



Regional Development Assessment Panel Related Information

Meeting Date and Time: Tuesday, 6 May 2025; 9:30am
Meeting Number: RDAP/41

PART C – CITY OF KALGOORLIE-BOULDER

1. Declarations of Due Consideration
2. Disclosure of Interests
3. Form 1 DAP Applications
 - 3.1 Lot 173 Kitchener Road, Mullingar - Proposed Workforce Accommodation Facility – DAP/24/02817
4. Form 2 DAP Applications
5. Section 31 SAT Reconsiderations



Attendance

Officers/Technical Advisors in attendance

Kevin Tang (City of Kalgoorlie-Boulder)

Paul Lees (City of Kalgoorlie-Boulder)

Applicants and Submitters

Ben Doyle (Planning Solutions)

Steve Allerding (Allerding & Associates)

Lisa O'Donoghue



PART C – CITY OF KALGOORLIE-BOULDER

1. Declarations of Due Consideration

2. Disclosure of Interests

Please note a standing declaration of interest, if the items on this agenda have been considered at the relevant local government council meeting, the local government DAP members acknowledge that in accordance with section 2.4.9 of the DAP Code of Conduct 2024 they have declared that they had participated in a prior Council meeting in relation an item being determined at this meeting. However, under section 2.1.2 of the DAP Code of Conduct 2024, they acknowledged that they are not bound by any previous decision or resolution of the local government and undertakes to exercise independent judgment in relation to any DAP application before them, which will be considered on its planning merits.

Member	Item	Nature of Interest
Deputy Mayor Kirsty Dellar	3.1	Indirect Pecuniary Interest – Shareholder of land owner

3. Form 1 DAP Applications

3.1 Lot 173 Kitchener Road, Mullingar - Proposed Workforce Accommodation Facility – DAP/24/02817

3.1.1 Deputations and Presentations

Steve Allerding (Allerding & Associates) presenting in support of the recommendation for the application at Item 3.1. The presentation will address various issues in regards to the planning framework, Bushfire Assessment.

Lisa O'Donoghue presenting in support of the recommendation for the application at Item 3.1. The presentation will address the scale of the facility and the need for the scale of the facility given the available accommodation in the Kalgoorlie town site.

Ben Doyle (Planning Solutions) presenting against the recommendation for the application at Item 3.1. The presentation will request DAP Members to defer the application for a period of 60 days to allow the applicant and client to further engage with the City.

The City of Kalgoorlie-Boulder may be provided with the opportunity to respond to questions of the panel, as invited by the Presiding Member.

4. Form 2 DAP Applications

Nil.

5. Section 31 SAT Reconsiderations

Nil.



Presentation Request Form

Regulation 40(3) and DAP Standing Orders 2024 cl. 3.6

Must be submitted **at least 72 hours (3 ordinary days)** before the meeting

Presentation Request Guidelines

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Presentations are not to exceed **3 minutes**. It is important to note that the presentation content will be **published on the DAP website** as part of the meeting agenda.

Please complete a separate form for each presenter and submit to daps@dplh.wa.gov.au

Presenter Details

Name	Steve Allerding
Company (if applicable)	Allerding and Associates
Please identify if you have any special requirements:	YES ☐ NO ☒ If yes, please state any accessibility or special requirements: Click or tap here to enter text.

Meeting Details

DAP Name	Regional Development Assessment Panel
Meeting Date	6 May 2025
DAP Application Number	DAP/24/0817
Property Location	Lot 173 Kitchener Road, Mullingar
Agenda Item Number	3.1

Presentation Details

I have read the contents of the report contained in the Agenda and note that my presentation content <u>will be</u> published as part of the Agenda:	YES ☒
Is the presentation in support of or against the <u>report recommendation</u> ? (contained within the Agenda)	SUPPORT ☒ AGAINST ☐
Is the presentation in support of or against the <u>proposed development</u> ?	SUPPORT ☐ AGAINST ☒
Will the presentation require power-point facilities?	YES ☒ NO ☐ If yes, please attach
Will you be attending in person or via electronic means	In person ☐ Online ☒



Presentation Content*

These details may be circulated to the local government and applicant if deemed necessary by the Presiding Member. Handouts or power points will not be accepted on the day.

