

Shire of Roebourne Town Planning Scheme No.8
Draft Revised LPP No. DP10 – Transient Workforce Accommodation
&
Draft LPP No. DP20 – Social Impact Assessments

Schedule of Submissions

No/Ref	Date Received	Name	Address	Summary of Comments Made	Officer Response	Officer Recommendation
1	6 May 2014	Department of Planning	Locked Bag 2506 Perth WA 6001	<ul style="list-style-type: none"> It is anticipated that the Western Australian Planning Commission will consider the need for an appropriate planning instrument to address key planning issues associated with transient workforce accommodation in Western Australia (i.e. a State-wide approach to this issue). The DOP acknowledges the Shire's purpose and intent of this draft policy and notes that it establishes the Shire's position on transient workforce accommodation. This will provide guidance for the exercising of discretion in decision-making, which is consistent with the function of a local planning policy. In summary, the DoP advises that local planning policies are intended as guidelines used to assist the local government in making decisions under a local planning scheme. The DoP has concerns that the Shire's draft local planning policies go beyond this by imposing additional requirements, therefore purporting to impose a separate planning regime. It may be beneficial for the Shire to seek legal advice on this matter, particularly in relation to the enforceability of requirements that do not have explicit statutory authority. 	<p>Noted. This process has commenced. The City is broadly supportive of a State-wide approach and will have input where possible in the development of the SPP.</p> <p>Noted and agreed.</p> <p>Noted. McLeods Barristers and Solicitors provided the following legal advice on 3 September 2013 in relation to similar concerns raised by the DoP on the draft interim TWA policy adopted by Council for public advertising at its May 2013 meeting: <i>"I don't think it can be seriously suggested that a local planning policy cannot contain guidelines which extend beyond the strict terms of the enabling local planning scheme."</i> Notwithstanding, it is not considered the draft revised TWA Policy nor draft SIA Policy seek to contemplate outside of what TPS 8 currently establishes as relevant considerations for the determination of applications with respect to Social Impact Assessment or the proposed framework for contributions (refer Section 1.1 below).</p>	<p>No modification required.</p> <p>No modification required.</p>
1.1				<p><u>Social Impact Assessment</u></p> <ul style="list-style-type: none"> Although the State Planning Framework does not include any reference to social impact assessment, it is acknowledged that this is a useful mechanism to assess and mitigate impacts. The Department has concerns that the Draft Policies imposes a requirement for social impact management as this is not currently contemplated by the Scheme or State Planning Framework. Local planning policies can only exist at law to guide discretion and as such cannot purport to impose a separate planning regime. The Shire may wish to seek its own legal advice on this matter. 	<p>Noted and agreed.</p> <p>Noted. Clause 4.4 of TPS 8 – Matters to be considered by Council includes many matters with relevance to social impact assessment, including at (y) <i>"the potential loss of any community service or benefit resulting from the planning approval"</i>.</p> <p>Accordingly, the requirement for a social impact assessment for specific types of development that are known to have community impacts is considered to be a reasonable and relevant request, which is directly contemplated by TPS 8.</p> <p>McLeods Barristers and Solicitors provided the following legal advice on 3 September 2013 in relation to similar concerns raised by the DoP on the draft interim TWA policy adopted by Council for public advertising at its May 2013 meeting: <i>"The comment that the Department has concerns about the draft Policy imposing requirement for social impact management in my opinion may be misconceived. The Shire's draft Policy does not seek to impose an obligation of social impact management, but puts it forward as a mechanism that may be used in appropriate circumstances."</i></p> <p>It is acknowledged that social impact is not currently contemplated by the State Planning Framework. It is, however, common practice for such matters to be dealt with despite the silence of a State Planning Framework on the matter. There is also considerable precedent for the requirement for SIA to accompany applications for development approval in the State, particularly major projects.</p>	No modification required.
1.2				<u>Contributions</u>	Noted. The policy does not require proponents to make a contribution but rather	No modification required.

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				<ul style="list-style-type: none"> The requirement for a proponent to make a contribution to the Shire, as outlined in Part 6.8 of the draft LPP, appears to be outside the scope of a social impact management plan. Such a requirement may be invalid as a planning condition under the <i>Planning and Development Act 2005</i>, and may represent a tax that is not authorised by the <i>Local Government Act 1995</i>. Accordingly, it may be beneficial for the Shire to seek its own legal advice on this matter. 	<p>includes contributions as a social impact management measure. The policy does attempt to provide transparent, fair and accountable guidelines in relation to contributions:</p> <ul style="list-style-type: none"> Recognition of previous or on-going contributions made by a proponent, including within a State Agreement framework. Intention to establish a 'standard contribution rate' through normal municipal budget process, with associated statutory processes set out under the Local Government Act. Open to proponent to consider whether to make a contribution and/or form of contribution (which may be guided by a social impact assessment) Proposed contributions to be set out as part of application, to enable proper consideration of the merits of development application, including associated community impact. Aggrieved applicant may seek review through the State Administrative Tribunal. 	Copy of City response to be referred to DoP.
1.3				<ul style="list-style-type: none"> The Department of State Development has recently developed the Infrastructure and Services Assessment Framework as the preferred approach to impact assessment. The Framework provides a consolidated approach to the identification of potential impacts on communities, infrastructure and services directly associated with major resource projects at a local, regional and state level. 	Noted. It is not intended that the draft SIA Policy duplicate the DSD impact assessment process, rather provide guidance for the assessment of proposals referred to the City under State Agreement Legislation or via other State review processes for comment, not to mention applications referred to the local government for a decision. It is hoped that this policy will assist the City and others address social impact considerations as part of preparing and reviewing particular types of development proposals, and thereby contribute to more efficient processing.	Undertake further consultation with DSD regarding the draft revised version of DP20 to better reflect the acknowledgement of other project assessment processes such as the ISA Framework and the intention to use DP20 to help streamline those processes.
2	23 April 2014	Pilbara Development Commission (PDC)	PO Box 51 WEST PERTH WA 6872	<ul style="list-style-type: none"> The Pilbara Development Commission's Board, at its 13 November 2014 (<i>sic</i>) meeting moved the following TWA Policy/Position: <i>"The Commission does not support the development of new or existing Temporary Worker Accommodation unless the projects can demonstrate a need and a social benefit to the community"</i> The draft policies are consistent with this position and therefore, in principle, the Commission supports the Shire's Policy approach to dealing with TWAs and, in particular, the Policy Layout. 	Noted.	No modification required.
2.1				<ul style="list-style-type: none"> It is, however, the Commission's recommendation that, given the Regional Significance of FIFO/TWA activities generally, the Shire should work with the Department of Planning (DoP), Department of Regional Development (DRD), and other Local Governments and State Government Agencies, towards the development of an appropriate planning response that may include a State Planning Policy on TWA. 	<p>Noted. The City recently participated in a forum held in Perth with the Department of Planning and other key Government stakeholders, to inform the preparation of a State-level planning policy to guide the use and development of TWA facilities within the State. The City is keen to maintain this involvement.</p> <p>The City is however proceeding with the finalisation of its local planning policy in the interim, noting that the State-level planning policy is not yet considered a 'seriously entertained' planning proposal and there is a need to establish a refined local statutory planning framework for the consideration of TWA proposals.</p>	No modification required.
2.2				<ul style="list-style-type: none"> The PDC has recommended that a Regional Forum into Transient Workforce Accommodation be held. 	Noted. The WAPC held this forum on 26 June 2014. The City participated and presented at the forum.	No modification required.
2.3				<ul style="list-style-type: none"> Should the Shire determine to pursue the WAPC to develop an appropriate planning response, it is recommended that the Draft TWA and SIA Policies be forwarded to the DoP for consideration, and include the Shire's proposed timetable for the finalisation of the Draft TWA and SIA Policies and any subsequent actions. 	Noted. The Draft Policies were referred to the Department of Planning as part of the public advertising process, with comments received and considered above.	No modification required.
2.4				<p><u>Overall</u></p> <ul style="list-style-type: none"> TWA should be a use that can be considered within the 5-20 year urban fringe and "Urban Development Zone" to maximise the legacy of infrastructure and built form. This may also result in reduced infrastructure costs in future urban areas, and provide fully serviced land for future use 	Noted. TPS8 currently provides discretion for TWA to be approved in a number of zones, including the Urban Development zone, which is beneficial when there is limited land available and peak construction is occurring. Given the intention to transition TWAs in Urban Development zones to urban uses over time, it is important that time-limited approvals are imposed on such TWAs.	No modification required.

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2.5				<ul style="list-style-type: none"> The definition for TWA under the SoR Local Planning Scheme (LPS)- "dwellings intended for the temporary accommodation of transient workers and may be designed to allow transition to another use or may be designed as a permanent facility for transient workers and includes a contractor's camp and dongas", it is recommended that the temporary buildings associated with a TWA, do not conform to the definition of a dwelling under the Residential Design Codes and therefore further consideration should be given to this definition. 	<p>Noted and agreed. The City's current TPS 8 recognises that structures proposed under the land use definition of 'Transient Workforce Accommodation' do not conform to the definition of a dwelling under the Residential Design Codes, hence the inclusion of this separate land use classification.</p> <p>The planning merit of revising the Scheme definition of 'Transient Workforce Accommodation' will be investigated as part of the City's upcoming Scheme Review process. This may result in a more appropriate definition for TWA and/or delineate between types of TWA facilities. It is beyond the scope of the proposed local planning policy, however, to amend definitions in the Scheme.</p> <p>The definition of TWA within the local planning policy reflects the Scheme definition; however the City recognises that the local planning policy may need to be amended in the future once the new Local Planning Scheme is finalised in order to reflect any new Scheme definition.</p>	No modification required.
2.6				<p><u>Draft TWA Policy</u></p> <ul style="list-style-type: none"> Under Section 6.1, Matters to be considered in exercising discretion it is recommended that: <ul style="list-style-type: none"> Dot point 1 be modified to "Where alternative accommodation options have been investigated and discounted on justified grounds, and the TWA is required to service the needs of a construction project, construction phase or maintenance shut down" or something similar; A dot point be included that considers the legacy benefits of infrastructure and/or built form; and Dot point 7 reference to cumulative impacts, sustainability and liveability. The ability to measure these is not understood by the reviewer. 	<p>Noted.</p> <p>a) The current dot point 1 adequately addresses the issue of need and nexus, therefore no change is recommended.</p> <p>b) Agreed. There is merit in including an additional bullet point to adequately address the potential for legacy benefits from the proposed development for the community as a key matter in Council exercising its discretion.</p> <p>c) Noted. This is a strategic issue informed by data, research and strategic plans and policies like the draft Local Planning Strategy. This matter will be considered to some degree as part of preparing a Social Impact Assessment although it is not the responsibility of an individual proponent to undertake such a strategic assessment. Such assessments will be undertaken by the City, largely informed by the growing repository of relevant data, research, evidence and policy.</p>	<p>One (1) additional bullet point to be added to Section 6.1 as follows:</p> <ul style="list-style-type: none"> <i>'Consideration of potential legacy benefits for the community as a result of the development'.</i>
2.7				<ul style="list-style-type: none"> Under Section 6.2, Construction v operational phases, and in regard to dot point 1, "Only where those workforces cannot be accommodated in town-based short stay accommodation or permanent dwellings" is not a desirable outcome, and a reconsideration of the wording is recommended. 	<p>Uphold. The accommodation of large construction workforces in town-based accommodation is unlikely to be appropriate given their potential short term impact on the community. The wording of this section will therefore be modified to reflect this.</p>	<p>Text to be modified as follows –</p> <p><i>'... primarily during the construction phase of major projects where those workforces cannot be accommodated in other TWAs and it would be inappropriate to accommodate those workforces in town-based short-stay accommodation or permanent dwellings, recognising that construction workforces on such projects are typically large and short-term and may have the potential to negatively impact on the local community'.</i></p>
2.8				<ul style="list-style-type: none"> Under Section 6.3, Permissibility of other uses, the request for separate applications is not lawful under the State's Planning legislation and therefore the wording should be amended to encourage the submission of separate applications. 	<p>The definition of TWA is intended to accommodate transient workers only, and does not explicitly allow for other commercial uses.</p> <p>It is recognised that TWA facilities are designed to be self-sufficient and there may be a case for allowing some other publicly available commercial facilities in some cases. The purpose of this requirement is to ensure such commercial uses are appropriately considered and approved, not just allowed as incidental uses to the primary TWA use. This is consistent with other developments which require specific</p>	<p>Update Section 6.3 as follows:</p> <p><i>'The provision of commercial uses on TWA sites and/or public access to on-site amenities shall be subject to a separate planning approval, unless expressly included in an existing approval. A single planning</i></p>

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					<p>use approvals as part of the same application.</p> <p>The requirement to obtain separate planning approval for other (commercial) uses is required in accordance with Clause 4.1 of TPS 8.</p> <p>There may be some confusion in relation to this requirement, as it is apparent that some submitters believe that a separate planning application is required to be lodged (independent of the application relating to the TWA).</p> <p>This is not the case. A single application can request planning approval for a number of uses, however each specific use will be determined individually. It is acknowledged that the current wording of the provision may be ambiguous in this regard. It is recommended the text be updated to clarify the requirement.</p>	<i>application can request approval for multiple uses’.</i>
2.9				<ul style="list-style-type: none"> In regard to Section 6.6, Development Standards: <ul style="list-style-type: none"> a. The Commission notes It is good planning practice to include any development standards within the LPS; and b. Table 1 was not included with the Policy, and therefore the development standards were unable to be assessed or commented on by this review. 	<p>Noted. Table 1 was an omission from the advertised version of DP10. Copies of Table 1 were referred to those who requested a copy. Table 1 has been revised to distinguish between the development standards for the various types of TWA. It is recommended the draft revised policies, including revised Table 1, be publicly advertised prior to being finally adopted. This will provide opportunity for further review.</p>	Revised Table 1 be readvertised with draft revised policies to give submitters the opportunity to comment on recommended revisions.
2.10				<ul style="list-style-type: none"> Under Section 6.7, <i>Assessment of Social Impact</i>: <ul style="list-style-type: none"> a. Whilst the requirement for a Social Impact Assessment (SIA) is supported in principle, it should be noted that generally SIAs are not required for major projects, but rather a targeted assessment of economic, social or community impacts relevant to the project should be included. SIAs can result in significant costs and time delays to projects on matters that are unrelated to the project; and b. The reference to "clause 3.8 below" needs correction and clarification on its impact on this section of the Policy. 	<p>Noted. It is not intended that the draft SIA Policy duplicate the DSD impact assessment process, rather provide guidance for the assessment of proposals referred to the City under State Agreement Legislation or via other State review processes for comment, not to mention applications referred to the local government for a decision. It is hoped that this policy will assist the City and others address social impact considerations as part of preparing and reviewing particular types of development proposals, and thereby contribute to more efficient processing.</p> <p>Noted and agreed.</p>	<p>Adopt for further public advertising a draft revised version of DP20 to better reflect the acknowledgement of other project assessment processes such as the ISA Framework and the intention to use DP20 to help streamline those processes.</p> <p>Number reference to be updated accordingly.</p>
2.11				<ul style="list-style-type: none"> In regard to Section 6.8, <i>Framework for contributions</i>, and all associated subsections, the following comments are provided: <ul style="list-style-type: none"> a. Given the method, status, and non-relationship to the State's Planning Policy (SPP) 3.6 of the contribution agreements, it's likely that these could be successfully challenged in the State Administrative Tribunal, and therefore it's recommended that further consideration be given to this section. It may be beneficial for the policy to include the principles of SPP 3.6, i.e. the needs and nexus test; and b. Under 6.8.3, the reference to “clause 3.8 below” needs correction and clarification on its impact on this section of the Policy. 	<p>The contribution framework proposed by the draft Policy has not been prepared under the provisions of SPP 3.6. McLeods Barristers and Solicitors provided the following legal advice on 3 September 2013 in relation to similar concerns raised by the DoP on the draft interim TWA policy adopted by Council for public advertising at its May 2013 meeting:</p> <p><i>“It can’t reasonably be suggested however that the contribution mechanisms contemplated in SPP 3.6 are appropriate for the type of temporary TWA that the Shire is presently encountering”.</i></p> <p>The framework has however been prepared to be generally consistent with the underlying principles. These principles are specifically listed within Clause 6.8.3 of the Draft Policy.</p> <p>Noted and agreed.</p>	<p>No modification required.</p> <p>Number reference to be updated accordingly.</p>
2.12				<ul style="list-style-type: none"> In regard to Section 7, Application Requirements, it's recommended that under dot point 2, a reference to the location of the Infrastructure plan be incorporated into the point. 	<p>Noted however the City is unclear as to what the submitter means in terms of the ‘Infrastructure Plan’.</p>	No modification required.
2.13				<p><u>Draft SIA</u></p> <ul style="list-style-type: none"> How is a requirement for a Social Impact Statement (SIA) and Social Impact Management Plan (SIMP) going to be enforced on proposals that only require Shire comments? It is understood that the Department of State Development (DSD) will be addressing the potential project implications of the requirements for SIA. 	<p>The City will use its policy to assist in the consideration of proposals referred to it for comment. It is hoped that the policy will provide clear guidance to proponents about the City's expectations and that this contributes to quicker processing of proposals.</p> <p>Noted and acknowledged. Refer to Officer Response at row 1.3.</p>	<p>No modification required.</p> <p>Refer to Officer Recommendation at row 1.3.</p>

