

**City of Karratha Local Planning Policy DP10 Workforce Accommodation - Schedule of Submissions**

Summary of Comments Received	Officer Response	Officer Recommendation
<b>1. Rio Tinto</b>		
<p>1.1 Rio Tinto has a substantial presence within the City and owns a significant accommodation portfolio. This includes approximately 1500 residential dwellings of which, over 500 dwellings were built/purchased in the last 10 years to support ongoing and expanded port operations.</p> <p>Rio Tinto remain committed to having a residential based workforce within the City, and have introduced policies that encourage choice and flexibility for employees to either rent company owned housing, rent external housing or purchase their own housing. These policies have contributed to the increasing normalisation of the accommodation market, to the extent that now 50% of the Dampier/Karratha based employee households do not reside in company provided housing</p>	<p>Noted. Residential living for operational roles is strongly encouraged and this is reflected in the revised DP10.</p>	<p>No modification recommended.</p>
<p>1.2 Rio Tinto has intentions to refurbish, develop or redevelop many of our existing sites for WA uses in the future as business needs arise. Consequently, this submission seeks to safeguard Rio Tinto's interest within the City's boundaries which include:</p> <ul style="list-style-type: none"> <li>• Existing WA development;</li> <li>• Existing Special Lease land granted under State Agreements which Rio Tinto has access due to our mining operations; and</li> <li>• Freehold land which is owned by Rio Tinto and our subsidiaries.</li> </ul> <p>Rio Tinto has recently attended meetings with the City's Technical Officers where we discussed our ongoing operations and new developments, such as at Wickham Village and Peninsula Palms in Dampier.</p> <p>Whilst existing approvals are in place, these discussions notified the City of Rio Tinto's continued rationalising of WA across some of our sites and also notified of our intentions to ensure the ongoing use and operation of other WA developments such as Peninsula Palms.</p>	<p>Noted.</p> <p>Under the draft Policy there remains opportunities to refurbish, develop or redevelop existing and proposed workforce accommodation facilities in a manner which seeks to minimise the proliferation of unnecessary or speculative workforce accommodation.</p> <p>In preparing the draft Policy, the City seeks to collaborate with stakeholders to ensure an appropriate supply of workforce accommodation whilst delivering Council objectives to encourage and enable residential-based workforces where possible.</p>	<p>No modification recommended.</p>
<p>1.3 It is the position of Rio Tinto that our State Agreements provide certain exemptions that have the effect of making it beyond the power of the City to apply the Policy to Rio Tinto facilities.</p>	<p>Noted.</p> <p>The City acknowledges and recognises the existence and role of State Agreements.</p>	<p>No modification recommended.</p>
<p>1.4 Section 4.2(b)</p> <p>The AEC Report has not been released and Rio Tinto has not had an opportunity to review and provide comment. Without review of this report Rio Tinto retains concern of its application as a measure of base-</p>	<p>This Council report publicly releases the AEC Report.</p>	<p>No modification recommended.</p>

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level supply. Notwithstanding, we would be happy to review and provide comment on AEC Group's report.		
1.5 Rio Tinto submits that it has not recently been asked for updated forecasts for FIFO demand by AEC as the report was commissioned over 12 months ago. Rio Tinto submits that industry forecasts can change quickly, as a result of not only new projects, but also from changes in maintenance schedules which can significantly impact the peak demand for accommodation.	Since the time of this submission AEC has contacted Rio Tinto and the results of that contact have informed the final AEC 2018 report which will be made publically available.	No modification recommended.
1.6 Furthermore, the resources sector sentiment can change quickly which may result in rapid accommodation demand, causing price distortion in accommodation markets as new supply has long lead times for approval and construction. Rio Tinto cautions the City against relying on forecasting done at a single point in time and relying on earlier statements such as <i>"no further increase in supply is required"</i> from the AEC report referred to on page 3 of "Shire of Roebourne Town Planning Scheme No. 8 Amendment No 39" prepared by Taylor Burrell Barnett September 2016.	The AEC report has been prepared and updated in 2015, 2016 and 2018. It is the intention of the City to maintain the relevance of the AEC research and findings through ongoing updates to ensure relevance in the consideration of workforce accommodation proposals against Council objectives regarding proliferation.	No modification recommended.
1.7 Rio Tinto submits that the City should build in flexibility to enable supply to respond rapidly when there is a change in demand, driven either by new project construction, or changes in maintenance schedules that impact on peak accommodation demand.	<p>The City acknowledges the need for flexibility to allow for workforce accommodation supply to respond rapidly when there is a change in demand. The demonstration of change in the demand for workforce accommodation would satisfy the draft policy requirements for the demonstration of need. It is not clear from the submission how the draft Policy does not provide flexibility to respond to changes in demand.</p> <p>The Policy seeks to discourage speculative workforce accommodation proposals and approvals, based on potential development, as they undermine efforts to encourage a residential-based workforce where possible. The intent of the Policy is to allow for the demonstration of need to be satisfied where a reasonable degree of certainty can be demonstrated that a project is proceeding, and workforce accommodation associated with the project is warranted, following consideration of workforce accommodation supply across the City.</p> <p>Should rapid demand occur, then need for workforce accommodation may be demonstrated.</p>	No modification recommended.

