

ITEM	SUMMARY	AURORA COMMENT
	A BMP and BEMP) has been prepared for the site to satisfy the provisions of the SPP No. 3.7 - Planning for Bushfire Prone Areas and Guidelines for Planning in Bushfire Prone Areas. The BMP and BEMP will be implemented as a condition of Development Approval for the proposed development. Further investigations to address limited access into the entire townsite and the site will be necessary.	

APPENDICES

ITEM	SUMMARY	AURORA COMMENT
Appendix A	<p>Contamination Review</p> <ul style="list-style-type: none"> There have been no soil or groundwater investigations undertaken at the site however it is understood offsite contamination (and possible remediation) associated with former fuel infrastructure located to the north has previously occurred. Reports presenting details of investigation(s) and/or remediation offsite have not been identified and as such the specific scope and/or effectiveness of any remediation works is not well understood. In this regard the nature and extent of existing and/or residual contamination in soil or groundwater is not known. The risk to the site is considered to be LOW. It is not known if the soils in the area marked as having a moderate to low risk of ASS being present are potential or actual ASS. The requirement to investigate is dependent on whether development plans for the site involve disturbance of potential ASS material or if dewatering may be required. Management measures, such as development of an ASS management plan (ASSMP) or dewatering management plan (DMP), would be dependent on the findings of any ASS investigation. The risk to the site is considered to be LOW. Onslow Townsite (including the site) is listed on the Department of Defence (DoD) UXO <p>Mapping Application as having a Slight Potential for the presence of UXO. It is not known if a detailed UXO survey has been undertaken at the site, or if records exist of any historical UXO searches or recovery operations in relation to the site. Information on possible UXO presence in AECOM (2010) was anecdotal in nature. The risk to the site is considered to be LOW to MODERATE.</p> <ul style="list-style-type: none"> Without a hazardous materials (HAZMAT) survey of the site or previous site investigations, it is not known if asbestos containing materials (ACM), asbestos fines (AF) or fibrous asbestos (FA) are present at the site. If these are present, they may be a source of potential contamination for onsite and offsite, current and future, receptors (human health). The risk to the site is considered to be LOW to MODERATE. <p>Based on the data gaps identified, the following recommendations are made:</p> <ul style="list-style-type: none"> A UXO survey of the site should be considered prior to any site works commencing. A HAZMAT site survey should be considered to evaluate the potential presence of asbestos at the site. Conduct a review of any available contamination investigation and/or remediation reports describing works associated with former bulk fuel infrastructure (i.e. AOPC 1, AOPC 2 and AOPC 3) to determine the requirement for investigation onsite. 	<p>Checked contaminated sites database: No confirmed sites.</p> <p>The Contaminated Sites Database holds information on confirmed contaminated sites only, i.e. sites that have been classified as <i>contaminated - remediation required</i>, <i>contaminated - restricted use</i> and <i>remediated for restricted use</i>.</p> <p>All other reported sites are listed on the Department's Reported Sites Register—including those awaiting classification.</p> <p>Information is available in two forms --</p> <p>A Basic Summary of Records (BSR) contains information on:</p> <ul style="list-style-type: none"> the classification assigned to the site and the reason for the classification with reference to any relevant guidelines and standards restrictions on the use of the site any notice given under Part 4 of the <i>Contaminated Sites Act 2003</i>, i.e. investigation notice, clean-up notice or hazard abatement notice. <p>A Detailed Summary of Records (DSR) includes (in addition to the information provided for a Basic Summary of Records):</p> <p>copies of any certificates of contamination audit given in respect of the land</p> <ul style="list-style-type: none"> the author, date and title of any Audit reports, environmental reports, management plans and sampling and analysis programmes submitted to DWER. <p>A DSR has not been undertaken, presumably on the basis that risk is considered to be low.</p>

	<ul style="list-style-type: none"> Site development plans should be reviewed to determine if ASS may be disturbed by development activities or if dewatering is to occur, and thereby determine the requirement for an ASSMP/DMP. Depending on the findings of the above, consideration should be given to intrusive site investigations to: <ul style="list-style-type: none"> Investigate the contamination status of soils (and potentially groundwater) onsite at AOPC 1, AOPC 2 and AOPC 3, to confirm there are no hydrocarbon impacts. Assess the potential presence of asbestos (ACM, AF or FA) in soils at the site. If identified to be present, asbestos remediation should be undertaken in accordance with Department of Health guidelines. In the absence of any site investigations associated with AOPC 1, AOPC 2 or AOPC 3, an unexpected finds protocol (UFP) is recommended to be developed prior to site development works. The protocol should detail the management requirements should any of the contaminants of potential concern (COPCs) for the site be encountered during site development works. 	
Appendix B: Flora Survey	<p>One broad landform (low coastal dune systems with mixed laterite sands) (Appendix B).</p> <p>The vegetation within the site, VT1, was described as <i>Acacia coriacea</i> subsp. <i>coriacea</i> and <i>Acacia tetragonophylla</i> (with <i>Crotalaria cunninghamii</i> subsp. <i>sturtii</i>) mid to low sparse shrubland over <i>Cenchrus ciliaris</i> and <i>Eulalia aurea</i> low tussock grassland with <i>Triodia epactia</i> low sparse hummock grassland over <i>Euphorbia myrtaoides</i> low sparse herb land.</p>	<p>Acacia shrubland is different to Beard description of Cape Yannare Coastal Plain 117 which is a hummock grassland.</p> <p>Appendix B checked and information deemed acceptable.</p>
Appendix B. Detailed Flora and Fauna Assessment	<p>Detailed Flora and Fauna Assessment</p> <p>Shorebirds, including conservation significant species, may use coastal dune areas within the Survey Area, however, these species are highly mobile and would not be reliant on the habitats within the Survey Area.</p> <p>The key findings of the survey within the Survey Area were:</p> <ul style="list-style-type: none"> No Threatened flora species pursuant to the EPBC Act and/or gazetted as Threatened pursuant to the BC Act, or DBCA listed Priority flora were recorded during the surveys. Four introduced species were recorded during the survey, one of these <i>*Tamarix aphylla</i> listed as a declared pest and a Weed of National significance under the BAM act. One vegetation type, VT1, coastal dunes was mapped within the Survey Area. No TECs or PECs were recorded within the Survey Area. One broad fauna habitat was observed within the Survey Area comprising coastal dunes. One conservation significant fauna species, <i>Lerista planiventralis maryani</i> (P1), utilises dune habitat in the bioregion, and records indicate that it historically occurred within 1 km of the Survey Area. A targeted terrestrial vertebrate survey would be needed to confirm its presence or absence. 	<p>Search distances for TEC, PEC, Threatened Flora and Fauna are appropriate.</p> <p>No significant constraints for on-site surveys (timing, weather etc).</p> <p>Flora survey adequacy OK, although the report said that there was 4.1 quadrats per ha (when there was 6 over the 25 ha which equated to one quadrat per 4.1 ha).</p> <p>Shorebirds left out of habitat assessment. OK, but premise that they are not reliant on survey area should be discussed.</p> <p>Impact to <i>Lerista planiventralis maryani</i> (P1) may be required.</p>

	<ul style="list-style-type: none"> Shorebirds may use the coastal dune areas within the Survey Area; however, these species are highly mobile and would not be reliant on the habitats within the Survey Area. 	
Urban Water Management Plan	Urban Water Management Plan	Not reviewed.
Bushfire Management Plan (BMP)	Bushfire Management Plan (BMP)	Not reviewed.
Bushfire Emergency Management Plan (BEMP)	Bushfire Emergency Management Plan (BEMP)	Not reviewed.
Coastal Setback?	Coastal Setback?	<p>No consideration of coastal setback requirements.</p> <p>MRA document: Onslow Townsite Planning Coastal Setbacks and Development Levels (MP Rogers and Associates, 2011) recommended S1 – Severe Storm Erosion: 99 m, S2 Historic Shoreline Movement: 20 m, S3 Climate Change: 90 m. Total recommended Physical Processes Setback: 209 m. Current design approximately 100m. Viability of design depends on life of village infrastructure, transportability and layout to allow for managed retreat.</p>



**13.2F - DAP Application – DAP/21/02078 -Da 21-67 | L300 Back Beach Road,
Onslow - Transient Workforce Accommodation (500 Persons)**



Enquiries: Benjamin.Leevy@ashburton.wa.gov.au
File: BAC.0300
Development Application: 21-67

5 November 2021

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ABN 45 503 070 070

Dear Adrian,

APPLICATION FOR PLANNING APPROVAL DA 21-67 | DAP/21/02078 | TRANSIENT WORKERS ACCOMMODATION - ONSLOW VILLAGE (500 PERSON) AT LOT 300 BACK BEACH ROAD, ONSLOW

The Shire of Ashburton's Town Planning Team have undertaken a review of your application received on 2 September 2021. The following further information is requested:

Clearing of Vegetation

The submitted documentation including the Bushfire Management Plan (Attachment 5) and Environmental Report (Attachment 5), identify that clearing of natural vegetation is to occur on the site. However, the degree and amount of clearing is not clearly identified in the lodged documentation and associated plans with contradictions occurring between the above documents.

Please provide a Clearing Plan that illustrates the areas of native vegetation on the site that is proposed to be cleared as part of this development (this includes areas to be cleared for APZ).