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				<ul style="list-style-type: none"> Section 6.4, Social impact assessment scope and methodology, makes references to Section 8.1 and 8.4, and these require correction and a clarification on their impact on this section of the Policy. 	Noted and agreed.	Number reference to be updated accordingly.
3	29 April 2014	Department of State Development	1 Adelaide Terrace EAST PERTH WA 6004	<p>The Department does not support the Shire's approach in relation to these policies for the reasons outlined below.</p> <ul style="list-style-type: none"> The State's preferred approach to the facilitation of support infrastructure for major projects is the Infrastructure and Services Assessment (ISA) Framework, which is also being utilised as part of the Anketell project. 	Noted and acknowledged. The intention of the Policy in relation to such matters is to provide a framework against which such proposals can be considered, thereby providing more clarity and efficiency. The Policy does not, and cannot preclude other State-level processes. The Policy is at least a reference for consistent consideration of such projects. Nonetheless, the policy would benefit from further consideration about how it can be better integrated into higher level assessment processes rather than duplicating other processes or creating another process.	Refer to Officer Recommendation at row 1.3.
3.1				<ul style="list-style-type: none"> The ISA framework has been embedded within the Department's project facilitation process to improve facilitation of major resource and infrastructure projects for which the Department is Lead Agency. There would appear to be no rationale for a proponent to undertake both a social impact assessment and an ISA. 	Noted. Refer to points made above.	Refer to Officer Recommendation at row 1.3.
3.2				<ul style="list-style-type: none"> Section 6.1 of the draft Social Impact Assessments policy indicates that the policy will apply to proposals covered by State Agreements. For State Agreement projects, the Minister's decision is the final decision. Additional approval processes should not be imposed to operate after the Minister's approval. 	Noted. Refer to points made above.	Refer to Officer Recommendation at row 1.3.
3.3				<ul style="list-style-type: none"> State Agreement companies already submit documentation such as Community Development Plans, Local Participation Plans and Local Content Reports. The draft Social Impact Assessments Policy may therefore result in the duplication of approvals processes. It will also be difficult to impose upon State Agreement proponents the obligation to submit social impact assessments where it is not specifically a requirement under the relevant State Agreement. 	Noted. Refer to points made above.	Refer to Officer Recommendation at row 1.3.
3.4				<ul style="list-style-type: none"> The Department supports a coordinated and consistent approach to transient workforce accommodation across the Pilbara rather than the development of separate strategies/policies for each local government area. 	Noted. A State-wide approach to TWA is supported and the City is actively participating in the process to prepare a State-level planning policy. The adoption of such a policy is likely some time away. There is a critical need for the City to progress its own independent local planning policy to guide decision making in the interim. Even once such a State-level policy comes into effect, there will likely still be a need for a local level policy.	No modification required.
4.	23 April 2014	The Mac	GPO Box 2720, Cloisters Square, WA 6850	<ul style="list-style-type: none"> TWAs should not be restricted to a specified construction project but should be able to service multiple projects if required. 	Noted. There is no objection to TWA facilities servicing multiple construction projects. The current Policy framework does not restrict this from taking place.	No modification required.
4.1				<ul style="list-style-type: none"> The MAC does not agree to a policy where the type of user is restricted (i.e. Operational, general public etc). 	Noted. Following consideration of all submissions, it is recommended that the draft TWA policy be revised to distinguish base-level TWA supply from construction camps. The MAC forms part of the base-level TWA supply. Less restrictions will apply to base-level TWA supply, although users would need to fit within the transient worker definition. It is recommended that the draft revised policy still encourage residential operational workforces but now promote a higher standard and integrated form of development for FIFO operational workforces.	Adopt for further advertising a draft revised version of DP10 to distinguish between a construction camp, base-level TWA supply and high standard integrated TWA developments in urban neighbourhoods.
4.2				<ul style="list-style-type: none"> Short term TWAs (restricted to the term of the construction project) will be of low quality and have limited ability to provide any legacy/community benefits. 	Noted. Following consideration of submissions it has become clear that there is a need to distinguish base-level TWA supply from construction camps. The MAC forms part of the base-level supply so will not be restricted to the same degree as TWAs approved as construction camps. The appropriateness of including The MAC in a TWA zone will need to be considered as part of the Scheme Review.	Refer to Officer Recommendation at row 4.1.
4.3				<ul style="list-style-type: none"> 2.2 Exclusions <i>Transient workforce accommodation facilities are exempt from this Policy</i> 	Noted and agreed. 'Permanent basis' in this circumstance refers to residential development, where the	Text to be updated as per suggestion.

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				<p>where:- a) the provisions of State Agreement Legislation and the Mining Act 1978 overrule the Act and the Scheme; and b) it involves the construction of dwellings intended for human occupation on a permanent basis. Such buildings are subject to the Codes.</p> <p>Suggest using “or” instead of “and” between points a) and b).</p> <ul style="list-style-type: none"> Define “permanent basis”. 	occupant resides at the dwelling on a permanent basis.	
4.4				<ul style="list-style-type: none"> Clarify the difference between Short Stay Accommodation, Temporary Accommodation and Transient Workforce 	<p>The difference between these use classes is presented within the draft Policy. A transient worker refers to the end user of TWA and TWA refers to the specific structures/buildings.</p> <p>Short stay accommodation is a type of temporary accommodation which restricts occupancy by the same person to 3 months in any 12 month period.</p>	No modification required.
4.5				<p>Short stay accommodation has the meaning given to it in the Scheme. That is a premises used for accommodation that may be occupied by the same person(s) for a maximum period of three months within any twelve month period, and are not subject to a residential tenancy agreements (residential leases).</p> <p>Define “premises”.</p>	‘Premises’ is not specifically defined within TPS 8 however is defined within the Model Scheme Text as ‘land or buildings’.	No modification required.
4.6				<p>Temporary accommodation means an accommodation use that is not permanent.</p> <p>Define “not permanent”.</p>	‘Not permanent’ in this circumstance can be defined as accommodation which is constructed for a <u>temporary</u> period of time.	No modification required.
4.7				<ul style="list-style-type: none"> What definition do the hotels, caravan parks, rental properties and service worker accommodation come under? 	<p>In accordance with the City’s TPS 8, there are separate use classes for the uses hotel and caravan park and therefore the definition for each is in accordance with TPS 8.</p> <p>The definition of a rental property would depend on the nature of the development – ie. Whether the property is for permanent residential or temporary workforce purposes.</p> <p>The land use classification of service worker accommodation under TPS 8 again would depend on the nature of the development (permanent residential or temporary workforce purposes).</p>	No modification required.
4.8				<p>Transient worker is a worker that stays in the Shire while working in the Shire on a continuous work program but who lives elsewhere (ie. a worker on a fly in-fly out roster).</p> <ul style="list-style-type: none"> What is the relevance of the words “on a continuous work program”? 	‘On a continuous work program’ is intended to distinguish a FIFO worker from other potential guests including a business traveller or tourist. This will help ensure TWA developments continue to be used for their intended purpose.	No modification required.
4.9				<p>Consequences: This policy represents the formal policy and expected standards of the Shire. Appropriate approvals need to be obtained prior to any deviation from the policy. It is imperative that Councillors and Officers retain appropriate documentation to substantiate their expenditure. Elected Members and Employees are reminded of their obligations under the Shire’s Code of Conduct to give full effect to the lawful policies, decisions and practices of the Shire.</p> <ul style="list-style-type: none"> Non-material comment: What is the relevance of this paragraph to this policy? 	Section 4.0 of the draft Policy clarifies the status of the Policy and demonstrates the requirements of Council in terms of their obligations under the Shire’s Code of Conduct. This is a standard provision incorporated within the City’s Policy suite.	Adopt for further advertising a draft revised version of DP10 that includes more relevant statements in relation to consequences.
4.10				The recent construction phase experienced in the Shire has resulted in far more TWA beds being available and approved than are forecast to be required in coming years (Shire of Roebourne Local Planning Strategy Evidential Analysis Paper, September 2013). The Shire’s preference is to accommodate workers in		

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				<p><i>more permanent forms of town-based accommodation wherever possible, preferably dwellings. Where there are intentions to accommodate FIFO operational workers in other forms of accommodation, the Shire expects the development to be of a high standard, suitably integrated with surrounding development, not a typical camp situation or layout.</i></p> <ul style="list-style-type: none"> Market forces will lead to the closure of smaller, operationally inefficient, poorly located TWA's. Fewer, suitably sized (larger) and higher standard TWA's are sustainable. Allowing TWA facilities to accommodate <u>all</u> workers will encourage higher quality and better integrated developments. Last sentence: Whose "intentions" is this referring to? The applicant or the operational worker? What "other forms of accommodation" is this referring to? 	<ul style="list-style-type: none"> Agreed that market forces will be the biggest influence on TWA bed supply. Following review of all submissions, it is recommended that the policy be revised to distinguish between TWA development intended for base-level supply and TWA intended as a construction camp. The expected quality of development will depend on its intended function, with a preference for operational FIFO workers to be accommodated in developments that are compatible with and integrated into an urban setting. This is referring to the intentions of the Applicant. It is recommended reference to "other forms of accommodation" be replaced with reference to "on a permanent basis". 	Replace reference to "other forms of accommodation" with reference to "on a permanent basis".
4.11				<p><i>The Pilbara Cities initiative seeks to facilitate the development of a hierarchy of urban settlements where people choose to settle on a permanent basis, a place to raise families with access to high standards of education, health and diverse employment and career opportunities. To that end, there is a clear intent at the State, Regional and Local Government level to promote a local skilled workforce and facilitate a transition to a permanent town-based population that supports facilities in a manner that is beneficial to the workers, employers and the broader community.</i></p> <ul style="list-style-type: none"> Agree people are free to "choose" to settle on a permanent basis. TWA's are part of the hierarchy of urban settlements and can assist people in transition to settling on a permanent basis. The initiative and intent expressed can still be achieved through policy that encourages high quality TWA facilities providing accommodation for <u>all</u> workers. 	<p>Noted. For people to choose to settle in the City on a permanent basis there needs to be employment opportunities. Residential workers and their families generate far more employment opportunities than FIFO workers. The critical role TWA plays during the construction phase of major resource projects and to accommodate peak short-term workforce requirements is acknowledged. It is further acknowledged that fly-in fly-out work will continue to be a significant employment model in the Pilbara.</p> <p>It is not accepted that TWAs are part of the hierarchy of urban settlements although it is accepted that people can transition from TWA accommodation to becoming permanent residents.</p> <p>It is not clear how such an approach achieves the transition. Following review of all submissions, it is recommended that the policy be revised to distinguish between TWA development intended for base-level supply and TWA intended as a construction camp. The expected quality of development will depend on its intended function, with a preference for operational FIFO workers to be accommodated in developments that are compatible with and integrated into an urban setting.</p>	No modification required.
4.12				<p><i>The Shire acknowledges the critical role Transient Workforce Accommodation plays during the construction phase of major resource projects and to accommodate peak short-term workforce requirements associated with maintenance shut downs.</i></p> <ul style="list-style-type: none"> TWAs play a critical role in more than just resource industry projects. They provide workforce accommodation across multiple projects and industry sectors. 	<p>Noted. It is acknowledged that TWA provides accommodation for other industry sectors and projects, however the primary purpose should be for construction and maintenance shut downs. It is questionable whether TWAs play a critical role in accommodating other workers.</p>	No modification required.
4.13				<p><i>The Shire's aspiration is that workforce accommodation needs should be met as much as possible through more permanent forms of town-based accommodation, rather than transient workforce accommodation.</i></p> <ul style="list-style-type: none"> Whilst we acknowledge the Shire's aspiration and preference, our position is that <u>all</u> workers and employers should have freedom of choice in the availability of accommodation options. Policy that restricts TWA usage does not make town based accommodation (R-Code accommodation) more attractive. 	<p>Noted. Civeo's position is acknowledged. There is now choice in accommodation options and residential is becoming more feasible. Land can only be used and developed in accordance with approvals under the planning scheme.</p> <p>TWA should be used for the purpose for which it is intended. Statutory planning by nature places boundaries on use permissibility for the benefit of the community. The City wants to transition to more sustainable local economies and communities. It is important for all parties to consider how that transition can be achieved.</p>	No modification required.