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	<p>The preference to control workforce accommodation is acknowledged.</p> <p>As stated in the draft Policy, the need for additional beds to be added to the supply of workforce accommodation beds within the City must be demonstrated in the context of workforce accommodation provision across the City and across industry demands.</p>	
<p>1.8 Section 4.2(i)</p> <p>Rio Tinto submits that Workforce Accommodation is subject to increased shire rates in accordance with the City of Karratha's differential rating scheme of \$0.32/\$ GRV for WA compared to \$0.05/\$ GRV for tourist accommodation. In addition, the Community Infrastructure &amp; Services Partnerships between RTIO and the City should be considered as part of our contribution for any existing and future WA developments. Rio Tinto would not support additional monetary contributions requested by the City for a specific development outside of the existing CISP arrangements and shire rates payable to the city.</p>	<p>Noted. The City is not after additional monetary contributed, rather it wishes to ensure that RTIO complies with the Policy.</p>	<p>No modification recommended.</p>
<p>1.9 Section 5.1.1</p> <p>Rio Tinto does not support existing developments which have long-term approvals being unduly restricted as a result of the potential upgrade and provision of additional accommodation. Many of Rio Tinto's existing developments have the potential for expansion due to the provision of existing communal facilities and access to undeveloped land which could be developed for additional accommodation. Whilst additional accommodation provided could be extensive, there is also the opportunity for modest increases in accommodation with refurbishment. With already substantial infrastructure in place, time limiting approvals for existing infrastructure could compromise the development opportunity and outcomes for Rio Tinto.</p> <p>Furthermore, should additional development occur co-located within an existing facility, the incidental increase in rooms should not extinguish the validity of the existing facility approval.</p> <p>As an alternative, should the City insist on time limiting all 'temporary' sites which have expansion proposals, then consideration should be given to allow a measure to be put in place to not unduly restrict sites which may only have modest expansion proposals. The test of significance could be applied to a development, using a metric such as</p>	<p>It is the position of the draft Policy that developments with long term approvals may continue unimpeded until such time as an intensification of the land use is proposed, as represented by an increase in bed numbers. Furthermore, the Policy seeks to create a level playing field in terms of all workforce accommodation being subject to time limited approvals where appropriate (recognising the aforementioned circumstances of development with long term approvals).</p> <p>Time limitations have been placed as conditions of Development Approval onto workforce accommodation proposals as they are temporary in nature. Appropriately designed and integrated workforce accommodation may be suitable for longer term approvals and the proposed Policy allows for longer term approvals to be granted.</p> <p>The ten-year timeframe with option for five-year extension has been proposed following a review of conditions relating to time limitations upon workforce accommodation proposals approved over the last decade.</p>	<p>No modification recommended.</p>

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increase in accommodation rooms of greater than 20 % yield being significant and therefore warranting new development applications.		
<p>1.10 Section 5.1.3</p> <p>Rio Tinto does not support the five-year maximum for extension of time associated with existing approvals. Rio Tinto submits that Council should provide five years as a guide for extension periods, with discretion for Council to increase the time period for extensions on a case by case basis. This would enable Council to consider proposals that have a more significant development investment to be treated differently to those facilities of a lower investment standard.</p> <p>Rio Tinto submits that it is important for the City to have the ability to provide subsequent approvals for existing facilities through a longer-term period which aligns with Rio Tinto's objectives. Longer-term approvals provide security for Rio Tinto for its ongoing supply to support operations workforce requirements.</p>	As per Officer Response No.1.9.	No modification recommended.
<p>1.11 Section 5.1.8</p> <p>Rio Tinto submits that flexibility should be accommodated to allow an approval to remain in place or be suspended if a facility is placed into care and maintenance. It is important that Rio Tinto can then seek to reopen existing sites with the certainty of existing / past approvals still being applied without the need to revisit approval procedures.</p>	Irrespective of whether a workforce accommodation facility is active or in care and maintenance, there is a need to review the merit of retaining the facility and consideration against the impact that a potential oversupply of workforce accommodation beds may have upon the local community, in the opinion of the City.	No modification recommended.
<p>1.12 Section 5.2.1</p> <p>Rio Tinto requests the City to provide flexibility regarding where and when demonstration of need is applied. Rio Tinto should not be placed at an unfair advantage regarding the upgrade and or expansion of its existing facilities as a result of this provision, which could possibly create a barrier for entry and create an unfair advantage for incumbent operators with permanent tenure.</p>	The demonstration of need should be applied to all prospective workforce accommodation for consistency and equality.	No modification recommended.
<p>1.13 It is not considered appropriate for the City to review commercial negotiations between incumbent operators and resource companies such as Rio Tinto, when demonstrating the need for additional beds.</p>	The City has no intention of reviewing commercial negotiations. Public announcements regarding the progression of projects to a stage where workforce accommodation needs may be seriously entertained would, in most circumstances, satisfy the proposed demonstration of need requirements.	No modification recommended.
<p>1.14 Section 5.2.5</p> <p>Rio Tinto suggests that this list includes reference to future projects</p>	As per Officer Response No.1.7.	No modification recommended.

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<p>1.15 Section 5.2.6</p> <p>Rio Tinto submits that this requirement is not feasible for a single proponent to provide as part of an individual application for a new or expansion of an existing facility. This is a regionally significant issue which should be led and undertaken by the City of Karratha for the reasons of the significant scope; access to information; and to ensure transparency.</p>	<p>The submitter refers provision 5.2.6 which states: <i>'Assessment of workforce accommodation proposals must consider the cumulative impacts of multiple workforce accommodation developments on the sustainability and liveability of affected towns and the City generally.'</i> This provision relates to the assessment of workforce accommodation proposals by regulatory bodies rather than information to be included within applications by proponents.</p>	<p>No modification recommended.</p>
<p>1.16 Section 5.4</p> <p>This requirement indicates a standard commensurate to high quality residential apartments. In the first instance, this can only be measured subjectively and if it is the City's endeavour to appropriately measure the form of development proposed, then a set of design guidelines or similar, should be formulated to provide better guidance for proponents and the decision making bodies. Residential apartment terminology is also a different housing typology to that of Workforce Accommodation, where that latter could be considered more akin to motel type development.</p>	<p>Design guidelines are not considered necessary as there are examples of integrated workforce accommodation which may be emulated. The Cajuput villas as an apartment style development within the catchment of an activity centre is the prime example of this.</p>	<p>No modification recommended.</p>
<p>1.17 In addition to the above, decision making relating to the appropriateness of design needs to take into consideration the location and context in which it is proposed. Residential apartments are generally constructed in locations where higher density is warranted, for example where there are amenity and facilities to support it. This is not necessarily the case for all Workforce Accommodation where lower density detached facilities are required. Therefore, the Policy needs to be flexible in its application of design standards.</p>	<p>Noted.</p> <p>The Policy is intended to be flexible and enable higher density, apartment style workforce accommodation in urban locations. It is noted that Scheme Amendment No.39 seeks to expand the land use zones where workforce accommodation may be a discretionary land use and includes the City Centre zone.</p>	<p>No modification recommended.</p>
<p>1.18 Recognition of partial high quality permanent built form within developments enabling longer term approvals is necessary. For example, a major project may have a larger construction than smaller ongoing operation and shut/project workforce. Flexibility is required to develop both transportable and high quality permanent construction accommodation within the same development. The transportable portion requires time limited approvals for the construction phase and the high quality permanent build accommodation should be granted permanent approval as warranted by this standard of construction.</p>	<p>A staged proposal may be considered on its merits. Furthermore, a design which balances a partial high quality permanent built form which screens traditional style workforce accommodation, may be considered.</p>	<p>No modification recommended.</p>
<p>1.19 Section 5.4.3</p> <p>This requirement is not supported by Rio Tinto as it is too prescriptive and does not provide flexibility to take into consideration the aspects of</p>	<p>Provision 5.4.3 states: <i>'Proposals for longer term approvals must provide contiguous, activated street front development'</i>. This requirement highlights the expectation of the draft Policy that</p>	<p>No modification recommended.</p>