Brief sentence summary for inclusion in the Additional Information as part of the agenda	<i>The presentation will address:</i> Refer comments below.
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In accordance with Clause 3.6.2 of the *DAP Standing Orders*, your presentation request must also be accompanied with a written document setting out the substance of the submission. If the presentation references documents that are contained within the responsible authority attachments, please consider referencing the attachment and not including a duplication of documents.

Please attach detailed content of presentation or provide below:-

1. Whilst the use is Discretionary under the zoning of the land, both the development and use of the land requires approval. This requires testing against the suitability and capability of the site to accommodate the proposed development having regard to the current and likely future framework;
2. Under the planning framework, the Subject Site is zoned as Residential R10, which is premised as a low-density residential coding pursuant to the Residential Design Codes (RDC's). This coding applied by Council sets the expectation of the land in terms of its likely intensity and community amenity expectations. The proposal to accommodate over 800 workers in a 200 (four room) transportable cabins is a significant increase in the density/intensity expectations which is reflective of the high level of community objection expressed for the Proposal and has implications for the functionality of the site for traffic, bushfire and need, which were also pre-eminent in the level of objections received from the community. The low-density designation of the site which is incongruent with the proposal for a far more intensive development for up to 800 workers.
3. Having regard to the above, the Officer's report has acknowledged there are shortcomings with respect to the Bushfire Assessments being brought up to date with the current Bushfire standards. The proposal to condition these is not accepted and is not good planning practice as it needs to demonstrate that the Proposal would be sufficiently acceptable to meet bushfire criteria as a matter of orderly and proper planning before any decision to approve the application is made. This is also critical because workforce accommodation is recognised as a vulnerable facility, which requires the preparation and adoption of a Bushfire Emergency Plan by a BPAD Level 3 (formerly Emergency Evacuation Plan). No mention is made in the officer's report for the preparation of such a plan, which would be a significant omission that would warrant against any determination being made.

Shortcomings with respect to the Bushfire Assessments being brought up to date is essential including whether:

- A BEP has been prepared;



- Whether appropriate consents for the use and ongoing management of the emergency access way is known and already in place to satisfy the suitability of the proposal.
4. The development is essentially accommodating a rotating short stay equivalent accommodation for its workforce. The City's workforce accommodation policy requires the application to undertake a needs assessment. Whilst the application has considered the availability of permanent accommodation, it has failed to consider the availability of short-term accommodation options as part of its assessment which indicate that there are high vacancy rates that would be capable of accommodating a large proportion of the workforce accommodation needs.
 5. The above shortcomings are significant and in the absence of these matters being properly addressed, it would warrant against approval being provided for the Proposed Development; and, having regard to the above matters, when the Proposed Development is considered against the planning framework, and particularly the criteria under Clause 67(2) of the Planning Regulations (that DAP is required to have due regard to), our submission is that the Proposed Development is neither capable nor appropriate for approval as currently proposed.

Deputation on Kitchener road workers accommodation

Kitchener road - Kalgoorlie.

Thank you for the opportunity to present today.

Introduction

We prepared a detailed submission opposing the application principally as it applies to the suitability of the use of the land, along with its intensity, and shortcomings which had not been properly tested with bushfire and emergency access

1. Whilst the use is Discretionary under the zoning of the land, both the development and use of the land requires approval. This requires testing against the suitability and capability of the site to accommodate the proposed development having regard to the current and likely future framework;
2. Under the planning framework, the Subject Site is zoned as Residential R10, which is premised as a low-density residential coding pursuant to the Residential Design Codes (RDC's). This coding applied by Council sets the expectation of the land in terms of its likely intensity and community amenity expectations. The proposal to accommodate over 800 workers in a 200 (four room) transportable cabins is a significant increase in the density/intensity expectations which is reflective of the high level of community objection expressed for the Proposal and has implications for the functionality of the site for traffic, bushfire and need, which were also pre-eminent in the level of objections received from the community. The low-density designation of the site which is incongruent with the proposal for a far more intensive development for up to 800 workers.