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4.14				<p><i>The Shire is committed to helping to grow and develop the local economy and the local community. While TWAs do make a contribution, they are only intended to serve a specific purpose (that being transient worker accommodation). In all cases except within a TWA zone, this is on a temporary basis. Acceptable forms of more permanent accommodation should be distinguished from typical TWA uses.</i></p> <ul style="list-style-type: none"> The purpose of, and the points made in this section are not clear. Suggest rewording for clarity. 	Noted. Additional clarification may be required to distinguish acceptable forms of more permanent accommodation from typical TWA uses. It is considered, however, that the only point that needs to be clarified is the acceptable forms of more permanent accommodation. After considerable research and reviewing all submissions, it is recommended that distinctions be made on the intended purpose of the TWA, tenure, zoning and the standard of development, and efforts to integrate the development into an urban neighbourhood for long term operational FIFO workers.	Include additional clarification to distinguish acceptable forms of more permanent accommodation based on intended purpose, tenure, zoning, the standard of development and efforts to integrate the development into a neighbourhood if for long-term operational FIFO workers.
4.15				<p><i>The Shire limits timeframes and the scope of uses permitted under the use class transient workforce accommodation to reflect the intention for the use.</i></p> <ul style="list-style-type: none"> Where TWAs are within the appropriate zoning there should be no time limit. Limits on timeframes and uses produce low quality facilities and restrict opportunity for legacy contributions or benefits to the community. 	The Transient Workforce Accommodation zone is the only zone within the Scheme where TWA is a permitted use and where TWA as a permanent use is contemplated. While there are good planning reasons for applying a time-limited approval period of five (5) years to temporary TWA uses, it is evident from research and from reviewing submissions that there needs to be a base-level supply of TWA beds. It is also a reasonable contention that a high quality facility requires a longer-term approval to justify investment. There is little concern about the quality of a construction camp development, given its temporary nature, so there should be less concern about a five (5) year approval for such a facility. There should be an expectation of greater permanency of use over freehold title. A TWA development contributing to base-level supply, however, should be of a higher standard given its more general need and should therefore receive longer-term approvals. Ultimately TWA developments designated for base-level supply should be zoned TWA.	The policy be revised to allow for longer-term approvals for tem (10) years for developments designated for base-level supply, based on freehold tenure, with the ultimate aim of including base-level supply TWA developments in TWA zones.
4.16				<p><i>The Shire believes a community contribution should be made by TWA proponents at the time of initial approval as there is a relative loss of community service and benefit in approving TWAs due to association with FIFO working arrangements.</i></p> <ul style="list-style-type: none"> The MAC is not opposed to community contributions. However, the MAC is unaware of any credible/impartial evidence to support the statement “there is a relative loss of community service and benefit in approving TWAs due to association with FIFO working arrangements”. This statement should not be presented as the justification for a community contribution. Well managed, high quality TWAs can provide significant benefits to the community. Limits on time and uses restrict the ability to pay contributions. The MAC would support contributions based on occupancy above a certain threshold. 	<p>Noted. There is a wealth of evidence and it is quite obvious that TWAs through association with FIFO working arrangements result in a relative loss of community service and benefit in comparison to residential workers.</p> <p>It is acknowledged that TWAs provide some benefits to the community.</p> <p>Limits on time and uses are required to reflect the intention for TWA. It is accepted that the shorter the period of approval, the less capacity there is to provide legacy/community contributions. It is important to know the intention for a TWA development to determine appropriate approval timeframes and expected development standards.</p> <p>The City is encouraged that The MAC is prepared to consider contributions. Where contributions are considered appropriate, the proposal for contributions based on occupancy above a certain threshold is something the City would be prepared to consider and discuss further with TWA proponents.</p>	No modification required.
4.17				<p><i>Where transient workforce accommodation is a ‘discretionary’ or ‘advertised’ use in a particular zone, the following matters shall be considered by the Shire in determining whether it should exercise its discretionary powers and approve TWA in that zone of the Scheme:</i></p> <ul style="list-style-type: none"> The MAC supports a more rigid approval process when TWAs are applied for outside a TWA zone. 	Noted. The use permissibility under the Scheme cannot be changed via this Policy. The Policy does guide decisions, however, on how discretion under the Scheme is applied. To this end, following review of all submissions, it is recommended that TWA on Crown land only be used for construction camps and that TWA currently on freehold land form part of the base-level supply, with the ultimate aim of including all base-level supply TWA in a TWA zone. This will provide a more prescriptive approach to determining TWA.	No modification required.
4.18				<p><i>Whether the TWA is needed to service the needs of a construction project, construction phase or maintenance shut down.</i></p> <ul style="list-style-type: none"> Include operational phase. 	Noted. While after reviewing research and all submissions, the City accepts there is a need for base-level supply of TWA beds, it is the City view that operational accommodation needs should primarily be met within town-based permanent accommodation, where possible. The City is prepared, however, to consider TWA for operational FIFO workers where the development is embedded and integrated into a neighbourhood.	The Policy be revised to recognise the need for base-level supply TWA as well as TWA for construction projects and the differences in these facilities.
4.19				<p><i>The cumulative impacts of multiple TWA developments on the sustainability and liveability of affected towns and the Shire generally.</i></p> <ul style="list-style-type: none"> TWA’s of fewer than 200 beds are operationally inefficient and tend to 	Noted.	No modification required.

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				struggle when market rates reduce. Fewer, larger and better TWA's are sustainable.		
4.20				<p><i>Such other matters as considers relevant, including matters identified in Section 4.4 of the Scheme</i></p> <ul style="list-style-type: none"> The commercial viability of the project requiring a TWA must be considered. 	Noted. The commercial viability of a particular project is a key consideration for the Applicant.	No modification required.
4.21				<p>6.2 Construction v operational phases <i>As a matter of principle, the Shire supports the use of TWA to provide for:</i></p> <ul style="list-style-type: none"> The MAC does not consider it appropriate to restrict operational workforces from using TWAs. 	Noted. Refer discussion above at row 4.18.	No modification required.
4.22				<p>peak <i>workforce demands during the construction phase of major projects only where those workforces cannot be accommodated in town-based short-stay accommodation or permanent dwellings or other TWAs; and</i></p> <ul style="list-style-type: none"> Suggest rewording as marked. 	Noted. It is not considered necessary to revise the provision as suggested, although it is recommended that the provision be revised.	Text to be modified as follows – <i>'... primarily during the construction phase of major projects where those workforces cannot be accommodated in other TWAs and it would be inappropriate to accommodate those workforces in town-based short-stay accommodation or permanent dwellings, recognising that construction workforces on such projects are typically large and short-term and may have the potential to negatively impact on the local community'.</i>
4.23				<p>peak <i>short-term workforce requirements associated with maintenance shut downs.</i></p> <ul style="list-style-type: none"> Based on the suggested wording above, this point is not necessary. 	Noted. Suggest wording above is not recommended.	No modification required.
4.24				<p><i>As a matter of principle, the Shire's preference is for operational workforces to be accommodated in town-based permanent dwellings, wherever possible. The Shire believes there are good business reasons for considering this option. The Shire encourages dialogue with companies in the consideration of such options.</i></p> <ul style="list-style-type: none"> Whilst the Shire's preference is acknowledged, policy must not deny employers and workers freedom of choice in their accommodation options. The MAC encourages fact based dialogue. 	<p>Noted. The draft policies do not deny employers and workers freedom of choice in their accommodation options within the scope of permitted uses as approved under the planning scheme.</p> <p>The City supports fact based dialogue.</p>	No modification required.
4.25				<p><i>Where there are intentions to accommodate FIFO operational workers in other forms of accommodation, the Shire expects the development to be of a high standard, suitably integrated with surrounding development, not a typical camp situation or layout. Acceptable forms of accommodation should be distinguished from typical TWA uses.</i></p> <ul style="list-style-type: none"> This paragraph is not clear. Whose "intentions"? Suggest rewording. The MAC encourages good standard, financially viable, integrated workforce accommodation facilities. 	<p>The 'intentions' is referring to the intentions of the Applicant, when an application for planning approval is lodged with the City.</p> <p>Noted. While The MAC can be considered part of the base-level supply of TWA beds it does not represent the type of development referred to for accommodating operational FIFO workers. The Policy should be revised to more clearly define the type of development expected for accommodating operational FIFO workers.</p>	The Policy be revised to more clearly define the type of development expected for accommodating operational FIFO workers.
4.26				<p>6.3 Permissibility of other uses <i>The provision of other commercial uses on TWA sites and/or public access to on-</i></p>	Uphold. Refer discussion at row 2.8 above.	Text modifications as per row 2.8.

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				<p><i>site amenities shall be subject to a separate planning application, unless expressly included in an existing approval.</i></p> <ul style="list-style-type: none"> Certain “commercial uses” such as shops, bars and restaurants are integral parts to successful TWAs. Therefore why is a separate application necessary? This could add uncertainty and lengthy approval time to the commercial business case of a TWA investment. 		
4.27				<p><i>Applications for other commercial uses such as short stay accommodation, restaurants, function centres and take-away food outlets shall be considered on their merits. It is noted that TWA is intended to accommodate transient workers only.</i></p> <ul style="list-style-type: none"> The MAC does not support any restriction on who stays at TWAs. 	Noted. Refer previous discussion above at row 4.18.	No modification required.
4.28				<p>6.4 Time limited temporary use</p> <ul style="list-style-type: none"> A TWA facility restricted to a maximum 5 year term would be of low quality and need to charge very high rates. Further, the ability to deliver community contributions, benefits or legacy items is compromised. A minimum of 15 years is required to deliver commercially viable, quality facilities that support the community and guests staying there. Council also needs to consider the commercial impact any conditions have on the projects serviced by the TWAs and the subsequent economic impact across the Pilbara and WA. Policy that renders TWAs not viable could undermine the industries that are the mainstay of the local economy. It is inappropriate to require TWA applicants to provide details of occupancy, contracts or bookings as this would compromise commercial confidentiality. It is up to the applicant to satisfy whether there is adequate demand to service the project. 	<p>Noted – in relation to time limits, refer to Officer Response at row 4.15.</p> <p>The local TWA market is currently highly competitive and this benefits projects serviced by TWAs. In addition, house prices and rents are normalising, the labour pool has expanded and the resources sector is moving into increased sustained operations. Industry and business will continue to monitor changes in market conditions and adjust business models to suit.</p> <p>Policy will not render TWAs unviable. The market will determine the viability of TWAs. The revised draft TWA policy is only intended to assist in implementing the vision for the Pilbara and the City. If TWA camps are needed, the policy supports their approval. If no more TWA camps are needed, the policy promotes their rationalisation and transition to other uses.</p> <p>The commercial confidentiality of certain information is respected. In the absence of details on occupancy or booking details, however, it is difficult to determine whether use is in accordance with approvals and to demonstrate the need for TWA beds to be approved or reapproved. Any such information would be treated by the City in complete confidence, and would not be made publicly available.</p> <p>Agreed. There is a requirement, however, for use to comply with approval under the planning scheme.</p>	The Policy be revised as per Officer Recommendation at row 4.15.
4.29				<p>6.6 Development Standards <i>Table 1 of this Policy sets out the development standards for TWA applications. All TWA applications will be required to demonstrate compliance with these standards. Where variations from specific development standards are proposed, justification will be required.</i></p> <ul style="list-style-type: none"> We have not had sight of Table 1 of this Policy. 	Noted. A copy of Table 1 was sent to the submitter. It is important to retain Table 1 to provide guidance on development standards for TWA developments, particularly given the additional attention to distinguishing construction camps from base-level supply TWA and TWA for operational FIFO workers, and the different development standards that apply to each type.	Table 1 to be updated to distinguish between the types of TWA facilities and the development standards that apply to each type.
4.30				<p>6.7 Assessment of Social Impact <i>All TWA applications will be required to be accompanied by a Social Impact Assessment and Social Impact Management Plan in accordance with the Shire's relevant local planning policy. Where a social impact assessment and social impact management plan have previously been prepared, a review only of that document will be required, with any updates and modifications incorporated into a revised version.</i></p> <ul style="list-style-type: none"> Clarify if second sentence refers to an amended application or renewal of application. 	Second sentence relates to both an amended application and renewal of application (to extend the time limit for instance).	No modification required.
4.31				<i>Management measures to be undertaken in accordance with the social impact</i>	Agreed. Text to be updated accordingly.	Text to be updated accordingly.

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				<p><i>management plan may include contributions in accordance with clause 3.8 below but need to address the full range of social impacts following guidance provided by the Shire's Social Impact Assessment Policy.</i></p> <ul style="list-style-type: none"> Amend "3.8" to "6.8" 		
4.32				<p>6.8 Framework for contributions</p> <ul style="list-style-type: none"> The MAC has no objection to contributions provided they do not render the TWA non-viable. The MAC is unaware of any credible/impartial research to support the claim "there is a relative net loss in community service and benefit as a result of FIFO TWA living compared to town-based living". This statement should not be presented as the justification for a community contribution. If the Shire has the relevant research available The MAC would appreciate receiving a copy. High quality, well run TWAs can provide significant benefit to the community. 	<p>Noted. As stated in the draft Policy, there is credible research which demonstrates that there is a potential relative net loss in community service and benefit as a result of FIFO/TWA living compared to town-based community living. This research and relevant legislation has been investigated in detail as part of reviewing TWA proposals and in the preparation of the draft Policies.</p> <p>The City has provided Civeo (The MAC) with some of the relevant studies. The City would be happy to direct Civeo or any other interested parties to other relevant documents.</p> <p>It is acknowledged that TWAs provide benefits to the community.</p>	No modification required.
4.33				<p>6.8.1 Form of contributions 6.8.2 Establishing a standard rate for contributions</p> <ul style="list-style-type: none"> The contributing company should be offered the opportunity of receiving public recognition for the contributions made. Council should also consider the impact any contributions will have on projects the TWAs are servicing and the subsequent economic impact across the Pilbara and WA. 	<p>Noted. Agreements with contributing companies can include the requirement for public recognition.</p> <p>The draft Policy seeks to address the impact TWAs have on the local community and local economy by trying to obtain a better balance and an appropriate mix of accommodation and worker types. The local TWA market is currently highly competitive and this benefits projects serviced by TWAs. In addition, house prices and rents are normalising, the labour pool has expanded and the resources sector is moving into increased sustained operations. Industry and business will continue to monitor changes in market conditions and adjust business models to suit.</p>	No modification required.
4.34				<p>6.8.3 Principles for contributions</p> <ul style="list-style-type: none"> "Accountable" or "Accountability"? 	Text should read 'accountability'. Text to be updated.	Text to be updated accordingly.
4.35				<p>7. Application Requirements</p> <ul style="list-style-type: none"> "Decommissioning/Rehabilitation Plan" – clarify the link between this point and 6.5. "Decommissioning/Rehabilitation Plan" or a "Decommissioning/Transition Plan" as per 6.5? 	Uphold. Text should read 'Decommissioning/Transition Plan' and should relate to Section 6.5 of the Policy.	Text to be updated accordingly.
5.		Rio Tinto Iron Ore (RTIO)		<ul style="list-style-type: none"> The 2014 TWA Policy has the potential to impact RTIO's development. It is our view that maintaining this mix is essential for the optimal functioning of our operations, and ensuring sustainable housing arrangements in the Shire. 	Noted.	No modification required.
5.1				<ul style="list-style-type: none"> We hold a similar view to the Shire that TWA is only one element within the overall context of economic development. RTIO remains focused on the sustainability and liveability of the towns in which employees work and live. To this end we continue to work towards revitalising towns within the Shire, as well as supporting a large range of community initiatives with many partners, including the Shire itself. 	Noted and appreciated. Rio Tinto is a model corporate citizen.	No modification required.
5.2				<ul style="list-style-type: none"> In 2013 the Shire signed the Community Infrastructure Services Partnership 	Noted and appreciated. The City acknowledges the existing capital contributions	No modification required.

