of land use zoning or subdivision which can be (and is) appropriately addressed as part of this single application for the entire zone. That is to say, the Development Application as submitted, sufficiently incorporates all of the information relevant to enable a coordinated development approach for a TWA village at the subject site and does not require a further level of planning consideration to enable development to occur. The subject site is under single landownership, meaning there is no need to coordinate design or infrastructure across multiple landholdings. Furthermore, appropriate consideration has been given to the surrounding interfaces.</p> <p>In this regard, it is not considered to be "in the interests of orderly and proper" planning to require a structure plan to be prepared on the basis that the site may be rezoned. It is acknowledged that Amendment No. 39 satisfies the threshold tests of being a "seriously entertained" proposal.</p> <p>Even if Amendment No. 39 is granted final approval by the Minister, the decision maker may still determine a development application in a development zone, where there is no approved structure plan in place, in accordance with Part 4, Clause 27 (2) and Part 5, Clause 43 (2) of the Regulations. It is not considered that a Structure Plan is required and therefore it is not necessary to seek direction from the WAPC as to whether a Structure Plan should be required prior to the determination of the application.</p>	Dismiss
<p>3.3 Notwithstanding that Workforce Accommodation is a Permitted use in the Workforce Accommodation zone, Workforce Accommodation provisions of City of Karratha LPS8 have not been satisfied to enable planning approval to be granted.</p>	<p>Clause 5.5.1 of Scheme No.8 states workforce accommodation should be in accordance with the Workforce Accommodation Local Planning Policy. The proposed development is considered against aspects of the Workforce Accommodation Local Planning Policy below and in the related report. Clause 5.5.3 requires development applications for workforce accommodation outside the Workforce Accommodation zone to be accompanied by information and plans indicating how and when the development will convert to a</p>	Dismiss

NAME OF DOCUMENT - Schedule of Submissions		
Summary of Comments Received	Officer Response	Officer Recommendation
	subsequent use. The subject site is currently zoned Transient Workforce Accommodation. Amendment No.39 proposes to rezone the site to Urban Development. The application seeks approval for 30 years. Whether or not that approval period is granted, the approval period will be finite. That answers the question of when development will convert to a subsequent use. The recommendation includes a condition requiring site decommissioning and rehabilitation. The Scheme includes a requirement for a structure plan to be prepared for Urban Development zones prior to subdivision and development. That answers the question of how development will convert to a subsequent use. This also addresses requirements of Clause 5.5.4.	
3.4 Applicants have placed greater emphasis on the draft version of DP10. The comments below show that there are significant gaps or inconsistencies between proposed development and local planning policy framework.	Consideration has been given to both the current and draft adopted version of the policy.	Note
3.5 Based on information included in the application, it appears that there is no actual need or demand to justify additional development of this scale. Draft policy requires proposals for new workforce accommodation to be accompanied by information that demonstrates need. Reference in application report to Woodside's 15 year demand forecast showing that company will require up to 1,500 beds to meet peak shutdown requirements not including future projects like a potential Burrup Hub development contradicts Premier's statement that the facility will house workers during upgrade works at Karratha Gas Plant, expansion of Pluto and during construction phases for Scarborough and Browse. Analysis commissioned by Karratha Districts Chamber of Commerce demonstrates there are enough rooms available in market to accommodate additional Woodside requirements without constructing new facility based on current demand profile and excluding new projects. Woodside's assessment only requires around 350 rooms at most. If existing rooms are unsuitable, then Woodside could work with existing operators to upgrade facilities to be suitable which would likely come at a lower cost. A further circa 2,000 rooms already approved and able to be brought onto market at Kingfisher and Civeo, which easily accounts for Woodside's demand and does not warrant further supply. The applicant has simply asserted the demand is required. There is no	<p>The Development Application report states that the need for the proposed development is generated through the need for Woodside to "underpin future growth options". This includes Karratha Life Extension and Browse to North West Shelf's Karratha Gas Plant and Pluto LNG Plant expansion. Woodside is not the only company seeking local workforce accommodation rooms. Woodside is seeking to have more control over the accommodation of its expected ongoing base-level FIFO workforce.</p> <p>Woodside believes there is a need to construct additional Workforce Accommodation rooms and has made the financial commitment to do so on that basis. It would not be appropriate to lock Woodside into a particular supply model on planning grounds and in the process create risks to Woodside's development plans. The Premier has announced that a lease for the development will be negotiated.</p> <p>The Scarborough acquisition and details of Woodside's Burrup Hub development concept have strengthened Woodside's case for additional quality workforce accommodation rooms. It is important that Woodside is able to advance its development plans with a level of certainty regarding its accommodation requirements.</p>	Note

NAME OF DOCUMENT - Schedule of Submissions		
Summary of Comments Received	Officer Response	Officer Recommendation
evidence to clearly demonstrate additional supply is required. The KDCCI report shows there is no real need for additional rooms. The applicant has used a reduction in accommodation as a basis of justification in their submission. No evidence of occupancy, contracts or bookings has been provided. The City survey of 750 people found 78% of respondents did not support the development or provision of additional rooms at the site.		