Traffic Impacts

It has been identified that the proposed volume of traffic entering the site at the proposed access point on Third Avenue may cause undue risks and congestion to the sensitive land uses along the proposed transport route.

The Shire's Infrastructure Team have provided the following comments:

- The access point to the development will be required to be from Back Beach Road. This will minimise the overall development traffic impact to the urban transport network and urban environment.
- All internal and external roads are required to be of a sealed surface (either asphalt or concrete) to minimise the impact of dust and erosion and ensure the assets level of service is maintained.

In addition to the above comments, the Shire requests, in accordance with Part 6.4 of the Vol. 4 of the WAPC - Transport Impact Assessment (TIA) Guidelines, that a Traffic Impact Assessment be submitted to the Shire for the development.

The TIA should address (but is not limited to):

- Transportation of FIFO staff to and from the site (flights);

- Quantify the proposed traffic movements along Third Avenue and Simpson Street and associated intersections.
- Impact on the nearby Onslow Primary School during school pick up and drop off ;

Bushfire Risk

It has been noted within the external agency response from the Department of Fire and Emergency Services (DFES), that modifications to the Bushfire Management Plan (BMP) are necessary to ensure it accurately identifies the bushfire risk and necessary mitigation measures.

1. Policy Measure 6.5 a) (ii) Preparation of a BAL contour map

Issue	Assessment	Action
<p>Landscap Management Plan</p>	<p>The BMP is reliant on a Landscape Management Plan (LMP) to establish and maintain APZ's (identified in Figure 5 of the BMP) and remaining vegetated areas of Plot 11 as managed to a low threat state, in accordance with AS3959.</p> <p>However, the submitted LMP does not reference APZ Schedule 1: Standards for Asset Protection Zones contained in the Guidelines, nor does it specify how excluded areas will achieve low threat status under AS3959. DFES recommends inconsistencies between the BMP and LMP are addressed to ensure the vegetated areas within the site are established and maintained in accordance with Schedule 1 of the Guidelines</p>	<p>Modification to the BMP is required. Decision maker to be satisfied that vegetation within the site is established and maintained in accordance with Schedule 1 of the Guidelines.</p>
<p>BAL Contour Map</p>	<p>DFES notes Figure 1 of the BMP (Development Plan) depicts a 15 metre wide separation distance between the project area boundary and proposed buildings. The BMP also states all proposed buildings are sited in BAL29 and below. However, Figure 4 of the BMP appears to depict buildings partially located in areas of BAL40, specifically, buildings located in the south western portion of the project area adjacent to Plot 2. DFES recommends any inconsistencies between Figure 1 and 4 are addressed to ensure the required 15 metre separation distance is achieved between Plot 2 and proposed buildings.</p>	<p>Modification to the BMP is required. Decision maker to be satisfied the required 15 metre separation distance can be achieved.</p>

2. Policy Measure 6.5 c) Compliance with the Bushfire Protection Criteria

Element	Assessment	Action
Location, and Siting & Design	A1.1 & A2.1 – not demonstrated The BAL ratings cannot be validated for the reason(s) outlined in the above table.	Modification of the BMP required. The decision maker to be satisfied that compliance with Element 1 and Element 2 can be achieved.
Vehicular Access	A3.2 – not demonstrated The BMP states: <i>The existing public roads sighted whilst travelling to the site appeared compliant with public road specifications of the Guidelines and will be sufficient for emergency egress or firefighter access to the site.</i> The BMP has not validated that the public road network meets the full technical requirements of the Guidelines.	Modification to the BMP is required. The decision maker to be satisfied that compliance with A3.2 can be achieved.
Vehicular Access	A3.5 – not demonstrated DFES considers the proposal to be of a scale that requires a private road network rather than a driveway. The proposal has the potential to accommodate up to 500 occupants. The private driveway should be upgraded to meet the technical requirements of column 1 Table 6 of the Guidelines. A3.5 is generally for use where a single house on a single lot is being proposed.	Modification to the BMP is required. The decision maker to be satisfied.

Issue	Assessment	Action
Bushfire Emergency Evacuation Plan (BEEP)	The referral has included a ' <i>Bushfire Emergency Evacuation Plan</i> ' for the purposes of addressing the policy requirements. Consideration should be given to the Guidelines Section 5.5.2 'Developing a Bushfire Emergency Evacuation Plan'. This contains detail regarding what should be included in a BEEP and will ensure the appropriate content is detailed when finalising the BEEP to the satisfaction of the Shire.	Comment only.

Please provide an updated BMP and BEEP that addresses the requested modifications, as listed above.

Environmental

The Environmental Assessment Report submitted as part of this application, has been reviewed and it has been identified that additional information is required to undertake a full assessment of the environmental impacts of the development on the site.

The matters that need to be addressed include:

- The Environmental Assessment Report does not address potential groundwater flow direction and whether adjacent potentially contaminating activities may have impacted groundwater beneath the site.
- It is not clear from the Environmental Assessment Report how much native vegetation will be cleared. It is important to quantify the extent of impacts i.e. how much vegetation is to be cleared for the development. The total area of clearing should be inclusive of bushfire management requirements (as noted above).
- The inclusion of species listed as 'Marine' and 'Shorebird' have not been included within the habitat assessments, given proximity of the site from the coast. Also likelihood of occurrence rating (high, medium and low) has not defined.
- The Environmental Assessment Report notes that *Lerista planiventris manyani* (P1), utilises dune habitat in the bioregion and records indicate that it historically occurred within 1 km of the site and that a targeted terrestrial vertebrate survey utilising pitfall traps would be required to assess its presence or absence in the site with greater certainty.
- The inclusion of a Construction Environmental Management Plan (CEMP) as part of the development application.
- Undertaking an Unexploded Ordinance (UXO) survey of the site prior to any works commencing on the site.
- Undertaking a HAZMAT site survey, to ascertain if the site has been impacted by asbestos containing materials (ACM), asbestos fines (AF) or fibrous asbestos (FA) are present at the site.
- Soil or groundwater investigations being undertaken at the site, to ascertain if off-site contamination from former fuel infrastructure located to the north has impacted the site and if possible remediation is required.
- An Acid Sulphate Soil (ASS) Assessment needs to be undertaken to identify if the site designated as 'moderate to low risk of ASS' being present on the site is 'potential' or 'actual' ASS.

Please provide an updated Environmental Plan and associated documentation that addresses the above issues.

Onslow Salt

The Acoustic Report submitted with the application does not address any of the existing noise impacts that affect the site. It is recognised that the proximity of the site to Onslow Salt's port operations may adversely affect the site's sensitive land uses (Accommodation Pods).

Please provide an updated acoustic report that identifies and addresses the impacts of the Onslow Salt operation and any other existing noise generating land uses that are located within close proximity to the development.

Fencing

The Shire requests further clarification around the design, materials of the proposed fencing elements on the site.

Please provide a Fencing Plan for the development, illustrating the areas proposed to be fenced, including the proposed design, materials and height.

Pursuant to cl. 65A of Schedule 2 of the *Planning and Development (Local Planning Schemes) Regulations 2015*, you are requested to provide the above information and documentation before the close of business on Friday **26 November 2021**.

Should you have any queries please do not hesitate to contact me.

Kind Regards,



Benjamin Leavy
Statutory Planning Officer



**13.2G - DAP Application – DAP/21/02078 -Da 21-67 | L300 Back Beach Road,
Onslow - Transient Workforce Accommodation (500 Persons)**

Job Ref: 9419
26 November 2021

Chief Executive Officer
Shire of Ashburton
PO Box 567
TOM PRICE WA 6751

Attention: Mr Ben Mckay – Manager Town Planning

Dear Mr Mckay

Request for Additional Information – Development Application (Shire's Ref: DA21-67)
Lot 300 Back Beach Road, Onslow

Rowe Group acts on behalf of Mineral Resources Limited (MRL), the proposed developer ('Applicant') of Lot 300 Back Beach Road, Onslow with respect to the proposed high-quality transient workers accommodation resort, herein referred to as the 'Onslow Village' (Shire's Ref: DA21-67).

We provide this correspondence in response to the Schedule of Submissions (following advertising) received from the Shire of Ashburton (Shire) on Monday, 1 November 2021, and the Shire's Request for Further Information ('RFI') received on Friday, 5 November 2021.

Each of the respective consultants has reviewed and responded to the various comments contained in both documents and provide additional information as requested. To assist in the progression of the Application, please find an amended copy of the Schedule of Submissions including the Applicant's response at **Attachment 1**.

For ease of reference, we have also responded to each of the matters raised within the RFI under corresponding headings. In support of the information contained within this correspondence, we have enclosed additional consultant advice which explores the above matters in further detail.

Clearing of Native Vegetation

As outlined within 360 Environmental's technical note provided at **Attachment 2**, the Bushfire Management Plan and Environmental Assessment Report identify that the clearing of natural vegetation will be required to enable to construction of Onslow Village.

The exact areas of clearing were not included (by way of a clearing plan) within the abovementioned reporting as under Part V of the *Environmental Protection Act 1986*, a separate application for a Native Vegetation Clearing Permit (NVCP) will be prepared and lodged with the Department of Water and Environmental Regulation (DWER). The NVCP Application will address clearing associated within the proposed development.