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				with RTIO which sets out undertakings to deliver better infrastructure, services and events to the community. RTIO has made significant capital contributions towards creating sustainable, liveable communities within the Shire. In recent years we have contributed to the Karratha Leisureplex facility, the Wickham Recreation Precinct and the Wickham town transformation.	Rio Tinto has made and looks forward to an ongoing collaborative working relationship. Existing contributions will be recognised and factored into any project-based discussions, as stated in the draft Policy.	
5.3				<u>TWA Policy</u> <ul style="list-style-type: none"> It is the position of RTIO that our State Agreements provide certain exemptions that have the effect of making it beyond the power of the Shire to apply the 2014 TWA Policy to RTIO TWA facilities. 	Noted. The exemptions applicable under State Agreements are acknowledged. The City would like to keep working with Rio Tinto to help deliver projects in a fair and reasonable way. The City will use the TWA policy and SIA policy as guides to providing comments on relevant proposals under State-level referral processes. It is hoped the policies contribute to providing more clarity and efficiency of process.	No modification required.
5.4				<ul style="list-style-type: none"> 2.2 – State Agreements RTIO welcomes the recognition that TWA facilities are exempt when provisions of State Agreements and the <i>Mining Act 1978</i> (O/VA) apply. Currently RTIO chooses to seek approval under the Shire's Town Planning Scheme (the Scheme) for TWA development. When making applications it is RTIO practice to make a qualifying statement regarding future plans that may be approved exclusively under a State Agreement. However RTIO may reconsider this approach in the future. 	Noted. The Shire appreciates Rio Tinto's current approach.	
5.5				<ul style="list-style-type: none"> RTIO has received legal advice which questions the ability of the Shire to impose policies such as the 2014 TWA Policy and the SIA Policy. For example, we draw the Shire's attention to the "No discriminatory rates" provisions of the State Agreements which govern RTIO operations. These provisions disallow local authorities to levy a discriminatory tax, rate or charge of any nature that impacts on the rights granted to RTIO under the State Agreements. It is our position that as a result of these provisions the Shire does not have the ability to levy a "contribution" as per the 2014 TWA Policy because it amounts to a charge not anticipated by the rights granted to RTIO under the State Agreement. 	Noted. The City's preference is to negotiate contributions directly with proponents at the most strategic level possible and as early in the process as possible to achieve efficiency of process, as has been the successful practice with Rio Tinto to this point. A contribution is only contemplated under the policy as a discretion. The need for a contribution should be evaluated based on a comprehensive social impact assessment that gives recognition to contributions already being made. Rio Tinto has undertaken the most successful social impact assessment program in the City's experience. The City would always seek to achieve an agreed outcome. Notwithstanding, in State Agreement areas the City is only a referral authority and otherwise, any decision of the Council (now predominantly the Pilbara JDAP) is open to independent review.	No modification required.
5.6				<ul style="list-style-type: none"> Further RTIO is concerned that through the 2014 TWA Policy the Shire seems to be directly linking a contribution payment to the granting of an approval for a TWA, irrespective of the nature of the proposed development and the other investment being undertaken by the Company within the Shire. 	As is mentioned above and in the draft Policy, other contributions need to be recognised as part of considering any proposal. The payment of a community contribution is one of various matters the Council will consider in exercising its discretion and determining applications for TWA. It is certainly not a sole determinant.	No modification required.
5.7				<ul style="list-style-type: none"> 2.2 – Exemptions, Permanent Dwellings RTIO submits that the 2014 TWA Policy does not clearly set out what, if any, TWA facilities would be exempted from the Policy. For example, clause 6.5.1 of the Scheme states that all TWA, whether designed as permanent or temporary structures, shall be in accordance with the TWA Policy. In our view certain TWA facilities should be exempt from the Policy, such as those which are constructed on a permanent basis and of higher quality. 	Uphold. The City's preference is for operational workers to be residents accommodated in self-contained dwellings. To Rio Tinto's credit, it has a residential workforce target for its operational workforce. In addition, Rio Tinto has invested in developments like Cajuput Villas: accommodation for its FIFO operational workforce that is of a high standard and fits into a residential neighbourhood. It is recommended that such developments should be exempt from the time restrictions that otherwise apply to TWA based on the effort and substantial investment that has gone into integrating this accommodation into an urban environment. While the preference for residential operational workers remains, development like this should be a model if operational FIFO is to be retained and incentives should be given to companies prepared to invest in such alternatives.	Text to be modified to more clearly draw the distinction between TWA camps and preferred forms of accommodation for operational FIFO workforces.
5.8				<ul style="list-style-type: none"> The Policy does not significantly differentiate between the requirements applicable to construction facilities and the requirements applicable to operational TWA facilities. 	Noted. Refer to comments above.	The Policy be revised as per Officer Recommendation at row 5.7.
5.9				<ul style="list-style-type: none"> The 2014 Policy sets out the Shire's preference for operational workforces to be accommodated in town-based permanent dwellings where possible; however we note there are operational FIFO employees that need to be housed in permanent TWA facilities, such as the newly constructed Cajuput Villas facility in Wickham. We also note that the 2014 Policy does not apply development standards to either classification of construction or operational facilities. For example, Table 1 does not discriminate between design criteria or development standards for construction camp facilities and permanent 	Uphold. Table 1 should be revised to distinguish between TWA camps and preferred forms of accommodation for operational FIFO workforces.	Table 1 to be modified to distinguish between TWA camps and preferred forms of accommodation for operational FIFO workforces.

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				higher quality town based operational TWA facilities.		
5.10				<ul style="list-style-type: none"> We seek clarification regarding how facilities like Cajuput Villas in Wickham would be treated under the Policy. In this case, the facility was constructed on residential zoned land and was approved as TWA accommodation. It was designed to comply with the Shire's operational TWA policy at that time and was built as a permanent facility occupied by FIFO workers on a non-permanent basis. It would appear that under the proposed 2014 TWA Policy, a facility like Cajuput Villas would not be differentiated from donga style construction workforce accommodation. 	<p>Noted. The Policy needs to more clearly distinguish developments like Cajuput Villas from TWA camps in terms of exempting such developments from time-limited approvals.</p> <p>Section 6.2 of the Policy already states that <i>'where there are intentions to accommodate FIFO operational workers in other forms of accommodation, the Shire expects the development to be of a high standard, suitably integrated with surrounding development, not a typical camp situation or layout'</i>.</p> <p>It is recommended Section 6.2 of the Policy be updated to clarify that that Council will take into consideration the matters outlined in Section 6.2 of the Policy when considering an application for FIFO operational workforce accommodation.</p>	<p>Section 6.2 to be updated to include the following additional text –</p> <p><i>'Where an application is received which proposes to accommodate FIFO operational workforces, Council will assess the application on its merits, having regard for the matters outlined in Section 6.1'.</i></p>
5.11				<ul style="list-style-type: none"> We understand the Shire is supportive of the high quality permanent facilities such as Cajuput Villas for operational FIFO employees, in proximity to town services as part of an overall strategy to facilitate integration. Notwithstanding this position, RTIO submits that key features of the current Policy, namely the five year time frame limits and the development contribution as applied to a Cajuput Villas style proposal could deter proponents from investing in and building such facilities in favour of more traditional donga facilities. 	Noted – as discussed above.	As above.
5.12				<p><u>2.2(b) - Clarification of Intended Exemption</u></p> <ul style="list-style-type: none"> RTIO seeks clarification on the exclusion provided by Clause 2.2(b) and the types of facilities intended to fall within this exclusion. We submit that dwellings intended for human occupation on a permanent basis (ie houses) are not TWA facilities and therefore do not require exemption from the policy. 	<p>The types of facilities intended to fall within the exclusion (2.2, b) include dwellings as defined by the Residential Design Codes.</p> <p>Should an application propose dwellings in accordance with this definition, it will be subject to the provisions of the Residential Design Codes, and will be exempt from this Policy.</p>	Text amended to 'Residential Design Codes' to clarify.
5.13				RTIO further submits that the reference "such buildings are subject to the Codes" may be misinterpreted because there are other buildings that are occupied on a temporary basis by two or more persons (ie Residential Buildings) that are subjected to the R Codes.	Agreed – text to be updated to 'dwellings and other buildings' to clarify.	Text amended to 'dwellings and other buildings' .
5.14				<p><u>6.1 Matters to be considered in exercising discretion</u></p> <ul style="list-style-type: none"> RTIO submits that assessment of "need" for a TWA facility is a commercial decision for our business. We will continue to provide the Shire with justification for any proposed TWA facility. 	Noted. It is acknowledged that need is a commercial consideration. The City's concern in relation to need is more from the perspective of whether more TWA beds are required to achieve the aims of regional growth and sustainable local communities and local economy. If more TWA beds are required, the City will support their introduction. If more TWA beds are not required to achieve regional growth and they could actually compromise the aim of sustainable local communities and local economy, then the City will review them very closely.	No modification required.
5.15				<p><u>6.2 Construction v operational phases</u></p> <ul style="list-style-type: none"> RTIO acknowledges the Shire's recognition that during peak periods TWA is required to house a large maintenance shut workforce. 	Noted.	No modification required.
5.16				<ul style="list-style-type: none"> RTIO also acknowledges the Shire's position that operational employees would ideally be non-transitory and accommodated in town based permanent dwellings. However, there will be an ongoing business need for some operational FIFO. In addition to maintenance shuts, there are a variety of tasks which are performed by contracting companies to support various aspects of ongoing operations that are not able to be supplied by a residential employment base. Resource companies require flexibility in contracting and employment arrangements to manage the cyclical nature of the industry, and FIFO continues to be an essential element in managing business demand. Arguably it is better to have sustainable growth in residential towns supplemented by FIFO practices that allow demand to be managed without creating a potential oversupply of housing in the event of a downturn. It is not practical for resource companies to house operational FIFO employees in residential accommodation. FIFO employees on 12 hour shifts 	Noted. The City encourages resource companies and their contractors to prepare housing strategies that demonstrate fair and reasonable consideration to, and appropriate balance between, a residential workforce and FIFO workers, and to give consideration to community contributions where operational FIFO workforces are contemplated. As is mentioned above, Rio Tinto has operational resident worker targets, which contributes substantially to the vision for the City.	No modification required.

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				need to have ready access to services and facilities (such as food, beverage, laundry, recreational facilities) close to their accommodation units. Furthermore, larger purpose built facilities enable FIFO employees to have all their needs met in relation to food preparation and room servicing.		
5.17				<p><u>6.3 Permissibility of other uses</u></p> <ul style="list-style-type: none"> The 2014 TWA Policy states that provision of other commercial uses on TWA sites and/or public access to on-site amenities is subject to a separate planning application. RTIO submits that incidental development relating to the TWA facility should be able to form part of the same development application. Including all development in the TWA application will create a more streamlined process that ensures development is not fragmented. The 2014 TWA Policy also states that the Shire will limit the scope of uses permitted at a TWA site. We would appreciate further clarification regarding the scope of uses permitted within TWA. We note that the Shire has previously stated that TWA development (particularly construction workforce facilities) should be provided with on-site facilities, such as recreational facilities (pool, ovals, gym etc), wet and dry mess, so as to minimise potential impacts to nearby communities facilities. We question why public access to on-site amenities requires a separate planning application. Public access has been encouraged in the past and, in some cases, mandated. The 2014 TWA Policy may discourage community integration through use of on-site facilities such as the central facilities building in Wickham. This building is an example of best practice design to meet the needs of the FIFO employees as well as provide open access to Wickham community members 	<p>Noted, refer discussion at row 2.8.</p> <p>The draft Policy is not seeking to preclude public access to TWA facilities. It is only trying to make sure TWA facilities are used for their intended purpose. If uses outside the scope of uses approved under the planning scheme are being or proposed to be undertaken, then those uses need to have their own approval. If there is concern that proposed additional uses may not be appropriate as part of a TWA development and may not represent a good planning outcome, the Council may choose to refuse such uses.</p>	Text to be revised as per Officer Recommendation at row 2.8.
5.18				<p><u>6.4 Time limited temporary use</u></p> <ul style="list-style-type: none"> The 2014 TWA Policy outlines a maximum time limit of five years will be applied to development approvals for new TWA, however the specific time limit will be at the discretion of the Shire. However, the 2014 TWA Policy does not specify whether the five year default time limit applies to construction and operational facilities or just construction facilities, and as stated above does not take into account the quality or permanence of the buildings and the broader investment in development made by the company. Given the 2014 TWA Policy states the Shire's preference for permanent operational facilities, we suggest should a time limit be necessary, this should only apply to construction facilities that are clearly intended to be temporary. 	Noted and agreed. Refer discussion at rows 5.7, 5.9 and 5.10.	Text to be updated as per rows 5.7, 5.9 and 5.10.
5.19				<ul style="list-style-type: none"> We seek confirmation as to whether the 2014 TWA Policy would apply to facilities such as Cajuput Villas in Wickham which was designed and constructed as a permanent building and not subject to an approval time limitation. Without security of tenure and approvals to match the investment made by the company in the long life design and operation of such facilities, there would be a significant disincentive to invest in high quality facilities. Cajuput Villas was twice the cost of a traditional donga village (on a per room basis and it would be an unfortunate consequence if the five year limit on planning approval encouraged the provision of more temporary structures. 	As discussed at rows 5.7, 5.9 and 5.10.	Text to be updated as per rows 5.7, 5.9 and 5.10.
5.20				<ul style="list-style-type: none"> In regard to the requirement to provide evidence of occupancy, contracts or bookings to demonstrate demand, RTIO would like to understand why this is considered to be a relevant consideration in assessment of a planning application. We submit that demand for the facility is a commercial consideration for the proponent, not the Shire. 	The commercial confidentiality of certain information is respected. In the absence of details on occupancy or booking details, however, it is difficult to determine whether use is in accordance with approvals and to demonstrate the need for TWA beds to be approved or reapproved. Any such information would be treated by the City in complete confidence, and would not be made publicly available.	No modification required.
5.21				<p><u>6.5 Decommissioning/Transitioning</u></p> <ul style="list-style-type: none"> The 2014 TWA Policy requires a decommissioning or transition plan to be 	Noted. The requirement for a decommissioning or transition plan does not apply if the facility is permanent or a renewal to the approval is granted. Some discretion	Include qualification in Section 6.5 that the requirements for

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				lodged with the Shire 18 months prior to the expiry of the planning approval for a TWA facility. RTIO seeks clarification if this is a requirement when the TWA facility is permanent, or in the event an extension of an existing approval is requested, which may not necessarily be known 18 months prior to the expiry of an approval. Given the dynamic nature of our industry a period of three months is more practical.	can be included to consider requests for reduced periods where there is still a commitment to prepare such plans.	decommissioning or transition plans only applies to time-limited approvals where renewal is not expected to be granted and provide some discretion to consider reduced periods for lodgement of decommissioning or transition plans where there is a commitment to preparing and implementing such a plan.
5.22				<ul style="list-style-type: none"> RTIO seeks further guidance from the Shire regarding the lodgement of transition plans. Specifically are transition plans required if an existing purpose will be retained after the five year threshold? We would appreciate clarification regarding the submission of a plan, as clause 6.5 requires that a plan is required to be submitted 18 months from closure; however clause 7 requires a plan to be lodged on application for planning consent. 	Noted. The Decommissioning/Transition Plan referred to in Section 7 is a preliminary plan showing the applicant is thinking about use beyond TWA. The Decommissioning/Transition Plan referred to in Section 6.5 is a detailed plan specifying how and when the TWA facility will be decommissioned and transition to another use.	Section 7 to be modified to refer to a “Preliminary Decommissioning/Transition Plan” Section 6.5 to be modified to refer to a “Detailed Decommissioning/Transition Plan”
5.23				<u>6. 7 Assessment of Social Impact</u> <ul style="list-style-type: none"> Section 6.7 of the 2014 TWA Policy states that where a social impact assessment and social impact management plan have previously been prepared, only a review of that document will be required, with any updates and modifications incorporated into a revised version. Any requirement for a social impact assessment should be consistent with the Shire's SIA Policy. 	Noted and agreed.	No modification required.
5.24				<u>6.8 Framework for contributions</u> <ul style="list-style-type: none"> RTIO considers that it is reasonable for a local government to require development contribution payments for community infrastructure where there is a demonstrated need for this infrastructure, particularly as a consequence of the particular development. We submit that the proponent's existing commitments should be considered in determining whether further contributions are necessary. In our view the 2014 TWA Policy should not create a disincentive for companies to invest separately in community infrastructure or facilities. 	Noted and agreed. Existing contributions made by Rio Tinto through a Memorandum of Understanding agreement with the City will be considered in the negotiation of contribution for new/extended facilities. The draft Policy currently contemplates this under Section 6.8.2 – ‘other contributions anticipated to be collected’.	No modification required.
5.25				<ul style="list-style-type: none"> We submit that further evidence is required to demonstrate the relative net loss in community service and benefit from having TWA facilities. Whilst FIFO employees can be seen as an opportunity cost compared with residential employees, we query the extent to which such FIFO facilities result in a tangible cost burden to the Shire or surrounding community that is required to be offset by a development contribution. We also note that the justification for differential rates charged on TWA facilities introduced by the Shire in 2013 was to deal with the impact that TWA properties have on the utilisation of the Shire's infrastructure, services and community amenities. 	While TWAs serve an important purpose, the continuing approval of TWAs does not align with the City long term view of where it is aiming to be in the future. The City, with contributions from others (including Rio Tinto) has invested in community infrastructure capable of servicing a population of 50,000. The City needs to maintain these facilities regardless of whether the people working in the City are residents or FIFO workers. The City wants to get the balance right between a sustainable local community and local economy and accepting a component FIFO workforce in achieving regional growth. Given the association of TWA developments with FIFO workforces, a community contribution is one way a TWA proponent can propose to achieve the balance. The rates the City charges on TWA developments is another.	No modification required.
5.26				<ul style="list-style-type: none"> We submit that a stringent process should be followed by the Shire to implement this process as established through the West Australian Planning Commission's (WAPC) State Planning Policy 3.6- Development Contributions for Infrastructure (SPP 3.6). SPP 3.6 sets out the standard development contributions for infrastructure applied by the WAPC on a subdivision, strata subdivision, or development of land. It also provides a consistent, accountable and transparent system for local governments to plan and charge for development contributions over and above the standard provisions through development contribution plans. Under this policy, local government planning schemes set out the system of charging through development contribution plans. This provides an 	The contribution framework proposed by the draft Policy has not been prepared under the provisions of SPP 3.6 and was never intended to. McLeods Barristers and Solicitors provided the following legal advice on 3 September 2013 in relation to similar concerns raised by the DoP on the draft interim TWA policy adopted by Council for public advertising at its May 2013 meeting: <i>“It can’t reasonably be suggested however that the contribution mechanisms contemplated in SPP 3.6 are appropriate for the type of temporary TWA that the Shire is presently encountering”.</i> The framework has however been prepared to be generally consistent with the underlying principles. These principles are specifically listed within Clause 6.8.3 of the Draft Policy.	No modification required.