<p>3.6 The application report states that a 30 year approval is sought to align with the lease agreement between the State Government and Woodside. The Premier's media release only announced the State Government's intention to enter into lease negotiations. It has subsequently been confirmed by the Premier's Office and Minister for Lands' Office that no such lease has been executed. The term of any approval should be informed based on the adopted planning framework. Amendment No.39 is considered a seriously entertained proposal. In relation to Council's adopted version of DP10, the submission does not clearly articulate service demand associated with any identified major construction project, tenure arrangements are not relevant, no approvals are in place, key objectives for the Karratha Precinct would be compromised by an approval for the duration sought as it would prevent use of the land to support continued residential expansion and there is no evidence of contracts or bookings to demonstrate demand. A maximum period of ten years can be granted for the proposed Urban Development zone.</p> <p>In relation to Council's adopted draft version of DP10, no existing approvals are in place, a maximum of 10 years can be granted and any approval should only be granted in association with approvals to undertake further construction by Woodside for an equivalent time. The longest duration of any approval should be 10 years.</p>	The revised Development Application report (submitted 31 August 2018) has been amended to refer to an "intended lease agreement". The recommendation of a maximum approval period of 10 years is supported.	Uphold
3.7 Section 6.4 of the adopted version of DP10 requires a proposed development intended to accommodate FIFO operational workers in TWA on a permanent basis to be of a standard commensurate with permanent, high quality residential apartments and suitably integrated with surrounding development. This principle is maintained in the adopted draft version of DP10.	The standard and quality of proposed development fronting public roads is predominantly of in-situ construction. There has been particular attention to improve the design of built form at the corner of Bayview Road and Rankin Road to achieve compatibility with surrounding residential development. Additional architectural features such as screening and balconies have been included to add visual interest and articulation to the built form.	Note

NAME OF DOCUMENT - Schedule of Submissions		
Summary of Comments Received	Officer Response	Officer Recommendation
<p>The development is located next to single storey low density residential development at a density of around R25. The proposed development is two-storey high density development at around R100, four times the density of surrounding areas and at a substantially larger scale. The development is largely transportable structures, similar to Club Hamilton in South Hedland (comparison of 3D image and photo included in submission) which is 8 or so years old and shows the standard and quality of two-storey transportable workforce accommodation. This is clearly not comparable to the standard and quality of the surrounding predominantly in situ residential development.</p> <p>The built form concept is monotonous as opposed to diverse. The accommodation buildings appear to be of the same size, scale and bulk. Administrative buildings are substantially setback from the street. Design largely reflects any other typical two-storey workforce accommodation development across the Pilbara. In our view it is difficult to see how the proposed design fosters any unique elements that could be considered to contribute to an active and interesting public domain.</p> <p>An activated street front development is typically associated with setbacks of less than 5m, and often 0m setback. Setbacks for buildings along Balmoral Road substantially exceed this.</p> <p>Parking areas are not located behind street front buildings.</p> <p>The site is not located within a walkable catchment of an activity centre. The scale and intensity of development should be more commensurate with surrounding. Proposal represents second highest residential density within Karratha. It would deliver equivalent population of Onslow on 7ha site. This scale and density is not appropriate in this location.