

**PROPOSED WORKFORCE ACCOMMODATION DA19120 – SCHEDULE OF SUBMISSIONS**

Summary of Comments Received	Officer Response	Officer Recommendation
<b>1. AUSCO</b>		
<p><b>1.1</b> The proposed development is almost three times the size of Ausco's application, which was refused. We would question whether a development of such a large scale is commercially viable once the projected wave of construction requirements has passed. Regardless, it will have a detrimental impact upon existing workforce accommodation and motel operators outside of peak construction demand.</p>	<p>While the commercial viability of a development is not a valid planning consideration, it is a requirement of Council's adopted Workforce Accommodation Local Planning Policy DP10 to demonstrate need for additional workforce accommodation rooms. While the applicant states the proposal is to accommodate construction workers for a particular construction project, officers are of the understanding that the company planning that construction project is pursuing another option. Therefore, this does not constitute demonstrated need. The requested timeframe of approval does not relate to any particular construction project either. There is currently no indication that baseload supply of workforce accommodation rooms needs to increase either. Officers will continue to monitor workforce accommodation supply and demand to ensure adequate and appropriate supply of workforce accommodation without compromising the vision for the City.</p>	<p>There is no demonstrated need for the proposed additional workforce accommodation rooms.</p>
<p><b>1.2</b> Ausco recently had a decision on workforce accommodation refused by JDAP in line with the City's recommendation to JDAP, where the request was to extend the life of an existing application that was already in place. Our own application did not require that the City of Karratha create anything new, it was simply to extend the life of something that already existed.</p>	<p>This point is unrelated to the subject application.</p>	<p>Note.</p>
<p><b>1.3</b> In consideration of the most recent JDAP application about the extension to Stayover's Kingfisher Village, the City and subsequently the JDAP listed three reasons to refuse the application including that "The proponent has not specified a construction project associated with the proposed development, as required by Council Workforce Accommodation Policy DP10".</p> <p>The applicant has gone to great lengths to infer the project is linked to Woodside's planned expansions. However, Woodside released the following statement in late June 2019:</p> <p>i. Bechtel is undertaking the Front End Engineering and Design (FEED) for Woodside's proposed Pluto Train 2 Project, which includes activities to finalise the costs and technical definition of the project.</p> <p>ii. Bechtel has issued a number of packages, including Temporary Workforce Accommodation, through Industry Capability Network of WA</p>	<p>The applicant has not provided a definitive link between the stated construction project and the proposed development as the basis for demonstrating need.</p>	<p>No evidence has been provided to support the claim that the development is required for a construction project.</p>

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<p>(ICNWA) to understand the capacity of local, regional and national suppliers and confirm pricing for its proposal.</p> <p>iii. Options on the right accommodation for the projected construction workforce are still being considered by Bechtel and no decisions or agreements have been made.</p> <p>It is therefore clear that the applicant and developer are simply speculating. The project is not associated with a specific construction project and should not be supported on this basis.</p>		
<p><b>1.4</b> It is our view that the proposed use of the additions to the development is clearly “Workforce Accommodation” as opposed to “Accommodation Resort”. Workforce Accommodation is defined in the Deemed Provisions as:</p> <p><i>“Workforce accommodation means premises, which may include modular or relocatable buildings, used —</i></p> <p><i>a. primarily for the accommodation of workers engaged in construction, resource, agricultural or other industries temporarily; and</i></p> <p><i>b. for any associated catering, sporting and recreation facilities for the occupants and authorised visitors.”</i></p> <p>The applicant has made it clear that the use of the proposed additions will be made available exclusively to workers engaged in construction or other industry temporarily. The rooms will not be available to any other type of occupant, tourist, business traveller etc.</p>	<p>Officers agree with this view.</p>	<p>The proposed use is Workforce Accommodation.</p>
<p><b>1.5</b> The proposed use of the land is inconsistent with the adopted Structure Plan for the subject site. The Development contemplates exclusive use of the site for construction workers as opposed to white-collar workers or tourists, clearly a position which is inconsistent with the Structure Plan objectives. The Structure Plan expressly states not to operate the site as Workforce Accommodation.</p>	<p>The Structure Plan contains provisions which do not support a sole workforce accommodation development on this site. Rather, the Structure Plan supports use of the site for resort style tourism, which the applicant has stated they would transition to at the end of the ten year approval period sought. The intent of the Structure Plan is captured by the following observations:</p> <ol style="list-style-type: none"> <li>1) The Structure Plan map shows the site as a ‘Tourism Area’;</li> <li>2) The permissibility table within the Structure Plan does not include the land use of workforce accommodation and makes the following statement; ‘All other uses are not permitted’.</li> <li>3) A provision of the Structure Plan requires a deed to be prepared with the City, which stipulates that the predominant use of the site shall not be for workforce accommodation at any one time.</li> </ol>	<p>The approved Structure Plan does not provide for workforce accommodation to be the predominant use.</p>