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				<p>equitable system for planning and charging development contributions across defined areas, and provides certainty to developers, infrastructure providers and the community about the charges which apply and how the funds will be spent.</p> <ul style="list-style-type: none"> RTIO notes that the Shire may not wish to be tied to the requirements of SPP 3.6. However we submit that there are principles that any development levy or contribution should follow as outlined in section 5.2 of SPP 3.6 and replicated in the 2014 TWA Policy at 6.8.3. The 2014 TWA Policy states that the contribution arrangements proposed are not 'formal arrangements' pursuant to SPP 3.6; however it recognises the underlying principles. RTIO submits that the 2014 TWA Policy requires detail as to how it is consistent with the above principles. In particular the 2014 TWA Policy does not demonstrate the need for the infrastructure (need) and the connection between the development and the demand created (nexus). 	<p>Without getting into detail, the comments above outline the need for the contribution and the nexus to TWAs. The City continues to work on defining this relationship and is aiming to have clearer calculations available that can be used as the basis for determining contributions.</p>	
5.27				<ul style="list-style-type: none"> Clause 6.8.4 of the 2014 TWA Policy states that funds collected via contributions will be maintained in a reserve account for the payment of infrastructure and administrative costs. RTIO submits that the 2014 TWA Policy does not detail what items the funds will be reserved for, with reference made only to the Shire's Plan for the Future, adopted planning strategies and adopted Community Facility Plans. 	<p>Noted. The detail regarding the specific items the funds will be reserved for will be determined on an annual basis as part of the normal municipal budget process, which will be publicly available.</p> <p>It would be unreasonable and premature for the Policy to detail specific items at this point time, however the Policy does reference that the items will be in accordance with recommendations of key adopted Council documents, including the Strategic Community Plan and Community Facilities Plan etc.</p>	No modification required.
5.28				<ul style="list-style-type: none"> RTIO submits that funds raised by contributions should be directed using a system of hypothecation towards a fund expressly for the town in which the TWA facility is located. We would appreciate clarification regarding expectations around the form of the "legally binding document" that will set out contributions. 	<p>This is a reasonable expectation. Expectations around the form of the "legally binding document" setting out contributions would be that the document is as simple but as clear as possible, that it is agreed and that it sets out matters such as who has made the contribution and for which development, the value of the contribution and what the contribution is to be used for. Other matters can be included as required.</p>	No modification required.
5.29				<ul style="list-style-type: none"> Regarding 6.8.1 and the "Form of Contributions", RTIO submits that while section 9.1 of TPS 8 allows the Shire to make agreements, it does not grant a unilateral ability to mandate a contribution system. We submit that the TWA Policy does not make provision for an "agreement" as anticipated by 9.1 of the TPS, as there is no optionality available for RTIO. If a TWA facility is to be approved by the Shire then the "agreement" will be imposed by the Shire, entirely on the Shire's terms. 	<p>Noted. The City cannot impose an agreement. Section 6.8.1 of the Policy states agreements can be reached between the Applicant and the City regarding contributions to be made, the basis upon which contributions are made and the application relating to those contributions. This is in accordance with Clause 9.1 of TPS 8. The City would apply a test of reasonableness to any requested contribution and is aiming to have clearer calculations available that can be used as the basis for determining contributions. An applicant can seek independent review of any decision of the Council (or Pilbara JDAP).</p>	No modification required.
5.30				<ul style="list-style-type: none"> We note that the 2014 TWA Policy states there will be an established standard contribution rate and we seek clarification on whether this applies to construction and operational facilities. Currently RTIO contributes funds as per agreements with the Shire relating to the Kangaroo Hill and Birra Birra camps as well as paying differential rates on all TWA facilities. We submit that a high quality town based facility that is designed in keeping with its surrounding area and has open access facilities should not pay the same rate as a traditional donga village, reflecting the higher investment that the proponent has made in the facility. 	<p>This contribution applies to all applications for transient workforce accommodation; as they are all considered compromised outcomes from a community building perspective. While the City encourages high quality town-based FIFO operational workforce accommodation, rating matters need to be considered separately. The City is happy to talk to Rio Tinto and others regarding this submission.</p>	No modification required.
5.31				<ul style="list-style-type: none"> RTIO seeks further clarification that once a contribution proposal has been accepted by the Shire for a TWA development that no further contribution will be sought, even if the facility has a significant expansion, modification or extension. 	<p>In accordance with Clause 6.8 of the Policy 'once a contribution proposal has been accepted by the City for a TWA development, no further contribution will be sought by the Shire'.</p> <p>An application for an extension of time would not attract a separate contribution. An application for expansion could attract a separate contribution because it is new development. This point could be clarified</p>	<p>Modify the last paragraph of Section 6.8 to read:</p> <p><i>"... no further contribution will be sought by the City for re-approval of that development."</i></p>
5.32				<p>We submit it is likely that most TWA applications will be determined by the Pilbara Joint Development Assessment Panel (JDAP) rather than Council, given the likely dollar value. The role of the JDAP in the assessment process is to test the validity of a condition of planning approval. A condition is valid if it has a planning purpose, it fairly and reasonably relates to the development and if it is not so unreasonable that no reasonable planning authority could have imposed</p>	<p>Noted. The City would not recommend imposition of a condition requiring an agreement to be entered into in relation to a community contribution.</p>	No modification required.

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				it. It is questionable whether the JDAP would consider a condition requiring an agreement to be entered into for an unknown contribution amount for an unidentified community infrastructure item to be fair and reasonable.		
5.33				<p><u>Application to existing TWA facilities</u></p> <p>We would appreciate guidance on the 2014 TWA Policy's application to existing TWA facilities, and request confirmation that the policy will not be retrospectively applied to existing TWA facilities.</p> <p>We request that the Shire use its discretion when assessing whether the policy should apply to existing facilities that are proposed to be expanded or modified. Minor expansions/modifications should not trigger this Policy; however we recognise that the Shire would want to understand the impact of significant expansions or modifications to existing facilities.</p>	<p>Noted. The requirements within the Policy will not apply to existing TWA development where they have all appropriate approvals in place.</p> <p>The Policy will be a consideration, however, for TWAs on time-limited approvals when applications are made to renew approvals. In addition, where 'other' land uses (eg. commercial uses such as a restaurant, take away food outlet) are currently operating within a TWA facility without planning approval, a retrospective approval will be required to be sought from the City, which will trigger consideration under the new policy.</p> <p>Noted. There are too many risks in Council having discretion to approve minor expansions that align with an existing approval rather than the policy. This would potentially allow for incremental expansion of facilities that are not on time-limited approvals. It would be preferred to recognise development approved before introduction of the policy and apply the policy consistently to all new TWA development applications received. Council will exercise its discretion having regard for the items listed under Clause 6.1 of the Policy.</p>	No modification required.
5.34				<p>Finally we note that the below are referenced without appearing in the 2014 TWA Policy:</p> <ul style="list-style-type: none"> • Clause 3.8 in Section 6. 7; and • Clause 3.8 in Section 6.8.3. 	Noted. Text to be updated to refer to correct sections of the Policy.	Text to be updated accordingly.
5.35				<p><u>Previous contributions by RTIO</u></p> <ul style="list-style-type: none"> ▪ RTIO submits that existing contributions (rates, taxes and community investment programmes) should be taken into account when considering the application of a contribution regime. We already pay significant rates in respect to TWA facilities and have a significant community investment partnership with the Shire of Roebourne, and communities within the Shire. 	Noted. Refer to comments above.	No modification required.
5.36				<ul style="list-style-type: none"> ▪ Further, the extension and quantum of differential rates for TWA developments was based on the same rationale that TWA developments provide a relative net loss in community service and benefit; which is the same rationale for requesting a developer contribution for TWA facilities. As stated above, a policy regarding contributions should not be designed in a manner that creates a disincentive for companies to invest separately in community infrastructure or facilities. 	Noted. Refer to comments above.	No modification required.
5.37				<ul style="list-style-type: none"> ▪ RTIO does not agree with the general assertion that there is a potential loss of community service or benefit resulting from TWA development, particularly as we have already contributed to extensive community infrastructure within the Shire, such as sport and recreation facilities like Wickham Recreation Centre, pool and ovals. 	Noted. The significant investment made by Rio Tinto in various local community facilities and services is recognised, however this does not alter the City's view that transient workforce accommodation facilities on their own can deliver a relative net loss in community service and benefit when compared to a residential workforce.	No modification required.
5.38				<p><u>SIA Policy</u></p> <p><u>Relationship with State/Federal Environmental Assessment and other approvals</u></p> <p>The SIA Policy requires a social impact assessment (SIA) for new proposals, existing development/land uses and proposed developments that do not require development approval under the provisions of the Shire's town planning scheme.</p> <ul style="list-style-type: none"> ▪ RTIO submits that the SIA Policy does not outline the relationship with other assessment processes, or whether a SIA is required by the Shire in addition to those already prepared under State/Federal environmental assessment processes. ▪ RTIO currently prepares SIAs as a result of our obligations under the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)</i> and the State <i>Environmental Protection Act 1986</i> 	Noted. Refer discussion at row 3.	The SIA Policy be revised to better integrate it into higher level assessment processes and avoid duplication and replication.

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				<p>(EPA Act). The Environmental Protection Authority undertakes the environmental impact assessment of proposals/schemes referred to it under Part IV of the EPA Act.</p> <ul style="list-style-type: none"> We submit that the Shire's requirement of a SIA in situations where a formal environmental assessment is undertaken under the EPA Act or EPBC Act creates unnecessary duplication and we do not support such duplication. We submit that a note be included in the SIA Policy that identifies where a formal environmental assessment has been undertaken the outcomes of this process take precedence. 		
5.39				<p>The Shire's 2014 TWA Policy outlines that where a SIA and social impact management plan have previously been prepared, only a review of that document will be required, with any updates and modifications incorporated into a revised version. Should social impact assessment be required by the Shire, a similar note should be included within the SIA Policy.</p> <ul style="list-style-type: none"> It is unclear how the proposed SIA process will fit with State Agreement approvals processes. The State usually allows a local authority only a few weeks to comment on a State Agreement proposal. If the local authority undertakes public consultation or independent review of a SIA during this period, it is unlikely that the Shire would be in a position to comment on the proposal within the allotted time frame. Given that the Ministerial approval period for a State Agreement proposal is two months, there is a disconnect between requiring a lengthy SIA process for every State Agreement proposal and the existing statutory framework for proposals. 	Noted. Refer discussion at row 2.10.	The SIA Policy be revised to better integrate it into higher level assessment processes and avoid duplication and replication.
5.40				<p><u>6.1 Requirement for a social impact assessment</u> The SIA Policy states that a SIA is required for proposed developments even if they do not require development approval under the provisions of the Shire's town planning scheme, but are required to be referred to the Shire for comment (such as state agreement proposals). This statement is ambiguous and does not provide detail on the process, including whether approval is required by the Shire under these circumstances.</p> <ul style="list-style-type: none"> We contest the view that the Shire has the ability to require a SIA for developments that do not require development approval by the Shire. We submit that the existing State approval processes should adequately deal with SIA requirements. 	Noted. Refer discussion at row 3.	The SIA Policy be revised to better integrate it into higher level assessment processes and avoid duplication and replication.
5.41				<ul style="list-style-type: none"> The SIA Policy outlines that additionally the Shire may, at its discretion, require a SIA to be completed and submitted for other forms of development/proposed land uses. RTIO submits that further detail should be provided in regard to the circumstances under which the Shire may apply discretion and outline the matters to be considered in applying this discretion. 	Noted. It is recommended that the words "are likely to have a significant local social impact" be added to the second paragraph of Section 6.1.	The SIA Policy be revised to add the words "are likely to have a significant local social impact" to the second paragraph of Section 6.1.
5.42				<ul style="list-style-type: none"> The SIA Policy states (at clause 2.1) that it applies to the entire local government area, however this appears to be contradictory to section 6.1 which states that a social impact assessment is to be completed for new proposals within the use classes of 'Industry - Resource Processing' and 'Transient Workforce Accommodation' and on land that is zoned 'Strategic Industry'. We submit that if the policy extends to the whole Shire then social impact assessment related conditions could being placed on various approval streams outside the current Shire approval jurisdiction. We submit that this poses a risk to timing for our future developments with the Shire. 	Noted. Clause 2.1 clarifies that the Policy applies to the whole local government area, where consideration is triggered by Section 6.1 (explained above).	No modification required.
5.43				<ul style="list-style-type: none"> We further submit that the reference to where commitments given in an existing social impact management plan "have been met" should be modified to "have been met to the extent within the control of the proponent". In some cases, programmes have several partners, and completion of actions may be due to the actions of a party other than 	Uphold. It is recommended that the Policy be revised as requested.	<p>Section 6.1 of the Policy be revised as follows:</p> <p>"... where commitments given in an existing social impact management</p>

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				the proponent.		plan have been met to the extent within the control of the proponent ".
5.44				<ul style="list-style-type: none"> RTIO notes that clause 6.4 refers to Section 8.1 and Section 8.4. These sections do not appear in the SIA Policy. 	Noted – references to be amended accordingly.	Text to be updated accordingly.
5.55				<p>Conclusion Thank you for the opportunity to make submissions regarding the Shire's 2014 TWA Policy and SIA Policy. For ease of reference we set out our key submissions below:</p> <ul style="list-style-type: none"> RTIO does not accept that the Shire has the requisite power to impose the 2014 TWA and SIA Policies in respect of projects that operate pursuant to a State Agreement. RTIO's State Agreement framework does not allow the Shire to levy a contribution payment. RTIO requires clarification as to the 2014 TWA Policy's application to permanent high quality TWA facilities typically associated with operational FIFO, including whether facilities of this type will be subject to the 5 year limit on planning approval for TWA. The Shire does not have the ability to require a SIA for developments that do not require development approval by the Shire <p>We trust our comments will be taken into consideration during the Shire's consideration of the 2014 TWA Policy and SIA Policy. There will always be a need for TWA in Pilbara towns, and the planning policies of the Shire need to recognise this form of workforce arrangements and the accommodation that is best suited to these workers.</p>	Noted. Responses provided above.	No modification required.
6.		Cherratta Lodge		<p>I have split my submission into two areas:</p> <ol style="list-style-type: none"> My comments on the Town Planning Scheme, as it is my belief that a distinction needs to be made in the zoning within the Town Planning Scheme as well as in the Development Policy. My comments on the Revised Development Policy I have tried to articulate this below. 	Noted and acknowledged. It should be highlighted however that the submitters comments on the Town Planning Scheme is outside the scope of this process and that any future changes to the Scheme should be highlighted by the submitter at a time when the Shire's new Local Planning Scheme is publicly advertised.	No modification required.
6.1				<p>Broad Comments on the Town Planning Scheme The Shire of Roebourne has been through a recent growth stage for demand for accommodation that will not sustain unless large construction projects are started every three years which is unlikely. The upswing of this demand was not predictable and neither is the downswing.</p> <p>Currently the Council and the community are trying to deal with major construction camps open to the public, TWA facilities on light industrial land and an oversupply of housing which are all providing financial pressure to investors and operators.</p>	Noted and agreed.	No modification required.
6.2				<ul style="list-style-type: none"> From my perspective I do not believe the Council will be able to have a smooth transition into resolving these issues without first making amendments to the Town Planning Scheme to make a distinction with the two types of workforce facilities that are currently in the Shire of Roebourne being: Specific Purpose Construction Accommodation, and, Transient Workforce Accommodation and Remote Specific Purpose Operational Accommodation. These are completely different uses and by combining them both into the same policy I believe it results in development guidelines not fitting both uses and prolonged TWA facilities on the edge of towns. In my opinion it also has the potential to pull the Council into many commercial disputes and trips to the State Administrative Tribunal 	Noted. Following consideration of all submissions, it is recommended that the draft TWA policy be revised to distinguish base-level TWA supply from construction camps. Cherratta Lodge forms part of the base-level TWA supply. Less restrictions will apply to base-level TWA supply, although users would need to fit within the transient worker definition. The draft revised policy still encourages residential operational workforces but now promotes a higher standard integrated form of development for FIFO operational workforces.	Draft Policy to be revised as per Officer Recommendation at row 4.1.