3. Having regard to the above, the Officer's report has acknowledged there are shortcomings with respect to the Bushfire Assessments being brought up to date with the current Bushfire standards. The proposal to condition these is not accepted and is not good planning practice as it needs to demonstrate that the Proposal would be sufficiently acceptable to meet bushfire criteria as a matter of orderly and proper planning before any decision to approve the application is made. This is also critical because workforce accommodation is recognised as a vulnerable facility, which requires the preparation and adoption of a Bushfire Emergency Plan by a BPAD Level 3 (formerly Emergency Evacuation Plan). No mention is made in the officer's report for the preparation of such a plan, which would be a significant omission that would warrant against any determination being made.

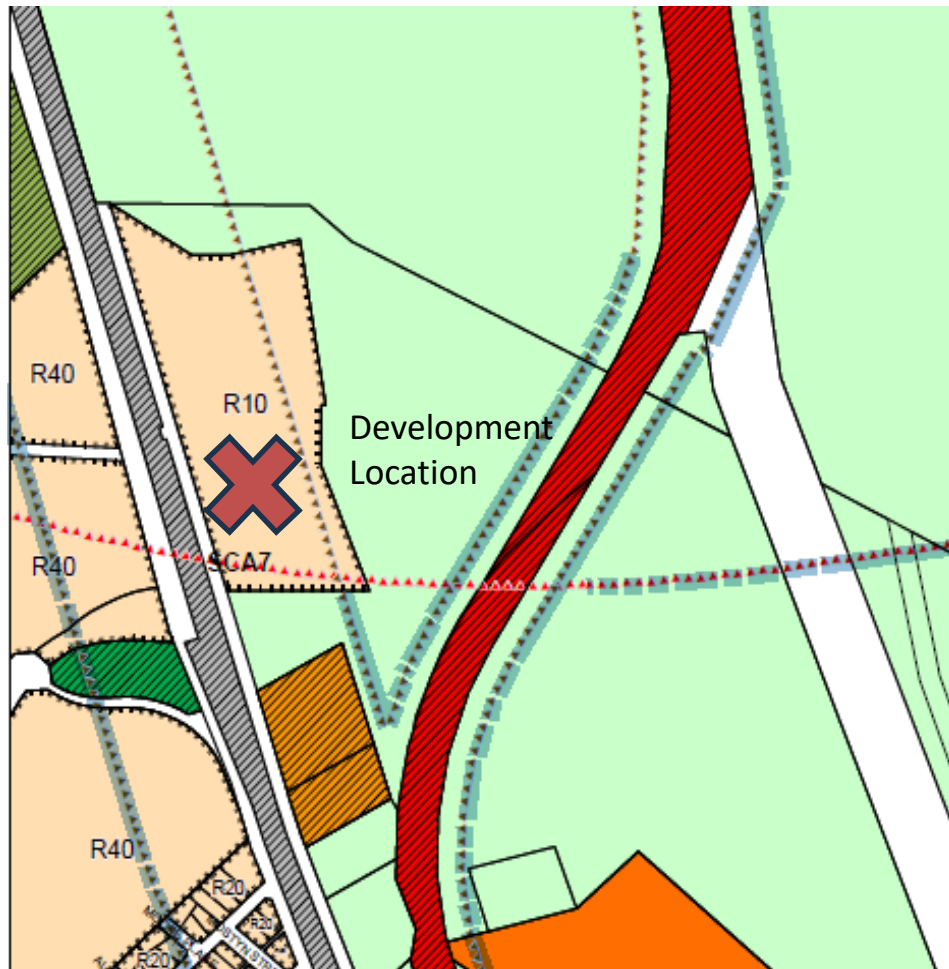
Shortcomings with respect to the Bushfire Assessments being brought up to date is essential including whether:

- A BEP has been prepared;
 - Whether appropriate consents for the use and ongoing management of the emergency access way is known and already in place to satisfy the suitability of the proposal.
4. The development is essentially accommodating a rotating short stay equivalent accommodation for its workforce. The City's workforce accommodation policy requires the application to undertake a needs assessment. Whilst the application has considered the availability of permanent accommodation, it has failed to consider the availability of short-term accommodation options as part of its assessment which indicate that there are high vacancy rates that would be capable of accommodating a large proportion of the workforce accommodation needs.