Notwithstanding, to assist the Shire understand the extent of clearing required for the purposes of the development application, please find enclosed an 'Indicative Clearing Plan' at **Attachment 3** for the proposed development which identifies the following:

- The areas to be cleared with no exemptions as per the NVCP requirements (7.71ha);
- The areas to be cleared that are exempt as per the NVCP requirements (6.62ha); and
- The areas to be retained (6.13ha).

The Bushfire Management Plan ('BMP') also reflects the fire management measures applicable to clearing in the development site.

Traffic Impacts

As outlined within the Schedule of Submissions, access to the Onslow Village is proposed via Simpson Street (which is an Arterial/Primary Distributor Road within the Onslow Townsite Expansion Structure Plan) and Third Avenue, which was identified as the preferred solution, considering a detailed review of alternative access options (i.e. Back Beach Road), affected by Aboriginal Heritage issues, risk of coastal inundation and impacts on overland flow of stormwater.

All internal roads will be sealed (i.e. asphalt or concrete) to the satisfaction of the Shire to minimise the impact of dust and erosion and maintained by the Applicant for the life of the development.

Also, Uloth and Associates has prepared an updated Traffic Impact Statement (TIS) addressing the matters raised by the Shire and is provided at **Attachment 4**. Shawmac (Civil and Traffic Consultancy) has also been engaged to undertake a peer review of Uloth and Associates' TIS and is provided at **Attachment 5**. A summary of the TIS and Shawmac's peer review is outlined below:

- Transport to/from the Airport from the Village will occur 7 days per week, with staff from inbound flights arriving around 9am, and staff for outbound flights departing at around 4pm daily. Airport transfers will be serviced by one 22-seat bus plus one light vehicle for each flight, resulting in a total of 8 vehicle trips per day.
- The mining worksite will operate 24 hours per day, 7 days per week, with two 12-hour shifts each day. Of the 250 workforce, it is expected that 150 will work the day shift from 6 am to 6pm, with the remaining 100 working night shift from 6pm to 6am. On this basis, it is noted that the peak vehicle movement periods are outside of the peak movement periods for the school / surrounding road network.
- Based on industry-standard trip generation rates for 'High-turnover Sit-Down Restaurant' and 'Drinking Place' and, it is estimated that the external-use component of the proposed on-site facilities will generate a maximum of 50 vehicle trips (in and out combined) during the overall peak hour. This would typically

translate to an estimated 550 vehicle trips per day under normal commercial operations. However, with the proposed restriction of public-use availability, it is estimated that the maximum flow of 50 vehicle trips accessing the site during the overall peak hour will translate to a maximum of approximately 250 vehicle trips per day.

Bushfire Risk

We understand that it has been noted within the external agency response from the Department of Fire and Emergency Services (DFES), that modifications to the BMP are necessary to accurately identify the bushfire risk and necessary mitigation measures. In this regard, we note that an updated BMP and Bushfire Emergency Evacuation Plan (BEEP) have been prepared addressing the various matters raised by DFES and the Shire as outlined within 360 Environmental's technical note at **Attachment 2**.

Environmental

Consistent with the above, 360 Environmental has also prepared a response to the various environmental matters within the technical note provided at **Attachment 2** to this letter. In this regard, a summary of the responses to the various 'Environmental' matters raised by the Shire is provided below:

- The Environmental Assessment Report ('EAR') has been updated to include reference to the groundwater flow direction (refer to Section 3.5. 1 of the EAR) and is further detailed within the Urban Water Management Plan ('UWMP').
- As outlined above, 360 Environmental has prepared an 'Indicative Clearing Plan' applicable to the proposed development.
- An additional desktop assessment has been undertaken to address the presence and significance of 'Marine' and 'Shorebirds' and is outlined in Section 3.10.1 of the EAR, including the likelihood of occurrence rating. The DWER requirements for these Targeted Surveys shall be undertaken between the months of September and April. The Targeted Surveys can be fulfilled as a condition of development approval for the proposed development.
- A Targeted Terrestrial Vertebrate Survey may be necessary to determine the presence and significance of the *Lerista planiventralis maryani* species. The DWER requirements for this Targeted Survey shall be undertaken between September and April. As above, the Targeted Survey can be fulfilled as a condition of development approval for the proposed development.
- As outlined within the EAR, the purpose of a Construction Environmental Management Plan (CEMP) is to manage and mitigate those construction and development works that may impact on the existing environmental conditions of the site. A CEMP is generally warranted during the construction phase and can be fulfilled as a condition of development approval. Notwithstanding, the EAR sufficiently addresses those existing environmental conditions and associated environmental assessments, investigations and/or relevant approvals.
- The EAR (Section 4.7.3) and Desktop Contamination Assessment highlighted that an Unexploded Ordinance (UXO) survey of the site would be required prior to any works commencing on the site. It is recommended that this matter can be fulfilled as a development condition applicable to the proposed development.

- The EAR (Section 4.7.3) and Desktop Contamination Assessment highlighted that a HAZMAT site survey would be required to confirm whether the site is impacted by ACM, AF, and FA. It is recommended that this matter can be fulfilled as a development condition applicable to the proposed development.
- The EAR (Section 4.7.3) and Desktop Contamination Assessment identified that further soil and groundwater investigations may be required to confirm whether contamination from the former fuel infrastructure has impacted the site. The risk has been considered low of offsite impacts. However a Detailed Site Investigation would address this. This is a separate process to the development application process and should be addressed accordingly.
- The EAR (Section 4.6.3) identified that a Self ASS Self-Assessment would be required to be undertaken to determine the 'potential' or 'actual' presence of ASS on the site. It is recommended that this matter can be fulfilled as a condition of development approval applicable to the proposed development. This is a separate process to the development application process and should be addressed accordingly.

With respect to the above, the EAR and supporting technical note address the environmental considerations raised by the Shire. It is recommended that all the environmental considerations raised within the Shire's RFI can be adequately addressed as conditions of development approval.

Onslow Salt

The Acoustic Report prepared by Stantec that was submitted as part of our Development Application, has considered the existing Acoustic Environment and impact from Onslow Salt, and specifically assessed the impact from Onslow Salt on the proposed accommodation pods. In this regard, it is noted that Section 3 'Acoustic Environment' and Section 4 'Noise Intrusion' of the Acoustic Report outline the assessment undertaken and provides various noise attenuation measures (i.e. external wall materials, external glazing, and roof construction materials).

An assessment may need to be calibrated using onsite noise measurements during the design development process, if deemed necessary by the acoustic engineer. Further, the design of the accommodation pods will ensure the internal noise levels accord with Australian Standard AS2107:2016.

Notwithstanding, the Applicant also notes the following:

- Lot 300 is surrounded by existing residential properties that are in similar proximity to the Onslow Salt Operations, with several residences within closer proximity than the location of the accommodation pods; and
- Lot 300 has a similar proximity to the Onslow Salt site to Development WA's 'Barrarda Onslow' residential development. In this regard, it is noted that the 'Onslow Residential Design Guidelines' prepared by Development WA does not require, mandate or recommend any additional acoustic treatments for residential buildings to be constructed within the 'Barrarda Onslow' development.

Fencing

The Applicant has advised that there is no fencing proposed to be erected around the Onslow Village. Notwithstanding, there will be a standard boom gate entry from Third Avenue to maintain security / control traffic movement between certain hours.

On this basis, no fencing plan has been provided as part of this response.

Additional Supporting Information

In addition to the above response to the Schedule of Submissions and Shire's RFI, our Client has requested that we advise the Shire that there is a considerable amount of literature released by the Government of Western Australia, Commonwealth Government, as well as other organisations and institutions regarding mining accommodation that supports the proposed Onslow Village. In this regard, the consultant team has reviewed various research papers and documents, including, but not limited to the following:

- Commission for Occupational Safety and Health (2019) "Mentally healthy workplaces for fly-in fly-out (FIFO) workers in the resources and construction sectors" – code of practice: Department of Mines, Industry Regulation and Safety, Western Australia;
- Centre for Transformative Work Design (2018) "Impact of FIFO work arrangements on the mental health and wellbeing of FIFO workers" – Mental Health Commission, Western Australia;
- Education and Health Standing Committee (2015) "The impact of FIFO work practices on mental health – Final Report" – Legislative Assembly, Parliament of Western Australia; and
- The Parliament of the Commonwealth of Australia (2013) "Cancer of the Bush of Salvation of our Cities? Fly-in, fly-out and drive-in drive-out workforce practices in Regional Australia" – House of Representatives Standing Committee on Regional Australia.