</p> <p>It is our view that substantial reduction in number of units and substantially greater design improvements would be required to achieve an outcome which reflects the City's policy intent.</p>	<p>The built form design has been slightly modified since advertising to further enhance the appearance of the development from surrounding streets. The design has been modified such that the buildings at the corner of Rankin Road and Bayview Road have been brought forward to within 8 – 10 metres of the Bayview Road lot boundary and 3 – 5 metres of the Rankin Road lot boundary to provide for an engaging and activated streetscape outcome. It is noted that the Bayview Road reserve is wider along this section, which contributes to what appears to be a development setback. The submitter has been given the opportunity to consider and comment on the updated plans.</p> <p>The majority of the car parking areas have been sleeved behind the buildings, with those located in front of the buildings being required from an operational perspective for safe and easily identifiable access and egress. Areas of car parking have been given due consideration as part of the design response, with areas of landscaping and / or architectural treated screening being provided to mitigate any perceived visual impact.</p> <p>Whilst the proposed TWA village is not located within a walkable catchment of a defined activity centre, the Social Impact Management Plan details a number of measures which will be put in place to ensure the residents of Bay Village integrate and interact with the Karratha Town Centre. By way of example, shuttle buses and communal bicycles will be provided to provide other transportation measures for residents (other than private vehicles) to access the Town Centre.</p> <p>The Premier has announced that a lease for the development will be negotiated. It is not considered that the site is over-developed for the purposes of workforce accommodation and the design is considered acceptable for the recommended approval timeframe.</p>	
<p>3.8 A Social Impact Assessment is required prior to any determination of this application. The proponent has not provided a Social Impact Assessment or any associated justification.</p>	<p>The preparation of Social Impact Assessment is currently being undertaken. The application report includes a Social Impact Management Plan Commitments table which has been assessed in terms of whether it represents an acceptable level of community integration and contribution for the proposed development.</p>	Dismiss
<p>3.9 Clause 5.5.2 of LPS8 provides for the requirements of the R-Codes and Clause 5.3 of the Scheme to be varied for workforce</p>	<p>If the proposed development is approved, the subject site will remain suitable for future residential development whether the proposed development remains on site or not. Because Workforce</p>	Note

NAME OF DOCUMENT - Schedule of Submissions		
Summary of Comments Received	Officer Response	Officer Recommendation
accommodation by the local government provided adequate justification for the variation is submitted. The applicant's report provides no justification or detail with respect to either compliance with the R-Codes or appropriate justification to warrant substantial variation. This provision is particularly relevant noting that the proposal to rezone the land to Urban Development under Amendment No.39 is seriously entertained. The City has articulated that the subject site is considered capable of meeting long-term residential needs and the Department of Planning supports this. In lieu of a specific Structure Plan for the site, we consider any proposed development should comply with acceptable or performance criteria of the R-Codes.	Accommodation rooms are not self-contained, modifications would be required to buildings to accommodate permanent residential use and to approve the buildings for such use. There are obvious benefits in planning to re-purpose the buildings beyond their intended initial use. The City would be happy to help transition use of this site in the future. While the proposed use is Workforce Accommodation, the City has been working towards ensuring the development is compatible with the residential surroundings.	