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				which would not be a good outcome for the Council.		
6.4				<p>Specific Purpose Construction Accommodation Is an accommodation facility that is to be constructed for a specific purpose construction project to be removed when that project has commenced operation.</p> <ul style="list-style-type: none"> The specification on a construction camp should be lower than a permanent facility and what is specified in the reviewed DP 10. This use would requires its own development policy as DP 10 to reduce construction cost on new mines and rail networks. 	<p>Based on the Policy the simple answer is yes.</p> <p>The need for distinction is agreed. Table 1 should be updated to distinguish between the types of TWA facilities and the development standards that apply to each type.</p>	Table 1 to be revised to distinguish between the types of TWA facilities and the development standards that apply to each type.
6.5				<ul style="list-style-type: none"> If Australia and the Shire of Roebourne are to remain internationally competitive to attract international finance we need to reduce the costs of new construction projects. 	Noted.	No modification required.
6.6				<ul style="list-style-type: none"> There must be a restriction on allowing residence to any patrons not working on the intended Construction project that the Camp was approved for as well as the camp being removed at the end of construction phase. It is my belief that time periods should not be given on these projects but specified at the completion of construction and the commencement of operation. This will prevent the need for extensions and prevent these camps being used for operation which is currently the practise. 	Noted. This generally aligns with the City's current view.	No modification required.
6.7				<p>Permanent Transient Workforce Accommodation and Remote Specific Purpose Operational Accommodation Is an accommodation facility that fits one of the two following classifications: constructed on TWA zoned land located in townships and multi-user; or company owned Operational Accommodation on remote sites under mining leases not located in townships and single-user.</p> <ul style="list-style-type: none"> The revised DP 10 is adequate for both these uses. 	Noted.	No modification required.
6.8				<ul style="list-style-type: none"> It is important that if a mining company owns an accommodation facility such as Gap Ridge in a town location that it not be allowed to compete in the market. 	Noted. The Policy can only be considered in relation to this matter when the lease is due for renewal.	No modification required.
6.9				<ul style="list-style-type: none"> It should be considered to construct to a class 3 level if located in towns (equivalent of a hotel) as they will be permanent and will provide the necessary services and appropriate visual amenity. 	Noted. It is good to receive and consider suggestions like this but while Class 3 may be necessary (fire separation), it is not considered that this delivers the qualitative design and development outcomes the City is seeking in relation to a fully integrated TWA development model.	No modification required.
6.10				<ul style="list-style-type: none"> Currently, there is only a small portion of land zoned TWA and this will enable the Council to control this use and control its impact on the townships. If a mining company wishes to accommodate its operational workforce in camps in towns it should be encouraged but by requiring a re-zone of land it will enable the Council to dictate terms and place a restriction of single user as opposed to be open to legal challenges if the current policy continues. 	Noted and agreed. After reviewing all submissions it is recommended that the policy be revised to provide for a base-level supply of TWA beds. Ultimately it is likely to be recommended that Council include base-level supply TWA developments in a TWA zone and allow flexibility to approve temporary construction camps elsewhere when required.	No modification required.
6.11				<ul style="list-style-type: none"> For this to work it is imperative that another classification is added to the zoning table in the Town Planning Scheme. I have done an example below: 	Noted. The merit of including more specific TWA uses within the new Local Planning Scheme Zoning Table will be considered as part of the Scheme review process.	No modification required.

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				the impact these premises have on the town as they are forced to close when the projects finish so it does not dramatically impact on the property market as is the case today.	the TWA zone, it is recommended that the maximum time-limited approval be ten (10) years to recognise the more general purpose. For construction camps on Crown land it is recommended that the maximum time-limited approval period remain five (5) years.	limited approval period for TWA developments on freehold title designated part of the base-level supply outside the TWA zone..
6.17				Part 7 b <ul style="list-style-type: none"> There should be a restriction on non TWA zoned camps that they are only constructed for a specific construction project or a remote operational purpose of companies owing or developing mining or oil and gas projects. If the land is not TWA zoned then they should not be multi-user and open to the public. 	Noted. Refer to the Officer Response above.	Refer to Officer Recommendation above.
6.18				Part 8 Additional Grounds for refusal that should be considered: <ol style="list-style-type: none"> that if the proposed location is within 60kms of a town centre the proponent need to establish that the required accommodation cannot first be provided within the town and its existing TWA/Tourism/Houses and other accommodation facilities For non TWA zoned land, a rehabilitation and removal of buildings agreement that ensures that at the end of the proposed use that gives the Council the power to close the camp if not removed. An agreement restricting to a single user to be signed that gives the Council the power to close the camp if they start accepting multi-users 	Noted. It is recommended that the draft policy be revised to define a remote camp based on being more than 50 Km from a townsite. The policy requires decommissioning/ transition plan for non-permanent TWA facilities. Restrictions on timeframes and use will be imposed most stringently to construction camps.	The draft policy be revised to define a remote camp based on being more than 50 Km from a townsite.
7.		Stayover by Ausco		Introduction Stayover by Ausco thanks the Shire of Roebourne for the opportunity to provide comment and be engaged in the preparation of proposed Local Planning Policy DP10 – Transient Workforce Accommodation (DP10). This strategy will have long term implications on future workforce accommodation supply issues in the Town. As a business who intends to continue our long-term presence in your community and region, we support the strategic planning approach that is being undertaken by the Shire of Roebourne. We consider this orderly and proper approach to the planning process will ensure stable supply of accommodation in the region and provide the broader business community with certainty on investment decisions to support your growth. Stayover by Ausco supports an open engagement process and appreciate the discussions we were able to have directly with staff at a recent meeting in April. We look forward to establishing an on-going dialogue with the Shire moving forward which makes positive contributions to the finalisation of this policy. In this regard we encourage the Shire to review the ‘Non-Resident Workforce Accommodation Guidelines’ adopted by the Urban Land Development Authority in Queensland. These guidelines were prepared following extensive engagement with all affected sectors and are considered to be largely practical in application, unambiguous and beneficial to affected communities. Our submission intends to provide the Shire with constructive feedback to strengthen the capacity for this strategy to be effectively implemented into the future.	Noted. The City appreciates constructive input. The Non-Resident Workforce Accommodation Guidelines adopted by the Urban Land Development Authority in Queensland have been reviewed. These guidelines focus on how TWA can be integrated into a community. They focus on how the impacts of a TWA development on surrounding residents can be best managed. Karratha has many examples of TWA, both integrated and separate. All seem to be able to work based on the attention to planning and design considerations at the site selection and planning stage. There is an acceptance that TWAs are required at times of peak accommodation demand. The City’s policy is attempting to distinguish different types of accommodation for different purposes and set different expectations and parameters based on the type of accommodation being considered. The City wants to avoid a situation where it thinks it is approving a certain type of use but it actually becomes something that it was never intended to be.	No modification required.
7.1				1. Shifting the Discussion to dealing with Non-Resident Workforce Stayover by Ausco encourages the Shire to transition the long term wording from ‘Transient Workforce Accommodation’ and ‘Temporary Worker’ to ‘Non-resident Workforce Accommodation’ and ‘Non-Resident Workforce’. This is consistent with the broader trend across Australia (including the Town of Port Hedland) as the industry and the provision of accommodation in regional areas continues to evolve and diversify.	Noted. In accordance with Clause 5.1.2 of TPS 8, any local planning policy prepared under Section 5.1 of the Scheme must be consistent with the Scheme. The draft TWA Policy reflects the same definition for ‘Transient Workforce Accommodation’ as the Scheme. The merits of alternative terminologies (including non-resident workforce) can be considered as part of the Scheme review process. Following the Scheme review, the	The draft TWA policy be revised to distinguish between a construction camp, base-level TWA supply and high standard integrated TWA developments in urban neighbourhoods.

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				<p>Transient Workforce Accommodation and the term transient worker reflects the historical perception of accommodation being 'donga' or 'camp' style accommodation for the housing of people on a defined roster (i.e. a FIFO worker) and associated with some specific project. This is indicated through the Shire of Roebourne Town Planning Scheme No. 8 definition and also within the proposed DP10.</p> <p>Workforce accommodation is now far more flexible and of substantially higher quality as compared to this historical perception of this accommodation. The quality and standard of accommodation continues to rise as industry workforce expectations increase. This has resulted in the implementation of built form and amenity improvements, making these facilities no longer temporary but permanent. Aside from industry pressure, this has arisen out of the understanding that there is a permanent need for non-resident workforce accommodation within regional areas to deal with:</p> <ul style="list-style-type: none"> the ups and downs of major construction projects where permanent facilities assist in providing a buffer, reducing impacts on accessibility and affordability of other accommodation forms; the understanding that many project developers no-longer provide accommodation for workers/ contractors on a specific projects due to the capital costs associated with such development; many contractors may utilise accommodation of a single location to service different clients undertaking construction or maintenance work within close proximity of each other; and providing long-term stable multi-user facilities achieves a better market outcome as overall costs associated with accommodation can be spread across many varying projects and over a far longer period of time improving competitiveness and driving down the cost to complete projects in the region. <p>Essentially open market workforce accommodation no longer caters for just one user or one construction project but for a myriad of users working on a variety of different industries or different construction projects (i.e. transport and logistics, retail, housing etc.). This links to periods of stay or the regularity of stay for non-resident workers. Stayover by Ausco has experienced that Non-resident Workers may be on a:</p> <ul style="list-style-type: none"> defined roster for a short-term period or permanent; be living in the region for 1-month only or 6-months; make un-rostered infrequent or frequent visits to address specific issues; or be on a permanent employment contract with a regular scheduled roster period. <p>Ultimately it depends on the employee, the type of work being undertaken and the industry sector they may be working for. Essentially non-resident workers can't be so narrowly defined to be on a '<i>continuous work program but who live elsewhere</i>'.</p> <p>Furthermore, facility operators cannot control who is occupied within the rooms as a result of contracts being between the operator and an employer. As an example, Stayover by Ausco is actually unable to track/ monitor what type of person and what work schedule the people in our facility are from any day to day period and it would also be unreasonable to request this information. We are simply aware they are people who do not live in the community but do undertake work there, whether temporarily or permanently.</p> <p>It is our view the broader definitions which have developed through extensive engagement with industry under the 'non-resident worker' title best reflect</p>	<p>City has the ability to amend the local planning policy so that it is consistent with the City's new Local Planning Scheme.</p> <p>The submitter's comments regarding the evolution of TWA facilities are noted. The City has a view about the purpose TWA camps were approved for, which has statutory support, and TWA operators have a view about what TWA camps can be used for based on an evolving business model. The concern is that local business and the local community will lose out (indirectly) at the expense of TWA camps developing their business.</p> <p>Following consideration of all submissions, it is recommended that the draft TWA policy be revised to distinguish base-level TWA supply from construction camps. Kingfisher Village forms part of the base-level TWA supply. Less restrictions will apply to base-level TWA supply, although users would need to fit within the transient worker definition. It is recommended that the draft revised policy still encourage residential operational workforces but now promote a higher standard integrated form of development for FIFO operational workforces.</p> <p>It is recommended that the definition for transient worker be revised to cover the scenarios presented.</p>	<p>The definition for transient worker be revised to cover scenarios presented by the submitter.</p>

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				modern day use and occupation for these facilities and give overall clarity on what this form of accommodation is used for.		
7.2				<p>1.1. Policy Recommendation Stayover considers the following actions should be made to improve the interpretation and understanding of the use and operation of modern day villages:</p> <ul style="list-style-type: none"> a. Amend the Policy title to ‘Non-Resident Workforce Accommodation’ Policy; b. Delete Maintenance Worker, Transient Worker, Temporary Accommodation and Transient Workforce Accommodation; c. Replace these definitions with the following: <p>Non-resident Worker: <i>‘means an employee participating in the workforce who does not reside on a permanent basis within the Local Government Area’</i></p> <p>Non-Resident Workforce Accommodation: <i>‘means Premises used to provide accommodation for non-resident workers. The use may include provision of recreational and entertainment facilities for the exclusive use of occupants and their visitors.’</i></p> <ul style="list-style-type: none"> a. Amend the policy wording accordingly. <p>The Scheme should be amended accordingly or be integrated into the Local Planning Scheme Review currently underway.</p>	Noted. Refer to comments above.	No modification required.
7.3				<p>2. Ensuring Long-Term Supply meets Established Long-Term Demand for all forms of accommodation The accommodation sector is diverse. The appropriate and suitable supply of non-resident workforce accommodation, short-stay accommodation and residential accommodation affects the use, accessibility and affordability of the others. As such, ensuring there is an appropriate supply of all forms of accommodation is important to ensure that other forms are available for appropriate uses.</p> <p>Stayover by Ausco considers that the use of hotels, motels and other forms of tourism accommodation and also residential housing inappropriate for the provision of the non-resident workforce market. Accommodation types should be used for their intended markets being:</p> <ul style="list-style-type: none"> • Short stay visitors (both leisure and business) for hotels, motels and caravan parks; • Permanent residents for residential housing; and • Non-resident workforce accommodation is used to accommodate non-resident workers who are on a fly-in/ fly-out roster or undertaken special projects for a period of time. <p>Improved supply of land for all forms of accommodation and management of how different forms of accommodation are used can better alleviate impacts on changing market conditions in the community. It would ensure balanced supply for the right forms of accommodation to match demand profiles.</p> <p>For example, if there is a lack of appropriate non-resident workforce accommodation, as has been the case in the preceding several years, demand may be met by other forms of accommodation such as hotels or housing. This can lead to overleveraging by investors/ developers based on an artificial demand. The long term outcome is an oversupply of certain types of accommodation compared to more long-term stable demand profiles.</p>	<p>Agreed.</p> <p>These comments are generally agreed.</p> <p>With the recent levelling of demand there is improved supply and more affordable rates for all forms of accommodation. The City’s preference is for there to be greater uptake of residential accommodation in these changing market conditions but the City accepts that demand should influence supply.</p> <p>The City recognises the critical role TWA plays in such circumstances. These circumstances, however, do not currently apply.</p>	No modification required.