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<p>a particular development such as context and location. Whilst in some circumstances this design approach is suited, it is not suited in all circumstances. As mentioned above, requirements such as this are better suited in a document such as design guidelines which can give consideration to a number of circumstances.</p> <p>This requirement also does not take into consideration proposals which are for expansion of existing facilities where this requirement may not be able to be achieved.</p>	<p>proposals for longer term approvals will be appropriately located and integrated i.e. within the catchment of an activity centre.</p> <p>The provision of contiguous street front development is considered to allow for greater opportunity for a proposed workforce accommodation facility to integrate with adjacent built form. It also addresses the concern of workforce accommodation providers regarding public access into facilities. This concern has been used to justify workforce accommodation facilities being surrounded by fencing.</p>	
<p>1.20 Section 5.4.4</p> <p>For similar reasons to that specified for Section 5.4.3 above, this requirement is not supported by Rio Tinto.</p>	<p>As per officer response No.1.12.</p>	<p>No modification recommended.</p>
<p>1.21 Section 5.5.1</p> <p>As mentioned above, the requirements relating to the preparation of a Social Impact Assessment and or a Social Impact Management Plan should be fit for purpose for the proposed development. Rio Tinto suggests that flexibility be provided in order to provide measures or scale when the preparation of such documents should be applied. This should similarly be applied in the context of the type and detail contained within such documents. There should also be flexibility to accommodate the preparation of such documentation as conditions of development approval, rather than 'upfront' as part of development applications.</p>	<p>Agreed that social impact assessments should be fit for purpose. As per Development Policy No. 20 Social Impact Assessment, proposals are assessed on their merits.</p> <p>Development Policy No.20 states Council position that potential social impacts should be identified as early as possible, where there is likely greatest flexibility and opportunity to maximise positive impacts and minimise and offset negative impacts. This would occur at the proposal scoping stage rather than as a condition of development approval.</p>	<p>No modification recommended.</p>
<p>1.22 Section 5.5.3</p> <p>The requirements specified under this Section are not supported by Rio Tinto as they are ambiguous and provide no certainty for which Rio Tinto can make decisions regarding development. Should the City wish to pursue this approach, then a set of defined criteria are required to provide certainty and understanding for proponents.</p> <p>Rio Tinto submits that the extensive investment made through the Community Infrastructure &amp; Services Partnerships with the City (as outlined earlier in Section 4.2 (1) should be considered as part of our contribution for any existing and future WA developments. Rio Tinto would not support additional monetary contributions requested by the City for a specific development.</p>	<p>The current version of Development Policy No.10 includes a Framework for Contributions and was prepared in consideration of Clause 4.4 of Town Planning Scheme No.8 which states as one of the matters to be taken into account when determining the merits of a proposal: 'the potential loss of any community service or benefit resulting from the planning approval.'</p> <p>Research shows that there is a relative net loss in community service and benefit as a result of FIFO workforce accommodation compared to residential based workforce. This relative loss, and any contribution towards offsetting shall be considered, among other matters, in determining the merits of a proposal.</p> <p>The draft version of Development Policy No.10 states that '<i>In accordance with Clause 9.1 of Town Planning Scheme No.8, agreements can be reached between the Applicant and the Council regarding contributions to be made, the basis upon which</i></p>	<p>No modification recommended.</p>

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	<p><i>contributions are made, and the application of those contributions.</i> From this statement it is clear that there is flexibility to reach agreement on contributions which is recognised as a complex matter.</p> <p>As stated within the existing and proposed DP 10: <i>'If a proponent does not believe a contribution is warranted, then the Social Impact Management Plan needs to clearly articulate in detail, and based on evidence/commitments, the reasons why they believe a contribution is not warranted so this can be considered in determining the merits of the proposal.'</i></p> <p>It is noted that Council's position on the need for contributions is based on the potential adverse cumulative effects of workforce accommodation on building sustainable local communities and local economies, not just the impact of an individual workforce accommodation development on community facilities and infrastructure.</p>	
<p>1.23 Rio Tinto has a strong understanding of the manner in which WA is developed and operated in the Pilbara and the consideration necessary at the feasibility stages to understand if a project is viable. The City's position of WA as being temporary in all cases does not reflect the entire reality of Rio Tinto's workforce.</p> <p>WA is both permanent with ongoing demand for maintenance, operational and project needs as well as the more temporary form for defined construction needs. Rio Tinto's experience with building and subsequently decommissioning construction villages such as Kangaroo Hill (500 rooms) and Birra Birra (2400 rooms) as well as our ongoing facilities at Dampier, and Wickham shows that we use both temporary and permanent WA facilities.</p> <p>Rio Tinto appreciates the need to ensure there is integration between WA and the community and town services. However, it is expected that there will always be a need for WA, to allow Rio Tinto to operate and maintain their extensive assets within the City. Having time limited approvals and assuming WA is on a temporary basis in all cases is not compatible with our ongoing need for flexibility in accommodation requirements.</p>	<p>The City does not support permanent workforce accommodation subject to time unlimited approvals.</p>	<p>No modification recommended.</p>
<p>1.24 Rio Tinto submits that the needs analysis requirement may present commercial challenges, particularly if rapid demand exceeds baseline supply. Rio Tinto submits that there are commercial and operational reasons for a resources company to own and operate its own facility,</p>	<p>As per Officer Response No.1.7.</p>	<p>No modification recommended.</p>