In summary, the above-mentioned research papers and Government documents consistent findings that include:

- *The [Education and Health Standing] Committee was disappointed to find that recognition of the importance of the importance of connection to family and community to worker' mental health is not widespread. The industry does not appear to be sufficiently devoted to establishing residential and FIFO camps close to communities. Closer interaction between accommodation camps and communities is thought to be good for both.*
- *"The type, design and quality of accommodation and activities available may be used to support strategies for mentally healthy workplaces by providing controls to reduce the risks of harm associated with psychosocial hazards and risk factors..."*
- *"...Accommodation villages should be designed to encourage socialisation while also considering requirements for peace, privacy and safety. To minimise sleep disturbance as far as practicable, sleeping quarters should be located away from communal areas, with comfortable beds, soundproofing, air conditioning and blackout curtains. Those responsible for recreational activities (e.g. active lifestyle coordinators) should promote recreational activities with a clear social element (e.g. barbecues, social sports, movie nights) that are associated with better mental health and wellbeing."*

- *"Contact and integration with local communities should be facilitated where possible, ensuring positive benefits for all."*

Furthermore, it is also noted that Section 3.1.4 of the Shire of Ashburton Local Planning Strategy states the following with respect to workforce accommodation:

- *"The Shire acknowledges the WAPCs' Position Statement – Workforce Accommodation', dated January 2018, and supports the fundamental position that, wherever possible, workers are housed in established towns where they are able to both contribute to and benefit from the local, social and economic opportunities."*
- *"Accommodating workers in the towns is critical to improving their viability, vitality and resilience, while addressing many of the mental health issues identified in the Western Australian Parliaments Education and Health Standing Committee's discussion Paper of FIIPA mental health."*
- *... "the Shire will remain a strong advocate for resource companies to pursue residential development opportunities for operational workforce accommodation in Tom Price, Paraburdoo and Onslow."*

In summary, there is substantial amounts of evidence supporting that mining accommodation should be provided in proximity to established townsites, while also providing high levels of amenities for workers for better integration with local communities and for the mental health and wellbeing of mining workers.

We trust the information contained within this correspondence addresses the various matters raised within the Schedule of Submissions and Shire's RFI and therefore, request the Shire provide a favourable recommendation to the Regional Joint Development Assessment Panel.

Should you require any further information or clarification in relation to this matter, please the undersigned or Mr Adrian Dhue on 9221 1991.

Yours faithfully,



Greg Rowe
Rowe Group

Encl.

Attachment One

Applicant Response to Schedule of Submissions

SCHEDULE OF SUBMISSIONS

Submission Number (Records No.)	Submission Name	Description of Affected Property (if relevant)	Support, Object, Comment	Submission Details	Applicant's (Mineral Resources Limited) Comment	Officer Recommendation (No Change, or Modify)
1	21100380	Luke Strahan	2 HEDDITCH STREET, ONSLOW WA 6710	SUPPORT	<p>A. My submission is in support of the development of Lot 300, (DA 21-26- DAP/21/02078- TRANSIENT WORKERS ACCOMMODATION- ONSLOW VILLAGE (500 PERSON)</p> <p>Noted.</p>	
2	21100381 & 21100382	Brian Winsor and Eileen Glynn	15 CLARKE PLACE, ONSLOW WA 6710	OBJECT	<p>A. I am writing to you to object to this above mentioned application to develop a five hundred transient workforce accommodation in the town of Onslow.</p> <p>My interests would be affected as a private citizen and as an owner/ occupier of a private residence in Onslow at 15 Clarke Place.</p> <p>My objections are the environmental and social impacts to the town that this development will bring being,</p> <p>The site chosen being Lot 300 in Onslow to many of the Onslow residents is considered to be our park area and buffer zone where the birds and animals can survive and breed. Some of these birds and animals can be seen whilst taking a quiet scenic walk on the boardwalk from the memorial to the back beach. This proposed development is very large and the impact to the environment during construction and use will decimate the flora and fauna in that area and will never recover. After reading the planning proposals Attachment 3 Environmental Assessment report I believe the report is not a true indication of what birds and animals live in the area. In the report it lists fauna that lives in the area as Mammals 4 Research shows 10. Reptiles 8 including 5 turtles Research shows 46 plus the 5 turtles. Amphibians 0 Research shows 5. Included in the reptile list is a sand swimmer <i>Lerista onslowiana</i> which only occurs from Onslow to Giralia station and Barridale</p> <p>B. I understand that the workforce will be mixed but historically it will be mainly men, and this will create a heavily unbalanced mix of the sexes in the small town of approximately 850 people.</p> <p>C. To access the development, the extra traffic involved will have to travel from the town access ring road, along Simpson Street, turn left into Third Avenue and into the site, passing the Onslow School and residential housing. I believe the risk to our school children from the hazard of the large amount of extra vehicular traffic will be greatly enhanced. This is a 40 km per hour zone at certain times of the day. The extra noise this traffic will generate will greatly disturb the residents of Simpson Street, Third Avenue, the school, and other close by residents. The other option is that all the traffic will have to pass through the town centre.</p>	<p>The numbers stated in this submission are from the "desktop assessment" section of the Environmental Assessment Report (Section 3.10.1) which is only concerned with 'Conservation Significant' species known to occur in the surrounding area and is based on the Department of Biodiversity, Conservation and Attractions (DBCA), NatureMap and PMST database searches.</p> <p>Field surveys identified 14 bird species, 3 mammal taxa and 1 reptile species occurring in Lot 300. None of the recorded species were Conservation Significant Species.</p> <p>A full breakdown of Conservation Significant fauna species identified through the desktop assessment can be found in Appendix C of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B). A full breakdown of recorded fauna species can be found in Appendix D of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B). A full breakdown of potential fauna species can be found in Appendix A of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B).</p> <p>While the comment notes the presence of the Onslow broad-blazed slider, <i>Lerista onslowiana</i>, it is not a listed Conservation Significant species. NatureMap has 167 records of the species from Onslow to Marrilla Road (~ 160 km southwest of Onslow). There are no records of the species occurring in Lot 300, there are 32 records of the species within 2km of the site (1 record from 1982, 13 records from 1983, 17 records from 1993 and 1 record from 2012). A Targeted Terrestrial Survey shall be undertaken to confirm the presence and significance of <i>Lerista onslowiana maryani</i> species.</p> <p>A full breakdown of the 'Marine' and 'Shorebird' species identified through an additional desktop assessment can be found Section 3.10.1 of the EAR and Appendix F. A Targeted Fauna Survey shall be undertaken to confirm the presence and significance of these species.</p> <p>Demographic mix is not a relevant planning consideration as a result of the proposed development.</p> <p>Onslow Road and Simpson Street are both identified as Arterial / Primary Distributor Roads in the Onslow Townsite Expansion Structure Plan. On this basis, the Onslow Road and Simpson Street are capable of catering for the expected traffic to be generated by the Onslow Village.</p> <p>It is also noted that the separate submission received from the Department of Education confirms that "the proposal is unlikely to have any significant impact on the Primary School".</p>

					<p>D. This development will be constructed for a large part right near the town's boardwalk which is used extensively by locals and tourists alike. This boardwalk takes the user through some quiet and pristine coastal fragile dunes and this is a large part of Onslow's attractions. If this development occurs, the users view will be of buildings and accommodation units and lots of people. The town's tourism will be greatly affected.</p>	<p>As outlined in the Development Application Report, with respect to building scale, the strategy has been effectively stitching the new development into the fabric of the Onslow town site by ensuring building height and size is at human scale. All buildings proposed are single storey, with floor levels to respond to the existing terrain. Where possible, larger buildings are broken up with laneways, landscaping and view corridors, further integrating them into the landscape. On this basis, the scale of the development will not impact the surrounding community.</p> <p>Visualisation Renders are also provided at Attachment 1 of this correspondence indicating the impact of the facility when viewed from the beach, boardwalk and edge of town.</p>	
					<p>E. The proposed development will increase Onslow's population by over half again in a dense area so therefore the extra noise created by machinery such as refrigeration, air-conditioning units, vehicles and the residents themselves will greatly affect the local residents and tourists.</p>	<p>An Acoustic Report was prepared in support of the Development Application, to satisfy the requirements stated in the relevant policies and guidelines applicable to the project. The Acoustic Report addressed the noise from vehicles and residential which are predicted to comply with the <i>Environmental Protection (Noise) Regulations 1997</i> ('Noise Regulations'), given the management measures provided.</p> <p>Mechanical plant noise assessment (i.e. refrigeration, air-conditioning units) will be undertaken as part of the design development phase post approval. The Acoustic Report notes that appropriate treatments for such elements to ensure compliance with the Noise Regulations (i.e. solid barriers, acoustic cowlings/louvres, low noise fans) will be recommended if required.</p>	
					<p>F. I believe that a transient workforce accommodation village, especially of this size does not fit in a small town.</p>	<p>As outlined within the Development Application report, the Onslow Village is required in order to facilitate the existing and proposed mining operations within the region being undertaken by the Applicant.</p>	
					<p>G. Notes There is a large company operating in the area that has a mix of workers living in company housing in a designated residential area and transient workforce accommodation located close to their operations near site, which I believe works really well. Other companies in the area use full residential workforce which has enhanced the town greatly.</p>	<p>Refer to response to Submission No. 2 Item F above.</p>	
3	21100416	Sharon Eren-Hoffman	13 THIRD AVENUE, ONSLOW WA 6710	OBJECT	<p>A. I'd like to express my deepest concerns about the above development plan proposed as it totally disregards and disrespects the residents of our town, their safety and their quality of life.</p> <p>The idea of having the access to the camp through Simpson St, Third avenue and First street is the worst possible option especially since there is a perfectly less devastating option from Backbeach road.</p> <p>Having the access to camp as proposed, means that during and after the construction, Third avenue, Simpson street and First street will become a major traffic corridor with buses, cars, tracks and heavy machinery going in and out through these streets 24/7.</p> <p>It also means that the same traffic will move through Simpson road street, next to our school.</p> <p>The constant traffic through residential areas will effect the life quality of residents (noise and air pollution) and will increase the danger to road users - drivers and pedestrians.</p> <p>I hope that the access will be shifted to the logical option.</p>	<p>Access is proposed via Simpson Street (which is an Arterial/Primary Distributor Road within the Onslow Townsite Expansion Structure Plan) and Third Avenue, which was identified as the preferred overall solution, taking into account a detailed review of alternative access options affected by Aboriginal Heritage issues, risk of Coastal Inundation, and impacts on overland flow of stormwater.</p> <p>Following a review of the anticipated number of people onsite post-construction, the overall traffic generation is estimated at 70 - 80 vehicle trips per day for the Mining operations workforce, plus a maximum of approximately 330 vehicles per day generated by members of the public accessing the various shared facilities.</p> <p>In response to community concern, it is also now proposed to restrict the extent of access to shared facilities throughout the day in order to minimise the overall traffic impacts. In this regard, a Technical Memorandum has been prepared by Uloth and Associates to reflect these changes and is appended to this correspondence.</p>	