3.10 Clause 5.5.3 of LPS8 requires development applications for workforce accommodation outside Workforce Accommodation zone to be accompanied by information and plans indicating how and when the development will convert to a subsequent use which is consistent with the Scheme zoning. Amendment No.39 proposes to rezone the site to Urban Development. Therefore, the application should clearly demonstrate how and when the development will convert to a subsequent use. No such information (other than a plan to demolish the development) has been provided.	The previous development was demolished and the site was rehabilitated in accordance with a Rehabilitation Plan approved by the City. A Decommissioning and Rehabilitation Plan has been prepared and included as Attachment 8 to the Development Application report. This would provide for the site to be converted to a subsequent use. The applicant has advised that it is difficult to accurately ascertain how the site may transition or decommission in the future. A condition is recommended requiring a decommissioning, rehabilitation and transition plan to be prepared and implemented to the satisfaction of the City of Karratha.	Note
3.11 The applicant has provided details setting out how temporary structures will be removed, which addresses Clause 5.5.4 of LPS8.	Noted.	Note
3.12 Clause 5.5.5 of LPS8 provides for the local government to require by signed agreement a commitment to date and details of rehabilitation and conversion. The City should seek such an agreement to ensure the time-limited nature of the development	An appropriately worded condition should be included on the Planning Approval.	Note
3.13 There is a lack of adequate information in a number of other Matters to be Considered. The first aim of the Scheme pursuant to Clause 1.6 of LPS8 is facilitate community input into planning for appropriate balance between economic and social development, conservation of the natural environment and improvements in lifestyle and amenity. City's media release on 15 January 2018 determined through survey that 78% of respondents did not agree that there was a need for the camp and 80% said that where possible operational workers should be accommodated	The latest version of the Development Application addresses Regulation 67 of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i> . The Premier has announced that a lease for the development will be negotiated. Consideration of the proposed development against requirements of the R-Codes is addressed above. Under Amendment No.39, Workforce Accommodation is a permissible use in the Urban Development zone.	Note

NAME OF DOCUMENT - Schedule of Submissions		
Summary of Comments Received	Officer Response	Officer Recommendation
<p>residentially in town-based dwellings. It is clear that the community does not support the need for this project to go ahead, despite the economic headwinds Karratha has been facing since 2012/13.</p> <p>The requirements of the R-Codes have not been addressed.</p> <p>Section 2.3 of the Pilbara Planning and Infrastructure Framework (2012) includes the following actions:</p> <p><i>Identify appropriately located sites to accommodate fly-in fly-out workforces through preparation of regional and local government transient worker accommodation policies.</i></p> <p>The subject site has been identified through strategic planning and policy as not suitable for workforce accommodation. This is most easily reflected by proposal to rezone the land to Urban Development and support of Department of Planning, lands and Heritage for this outcome.</p> <p><i>Encourage urban based transient worker accommodation that is located close to commercial centres, to serve multi-purpose functions within region's communities.</i></p> <p>Proposed development located on urban fringe as opposed to integrated with commercial centre. Not within walkable catchment of an activity centre.</p> <p><i>State in consultation with industry and local government to develop a specific policy relating to workforce accommodation in the Pilbara.</i></p> <p>No policy has been developed by the State.</p> <p>We consider that a Structure Plan should be required noting Amendment No.39 is seriously entertained and given scale and density of development.</p> <p>It is clear the proposal is not compatible with its surrounds. Substantially greater density, scale, height and appearance. The proposed development is a polar difference to low density, single residential character of surrounding residential area.</p> <p>Limited detail on urban water management.</p> <p>Traffic impact assessment is considered to be deficient, Assessment makes unreasonable assumptions regarding traffic movements compared with number of car bays. No consideration of servicing movements, staff attendance and the like.</p>	<p>The fact that the subject site is not integrated with a commercial centre and not within a walkable catchment of an activity centre has influenced the recommended timeframe for approval, in accordance with Council's adopted draft version of DP10.</p> <p>Comments on suggestion that Structure Plan should be required are addressed above, as is the compatibility of the proposed development with surrounding residential development.</p> <p>A detailed Stormwater Management Plan has been prepared and included at Attachment 4 to the Development Application report.</p> <p>The traffic impact assessment prepared for the development has been reviewed by the City and has been found to be acceptable for the purposes of assessing the application.</p> <p>The City is not aware of any issues in relation to providing the proposed development with utility services.</p> <p>According to the information provided in the application report, circumstances have changed since the previous Bay Village development was placed into care and maintenance.</p>	

NAME OF DOCUMENT - Schedule of Submissions		
Summary of Comments Received	Officer Response	Officer Recommendation
<p>Details regarding ability for proposed development to be adequately serviced, particularly public utilities appear unclear. Further information required.</p> <p>Site previously leased by Woodside and used for workforce accommodation. Facility unused for 7 – 8 years and subsequently demolished. This is demonstration that site no longer needed; otherwise Woodside would have maintained lease and previous approvals.</p>		