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such as Wickham Lodge, Wickham Cajuput Villas and Peninsula Palms rather than rely solely on third party facilities. Indeed, some accommodation demand such as for shut maintenance is volatile in nature and difficult to accommodate with certainty in third party operated facilities.		
<p>1.25 Rio Tinto submits that it requires:</p> <ul style="list-style-type: none"> <li>the ongoing operation of existing WA facilities; and</li> <li>sufficient flexibility to obtain approvals for: <ul style="list-style-type: none"> <li>the development of a range of WA uses on freehold land under our ownership and land we have access to via Special Lease under State Agreement; and</li> <li>Refurbishment, development or redevelopment of sites with existing Rio Tinto assets that may or may not be currently being used for WA uses.</li> </ul> </li> </ul>	<p>The ongoing operation of existing workforce accommodation facilities is unaffected.</p> <p>The draft Policy retains the ability to obtain approvals for new workforce accommodation, including refurbishments and/or redevelopment of existing workforce accommodation.</p>	No modification recommended.
1.26 As detailed, time limiting simple and modest expansion proposals such as refurbishment and improvement of existing facilities could significantly restrict Rio Tinto's operations and town site development / contributions where existing facilities are left unused or not refurbished.	As detailed within the proposed Policy, refurbishments and additions which do not propose to increase the number of beds, would not trigger the application of a time limitation upon a time unlimited development.	No modification recommended.
<b>2. Rowe Group on behalf of Cherratta Lodge, Velocity Village/Velocity Motel and Karratha Village</b>		
<p>2.1 Demonstration of Need</p> <p>Clause 5.2 of the Draft TWA Policy states that: <i>proposals for new workforce accommodation facilities, requests to extend approval periods for existing workforce accommodation facilities or proposals to increase the number of beds associated with existing facilities must be accompanied by information that demonstrates need.</i></p> <p>Council's position is outlined in Clause 4.2 and, amongst other things, refers to a "base-level supply of TWA beds" having been identified in an AEC Group report to the City of Karratha. This key Policy provision has no guidance or basis as the Draft TWA Policy lacks a quantitative figure with respect to what constitutes the "base-level supply of TWA beds". That is, the Draft TWA Policy makes no reference to the specific number of beds that represents the "base-level supply" nor how such a figure was derived.</p> <p>Due to the cyclic nature of the commodities industry and the fly-in/fly-out (FIFO) workforce it employs, it will be difficult to maintain accuracy with respect to the "base-level supply of TWA beds" and to respond to fluctuations in accommodation requirements as a result of economic changes. We have concerns that accommodating the FIFO workforce</p>	As per Officer Response No.1.7.	No modification recommended.



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<p>and responding to changes in the economic conditions will be delayed or frustrated by the ambiguous requirements imposed in Clause 5.2 of the Draft TWA Policy. Unless the City of Karratha is constantly updating and reviewing data relating to the "base level supply of TWA beds" the ability to respond to industry requirements for TWA accommodation will be unnecessarily hindered and open for interpretation.</p> <p>It is requested that the rigid and subjective "demonstration of need" requirements in the Draft TWA Policy be modified to make it clear to existing and prospective TWA operators how the "base-level supply of TWA beds" is measured. Doing so will remove any ambiguities with respect to the demonstration of need provisions and ought to provide greater certainty for the City if an applicant were to contest or appeal the City's assessment/determination of this (ill-defined) term.</p>		
<p>2.2 Time-Limited Approvals on Existing TWA Facilities</p> <p>We have obtained legal advice on the general content of the Draft TWA Policy and, specifically, on the Policy provisions that seek to impose time-limits on existing non-time limited approvals should an increase in the number of TWA beds be sought (at a TWA facility). This would directly impact on the operations of our Client group given they collectively have obtained development approvals (without any imposition of a time-limit) from the City for their existing TWA operations at the subject site.</p> <p>'Attachment 1 - Hotchkin Hanly Legal Advice' contains a copy of the legal advice (dated 2 February 2018) we received in this regard.</p> <p>Hotchkin Hanly has addressed the Policy provision contained in Clause 5.1.1 of the Draft TWA Policy with a recommendation that Clause 5.1.1 not be included in a final version of the Policy for the following (summarised) reasons:</p> <p><i>The concern about the City's strict approach ["due regard" given to the Policy versus "full effect"] particularly finds expression in clause 5.1.1 of the TWA Policy, which appears to require any consideration of a fresh development application to increase a number of beds in Transient Workers Accommodation to result in not only a limitation upon the period of any approval for the increased number of beds, but also a modification to a previous approval which did not carry such limit...</i></p> <p><i>...The Court of Appeal in Reid v Western Australian Planning Commission [2016] WASCA 181 held that a condition of a development approval will be invalid if it does not reasonably refer to the nature of the development, even if it is consistent with a Policy...</i></p>	<p>As per Officer Response No.1.9.</p>	<p>No modification recommended.</p>

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<p><i>...A time limit for future Transient Workers Accommodation to be built may justify the imposition of such a condition, but it should not justify the imposition of such a condition for an existing use which carries no time limit, simply because a Policy attempts to provide the City with an opportunity to do so.</i></p> <p><i>That misconceives the function of conditions for development approval, which the Court of Appeal made clear...</i></p> <p><i>...There is no power residing in the City to unilaterally decide to modify an existing approval by imposing time limits it did not have. The mere insertion of a clause in a planning Policy attempting to provide an opportunity to cap an existing TWA development is not properly a "price" to pay for a fresh development approval, unless it can be shown that there is a nexus between the proposed new development and the need to cap the existing one as part of the new development. What is it about the new development which calls for a time-limit on the old one? If the new development is not undertaken, the condition is unenforceable anyway.</i></p>		
<p>2.3 Community Contributions</p> <p>Clause 5.5 (Community Integration) of the Draft TWA Policy requires TWA proposals in the 'City Centre', 'Town Centre', 'Commercial', 'Urban Development', and 'Residential' zones to be accompanied by a Social Impact Assessment (SIA), Social Impact Management Plan (SIMP) and an outline of appropriate community contributions.</p> <p>On our reading of the Draft TWA Policy, we understand it is not intended that a SIA, SIMP and/or community contributions are required for TWA developments in other zones (including the 'Mixed Business' Zone, which is the zone the subject site is proposed to be altered to under the provisions of Amendment No. 39). To avoid any confusion the Draft TWA Policy should include wording to clarify this position (i.e. that TWA proposals in other zones do not require a SIA, SIMP or community contributions).</p>	<p>As per Officer response No.1.22.</p>	<p>No modification recommended.</p>
<p>2.4 General Comments</p> <p>As outlined in Hotchkin Hanly's legal advice (refer Attachment 1), the Draft TWA Policy conflicts with the deemed provisions of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>. In this regard, the legal advice states:</p> <p><i>There are several matters of concern in relation to the draft TWA Policy. Although it provides that it should "guide" assessment and decision-</i></p>	<p>The draft Policy is a guide that informs Council's position on the assessment of Workforce Accommodation applications.</p>	<p>No modification recommended.</p>