4	21100417	Leah McTaggart	2 HEDDITCH STREET, ONSWLOW WA 6710	SUPPORT	<p>A. My interest are as a private citizen and current owner/occupier of the above address.</p> <p>My submission is in support of application number DA 21-67 but I would like to make a suggestion that the main entrance not be made off Third Avenue and rather from Simpson St in the vacant land across from Clark place. I believe this may be lot 23 Simpson St.</p> <p>This would avoid such large numbers of traffic passing through community areas of town i.e. past the school, community garden and church. I think a public walking entrance from third Avenue would be sufficient for public access purposes but I feel the traffic would be better managed with as little interruption through town as possible.</p>	<p>As part of the design of the development the Applicant considered various vehicular access routes. Due to the potential impact on Aboriginal Heritage and the risk of Coastal Inundation (refer to MP Rogers Coastal Hazard Risk Assessment), the vehicle access route as proposed was considered as the most appropriate.</p> <p>Access from Back Beach Road would also have a significant impact on the existing overland flow of stormwater and the approach to hydrology and Urban Water Management (Refer to 360 Environmental Assessment Report – Figures 8 and 9). The 360 Environmental Urban Water Management Plan also addresses this matter (refer to Appendix E of the Environmental Assessment Report).</p>
5	21100439	Sandra McAullay	3/20 SECOND AVENUE, ONSWLOW WA 6710	OBJECT	<p>A. I was born and raised in Onslow, I have lived here for a large portion of my life and have seen many changes to the town over my lifetime. Some good, some not so good and believe that this development is the latter.</p> <p>As a child, the 'bush' was a place to go exploring and should be left for future generations to do the same. I personally, go up to the 'Look out' (old water tank hill) on a regular basis, it's a place of peace and serenity to watch mother nature in all its glory as the sun sets. It's an area where locals and tourists alike go to visit to watch the sunset, this will now be diminished if the workers camp is located in this area. Therefore, I object to the proposed 'Resort Style 500 Room Transient Work Camp' – it doesn't matter how much it is styled and landscaped, it is still a worker's camp.</p> <p>It is noted as being 'Lot 300 Back Beach Road' but entrance is on Third Avenue so development/construction will interfere with the residents in this area and the school being close by, does NOT make this an ideal place to have a 'work camp'.</p> <p>Environmental impact on the Fauna and Flora on said area – Terrestrial Ecosystems outline numerous species in the Onslow area which will be affected.</p>	<p>Clearing of 14.33ha of land (within the 20.45ha parcel) will not impact the regional populations of any flora and fauna found in the area, as better habitat occurs in the surrounding area. No 'Conservation Significant' species were found during the survey area. Based on the field survey no 'Conservation Significant' flora species and no 'Conservation Significant' fauna species have a high likelihood of occurrence within Lot 300.</p> <p>Section 4.3.3 of the EAR notes various management measures that can be implemented to minimise the impact on flora and fauna.</p> <p>A full breakdown of Conservation Significant fauna species identified through the desktop assessment can be found in Appendix C of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B). A full breakdown of recorded fauna species can be found in Appendix D of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B). A full breakdown of potential fauna species can be found in Appendix A of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B).</p> <p>A Targeted Terrestrial Survey shall be undertaken to confirm the presence and significance of <i>Lerista onslowian maryani</i>.</p> <p>A full breakdown of the 'Marine' and 'Shorebird' species identified through an additional desktop assessment can be found in Section 3.10.1 of the EAR and Appendix F. A Targeted Fauna Survey shall be undertaken to confirm the presence and significance of these species.</p>

				<p>B. In reference to landscaping 'Touch the ground lightly' – how is that possible! There will be numerous machinery and roadworks to develop the area before the building starts (presuming the buildings are cyclone rated). The whole natural bushland area will be destroyed for the development of the camp.</p>	<p>A significant portion of the proposal is comprised of accommodation units that have been designed to be fully transportable steel framed units. These are to be installed onto stumps with concrete pad footings on site. The Village is linked by raised walkways.</p> <p>Whilst the Applicant acknowledges that there will be disturbance to the development as part of the construction process, the Architect has used this design driver to achieve the following outcomes:</p> <ul style="list-style-type: none"> • Develop a design that works with the sites natural topography. • Sets pedestrian paths and accommodation units off the ground to minimise the construction footprint. • Minimise site benching and retaining walls. • Maintain topography, overland flows, fauna routes, water infiltration and vegetation. • Guide the sympathetic revegetation of the site where disturbance has occurred. • Develop a construction methodology to minimise disturbance where feasible. <p>The landscape design includes opportunity for seed collection and repopulating of existing flora species.</p>	
				<p>C. An obvious alternative is Discovery Park which is already set up otherwise the land opposite Bindi Bindi Village could be utilised.</p>	<p>The Applicant investigated various locations for the proposed development as part of its initial planning phase. This phase considered a range of potential opportunities including existing accommodation facilities as well as vacant land holdings for development.</p> <p>Lot 300 was determined by the Applicant and its consultant team as the most suitable (and available site) that aligns with the development intent for reasons that include:</p> <ul style="list-style-type: none"> ▪ The use of the Site for the proposal is consistent with the Shire's strategic planning framework which identifies the potential under provision workers' accommodation, concluding that high-quality accommodation ought to be provided within the Onslow Village. ▪ The location of the village within the Onslow town site, coupled with the Applicants' ambition to redefine workers accommodation and facilities in the industry, has resulted in a project that breaks down perceived barriers and seeks to integrate into the local community. ▪ The location offers the opportunity to provide a range of facilities for use by the wider community to encourage inclusion, social interaction, and assimilation. The intent being to strike a balance with community in Onslow to provide improved amenity, retail, hospitality, and recreation destinations that encourage community use, increased local tourism, and provide reciprocal benefits back into existing businesses. ▪ The location allows for a significant outdoor recreation precinct that supports Cricket, Australian Rules, mini golf, volleyball and offers outdoor gyms. ▪ The location allows for the Applicant's to provide 'resort style' accommodation and facilities to a level of comfort and amenity not seen in the mining industry which will provide its users and workforce with an environment that fosters productivity, engagement, and good mental health outcomes. 	

					<p>D. Though I feel that this is already a forgone conclusion, and if that is the case, I strongly propose that after the 'life' of the project – the 'resort style' village should be dismantled, and the land put back to its natural habitat to regenerate as is the case with other transient work camps. It should not be gifted to Thalanyji. Onslow does not need a 500-room accommodation facility (in 30 years' time) when the accommodation that is available now does not get used to its full capacity. The town is too small (it will never be a Broome) the population will never increase to warrant a need for this, so it needs to go.</p>	<p>The construction strategy allows for a future use of this site beyond its function as workers accommodation. It is anticipated that the development could be reimagined as a tourist accommodation hub.</p> <p>Accommodation units have been designed to be fully transportable steel framed units, installed onto stumps and footings on site. Linked by raised walkways and broken up into distinctive communities, the design and construction of the accommodation units, their installation methodology and the master planning strategy allows for the number of accommodation units to be scaled back at any time either during or at the conclusion of its operational life – with minimal impact on the existing landscape.</p>
6	21100440	Dawn McAullay	49 SECOND AVENUE, ONSLOW WA 6710	OBJECT	<p>A. This is to advise that I am an owner and occupier of property on Second Avenue in Onslow and am definitely not in favour of the proposed development known as the "Onslow Township Village" also known as a Transient Work Camp to be built on Lot 300 on the Back Beach Road.</p> <p>Having read through Mineral Resources- Rowe Group - Application for Development Approval of Onslow Village, Landscaping Plans and various other attachments relating to this. It is stated that this huge tract of land being Lot 300, is bound by State owned Conservation, Recreation and Natural Landscape reservation to the north and north west. Before it mysteriously became Lot 300, this too fell into that category! It was our "park land" that we all enjoyed overlooking from the towns look out!</p> <p>They also state that public landscape spaces have been designed to provide a place where the community can gather for play and recreation, catering for the needs of residents, visitors and the broader community. It seems to me that they intend to build a town within a town!</p> <p>The facility's that they want in their village we already have in our town., these being a beautifully kept town Oval and Aquatic Centre which I might add are often and currently underutilised!</p>	<p>The Applicant acknowledges that the users of the Village are likely to spend a significant portion of time at this site and, as such, the intent is to build community, ownership, and a sense of belonging. This is achieved through providing significant amounts of amenity with shared gathering spaces, places for quiet reflection, outdoor recreation spaces and other amenities.</p>
					<p>B. Construction of something this size worries me greatly. The mobilisation of this camp will be coming in, no doubt, through the ring road, into Simpson Street, then Third Avenue. This is a residential area and includes passing the Primary School. Other access would be through the town and I will definitely be complaining if this does eventuate.</p> <p>The tract that has been made at the end of 3rd Avenue will obviously be the entrance to this Village and continue on as 3rd Avenue. Will it wipe out what were once sandhills that now have bush and vegetation growing on them as well as the all fauna. Of course it will!</p>	<p>Noted - Refer to response to Submission No. 2 Item C.</p>
					<p>C. As for BTAC letter of consent (being attachment 2) and who were soon to become registered proprietors of this land (letter dated 27/08/21). Are we the ratepayers of Onslow going to be told how and why that was given to them on a silver platter, so to speak?</p>	<p>The transfer of Lot 300 Backbeach Road, Onslow by the State of Western Australia (State) to Buarabalayji Thalanyji Aboriginal Corporation (BTAC) is a matter between the State and BTAC to which the Applicant is not privy.</p>