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<p><b>1.6</b> The Structure Plan anticipates overall occupancy rates within the development of approximately 550 persons. The proposed development is seeking approval for a population density 230% above that which was contemplated within the adopted Structure Plan. Implications for utilities, traffic and adequacy of the central facilities of such a substantially higher density require more detailed consideration before any development approval. No detail is provided by the applicant to demonstrate that utilities are adequate and internal amenities can accommodate the more intensive use.</p>	<p>The Structure Plan provides for a maximum of 270 residential units. If the proposed workforce accommodation were to transition to a residential use in the future, it would provide for 322 units, which is considerably higher than the maximum provided for under the Structure Plan. The proposed 1,288 rooms under this proposal would clearly be far greater than provided for in the Structure Plan for short term and tourist accommodation.</p> <p>In regard to utilities, the Water Corporation and Horizon Power have stated the proposal can be serviced by existing infrastructure in regard to sewer, water and power.</p>	<p>The proposal would constitute a substantial departure from the approved Structure Plan.</p>
<p><b>2. J Smythe</b></p>		
<p>2.1 Karratha does not need any more camps.</p>	<p>Council's adopted Workforce Accommodation Local Planning Policy DP10 only provides for additional workforce accommodation rooms to be approved based on demonstrated need. Officers do not believe there is demonstrated need for the workforce accommodation rooms proposed by this application.</p>	<p>There is no demonstrated need for the proposed additional workforce accommodation rooms.</p>
<p><b>3. Jeremy Nyman</b></p>		
<p>3.1 I am an owner of a unit in the existing Ranges development. You are, no doubt, aware of the original Ranges development proposal, much of which has been curtailed by economic circumstance. The current proposal allows for a variation of the original development concept with the maintenance of the "village" concept and a workforce accommodation facility superior to those previously offered in Karratha.</p> <p>I support the proposal for the following reasons:</p> <ul style="list-style-type: none"> <li>a) The proposal is compliant with the CoK Draft Local Planning Policy</li> <li>b) The architecture compliments the existing Ranges architecture and is far superior to any other workforce accommodation offered in Karratha.</li> <li>c) The landscaping is also complimentary to the existing Ranges, again exceeding current offerings within the City.</li> <li>d) Stages 1, 2 and the proposed stage 3 allow for ongoing accommodation by tourists, not just commercial clients.</li> <li>e) The proposed facility is adequate to provide for base and peak demands for accommodation.</li> </ul>	<ul style="list-style-type: none"> <li>a) The submitter has not explained how they have reached the conclusion that the proposal is compliant with the Draft Local Planning Policy.</li> <li>b) The submitter's comments regarding the quality of the development are valid.</li> <li>c) Proposed landscaping plans appear to be consistent with landscaping in the existing Stage 1 development.</li> <li>d) The proposed development would be for workforce accommodation and could not be used for other purposes while that approved use applies. The existing stages of the Ranges development could continue to operate for short term/tourist accommodation.</li> <li>e) The proposal has been put forward on the basis that it is required for a construction project, not the ongoing supply of workforce accommodation rooms. There are already in excess of 2,600 workforce accommodation rooms in the City of Karratha that are not</li> </ul>	<p>Note.</p>

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<p>f) The club, social and sports facilities allow interaction with other residents in both the workforce accommodation, stages 1-3 of The Ranges as well as people from the City itself.</p> <p>g) The design and facilities have taken into consideration the social impact of the proposal with the intent to minimise the known stresses on transient workers.</p> <p>h) Residents in the facility are not isolated from the City Centre and can still easily access and utilise services offered there</p> <p>i) The facility will create/require a large workforce, initially during construction but also for long term maintenance of services and the structure.</p>	<p>owned by resource companies. There are already in the order of an additional 1,000 approved rooms. While the City does not want to oversee an undersupply of baseload workforce accommodation rooms, the total number of approved rooms should be managed to minimise negative cumulative impacts on the local community and local economy.</p> <p>f) The City encourages community integration and would support occupants of any such development utilising existing retail and social opportunities in Karratha.</p> <p>g) The proposed development appears to be a higher standard workforce accommodation facility.</p> <p>h) The application proposes to complete a footpath link from the development site to the City Centre and to provide buses to and from the City Centre as part of the Social Impact Management Plan. This is a positive aspect of the proposal.</p> <p>i) The proposal would provide local employment opportunities during construction and operation.</p>	