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<i>making on development applications, clause 3 and the mandatory nature of the way in which requirements have been stated, suggest that the City intends the Policy to be strictly applied. To do so is inconsistent with their obligation under the Deemed Provisions (incorporated into all Local Planning Schemes) to only pay "due regard" to relevant Local Planning Policies, not apply them strictly.</i>		
2.5 There are a number of subjective terms used throughout the Draft TWA Policy. These include, but are not limited to, the following matters: <ul style="list-style-type: none"> <li>No definition (or guidance) with respect to an "identified need" for TWA beds;</li> </ul>	Part 5.2 of the draft Policy discusses need and provisions to guide how need will be assessed.	No modification recommended.
2.6 A lack of detail regarding how a TWA proposal would be deemed to be "appropriate to the location".	It is a stated objective of the proposed Policy to: <i>'Ensure that flexibility afforded in the location of workforce accommodation is balanced with controls that facilitate development appropriate to the location, and where development occurs within an urban setting, recognises principles of reciprocal benefits that can be realised for the local community and local business from an integrated workforce accommodation facility.'</i>	No modification recommended.
2.7 A lack of detail regarding what is deemed to be an "appropriately designed" facility commensurate to its location.	The proposed controls which relate to the design of the facility i.e. the provision of contiguous street front development for proposals seeking longer term approvals, will determine whether a proposed facility is appropriately designed commensurate to its location.	No modification recommended.
2.8 A lack of detail regarding how a TWA proposal would be an "appropriately integrated" facility.	Part 5.5 of the proposed Policy provides guidance on how a workforce accommodation proposal would be appropriately integrated into the community.	No modification recommended.
2.9 No technical basis supporting the time-limit provisions referred to in Clause 5.1 of the Draft TWA Policy (i.e. maximum of 10 years and extensions for terms of five (5) years).	The ten-year timeframe with option for five-year extension has been proposed following a review of conditions relating to time limitations upon workforce accommodation proposals approved over the last decade.	No modification recommended.
<b>3. Woodside</b>		
3.1 Response to Draft Policy Woodside is concerned that the Draft Policy adds a layer of ambiguity and uncertainty which is not aligned with business' need for long-term certainty and stability. We need to work together to ensure a supportive regulatory environment that enables the long-term, capital intensive investments that drive our industry. Accommodation security will be essential if we are to successfully pursue our long-term projects on the	Notwithstanding the desire of the resource industry for certainty and flexibility, there is a need for the regulatory environment to consider and balance the objectives of the resources industry and the local community.	No modification recommended.

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<p>Burrup Hub, which are aimed at extending the life of Karratha operations.</p>		
<p>3.2 Background</p> <p>The definitions in Clause 4.1 'categories of a FIFO worker' do not accurately reflect the demographics of Woodside's regular FIFO workforce. A majority of the FIFO workforce are contractor employees engaged on the multi-billion dollar Karratha Life Extension (KLE) project, which is aimed at extending the life of the Karratha Gas Plant. KLE is made up of a series of smaller work packages which are often short-term and/or flexible and/or highly skilled. As such, FIFO is offered for these roles.</p> <p>Another significant demographic in the FIFO workforce are gas plant operators. While these roles are operational, they are also highly skilled and highly sought after, both nationally and internationally. As such, while Woodside prefers to have residential operators, FIFO is also available for these roles.</p>	<p>The categories identified within Clause 4.1 are general in nature and not intended to represent the specific needs of Woodside at the current time.</p> <p>Gas plant operational workforces are captured within the definition of operational workforces. In regard to the competition for human resources and catering to the preferences of employees, it is stated within the proposed Policy that wherever possible, that it is Council's preference for workers to be accommodated within integrated forms of residential-based accommodation.</p>	<p>No modification recommended.</p>
<p>3.3 Time-Limited Approval</p> <p>Clause 5.1 of the Draft Policy relates to time limited TWA approvals.</p> <p>The Draft Policy states that: <i>Transient Workforce Accommodation is by its definition a temporary land use and therefore ... any approval will be subject to a time limit.</i></p> <p>Woodside refers you to the definition of 'Workforce Accommodation' as contained in the <i>Planning and Development (Local Planning Schemes) Regulations 2015 (WA)</i> (which we understand is the land use definition the City is adopting as part of Amendment No. 39). That is, 'Workforce Accommodation' is defined as (underlining for emphasis):</p> <p><i>"workforce accommodation means premises, which may include modular or relocatable buildings, used - primarily for the accommodation of workers engaged in construction, resource, agricultural or other industries on a temporary basis; and for any associated catering, sporting and recreation facilities for the occupants and authorised visitors. "</i></p> <p>The land use definition, and the practice of accommodating FIFO workers, is that the employee/worker is temporary (or transient) but the TWA facility itself may be permanent in nature. This is justified in the wording of the above definition and in the issuing of "development approvals in perpetuity" (i.e. with no time limits), which the City has done for numerous TWA facilities within its municipal boundary.</p>	<p>Reasoning for all workforce accommodation to be subject to time limitations has been provided and considered adequate.</p> <p>The granting time limited approvals became the regular practice following a period of both time limited and time unlimited approvals being granted. The submitter is referring to historical approvals and practices where time unlimited approvals were relatively normal.</p>	<p>No modification recommended.</p>