					<p>D. I feel for the ratepayers of Onslow. Those who have done the hard yard for their achievements and without handouts! Therefore it does annoy me that this prime tract of bushland that has been given away is going to be used for a Transient Work Camp.</p> <p>When and if the Resort handover happens at the end of the 30 year period, The only blessing in this debacle is that I won't be around to see it!</p> <p>As a footnote I would like to add that in 2019 our Shire requested that the towns boundaries be expanded. Whether to do with coastal hazard, you would be more aware of that than me. Therefore there must be other land more suited for a Transient Work Camp.</p> <p>I do hope that MRL will take up the alternative sites they have been offered.</p> <p>I have no objections to MRL coming to Onslow and wish them well in their endeavours as long as they keep away from Lot 300.</p>	<p>Noted - Refer to response to Submission No. 5 Item C above</p>	
7	21100441	Rob & Joanne Foley	19 CLARKE PLACE, ONSLOW WA 6710	SUPPORT	<p>A. Thank you for the DA notice issued recently and we have reviewed the DA documentation and can offer the following comments for the above proposed project.</p> <p>As a property and land owner in the town of Onslow WA, we think such an opportunity to develop the transient workforce Onslow Village (DA 21-67) on Back Beach Road will have an overwhelmingly positive outcome for the community as a whole and for the further development and subsequent investment within the town Onslow as a port hub serving the West Pilbara region, and we support the approval of the application made by the Rowe Group on behalf of Mineral Resources Limited.</p>	<p>Noted.</p>	
8	21100563	Paul Davidson	1 FIRST AVENUE, ONSLOW WA 6710	COMMENT	<p>A. I feel that there are better locations for this camp. But if they were to build in that location entry into the camp should be of back beach rd. There would be minimal impact on our school and residents in the area if we could change their entry point.</p>	<p>Noted - Refer to response to Submission No. 5 Item C above and Submission No. 10 C.</p>	

9	21100564	Peter Kalalo – Onslow Tourism & Progress Association	PO BOX 24, ONSLow WA 6710	OBJECT	<p>A. Lot 300 Back Beach Road Onslow site is included within the "Conservation, Recreation and Nature Landscape"</p> <p>We do not want the proposed MRL FIFO development anywhere, under any circumstances near our most popular tourist attractions. The Onslow War Memorial [visitors came from all over Australia to watch the sun rise through this iconic memorial], the Ian Blair Memorial Boardwalk, Ocean View Caravan Park and Lot 381 Second Avenue purchased by the Shire of Ashburton 2021 and currently used as overflow for caravan park. Residents are hopeful Council will budget for a proposed new caravan park extension due to the increased tourist numbers over the past four (4) years.</p> <p>Our small burgeoning tourism industry is highly dependent on the natural environment and cultural assets. Our heritage tourism focuses on local history and historical events that occurred in our area and is intended to promote education as well as general enjoyment.</p> <p>Tourism potential arises from protected areas and benefits from achievement in conservation and the development of protected areas to preserve the original natural beauty and provide visitors a satisfying trip.</p> <p>Tourists usually do not enjoy a trip with high vehicular movement, noise from construction, noise from reverse beepers, inundation of high viz wearing apparel or a landscape of miners; which was very evident during the Chevron Construction phase. Tourist numbers were down considerable and the word on the caravaners network along the Northwest Coastal Highway was "do not call into Onslow".</p> <p>A FIFO camp is not an environment-friendly development and will push tourism away by destroying the resource base our tourism relies on.</p> <p>Tourism provides seasonal economic stimulus to allow for diversification of employment and income potential and develops resources within the community. Improvements in infrastructure and services have benefited both the locals and the tourists and promoted travel into Onslow town site.</p> <p>The renewed mining fervour in Western Australia has had far reaching impacts in rural regions. Some communities are overwhelmed by a new population connected with mining, bringing with it a range of social and economic stresses and strains that small communities, in particular, are struggling to cope with.</p> <p>With such nomadic populations, regional Councils struggle to maintain a sense of community and infrastructure without a rate-paying resident population, while local resources are stretched and often unable to cope with the increased FIFO population using them.</p> <p>Onslow is a small rural host community and residents generally believe that FIFO workers do not contribute to local community organisations or participate in activities such as sporting groups or volunteering and take from the community with minimum return.</p> <p>New comers do not value the town and community the same way as long-term residents and returning tourists do. FIFO workers essentially "sit outside" the residential community and do not contribute to the functioning of the town.</p>	<p>As outlined within the Development Application Report, the intent of the 'Conservation, Recreation and Natural Landscapes' Reserve is as follows:</p> <p><i>The "Conservation, Recreation and Natural Landscapes" reserve is intended to accommodate a broad range of natural and <u>modified land uses and development</u> and may, subject to relevant approvals, <u>include extractive or resource processing industry and infrastructure</u>. Where applications for such development are considered by Local Government, it shall have regard for other legislation and/or the advice of the relevant landowner/manager.</i></p> <p>Having consideration to the intent of the 'Conservation, Recreation and Natural Landscapes' reservation, there are two (2) relevant matters which are to be given regard:</p> <ul style="list-style-type: none"> - A detailed on-site Environmental Assessment has been completed by 360 Environmental confirming that Lot 300 is not identified as containing features that are of significance (i.e. TEC's or significant vegetation); and - The Onslow Village is infrastructure (accommodation and amenity facilities) that are associated with and required for the Applicants extractive industry operations in the Region. <p>The proposed development is therefore consistent with the intent of the subject site's reservation and is therefore capable of approval.</p> <p>With respect to the impact on tourism, it is noted that the development offers a range of facilities for use by the wider community to encourage inclusion, social interaction, and assimilation. The intent is to strike a balance with the community in Onslow to provide improved amenity, retail hospitality, and recreation destinations that encourage community use, increased local tourism and provide reciprocal benefits back to into the existing businesses.</p> <p>Furthermore the Applicant is committed to handing over the facilities to the local Thalanyji people once the mining operation reaches its 'end-of-life', providing an accommodation facility within the Town Centre and will become a location to foster tourist activity. Accommodation units have been designed to be fully transportable steel framed units, installed onto stumps and footings on site. Linked by raised walkways and broken up into distinctive communities, the design and construction of the accommodation units, their installation methodology and the master planning strategy allows for the number of accommodation units to be scaled back at any time either during or at the conclusion of its operational life – with minimal impact on the existing landscape.</p>	
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					<p>We understand mining and tourism can co-exist but in this case 500 FIFO workers will be smack bang in the middle of our residential and tourist hub and we do not support in anyway the proposed development at Lot 300 Back Beach Road Onslow.</p> <p>The proponent and the developer must look for alternative sites and seek community feedback but at all cost must leave this natural site in situ for residents, tourists and future generations.</p>		
10	21100645	Fiona Swanson	1 FIRST STREET, ONSLow WA 6710	OBJECT	<p>To whom it may concern, I am writing this to you in relation to the transient workforce camp coming to town, I have a few questions I would like answered:</p> <p>A. Impact on town we have a lot of land around town which would not impact town people, why do they not look at that?</p>	Noted - Refer to response to Submission No. 5 Item C above.	
					<p>B. Why are they coming right into town and entering quiet residential areas?</p>	Noted - Refer to response to Submission No. 4 above.	
					<p>C. There is no mention in their proposal and plans to mitigate the danger to school children? In fact, there is little mention of the school in Simpson Street what-so-ever [found one reference]</p>	A separate submission received from the Department of Educations confirms that <i>"the proposal is unlikely to have any significant impact on the Primary School"</i> .	
					<p>D. Attachment 9 - Traffic Impact Assessment 16 buses to transport workers to the work site at start and finish of shift. They have estimated 100 vehicle trips per day, next sentence states even with members of the public utilising the proposed on-site facilities, it is therefore reasonable to expect that the proposed development will generate no more than perhaps 850 vehicles per day, which will have no significant impact on the surrounding road network. How is "perhaps 850 vehicle movements per day" on Third A venue and Simpson Street not going to impact residents and school children?</p>	<p>The number of vehicle movements per day quoted in the initial Traffic Impact Statement was based on an initial estimate to transport the full quota of 500 workers to / from the site. Following a review, the Applicant expects the <u>maximum peak occupancy</u> of 300 persons. These 300 people will be progressive and gradual over several years post construction. The Applicants immediate occupancy forecast upon construction completion is 150 persons. On this basis, the Traffic Impact Statement prepared by Uloth and Associates has been amended to reflect the actual transport requirements, being a maximum of 150 workers for the day shift and 100 for the night shift, thus requiring a maximum of 2 to 3 55-seat Coaches with perhaps 2-3 22-seat buses.</p> <p>In response to public submissions, it is also proposed to restrict the level of public access to the shared facilities throughout the day, resulting in reduced overall traffic flows of an estimated maximum 330 vehicle trips per day generated by members of the public accessing the shared facilities.</p>	
<p>E. Flora field survey was completed over two days only between 19th & 21st July, the people doing the assessment were not there very long and were roadside quite a lot of the time. Was it just basically a "desktop assessment"?</p>	<p>The field survey undertaken was a detailed vegetation and basic fauna survey. The field survey consisted of traversing the site (effort can be seen in Figure 3 of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B), sampling 6 flora quadrats, making opportunist flora records, undertaking 6 fauna habitat assessments, 6 20min bird surveys, and opportunistic fauna signs (sightings, calls, scats, tracks and diggings) were recorded throughout the site. A total of 30 person hours were spent on site, breaking down to 0.8 hrs per hectare.</p> <p>The detailed flora and basic fauna surveys were carried out in accordance with the relevant Environmental Protection Authority (EPA) guidelines.</p>						