5. The above shortcomings are significant and in the absence of these matters being properly addressed, it would warrant against approval being provided for the Proposed Development; and, having regard to the above matters, when the Proposed Development is considered against the planning framework, and particularly the criteria under Clause 67(2) of the Planning Regulations (that DAP is required to have due regard to), our submission is that the Proposed Development is neither capable nor appropriate for approval as currently proposed.

This is a matter of orderly and proper planning and when tested against the framework, we submit that it is not considered capable or appropriate for approval as proposed.

Kitchener Workers Accommodation - Zoning



- Low Density R10 Code for Kalgoorlie Future Growth area
- Expected density 1,000m2 lots
- Proposal for 800 bed facility far exceeds expectation of intensity
- Has implications for Access and Bushfire

Bushfire Prone Areas



- Context is all of land and surrounds is Bushfire Prone
- Presently no road access and constrained future access
- Workers Accommodation is designated as a Vulnerable Facility
- This has obligations that must be met for Safety of Life including:
 - Bushfire Emergency Plan (BEP)
 - Sufficient Access arrangements

Bushfire and Access



- Workers Accommodation is designated as a Vulnerable Facility
- This has obligations that must be met for Safety of Life including:
 - Bushfire Emergency Plan (BEP)
 - Sufficient Access arrangements
- Shortfalls include:
 - Only one Primary Access
 - Only one emergency access via Crown land unconfirmed
 - No BEP
 - BFMP not updated to meet current standards

Workforce Accommodation – Needs requirement

Council's Workforce Accommodation Policy
requires consideration of need:

3. Need

Proposals for new workforce accommodation facilities; requests to extend approval periods for existing workforce accommodation facilities; or proposals to increase the number of beds associated with existing facilities must be accompanied by information that demonstrates the need.....

Workforce Accommodation Policy – Needs requirement

To evaluate suitability of need, the policy includes the following provisions:

a. A proponent of new workforce accommodation, or an increase in the number of beds for an existing facility must demonstrate a need for the development, as part of their proposal. The need for beds must be demonstrated in the context of workforce accommodation provision across the City and in regard to the industry demand;

c. Assertions that there is adequate demand for workforce accommodation to support business investment which are not substantiated with demonstrable demand are not accepted as the basis for demonstrating need for new workforce accommodation;

e. Evidence of occupancy, contracts or bookings may contribute to the demonstration of demand for workforce accommodation;

Kitchener Workers Accommodation - Aerial



- Context of non remote accommodation with access to facilities
- Less than 3.5km from Lionel Street and Hannan street intersection
- Need for scale of facility having regard to zoning and location with access to facilities
- 22 Accommodation sites in Kalgoorlie noting not all workers typically FIFO with high vacancy rates: non assessed by applicant

Workforce Accommodation Policy – Needs requirement

22 hotel and short stay accommodation providers comprising:

- Albion Hotel
- Best Western Hospitality Inn
- Broken Hill Hotel
- Carnegie Lodge
- Discovery Park Boulder
- Discovery Park Kalgoorlie
- Federal Hotel
- Grand Hotel Kalgoorlie
- Midas Motel
- Miners Rest
- Overland Motel
- Piccadilly Hotel
- Palace + Australia Hotel
- Prospector Caravan Park
- Quest Apartments
- Railway Motel
- The Plaza Hotel
- The York Hotel
- Tower Hotel
- View on Hannans
- Rydges Kalgoorlie
- Weslan

Availability of beds from the period of July 2024 to April 2025, with only 15 of the 22 venues that responded at the time of writing which demonstrated that:

- The availability of available beds ranged from 131 to 515 over that period; and,
- The average available beds from respondents over that period per month was 287.



Presentation Request Form

Regulation 40(3) and DAP Standing Orders 2024 cl. 3.6

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Presenter Details

Name	Lisa O'Donoghue
Company (if applicable)	Click or tap here to enter text.
Please identify if you have any special requirements:	YES ☐ NO ☒ If yes, please state any accessibility or special requirements: Click or tap here to enter text.