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<p>3.4 The provisions do not take into consideration any commercial arrangements underpinning proposed TWA facilities, such as leasing terms (and subsequent options) between a TWA operator (lessee) and the landowner (lessor), which is proposed in the case of Bay Village in the State of Western Australia. Longer tenure terms (in leasing documentation) may conflict with the time limited provisions contained within the Draft Policy if applied inflexibly to TWA development approval applications and the Policy is therefore considered inappropriate and inflexible.</p>	<p>Commercial considerations are not considered to be a relevant planning consideration.</p> <p>Leasing arrangements should support and reflect land use approvals. Land use approvals do not need to align with terms of lease.</p>	<p>No modification recommended.</p>
<p>3.5 Woodside has concerns with the proposed time limited approval provisions of the Draft Policy for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is inappropriate to apply a time limited approval on an existing TWA facility that has development approval in place in perpetuity (i.e. with no time limit) should an increase in the number of beds be proposed on that facility.</li> <li>• This provision fails to take into consideration reconfiguring of accommodation modules for the purposes of refurbishment, maintenance or replacing outdated modules that may result in an increase in the number of TWA beds at that facility.</li> </ul>	<p>The draft Policy seeks to create a level playing field in the consistent application of time limitations upon development approvals for workforce accommodation.</p>	<p>No modification recommended.</p>
<p>3.6 It is not clear in what circumstances an approval of greater than ten years could be granted. A consistent approach should be adopted throughout the Policy.</p>	<p>A longer term approval may be granted when:</p> <ul style="list-style-type: none"> <li>• A workforce accommodation proposal demonstrates integration with the community;</li> <li>• Where performance criteria of the proposed Policy are satisfied;</li> <li>• Where a proposed facility is co-located and integrated with an activity centre to support local business, activate public spaces and provide opportunities for occupants to interact and engage with the community;</li> <li>• The City has confirmed the suitability of a location for a longer term workforce accommodation facility;</li> <li>• Where applications for longer term approvals foster the provision of a balanced and diverse built form which will contribute to the development of an active and interesting character in the public domain; and.</li> <li>• Where a proposal achieves high intensity land use and built form outcomes, including a range of medium to high density housing, within a walkable catchment of an activity centre.</li> </ul>	<p>No modification recommended.</p>

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	Notwithstanding the above comments, the Policy states under Clause 5.1.4 that construction camp types of workforce accommodation shall be approved for a timeframe based on the timeframe for the related construction project.	
3.7 A ten-year time limit appears to be at odds with the City of Karratha's preference for accommodation buildings that are high-quality, permanent and look and feel like part of the surrounding community.	The provision of high-quality longer term facilities is accommodated within the proposed Policy through the points raised in Officer Response No.3.6.	No modification recommended.
3.8 Demonstrated and Identified Need Clause 5.2 of the Draft Policy relates to demonstrating a need for a TWA proposal. This provision is a new provision that does not exist in the operative (current) TWA Policy DP10. In Woodside's view, determining workforce needs is a business decision that should not be determined by a local government authority.	The demonstration of the need for additional workforce accommodation beds is necessary to ensure that there is not a gross oversupply and proliferation of workforce accommodation beds within the City.  The City seeks to prevent the proliferation of workforce accommodation and discourage proposals that are speculative in nature. Furthermore, given the increased number of land use zones within which workforce accommodation may be considered, as proposed by scheme amendment no.39, then the submitters concerns regarding a sufficient supply of available land is suitably addressed.	No modification recommended.
3.9 An objective of the Draft Policy is to: <i>demonstrate an identified need for the beds and that such proposals are not speculative in nature</i> . The "need for beds" is subjective in itself and is not clearly articulated in the Draft Policy.	As per Officer Response No.1.7.	No modification recommended.
3.10 Although it is the City's underlying assumption that there is ... <i>sufficient existing workforce accommodation to meet current and future demand</i> (see page 7 of the AEC Group Report 2016) it is unclear whether the quality of existing accommodation was considered or whether this assumption is consistent with current industry needs. This assumption appears to underpin the City's current view that Woodside's proposed 700-bed facility is not required.	The quality of existing accommodation and its ability to meet the expectations of the market is considered to be a market concern. There is considerable flexibility to allow for all types of refurbishments to meet the demands of the market with, or without, triggering a requirement for a time limited approval.	No modification recommended.
3.11 The Draft Policy also refers to the "base-level supply of beds" which Woodside argues is another subjective term that may not be supported by qualitative assessments and robust data.	It is not clear why the term 'base-level supply of beds' is subjective. Notwithstanding, the AEC report has been prepared by experts based upon information and analysis which has been made publically available.	No modification recommended.
3.12 The AEC Group Report, which was commissioned by the City, also noted that the closure of the GRV facility would mean that Woodside would need to find alternative accommodation given the significant	This submission refers to the draft and confidential AEC report which has been superseded by the finalised AEC report which is publically available.	No modification recommended.

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workforce associated with maintenance and shutdown campaigns that are required to operate the Karratha Gas Plant and Pluto LNG Project.		
3.13 Woodside is not supportive of the demonstrated and identified need provisions of the Draft Policy because determining need 10+ years into the future is difficult to accurately predict, as it is contingent on projects going through stringent business analysis before going ahead. A shortage of beds could be a driver in a project not going ahead (considering the significant capital investment that new accommodation facilities require).	It is unlikely that demonstrating need for workforce accommodation beds in ten-year's time would satisfy the proposed requirements relating to demonstration of need as part of preparing and lodging a proposal for development approval.	No modification recommended.
3.14 Woodside is not supportive of the demonstrated and identified need provisions of the Draft Policy as there is no current consideration given to demand from other industries/projects. Woodside needs certainty over bed numbers. Just because there are sufficient beds locally now, does not mean there will be in 5 years. Woodside needs to cover its own 'need' and the most logical way to do this is by having control of its own beds.	The KDCCI Economic Impact Study (2017) had, as a key finding, that there is already sufficient FIFO accommodation within the City at the present time. Since the study, there has been no reduction in the provision of workforce accommodation facilities or beds that the City is aware of.	No modification recommended.
<p>3.15 Location and Community Integration</p> <p>The provisions contained within Clause 5.3 (Location) and Clause 5.5 (Community Integration) of the Draft Policy are (at least in Woodside's opinion) closely linked. Until Amendment No. 39 to the City's Local Planning Scheme No. 8 (LPS 8) was initiated in September 2016 Woodside (and other TWA operators and users) had the benefit of relying on specifically identified TWA zoned land by way of the 'Transient Workforce Accommodation' Zone (TWA Zone).</p> <p>The TWA Zone applies to strategic sites within the City's municipal boundary where a TWA land use has been considered appropriate in terms of its location. The TWA Zone applies to Woodside's Bay Village site and we specifically refer to our previous submissions objecting to the removal of the TWA Zone (by way of Amendment No. 39) and rezoning of TWA zoned sites. Our concerns and arguments contained in our previous submissions are still relevant and ought to be applied to the location provisions outlined in the Draft Policy.</p>	Scheme Amendment No.39 has been approved by the Minister for Planning.	No modification recommended.
3.16 Woodside has issues with the location and community integration provisions of the Draft Policy as the Draft Policy contains no guidelines or quantitative measures that assist in defining "community integration" or "relative community loss". Such terms are considered subjective in the absence of any supporting (measurable) guidelines.	Development Policy No.20 provides guidelines for social impact assessment and preparation of social impact management plans which are referenced within the community integration section of the proposed Policy.	No modification recommended.