				<p>F. Cannot find any information amongst the paperwork when the Fauna survey was completed if it was at all or was it only a "desktop assessment"? I would have thought surveyors would have been there for days and days, assessing the site several times per day at different times to look at the impact of wildlife [morning, midday and evening]</p>	<p>A basic fauna survey was undertaken between 19th & 21st July, the ecologist on site traversed the site, undertaking 6 fauna habitat assessments and 6 20min bird surveys, and opportunistic fauna signs (sightings, calls, scats, tracks and diggings) were recorded throughout the site. 15 person hours were spent conducting the fauna survey, breaking down to 1.7 hrs per hectare.</p> <p>The basic fauna survey was in accordance with the EPA technical guidance for Terrestrial vertebrate fauna surveys for environmental impact assessment. The survey intensity was determined to not be a constraint on the field survey.</p> <p>A full breakdown of Conservation Significant fauna species identified through the desktop assessment can be found in Appendix C of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B). A full breakdown of recorded fauna species can be found in Appendix D of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B). A full breakdown of potential fauna species can be found in Appendix A of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B).</p> <p>A Targeted Terrestrial Survey shall be undertaken to confirm the presence and significance of <i>Lerista onslowian maryani</i>.</p> <p>A full breakdown of the 'Marine' and 'Shorebird' species identified through an additional desktop assessment can be found in Section 3.10.1 of the EAR and Appendix F. A Targeted Fauna Survey shall be undertaken to confirm the presence and significance of these species.</p>	
				<p>G. There are so many other places in town available for use other than land that is zoned Conservation and Recreation and right beside a residential area. Example the Chevron block is already cleared, levelled and fenced and will not impact Onslow residents as it is on the town outskirts. Or why do they not purchase Discovery Parks already a transient workforce accommodation facility with 300 rooms and empty? No impact on Onslow residents.</p>	<p>Refer to previous comments to Submission No. 5 Item C regarding the location of the development.</p>	

11	21100646	Janette Bevan	17 FIRST AVENUE, ONSLOW WA 6710	OBJECT	<p>A. As a long-term resident of Onslow, I am strongly against the construction of the above village on our only strip of natural coastal bushland above our iconic Ian Blair Boardwalk.</p> <p>The proposed village is within a 2km radius of our school, most of the children that attend the school either walk or ride their bikes, I can't imagine the impact on this school zone with an extra 850 vehicular movement per day as quoted in attachment 9 traffic impact assessment.</p> <p>The small town of Onslow is an attraction to tourists and locals alike due to the quiet natural laid back coastal town with one supermarket (under pressure in the tourist season) a hardware and small chemist, hotel, Onslow Beach Resort and one service station. All these venues are within walking distance to residential areas. Why would the Shire or State Government allow the impact of a 500 person camp which would be right in the middle of this quiet iconic coastal town, when other venues with a lot less impact are available.</p> <p>During our busy tourist season our main street and facilities just cope with the influx, with cars and caravans 8-10 deep lined up outside the service station daily. Another 850 vehicular movement as quoted in attachment 9 traffic impact assessment in these streets per day is not possible.</p> <p>I am not closed to the idea of new industry coming into town but please do not allow a 500 person camp within a 2km radius of school, town and most popular tourist attractions being the Ian Blair Boardwalk, War Memorial and the water front park area in First Ave. Especially with other venues being available</p>	<p>Refer to response to Submission No. 2 Item D with respect to traffic considerations.</p> <p>Furthermore, following a review by the Applicant, the Applicant expects a <u>maximum peak occupancy</u> of 300 persons. These 300 people will be progressive and gradual over several years post construction. The Applicants immediate occupancy forecast upon construction completion is 150 persons.</p>	
12	21100647	Rob Wilkin	PO BOX 105, ONSLOW WA 6710	OBJECT	<p>A. As a nearby landowner, I do not want the development to proceed, the noise and dust pollution during construction will be unbearable and I do not want to live anywhere near 500 FIFO construction workers.</p> <p>Picked my house back in 1988 because it was close to the bush during my time, I have seen quolls, kangaroos, bush mice, brown frogs, lizards, skinks and geckos, so I cannot understand the Environmental Report Attachment 3 Table 6 overview of vertebrate fauna species found i.e., 14 Birds, 3 Mammals, 1 Reptile, 0 Amphibians</p> <p>Attachment 3 4.1 Limitations Table 7 Limitations & Constraints Associated with the Survey does state that the basic fauna survey consisted of six fauna habitat assessments, six 20-minute bird surveys, three hours of active searching and opportunistic records. Not very much time allocated to a 20.45-hectare block.</p> <p>B. There was so much contradictory information in all the Attachments 1 to 1 O particularly Attachment 9 Traffic Impact Assessment where it states "it is therefore reasonable to expect that the proposed development will generate no more than perhaps 850 vehicles per day which will have no significant impact on the surrounding road network". Well it will certainly impact on my life</p>	<p>Refer to response to Submission No. 10 Item F.</p> <p>Refer to response to Submission No. 10 Item D.</p>	

13	21100649	Peter Kalalo	52 SECOND AVENUE, ONSLow WA 6710	OBJECT	<p>A. I do not want any development on Lot 300 Back Beach Road as I do not want an eye sore near any of our tourist sites or in our town</p> <ul style="list-style-type: none"> ▶ Locals and tourist use the boardwalk daily and will not want to look at a construction camp ▶ The ANZAC Memorial brings a great deal of tourists to our town as now do the Paparazzi Pups and we do not want to spoil any of our attractions ▶ Lot 300 is our only natural landscape within the town site and I do not want it changed in any way ▶ I do not want to see an increase of motor vehicles on Third Avenue and Simpson Street ▶ Any such development would be a great detriment to our town ▶ The damage to the sand dunes, vegetation, and loss of any bird life, echindas, reptiles and kangaroos would be irreversible <p>Why would Council or the State Government give Mineral Resources Limited and any Chinese / Korean Consortium one of Onslow's most valuable assets?</p> <p>The proponent maintains the Onslow Village will provide much needed, high-quality transient workers accommodation, why do we need a FIFO construction camp in our town? We already have Discovery Park on Beadon Creek Road that has all the necessary amenities, restaurant, bar, swimming pool approx. three hundred (300) empty rooms and fifty (50) caravan sites it is used as workforce accommodation and is not near residential homes.</p>	<p>Refer to response to Submission No. 5 Item C with respect to the location of the Onslow Village.</p> <p>It is also that the Onslow Village has been architecturally designed to feel like an inherent part of Onslow through integration material, forms and colours to reflect the existing character of Onslow, in addition to appropriate site planning and building scale. The Applicant is committed to maintaining the facility as a high-quality, industry leading workers accommodation village, ensuring that it will not convert to an 'operational camp'. It is intended that all facilities will be handed over to the local Thalanyji people once the mining operation reaches its 'end-of-life', providing an accommodation facility within the Town Centre, supporting and boosting the future tourism industry within the Shire of Ashburton.</p>	
14	21100650	John Cullen	PO BOX 227 ONSLow WA 6710	OBJECT	<p>A. I do not want any development because I live right next door</p> <ul style="list-style-type: none"> - Do not want the noise, dust, vehicles or increase in number of people <p>Just do not need it!</p>	<p>Matters such as noise, dust and vehicle movements will be controlled through a Construction Management Plan during the construction process. It is anticipated that the requirement for a Construction Management Plan to be finalised and approved prior to the commencement of site works would be imposed on any planning approval.</p> <p>As outlined in the Economic Impact Assessment, there will be a range of qualitative economic, social and environmental benefits generated as a direct and indirect consequence of the development, and in particular the increase in population. For example, Macroplan research suggests that in the order of up to 5% of the income of the workers who are living and working in the Onslow Village could be spent off site in local businesses.</p> <p>Onslow's businesses could therefore expect a new annual spending injection in the order of approximately \$3.4 million from the new population / workforce.</p> <p>Further, the location of the Onslow Village is consistent with the Shire of Ashburton Local Planning Strategy which promote the development of extractive industries' workforce accommodation in already established towns (i.e. Onslow) to promote workers contributing to and benefitting from the local socio-economic opportunities in the town.</p>	