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7.4				<p>2.1. The future demand for Non-Resident Workforce Accommodation</p> <p>The Shire's Evidential Analysis Paper highlights and expectation that in the long-term there will need to be anywhere from 3,000 – 4,000 non-resident worker rooms in the Shire of Roebourne. This number appears based on the Price Waterhouse Cooper Study which only expressly considers impacts linked to the minerals and energy sector rather than the broader economy. We note the WAPC's Pilbara Planning and Infrastructure Framework (PPIF) suggests there may be a requirement for as many as 10,387 Town based accommodation rooms into the future.</p> <p>Stayover by Ausco does appreciate that at present, there is a slowing in the market and the immediate demand for accommodation, with the apparent number of beds across the Shire substantially exceeding demand. Whilst at a high-level this may seem reasonable ground to restrict further approvals, it does not consider:</p> <ul style="list-style-type: none"> many existing beds are linked to large scale construction projects which are not accessible to other industries and will not be made available to support other projects in the future; the likelihood of the inappropriate location of many of the beds available to support other projects and broader industry groups; and the long-term pipeline of projects which may require further accommodation to support them. <p>The idea that alternative workforce accommodation options will not be needed is not a true reflection of the market demands. We also consider the acknowledgement of the Shire and the WAPC that there is a long-term supply requirement for workforce accommodation means that affective planning should address long-term demand of the whole economy.</p>	Noted. Refer to 4 th paragraph of Officer Response to row 7.1.	Refer to 1 st Officer Recommendation for row 7.1.
7.5				<p>Restricting projects to only being for specified construction projects and limiting their lifespan to only 5-years will only create market uncertainty about future supply. A stable planned supply and allowance of workforce accommodation is very important. It assists in:</p> <ul style="list-style-type: none"> ensuring that the development investment decision for new forms or replacement of existing facilities reflects a commitment to a higher standard of offering and amenity; providing a buffer to absorb short-term spikes in property demand, associated with the resource sector investment cycle and changes in global economic drivers; and removing speculation about the capacity to meet market demand for accommodation of all forms reducing the driver for short-term property bubbles that have substantial impacts on housing affordability in a regional community; and ensuring that tourists accommodation is accessible for tourists; and assisting in the relocation of people living illegally and in poor forms of accommodation in industrial areas. <p>We note the PPIF advocates for the orderly provision and supply of workforce accommodation for the long-term. On this basis we strongly advocate the Council acknowledges that where workforce accommodation is provided to the right standard and in a reasonably appropriate location, time restrictions are not imposed so as to ensure certainty of supply through an orderly and proper planning process. This links to effective identification of land to be put aside for Non-Resident Workforce Accommodation in through provisions of this Local Planning Policy, the Local Planning Strategy and the reviewed Local Planning Scheme.</p>	Noted. The draft policy provides for a maximum time-limited approval period. For TWA development on freehold title designated part of the base-level TWA supply outside the TWA zone, it is recommended that the maximum time-limited approval period be ten (10) years to recognise the more general purpose. The appropriateness of including Kingfisher Village in a TWA zone will need to be considered as part of the Scheme review.	The draft TWA policy be revised to introduce a ten (10) year time-limited approval period for TWA developments on freehold title designated part of the base-level supply outside the TWA zone.
7.6				2.2. Short-Stay Accommodation as a Means for Non-Resident Workforce	Noted. Following research and consideration of all submissions, it is recommended	The draft policy be revised to

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				<p>Accommodation</p> <p>The use of hotel, motel and caravan parks to address short term accommodation demand has hampered the growth of a \$250 million tourism and short stay industry to the Pilbara Region. The value of tourism to the local economy and importance it has in diversification is highlighted by AEC’s report on short-stay accommodation in the Pilbara prepared for the PDC:</p> <p><i>Albeit relatively unknown, the Pilbara has an underlying tourism industry. While the tourism sector in the region has been dominated of late with business travellers associated with the resource and mining activity, the region has a drive based leisure tourism market focused on the natural amenity of the area. The region currently experiences over 500,000 visitors annually, and before 2006, leisure visitors outnumbered business visitors.</i></p> <p><i>While the tourism sector currently represents less than 1% of the economy (in GRP terms), it does inject \$250 million in expenditure into local communities and much of this money is usually received by local, small businesses. Reducing the reliance on the mining sector through tourism can help to provide more sustainability to local communities and represents an important injection of expenditure into the region.</i></p> <p>Over the preceding ‘boom’ years, the lack of accessibility to suitable business and leisure accommodation due to large scale use of hotels, motels and caravan parks for non-resident workforce accommodation has likely restricted growth of this part of the economy or even potentially reduced its contribution.</p> <p>The Federal Government’s <i>Cancer of the bush or salvation for our cities?</i>” Report highlights:</p> <p><i>“...access to transport and accommodation for the leisure sector is being seriously hampered by the rising trend of FIFO work.”</i></p> <p>The potential impact on the growth of the tourism industry was more explicitly expressed by the Queensland Government where it outlined:</p> <p><i>The FIFO/DIDO model has the potential to reduce the capacity of regional Queensland to benefit from tourism. For example, tourist accommodation in local towns that would typically be used by leisure visitors may be utilised - particularly during the pre-construction and construction phases, by the FIFO/DIDO workforce, putting pressure on the availability of tourist accommodation. In some cases, employers of FIFO/DIDO workers have booked out accommodation premises for an extended period of time, even if not fully utilised. In other cases, mining companies have purchased accommodation premises (e.g. caravan parks). Reports of complaints from travellers about the unavailability of accommodation in towns that tourists wish to visit are not isolated. As a result, these destinations have lost these visitors and the economic benefit (in terms of expenditure) tourists would have otherwise brought.</i></p> <p>Regional Development Australia advocates proactive responses and strategies to address tourism growth and development:</p> <p><i>The Pilbara’s natural and cultural heritage assets, such as its coastline, Karijini and the Burrup Peninsula’s rock-art galleries, are planned to be ‘conserved, celebrated and cherished’. In particular, the tourism sector has significant development potential, and strategies must be found to facilitate this expansion notwithstanding the various impacts, some detrimental, that resource development activities have on accommodation and services costs to visitors.</i></p> <p>What this highlights is that when the market is unable to provide the right type of accommodation to meet demand, other industries, particularly the tourism industry is affected and its potential growth and contribution to a diversified</p>	that the draft policy be revised to recognise the need for base-level supply of TWA beds.	recognise the need for base-level supply of TWA beds.

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				economy stunted. It is therefore important that the Shire considers the impacts of short stay accommodation being used for non-resident workforce accommodation and ensures appropriate supply of genuine non-resident workforce accommodation to meet market demand. This will ensure that the Shire's tourism industry has the means and access to facilities to support long-term stable investment to support growth in the sector.		
7.7				<p>3.3 Social Impacts and Residential Amenity – Using Housing for Non-Resident Workforce Accommodation</p> <p>The use of residential housing for non-resident workforce accommodation can have substantial impacts on the cost of housing in communities and also can negatively impact on the social well-being and amenity of a community with respect to safety, crime and anti-social behaviour. The Cancer of the Bush report cites many anecdotes from communities highlighting the impact of FIFO workers living directly in and around residential areas. The Queensland Nurses Council highlighted the following in a submission:</p> <p><i>“Declining visual amenity due to growth in the number of houses occupied by multiple temporary residents who did not care for gardens or premises. The more houses in the street taken up by miners sharing the rent, the bigger the decline in neighbourhood status with many large vehicles parked in the area and increases in noise levels”</i></p> <p>Other submissions and representations reiterated this issue noting young women being afraid to walk the street of their home towns because of the number of young men on the streets and the increasing number of transient workers making places less desirable to live.</p> <p>Another submission highlighted the difference where workers are located in well-designed villages specifically planned to cater for non-resident workers:</p> <p><i>When I am walking home at night, it is scary sometimes. I like walking along by the MAC camps. You see drunken guys who do not live in the MAC camps and it is scary. They run amok and do silly stuff, destroying stuff because they know that it is not their community.</i></p> <p>No definitive investigations have been completed to understand the social impacts of using residential housing. There are however clear indications which suggest companies who accommodate workers in non-resident workforce accommodation and prevent use of housing can reduce the sense/ feeling of a transient community and limit external anti-social impacts that are experienced. The International Finance Corporation's Guidance Workforce Accommodation (2009) implies that without properly planned workforce accommodation the following may occur:</p> <p><i>“social impacts including increased demands on infrastructure, services and utilities, development of illicit trade activities (drugs, prostitution, selling of stolen goods) and inflation in local rent and other subsistence items with detrimental consequences for the local population.”</i></p> <p>The Chamber of Minerals and Energy reaffirms this in a submission during the 'Cancer of the Bush' inquiry citing:</p> <ul style="list-style-type: none"> FIFO accommodation providers are able to exert a greater influence over the behaviour of workers than can be achieved in the wider community; and High quality of FIFO accommodation is more attractive to workers, and can result in higher standards of expected behaviour in and around the facilities. <p>Effective supply of well-designed, co-located non-resident workforce</p>	Noted. The City's preference is to have resident workers and their families accommodated in standard dwellings in normal suburbs. The current situation is getting more attractive for all concerned in considering this option. Following consideration of all submissions, it is recommended that the draft policy be revised to recognise the need for remote camps and construction camps, as well as providing a base-level supply of TWA beds. The City accepts that there will be some operational FIFO workers. The City wants to integrate and distinguish the accommodation requirements for these workers from TWA camps and their intended purpose. It is accepted that a number of factors need to be carefully considered in order for the integration model to be successful.	The draft policy be revised to recognise the need for remote camps and construction camps, as well as providing a base-level supply of TWA beds.

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				accommodation can reduce the requirement for the use of residential housing for workforce accommodation reducing social impacts. As supply is met by improved, well managed workforce accommodation, it is important Council implements appropriate regulatory framework to prevent the on-going use of residential housing for non-resident workforce accommodation. In doing so, the amenity of residential areas is likely to improve and affordability of family orientated housing will increase through greater supply of permanent housing options to the market.		
7.8				2.3. Policy Recommendations/ Actions a. The Shire of Roebourne undertakes to review the long-term need of non-resident work force accommodation for all industry in the Local Government Area. In doing so, the time-limited nature of approvals as outlined under section 6.4 of the policy should be amended to clarify the following: <i>"Where the land is located within the 'Transient Workforce Accommodation' zone or is proposed in a suitable location in accordance with other provisions of this policy, the Shire of Roebourne will consider granting approvals for undefined periods."</i>	Noted. The Policy seeks to exempt preferred forms of accommodation for operational FIFO workforces from time-limited approvals. The 5 year time-limited approval for TWA camps is not considered unreasonable. Workforce accommodation needs, preferred accommodation model and market conditions and will determine the viability of constructing TWAs under such conditions.	No modification required.
7.9				b. Objective 4 of the policy be amended to read as follows: <i>"Ensure that Non-Resident Workforce Accommodation proposals are established in locations that are consistent with the policy and to meet demand for non-resident workforce accommodation as identified in the Shire of Local Planning Strategy and Pilbara Planning and Infrastructure Framework."</i>	Noted. This additional objective is not considered necessary.	No modification required.
7.10				c. the Shire undertakes the following in addition to finalisation of the Policy: <ul style="list-style-type: none"> notifies the Community that the use of housing and short stay accommodation is not consistent with the intended use of such accommodation; establishes a new compliance and regulatory process to address complaints from the community about the use of accommodation in this way and suitable action measures; and considers measures which limit the opportunity for housing to be used or designed to be used as non-resident workforce accommodation (i.e. design measures such as limiting the number of ensuited bedrooms in a dwelling). 	Noted. While unrelated to the subject policies, a new Compliance Officer position is being introduced to Planning Services. The Compliance Officer will be responsible for ensuring compliance with planning approvals and conditions across all uses and areas.	No modification required.
7.11				3. Location of Non-Resident Workforce DP10 encourages that where non-resident workforce accommodation is needed, the Shire's position is the preferred location for such facilities is 'town-based'. This is broadly consistent with the PPIF and also Queensland's Non-Resident Workforce Accommodation Policy. Stayover by Ausco encourages this approach and continues to operate many villages which integrate into urban areas through built form but also through methods of procurement of services, employment and community integration strategies designed to affect meaningful and positive contributions into regional communities. The dialogue within the DP10 is somewhat ambiguous about what 'town-based' is defined as in the Policy. Stayover by Ausco considers that a set of principles to define the appropriateness of the location of non-resident workforce should be included within the policy to provide better clarity to the market and Council in assessing the suitability of a proposed non-resident workforce accommodation. Whilst some issues are addressed regarding location in section 6.1 (i.e. exposure to risk from natural hazards') we consider a specific section should be developed to deal with other considerations including: <ul style="list-style-type: none"> defining what is considered 'town-based'; potential conflicts with infrastructure and industry through proximity accessibility with respect to the broader road network; the potential to stagnate or affect the timely delivery of residential, 	Noted. The efforts some TWA camp providers take to engage local contractors and local staff are acknowledged. The Policy position is that there is a preference for residential operational workers and that preferred forms of accommodation for operational FIFO workforces should be integrated into residential neighbourhoods. The Policy position in relation to TWA camps is that they will be established when and where required for a limited timeframe that reflects the intended purpose. Noted. Other recommended revisions clarify suitable locations for the different types of TWA developments. No further modification required.	No modification required.

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				<p>tourism or industrial land to support growth; and</p> <ul style="list-style-type: none"> the potential alternative uses of the land which might support economic development. 		
7.12				<p>3.1. Policy Recommendation</p> <p>a. Section 6.1 be amended to focus on the suitability of the location of non-resident workforce accommodation in considering whether to approve the location. Suggested wording for this section may be as follows:</p> <p><i>“Where the Shire of Roebourne is considering an application for planning approval for ‘Non-Resident Workforce Accommodation’ or a proposed scheme amendment to rezone land to the Non-Resident Workforce Accommodation zone (it would be logical to shift the zone from TWA zone consistent with the recommendations in section 2 above), the Shire shall first consider the suitability of the proposal having regard to the following:</i></p> <ul style="list-style-type: none"> <i>whether the site is identified as a preferred location within the Shire’s Local Planning Strategy or any other policy developed by the Western Australian Planning Commission;</i> <i>the site being located within a gazetted town-site boundary as shown on the Scheme Maps;</i> <i>whether there is an existing approval for non-resident workforce accommodation on the land and the capacity for the land to provide any other reasonable commercial or rural use to the landowner;</i> <i>the proximity of the land to existing or future industrial areas to the affect that it may lead or has already led to land use conflicts;</i> <i>whether the proposal may compromise the future release of land for permanent residential accommodation or industry;</i> <i>whether the location and proximity to services offers a very high level of amenity which may be more suitable to support short-stay, tourism or business accommodation;</i> <i>potential impacts on the visual landscape on residential areas and important tourism routes;</i> <i>the potential of exposure to risks and natural hazards; and</i> <i>the potential environmental and heritage value of the land.</i> <p>Other matters referred to in section 6.1 such as zone objectives are already required to be considered in determining any application for planning approval and therefore do not need to be duplicated in the Policy.</p>	<p>Section 6.1 covers Matters to be considered in exercising discretion when approving a TWA. The matters raised in this submission focus on suitability of location.</p> <p>It is recommended that the approach to defining TWA supply be based on recognising the need for remote camps, providing a base-level supply comprising existing TWA camps on freehold title, and allowing for construction camps to be established on Crown land to accommodate specific construction projects and encouraging a higher standard integrated form of development for FIFO operational workforces.</p> <p>Section 6.1 refers to Section 4.4 of TPS 8, which list 28 matters to be considered by an applicant when lodging an application. It is considered that the additional matters under Section 4.4 of TPS8 will be adequate in the assessments of a TWA.</p> <p>The suggestion of identifying base-level supply sites in the local planning strategy is a good one.</p>	No modification required
7.13				<p>4. Quality of Accommodation</p> <p>Stayover by Ausco is a strong advocate for the provision of high quality accommodation and visual amenity for non-resident workers. It is reflected in the emphasis we place on design in all of our existing and planned facilities. We note the Shire shares a similar view based on the language within the proposed DP10 referring to the <i>‘Shire’s expectation the development to be of a ‘high standard, suitably integrated with surrounding development, not a typical camp situation or layout’</i> in section 5 of the draft and then later outlining <i>Acceptable forms of more permanent accommodation should be distinguished from typical TWA uses’</i>.</p> <p>The views expressed in proposed DP10 are also broadly consistent with the outcomes of Queensland’s ULDA policy on non-resident workforce accommodation for which Stayover by Ausco had extensive front-end involvement. These guidelines have now been adopted by the Queensland government (refer http://www.dsdp.qld.gov.au/resources/guideline/pda/guideline-03-workers-accom.pdf).</p> <p>We wish to emphasise that through the active engagement process associated with this policy, all stakeholders came to realise that ultimately the best way to</p>	<p>Noted. Kingfisher Village is an example of a base-level supply TWA camp as provided for in the draft revised TWA policy. The approach to setting design and development standards in the recommended draft revised policy is a sliding scale whereby there is little attention to design and development standards for remote and construction camps at one end and high expectations of a quality development for neighbourhood-based operational FIFO accommodation. The expectation for a base-level supply TWA camp is somewhere in between. Refer to recommended draft revised TWA policy Table 1.</p>	Table 1 of the draft TWA policy be revised to guide design and development standards that apply to the different types of TWA development.