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3.17 The provisions contained in the Draft Policy regarding Social Impact Assessments, Social Impact Management Plans and community contributions are also subjective in nature and lack any meaningful guidance.	Development Policy No.20 was adopted in September 2014 and has been implemented in regard to workforce accommodation related proposals since that time.	No modification recommended.
3.18 The references to 'need for contributions' should reference appropriate offsets from existing or past contributions - Woodside is a significant contributor to Karratha particularly in the areas of education, infrastructure and community grants.	Contributions are not required and Development Policy No.20 recognises flexibility of options for offsetting community impacts.	No modification recommended.
3.19 The 'need for contributions' should also consider the benefits that flow to a community from capital-intensive projects that the transient accommodation workforce supports.	This argument is not supported in isolation and when thorough analysis is conducted into cascading, or trickle-down benefits, then there may be the loss of jobs and/or other community impacts associated with opportunity costs associated with the development. This was evidenced in the economic analysis of the bay village workforce accommodation facility proposal conducted by RFF on behalf of the KDCCI. This Economic Impact Study identified a nett impact post-construction loss of 69 permanent jobs within the community and a negative \$6.6 million per annum to the local economy.	No modification recommended.
<p><b>3.20 Design</b></p> <p>Clause 5.4 of the Draft Policy relates to the acceptability of the design of TWA facilities.</p> <p>The Draft Policy states that: <i>Where a proponent intends to accommodate FiFo operational workers on a long-term basis, it is expected that the development to be of a standard commensurate with permanent, high quality residential apartments and suitably integrated with surrounding development.</i></p> <p>The subjective nature of such provisions (particularly in respect of the reference to "a standard commensurate with permanent, high quality residential apartments") in the Draft Policy undermines long-term certainty for our industry with respect to accommodating our workforce.</p>	Appropriately located workforce accommodation i.e. in proximity to an Activity Centre that is built to a high standard, is considered appropriate for longer term approval periods. These developments intergrate workforce accommodation facilities within the towns that they have an integral relationship with.	No modification recommended.
3.21 We do note, however, that through collaboration with the City's planning team, Woodside has made significant progress in implementing design principles for the Bay Village proposal.	Noted.	No modification recommended.
<b>4. Department of Jobs, Tourism, Science and Innovation</b>		
4.1 Section 5.1 - Duration (term) of Approvals	As per Officer Response No.2.9.	No modification recommended.



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<p>The LPP proposes to limit approvals for workforce accommodation proposals to a maximum period of 10 years, with an option/s to extend for a maximum period of 5 years. The LPP does not outline the reasons for selecting the 10 year and 5 year timeframes.</p>		
<p>4.2 Section 5.1.1 of the LPP states that where an increase in the number of beds is proposed, a time limited approval will be applied to an entire workforce accommodation proposal. The Department recommends the City review the rationale and practicality of using such a trigger to retrospectively limit the timeframe of a wider development approval.</p>	<p>As per Officer Response No.1.9.</p>	<p>No modification recommended.</p>
<p>4.3 The lease terms for the underlying land tenure of workforce accommodation proposals typically align with the intended design life of the proposal and the major projects they support. Inconsistencies in the term of approvals across planning, leasing, and project design life can create uncertainty for industry and affect industry's ability to make long term financial investment decisions.</p> <p>The Department recommends the LPP, as a minimum, align the term of an approval for a workforce accommodation proposal with the corresponding term of the underlying lease and / or the intended design life of a proposal.</p>	<p>As per Officer Response No.3.4.</p>	<p>No modification recommended.</p>
<p>4.4 Section 5.2- Demonstrating Need</p> <p>The LPP requires new and extensions to existing workforce accommodation proposals to be accompanied by information demonstrating the need for the proposal.</p> <p>The City refers to the AEC Report in the LPP which identifies a base-level supply of workforce accommodation beds in the City.</p> <p>The timing and extent of demand for workforce accommodation is driven by a range of factors including the economic conditions of the resources industry, the changing and overlapping phases of mining, resource and industrial projects (construction, maintenance, operation), and commercial considerations and decisions.</p> <p>The Department recommends the City recognise the dynamic nature of workforce accommodation proposals in the LPP, and to consider applying a flexible, case-by-case approach in the implementation of the LPP.</p>	<p>As per Officer Response No.1.7.</p>	<p>No modification recommended.</p>
<p>4.5 Further, the requirements of the LPP in relation to demonstrating need are onerous. For example, the following provisions are included in</p>	<p>As per Officer Response No.1.9.</p>	<p>No modification recommended.</p>

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<p>section 5.2: 'the need for beds must be demonstrated in the context of workforce accommodation provision across the City and across industry demands'; and 'proposals must consider the cumulative impacts of multiple WA developments on the sustainability and liveability of affected towns and the City generally'. Such open-ended provisions will be difficult for proponents of workforce accommodation proposals to define, measure and demonstrate, particularly in a commercially competitive environment where such information is not readily available.</p> <p>The Department recommends the City consider clarifying these provisions.</p>		
<p>4.6 Section 5.3 - Location and Section 5.5 - Community Integration</p> <p>Section 5.3 of the LPP encourages workforce accommodation proposals to lend themselves to community integration.</p> <p>The Department notes that while industries integrate part of their workforce within existing town based facilities, there is still a need for standalone facilities for commercial and operational reasons including the need to quickly accommodate and efficiently manage a large workforce over a short period of time.</p> <p>Section 5.3 of the LPP requires consideration for contributions where workforce accommodation do not lend themselves to community integration. Further, section 5.5 of the LPP requires the preparation of Social Impact Management Plans (SIMP) that include contributions or other management measures that offset any relative net loss in community service and benefit.</p> <p>The requirement for contributions is inconsistent with the WAPC's Workforce Accommodation Position Statement.</p>	<p>As per Officer Response No.1.22.</p>	<p>No modification recommended.</p>
<p>4.7 The LPP does not define or outline the way in which 'relative net loss in community service and benefit' will be measured. This further raises concern that the requirement for contributions is not aligned to the principle of need and nexus i.e. the LPP does not clearly demonstrate the need for the contributions in connection with the demand arising from the workforce accommodation development.</p> <p>The LPP proposes a case by case agreement between an applicant and the City on the contributions to be made, the basis upon which contributions are to be made and the application of those contributions. The Department is concerned that this provision is inconsistent with the</p>	<p>As per Officer Response No.1.22.</p>	<p>No modification recommended.</p>