Meeting Details

DAP Name	Regional Development Assessment Panel
Meeting Date	6 May 2025
DAP Application Number	DAP/240817
Property Location	Lot 173 Kitchener Road, Mullingar
Agenda Item Number	3.1

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Deputation Summary

I object to the proposed development on the basis of the existing availability of accommodation, the scale of the facility and the need for the scale of the facility given the available accommodation in the Kalgoorlie Townsite.

The suitability of the facility requires consideration against:

1. The Towns adopted Workforce Accommodation Policy; and
2. Clause 67 (n) and (v) of the *Planning and Development (Local Planning Schemes) Regulations 2015* which requires consideration of:
 - Social impacts of the development
 - The potential loss of community services resulting from the development (not economic competition)

This is specifically relevant in the context of the workforce accommodation is a proposed facility located close to the Town Centre of Kalgoorlie, and is not a remote camp. Therefore, it has potential implications for activity in the Kalgoorlie Townsite which are relevant considerations

Workforce Accommodation Policy

The Town has an adopted Workforce Accommodation Policy that requires for 5 year approval or more, amongst other things, demonstration of the following:

(5) Demonstrate significant social and/or community outcomes above those associated with a five (5) year time limited approval.

It also requires consideration of need having regard to the following criteria:

3. Need

Proposals for new workforce accommodation facilities; requests to extend approval periods for existing workforce accommodation facilities; or proposals



to increase the number of beds associated with existing facilities must be accompanied by information that demonstrates the need.....

As such, the need for additional beds must be considered against the capacity of existing settlements to meet the accommodation needs. The following provisions guide how need will be assessed:

To evaluate that, the policy includes the following provisions:

a. A proponent of new workforce accommodation, or an increase in the number of beds for an existing facility must demonstrate a need for the development, as part of their proposal. The need for beds must be demonstrated in the context of workforce accommodation provision across the City and in regard to the industry demand;

c. Assertions that there is adequate demand for workforce accommodation to support business investment which are not substantiated with demonstrable demand are not accepted as the basis for demonstrating need for new workforce accommodation;

e. Evidence of occupancy, contracts or bookings may contribute to the demonstration of demand for workforce accommodation;

The officer's report has provided a summary of the Applicant's response to these criteria which has only looked at the availability of existing permanent residential accommodation. It has not looked at the full gamut of available accommodation. This is reflected by the Council's RAR determination under proposed refusal reason 2 that the Proponent has not adequately demonstrated compliance with the Policy in respect to need.

I am an experienced operator of short stay accommodation in Kalgoorlie and am familiar with the availability of accommodation in Town. Mining operations comprise a multitude of accommodation needs from FIFO, to executive classes staying for differing periods of time. It is not a question of commercial competition, because it is not directly competing with short stay accommodation providers, but one of the aspects which is relevant to the scale and suitability of the facility is that Council requires workforce accommodation proposals to be assessed is the availability of other accommodation that would negate the need for the facility, or for the scale of the facility.

Accommodation to service the mining industry makes up an important component of overall demand for short stay accommodation providers to enable to provision of short stay accommodation options that also benefit the broader community. If that capacity is removed, then it has a potentially significant effect on operators to continue to provide that broader service to the overall community.

To that end a snapshot of accommodation vacancy was undertaken in the Town. That detail was provided in a planning submission, but I am able to speak to that accommodation needs as an existing operator in Town.



The snapshot looked at the availability of beds from the period of July 2024 to April 2025, with only 15 of the 22 venues that responded at the time of writing which demonstrated that:

- The availability of available beds ranged from 131 to 515 over that period; and,
- The average available beds from respondents over that period per month was 287.

This suggests that there is capacity to accommodate at least part of the workforce accommodation and mitigates against the overall scale of the facility, especially when considered against the low-density coding that applies to the site.

This consideration is particularly relevant given the central location of the workforce accommodation (ie non remote) and the requirement to consider the need for the facility under the policy as well as the social effects of the development.



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Presenter Details

Name	Ben Doyle
Company (if applicable)	Planning Solutions
Please identify if you have any special requirements:	YES ☐ NO ☒ If yes, please state any accessibility or special requirements: Click or tap here to enter text.

Meeting Details

DAP Name	Regional DAP
Meeting Date	6 May 2025
DAP Application Number	DAP/41
Property Location	Lot 173 Kitchener Road
Agenda Item Number	3.1

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