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				<p>regulate and improve how non-resident workforce accommodation affects communities was to focus on how these facilities appear and the amenity offered to workers within them. Put simply, the notion of construction or operational workforce as a means for regulation became too impractical to implement due to:</p> <ul style="list-style-type: none"> to the nuances and specialised services associated with regional heavy industry operations; the regularity or irregularity at which they are provided; and the variance in the contractors who may be appointed to provide them. <p>The ULDA's approach in Queensland was to provide controls for the type and quality of non-resident workforce accommodation depending on their location within the community. Essentially, non-resident workforce accommodation within the community should be to a standard and quality that makes a positive contribution to the amenity of a community. It provides opportunity for integration and alternative long-term adaptive reuse. Other facilities which are more remote may not be required to achieve the same quality or standard in accommodation.</p> <p>By setting varying built form standards, the higher quality of accommodation within the urban framework have a competitive advantage through the amenity offered as compared to less integrated accommodation. In doing so, non-resident employees are likely to seek higher quality forms of accommodation which are in the community as a result of natural labour market forces. This would particularly be the case where stays in the community are more regular. In doing so, the intent of defining and thereby restricting location of where certain non-resident workers can stay will (ie. within the urban framework) will naturally be achieved without any broader public policy intervention.</p> <p>Stayover by Ausco considers the ULDA process highlighted that effective management of non-resident workforce through built form controls is a more efficient way to deliver integration with the broader community. It is a policy that can be implemented during the planning approval stage rather than through compliance processes. It also is far more definitive and clear in its application for both the regulator and the industry. In this respect, whilst the Shire indicates the broader preference, we consider that greater clarity on design and amenity could be provided within the policy to achieve the overarching goal of integration into the community.</p>	It is recommended that reference be included in the draft revised policy to adaptive reuse as a possible legacy contribution.	Include reference to adaptive reuse in the draft revised policy as a possible legacy contribution.
7.14				<p>4.1. Policy Recommendation</p> <p>a. Section 6.6 and Table 1 be updated to broadly reflect the built form guidelines set out in the ULDA Non-Resident Workforce Accommodation Guidelines where non-resident workforce accommodation are proposed to be permanent and are defined as being town-based and suitably located in accordance with the recommended policy provision of section 4 of this submission.</p>	Noted. Refer to Officer Response above. It is recommended that the draft policy and Table 1 be revised to clarify the circumstances where permanent TWA development is an option and the general design and development standards expected for the different types of TWA under the policy.	The draft policy and Table 1 be revised to clarify the circumstances where permanent TWA development is an option and the general design and development standards expected for the different types of TWA under the policy.
				<p>b. The Shire remove the notion of trying to define and regulate the use of non-resident workforce accommodation based on a construction or operational workforce through the deletion of section 6.2 of proposed DP10. The terms remain ambiguous in application, and is very difficult for both operators and regulators to effectively manage through a compliance process.</p>	Noted. It is recommended that the draft policy be revised to recognise the need for base-level supply of TWA beds, to designate existing TWA developments on freehold title for that purpose and to restrict construction camps to Crown land for specific construction projects and for maximum time-limited periods of five (5) years.	The draft policy be revised to recognise the need for base-level supply of TWA beds, to designate existing TWA developments on freehold title for that purpose and to restrict construction camps to Crown land for specific construction projects and for maximum time-limited periods of five (5) years..
7.15				<p>5. Contributions</p> <p>Stayover by Ausco supports the notion of managing the potential social impacts on communities that may result from their construction and operation. Proposed DP10 advocates the use of Social Impact Assessment and Social Impact</p>	Noted. It is useful that the framework for contributions for TWA's in Section 6.8 is retained within the TWA policy as the framework is TWA focused. Section 6.8 does not and cannot require a contribution but leaves this open for further consideration. What the Policy does make clear though is that community	No modification required.

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				<p>Management Plans in accordance with Council’s proposed Local Planning Policy DP20 – Social Impact Assessments under section 6.7 of proposed DP10. Proposed DP10 however appears to pre-empt the outcomes of the Social Impact Assessment process under section 6.8 where it appears almost implicit that some form of contribution to the Shire is expected.</p> <p>The current framework appears rigid and determined through an internal standardised rate of contribution set out in section 6.8.2 which does not allow for a more open and transparent discussion around community contributions established through the Social Impact Assessment Process. Stayover by Ausco advocates a more cooperative approach to a contributions framework focused on the unique impacts from proposal to proposal which acknowledged that operators may also be able to offer variable services or contributions to suit changing community expectations or through the utilisation of a specific operator’s skills/ resources. As an example, Stayover by Ausco’s affiliation with Ausco Modular might allow them to donate facilities to a local club or for a local event to help offset costs. Other operators may be unable to make such a contribution and might rely on financial commitments to projects.</p> <p>In Canada, Community Benefits Plans are established which address local hiring, local procurement, Indigenous and gender equity plans, contribution to infrastructure and skills development and supplier development. These plans are effective in building capacity in regional communities and leave long term legacies. We consider this approach more appropriate and reasonable. It ensures a genuine link between contributions and impacts.</p> <p>In summary Stayover by Ausco considers that as any potential contributions should be informed through the Social Impact Assessment process, that policy framework around contributions should be included in proposed DP20 rather than DP10. This ensures consistency in the Shire’s policy framework and that there is an orderly and proper process to the management of potential impacts identified as part of a proposed development.</p>	<p>contributions are an important consideration from the City’s perspective because TWA approvals represent a compromise for the local community in the City’s view. No community contribution has been agreed for the recent 440 bed expansion of Kingfisher Village approved by JDAP in March 2013. The City will continue to develop the framework for contributions to avoid the inequity that results from having to negotiate with different TWA providers. The City would be happy to discuss further with Stayover by Ausco any of the contribution options raised in the submission.</p>	
7.16				<p>5.1. Policy Recommendations</p> <p>a. Section 6.8 be removed from proposed DP10.</p>	Noted however disagree.	No modification required.
7.17				<p>b. This Shire include a framework within proposed DP20 – Social Impact Assessment which sets out circumstances in which identified social impacts to the community should be addressed through voluntary contributions negotiated between the proponent and the Shire of Roebourne. Potential Impacts should be clearly defined through the Social Impact Assessment Process and subsequently form part of the broader Social Impact Management Plan required to be implemented as part of issuing planning approval.</p>	Noted. DP20 has a broader scope and while it does also present community contributions as an option for managing impacts on the community, it also acknowledges that under the current statutory framework this must be by agreement. The City will continue to promote the social impact assessment process as the appropriate process through which community impact management should be considered, including consideration of community contributions.	No modification required.
7.18				<p>6. Conclusion</p> <p>Stayover by Ausco supports Council’s direction on the development of non-resident workforce accommodation strategy. We have reviewed the policy and consider the above points and recommendations will strengthen the proposed strategy and improve the provision of accommodation in the Shire of Roebourne moving forward. We look forward to discussing our thoughts on this matter moving forward and thank the Shire for the opportunity to comment.</p>	Noted. The submitter has given a lot of thought to the draft policy during public advertising. Where it can, the City wants to work with all parties to achieve the best possible outcomes for all concerned. It is considered that this and other submissions have contributed to improving the draft policies.	
8.		Woodside		<p>1. Woodside acknowledges and supports the objective of the Shire of Roebourne to develop a sustainable and prosperous community across the region. Woodside believes that the Town Planning Scheme No.8 including the Draft Local Planning Policy (DP10) - Transient Workforce Accommodation, which aims to distinguish between accommodation for construction workforces and operational workforces should be broadened to include workforces during both construction and</p>	Noted. Following review of all submissions, it is recommended that the draft policy be revised to recognise the need for base-level supply of TWA beds but it is still recommended that this be distinguished from construction camps. It is recommended that tenure be a key consideration with existing TWA developments on freehold title being afforded longer terms of approval (10 years). It is recommended that TWA developments in TWA zones not be bound by time-limited approvals, with an intention to include the base-level TWA bed supply in TWA	The draft policy be revised to distinguish base-level TWA supply from construction camps based on tenure and the term of approval and to allow for no time limits on TWA development in the TWA zone or high quality TWA developments

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				operational phases of a project.	zones. It is also recommended that the preference for operational FIFO workforces to be accommodated in high quality TWA developments that are integrated into an urban neighbourhood be retained and that such developments not be bound by time-limited approvals either.	integrated into an urban neighbourhood.
8.1				<p>2. Industry requires a supportive and efficient regulatory environment. This includes policies to facilitate labour mobility and labour flexibility, and local governments with industry have a role to play to close the productivity gap.</p> <p>3. The LNG industry operates in a highly competitive and dynamic environment. Australia currently has high construction costs and declining productivity. Competition for labour remains an issue. Utilising a mixture of accommodation options is a necessary business requirement for reasons of safety, staff attraction and retention, productivity, and managing community impacts.</p>	<p>Noted. The City has helped facilitate growth in the resource sector. The City is simply trying to implement the vision for Karratha, which requires a shared approach. A sustainable local community and local economy benefits industries with a strong investment in the area.</p> <p>Noted and acknowledged. The City wants to do whatever it can to keep improving Karratha as a place that people want to come to live. It is hoped that Woodside continues to see benefits in such a cause.</p>	No modification required.
8.2				4. DP10, which proposes smaller camps with shorter leases diminishes the much needed flexibility required to attract future workers who continue to choose a FIFO lifestyle. Woodside seeks to provide choices in accommodation that will attract and retain a stable workforce now and to the future. This includes housing and well managed camps of appropriate size and quality as well as adequate lease tenure.	Noted. DP10 does not propose smaller camps. Following review of all submissions it is acknowledged that there is a need for a base-level supply of TWA beds and that a longer term of approval for such facilities would be appropriate. It is important to the City that operational workers continue to be given the choice of residential accommodation. The policy provides the option for operational FIFO accommodation in high quality TWA development that is integrated into an urban neighbourhood.	Refer to Officer's Recommendation at row 8 above.
8.3				5. Woodside's extensive 30 year experience in the Pilbara region has informed the view that consolidation of FIFO workforces, whether operational or of a campaign or shutdown nature, into a few well managed full facility camps with consistent service levels is best practice for the business, for workers' health and well-being and the broader community.	Noted. The City acknowledges the reasons for Woodside's view about best practice but does not believe that long term FIFO workforces are in the best interest of building a sustainable local community.	
8.4				6. Woodside will advocate the case for ongoing policy flexibility, supported by its 2013 Karratha accommodation staff survey data as well as Woodside's experience in exploring, developing and operating oil and gas projects in the Pilbara region since the 1960's. Woodside has had a strong presence in the Karratha community since the inception of the North West Shelf Project thirty years ago. Two thirds of Woodside's Pilbara operations workforce currently live in the Pilbara.	Noted and appreciated. The City is committed to implementing a vision for Karratha. The substantial contribution Woodside has made in a relatively short timeframe is acknowledged. The City looks forward to continuing its long-standing, productive working relationship with Woodside.	
8.5				7. Included is a case study of a transient workforce accommodation facility, namely Gap Ridge Village, which demonstrates community integration and investment.	Noted. With all due respect, the case study of Gap Ridge Village does not demonstrate community integration. The reasons for this lack of integration, however, are clearly understood.	No modification required.
8.6				8. In respect to the proposed "framework for contributions", Woodside believes this aspect of DP10 should remain flexible and include recognition of the broader level of community investment provided by transient workforce accommodation (TWA), like Gap Ridge Village, on behalf of an Operator.	Noted. The City recognises the significant investment Woodside makes in the local community. The City looks forward to continuing to work with Woodside towards an agreed approach.	No modification required.
8.7				9. Woodside believes that sustainable policies, and in particular DP10, must look to the long term. The policy should be adaptable to meet the changes in economic growth and workforce expectations, as well as position the community and industry for future development in the region.	Noted. Sustainability is a key driver behind this policy. The Policy is adaptable to deal with changing circumstances.	No modification required.
9.	15 may 2014	Department of Regional Development	PO Box 1143 West Perth WA 6872	1. DRD is taking a lead role in facilitating a whole of government approach to the consideration of TWAs in WA, with a particular focus on the Pilbara and has been working with a number of agencies including DoP, DoL, DSD, Landcorp, Tourism WA and PDC.	Noted.	No modification required.
9.1				2. DRD and the agencies (above) favour a more consistent approach to the management of TWAs across the Pilbara.	Noted.	No modification required.

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9.2				3. DRD notes the Shire's TWA Policy is complemented by the Shire's SIA Policy and that the Shire intends for both policies to work in tandem to provide a consistent approach to the management of TWAs.	Noted.	No modification required.
9.3				4. DRD acknowledges the Shire's position that transient workers have an impact on Pilbara communities and that it is important to get a balance to ensure the quality of life for permanent residents is not comprised.	Noted.	No modification required.
9.4				5. DRD would like to see a common terminology for TWA accommodation to assist in developing a common set of policies across Pilbara local governments. It is pleasing to note the Shire is using the same terminology for TWAs as DRD and the other agencies.	Noted.	No modification required.
9.5				6. DRD takes a view that any new TWAs should provide a legacy benefit to their host communities. DRD considers the effective management of TWAs is particularly important in terms of the achievement of the Royalties for Regions Pilbara Cities Vision. Therefore it may be beneficial to locate new TWAs so they could later be integrated into new residential suburbs. If TWAs were to be built to a high standard, it might be possible for TWA administration blocks to be converted to community centres (already cyclone rated) and individual accommodation units sold as private residences. This view is broadly consistent with the views of other agencies.	Noted. The suggestion of TWA buildings and infrastructure being available for adaptive reuse is a good one. Woodside's and Civeo's Gap Ridge TWA Camps potentially allow for adaptive reuse, being situated in an Urban Development zone. The requirement under the planning scheme for decommissioning/transition plans to be submitted with TWA applications supports this intention. It is recommended that the draft TWA policy be revised to emphasise the importance of thinking about adaptive reuse at the design stage.	The draft TWA policy be revised to emphasise the importance of thinking about adaptive reuse at the design stage.
9.6				7. DRD acknowledges that it may not always be easy to convert TWAs to other legacy purposes such as aged care and can understand the logic of the Shire's intention to offset any adverse effects through the mechanisms outlined under section 6.8 of the TWA policy. DRD also notes the Shire is mindful of potential legacy benefits from new TWA developments through the forms of contributions listed in section 6.8.1.	Noted.	No modification required.
9.7				8. DRD is concerned how effectively any local government authority can be in measuring "... <i>potential loss of any community service or benefit resulting from a planning approval.</i> " However, DRD notes in section 6.8 that Attachments A and B in the SIA Policy do attempt to provide guidance in addressing this issue.	Noted. The City will continue to work towards building a sustainable local economy and local community and will continue to monitor and review the effects of FIFO and TWA on that aim, as will others. This should show over time whether the City loses any potential benefits through TWA practices and if so to what extent, and what the right approach and balance is in accommodating those practices and transitioning over time.	No modification required.