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<p>principles that should guide development contributions i.e. transparency, equity, certainty and consistency.</p> <p>The Department strongly recommends the City undertake a thorough review of these provisions in the LPP.</p>		
<p>4.8 Section 5.4 – Design</p> <p>Section 5.1.2 of the LPP states that longer term approvals, exceeding 10 years, may be approved where performance criteria set out in the LPP are met.</p> <p>Section 5.4 of the LPP sets out development design guidance provisions, however, there are no explicit performance criteria set out in the LPP. Further, the design guidance provisions refer to subjective planning principles such as 'active and interesting character', 'streetscape', 'scale' and 'integration'.</p> <p>The Department recommends the LPP define these planning principles in the context of workforce accommodation proposals and the specific zones within which they are located.</p>	<p>As Per Officer Response No.1.16.</p>	<p>No modification recommended.</p>
<p>4.9 Section 5.4 expects workforce accommodation to be of a standard commensurate with permanent, high quality residential apartments, and that typical transportable camp buildings and layouts are unacceptable. This requirement is inconsistent with the WAPC's Workforce Accommodation Position Statement.</p>	<p>As Per Officer Response No.1.16.</p>	<p>No modification recommended.</p>
<p>4.10 Terminology</p> <p>The LPP includes references to 'transient workforce accommodation', 'workforce accommodation' and 'WA'.</p> <p>The Department recommends the LPP refer to 'workforce accommodation' for consistency with the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>.</p>	<p>This is noted. Terminology should be consistent with the Model Scheme Text, which states 'workforce accommodation'.</p>	<p>Modify Policy to refer to Workforce Accommodation (WA).</p>
<p>4.11 State Agreements</p> <p>The Department recommends the LPP acknowledge and recognise the operation of State Agreements within the City, noting that the development of workforce accommodation facilities within the City may be subject to State Agreement approval.</p> <p>The Department recommends the LPP give due regard to State Agreements when making decisions on development proposals within the City, and to consult with the Department before considering any land</p>	<p>As per Officer Response No.1.3.</p>	<p>No modification recommended.</p>

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use or development proposal that could impact on State Agreement projects.		
<b>5. Pilbara Development Commission</b>		
5.1 The Policy should note the WAPC's position statement on Workforce Accommodation from December 2017, which generally supports the City's policy	Noted.	No modification recommended.
5.2 The Building Code of Australia is now the National Construction Code (NCC).	Noted.	Replace reference to Building Code of Australia with National Construction Code.
<b>6. RFF on behalf of Stayover by Ausco/Kingfisher</b>		
<p>6.1 Time-limited Approvals</p> <p>Provision 5.1.1 outlines that:</p> <p><i>Where existing workforce accommodation has a time unlimited approval, works including upgrades and maintenance, shall enjoy the same time unlimited approval rights. Should an increase in the number of beds be proposed, a time limited approval shall be applied to the entire workforce accommodation facility.</i></p> <p>Ausco has an existing approval for transient workforce accommodation at the above-mentioned premises. This approval is not time-limited. This Policy provision suggests that Council would be able to retrospectively amend a previous approval to impose time-limited conditions. We contest the validity of Council to impose time-limited provisions retrospectively to an approval granted previously and that is not subject to an amendment.</p>	As per Officer Response No.1.9.	No modification recommended.
<p>6.2 Retrospectively applying new Policy to historical approvals is inconsistent with orderly and proper planning applied in such situations. Such situations should rather be dealt with in a non-confirming use type arrangement, whereby, the existing unrestricted time-limited nature of the approval stands (including minor additions or alterations) until such changes are made under the Town Planning Scheme to make the use not-permitted.</p> <p>This approach is consistent with an historically orderly and proper consideration of historical land use rights. It is also the arrangement that</p>	As per Officer Response No.1.9.	No modification recommended.

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<p>would be realised through changes to the local planning scheme as set out in the <i>Planning and Development (Local Planning Regulations) 2015</i> in the Model Scheme Text.</p> <p>Recommendation: Provision 5.1.1 be removed from the Local Planning Policy.</p>		
<p>6.3 Need</p> <p>Policy objectives and provisions under section 5.2 place a strong emphasis on the ability for a proponent to tangibly demonstrate need for additional rooms or an extension to a previous time-limited approval. Evidence is suggested to be based on occupancy, executed contracts or bookings to demonstrate demand/ need.</p> <p>Regulation 3 (3) of the Deemed Provisions of the Planning and Development (Local Planning Schemes) 2015 requires that:</p> <p><i>A local planning policy must be based on sound town planning principles and may address either strategic or operational considerations in relation to the matters to which the policy applies. A local planning policy must be based on sound town planning principles and may address either strategic or operational considerations in relation to the matters to which the policy applies.</i></p>	<p>As per Officer Response No.1.7.</p>	<p>No modification recommended.</p>
<p>6.4 The provisions under section 5.2 of the draft Policy create an environment which could restrict competition in the market and limit the opportunity to create a pipeline of supply to meet industry requirements in the longer term. Restricting competition by relying solely on a current demand profile to consider new proposals jeopardises established, sound town planning-based principles regarding:</p> <ul style="list-style-type: none"> <li>• -The adequate pipeline of land and supply to ensure affordability; and</li> <li>• -Ensure there are opportunities to enable and promote improved quality and diverse accommodation options in communities.</li> </ul>	<p>The assertion that that the provisions under section 5.2 would restrict competition has not been demonstrated.</p>	<p>No modification recommended.</p>
<p>6.5 In our view, consideration of demand within the established town planning framework should focus on ensuring sufficient land has been identified in the Local Planning Strategy (and subsequently Scheme) to ensure affordable land supply and enable economic growth of the region. This approach is consistent with the State Planning Strategy and Statement of Planning Policy 3 – Urban Growth and Settlement.</p> <p>Recommendation: The demand provisions of the draft Policy be removed and the City ensures through its Scheme review adequate</p>	<p>As per Officer Response No.3.8.</p>	<p>No modification recommended.</p>

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land is identified for workforce accommodation to meet long term demand and support the Local Governments economic development		