<p>15</p>	<p>21100651</p>	<p>Jennifer- Marlene & Stanley Carson</p>	<p>7 FIRST AVENUE, ONSLOW WA 6710</p>	<p>OBJECT</p>	<p>A. To Whom It May Concern</p> <p>Turtles - Reference Planning Application DA 21-67</p> <p>With regards the abovementioned application we do not want it to go ahead at all. We walk the boardwalk every single morning, down Back Beach Road and along Third Avenue to First Street and home. Sounds boring but every morning from 5am to 6am that is what we do. Jennifer-Marlene has been doing the loop for the past 8 years and myself the past 5 years regardless of the weather.</p> <p>Birds, kangaroos and echidnas [we have only actually come across the echidnas on the road not in the bush] we love it. It is the best time of day; we have even gotten used to Gotham City [over the way] and the massive red gas flare and orange horizon.</p> <p>To people from the city Lot 300 back Beach Road is just sand hills and scrub to Onslow residents it is our "Kings Park" it is a unique natural landscape and very popular with the tourists.</p> <p>We are very worried about the nesting turtles, they need a quiet dark beach to nest, if the development goes ahead the brightness from the camp will discourage females from nesting. If a female fails to nest after multiple false crawls, she will resort to less-than-optimal nesting spots or deposit her eggs in the ocean. In either case, the survival outlook for hatchlings is slim.</p> <p>Lighting near the shore also can cause hatchlings to become disoriented and wander inland, where they often die of dehydration or predation. Hatchlings have an innate instinct that leads them in the brightest direction, which is normally moonlight reflecting off of the ocean. Excess lighting from the nearshore buildings and streets draws hatchlings toward land, we need to reduce not increase the amount of artificial light that is visible from nesting beaches, we need to ensure there is no light pollution that will affect our precious turtles.</p> <p>There are a thousand other reasons why Lot 300 Back Beach Road is not an appropriate place for a 500-man Transient Workforce Camp that we are sure others will address.</p>	<p>Nesting and inter-nesting areas identified as habitat critical to the survival of marine turtles near Onslow: Green Turtles - Thevenard Island, Serrurier Island (nesting Nov - March), Flatback turtles – coastal islands from Cape Preston to Locker Island (nesting Oct - March).</p> <p>Turtles are unlikely to nest on the mainland beaches around Onslow, preferring the sandy beaches of offshore islands such as Thevenard and Direction Island.</p> <p>DBCA database records 1 Green Turtle on Sunrise Beach (2012, certainty – 'Not Sure'), 2 Green Turtles on Sunset Beach (2013, certainty – 'Not Sure'), 1 Flatback Turtle on Sunset Beach (2014, certainty – 'Certain'), 3 Flatback Turtles on Sunset Beach (2013, certainty – 'Certain'), 2 Flatback Turtles on Sunset Beach near Four Mile Creek boatramp (2017, certainty – 'Not Sure'). Only a single record of the previously mentioned records is of a turtle nest (Flatback Turtles on Sunset Beach near Four Mile Creek boatramp). The main mainland Flatback Turtle nesting area appears to be the east west aligned beach between the Wongalwarra Pool and Oakover River outlets, 18 km west southwest of Onslow (-21.689431, 114.940490). Thus, based on DBCA records it appears that use of the beaches near Lot 300 for nesting are minimal.</p> <p>If Green, Loggerhead or Flatback turtles were to nest on the Onslow beaches, light pollution may disorientate and effect the success of hatchlings reaching the water. However, it is likely these hatchlings are already impacted by predation from cats, dogs, dingoes, goannas, and silver gulls.</p> <p>The design incorporates lighting directed away from the shoreline and lighting that can be dimmed over the peak nesting seasons to minimize light pollution.</p> <p>Pendoley, K., Vitenbergs, A. Whittock, P. & Bell, C. (2016). <i>Twenty years of turtle tracks: marine turtle nesting activity at remote locations in the Pilbara region, Western Australia</i>. Australian Journal of Zoology. 64. 10.1071/ZO16021.</p> <p>Kregor, G., Stanley, F. & Liddelow J. (2005) Aerial survey of beaches between Onslow to Port Hedland for marine turtle nesting. https://library.dbca.wa.gov.au/static/FullTextFiles/065546.pdf</p> <p>Recovery Plan for Marine Turtles in Australia (2017). Commonwealth of Australia. https://www.awe.gov.au/sites/default/files/documents/recovery-plan-marine-turtles-2017.pdf</p>	
<p>16</p>	<p>21100658</p>	<p>Joseph Freeman</p>	<p>UNIT 1, 52 SECOND AVENUE, ONSLOW WA 6710</p>	<p>OBJECT</p>	<p>A. THE PROPOSED 500 MAN WORKERS CAMPSITE AT LOT 300 BACK BEACH ROAD IS UNACCEPTABLE ON ENVIRONMENTAL GROUNDS</p> <ol style="list-style-type: none"> DESTRUCTION OF FRAGILE GROUND NOISE AND DUST DURING CONSTRUCTION DISRUPTIVE TRAFFIC THROUGH TOWN SAFETY ISSUE <p>B. QUESTIONS</p> <ul style="list-style-type: none"> - WHERE IS THE WORKSITE AND WHY HAS THE CAMP TO BE IN TOWN? PLEASE EXPLAIN - DOES THE COMPANY BUY THE LAND OR LEASE IT? - AND HEY! LAST NOT LEAST WHERE IS THE FRESH WATER COMING FROM? 	<p>As outlined within the Environmental Assessment Report (EAR), the environmental issues identified in the EAR do not pose a significant constraint to the development of Lot 300. All environmental features can be managed through further technical investigations and / or the implementation of a Construction Environmental Management Plan during the construction phases of the development.</p> <p>Refer to response to Submission No. 5 Item C regarding the location of the development.</p> <p>It is intended that the Applicant will lease the land from the Buurabayji Thalanyji Aboriginal Corporation (BTAC).</p> <p>With respect to water, the water and wastewater services are available to the subject site and the Applicant has been in contact and is working closely with the Water Corporation to provide servicing to the development site.</p>	

17	21100659	Michael McKay	UNIT 4, 52 SECOND AVENUE, ONSLow WA 6710	OBJECT	A. Our infrastructure will not handle another 500 people; power, water, sewerage, shops etc.	As outlined within the Engineering Servicing Report prepared by Pritchard Francis, following a review of the existing physical conditions and infrastructure, the subject site can be served with roads, power, water, sewer, stormwater drainage and communications infrastructure.	
					B. MRL's environmental assessment is very obscure, some of the information is very doubtful and does not address all issues i.e., increase in traffic, will we have enough water? The increase of waste water/ sewerage, can the Water Corporation manage the increase? The underground pipes from the old WW2 bulk fuel infrastructure. Are any of the pipes full of old diesel or oil? Are they safe? Will they be disturbed during construction?	Refer to response to Submission No. 16 Item B. 360 Environmental's recommendation also includes the development and implement an Unexpected Finds Protocol (UFP). The UFP should provide advice and procedures for managing potential contamination during the construction, and includes wording such as: For all excavations, construction personnel are to continuously monitor excavations for signs contamination, including: <ul style="list-style-type: none"> • Unusual odour (e.g. fuel, rotten egg or sewage smells) • Change in colour (e.g. dark staining, yellow or other unusually coloured material) • Changes in consistency (e.g. layers of gravelly material) • Foreign objects (e.g. construction waste, possible asbestos containing materials, military items) • Oily sheens on collected rain or groundwater • Ash or tar in the soil • Anything different or unusual with respect to the surrounding soils. 	
					C. How are the sand hills going to remain stabilized? When the vegetation is removed and replaced with transportable huts what is going to prevent the surrounding landscape from subsidence?	The design of the accommodation modules is engineered to be low impact and on pad footings with access to be taken via elevated boardwalks so as to limit the impact of erosion / destabilisation and maintain the existing ecology corridors and overland flow paths. The Landscaping scope will include seed collection of existing established vegetation present on site and subsequent re-population of local flora to assist in stabilisation and to reduce erosion.	
18	21100708	Hugh & Sheryle Harmer	25 SIMPSON STREET, ONSLow WA 6710	OBJECT	A. More traffic to pass the primary school	Refer to response to Submission 10 Item C.	
					B. More traffic noise and more reversing beepers noise so close to my back yard (will be hearing reversing beepers when I will be putting the children to bed)	The car park noise emissions (from reverse beacons, car idling points, ignitions, door slams etc.) were considered as part of the preparation of the Acoustic Assessment prepared by Stantec. As outlined in Section 5.4.2 of the Acoustic Assessment, the noise levels received at the nearby sensitive receivers from the car park are compliant with the <i>Environmental Protection (Noise) Regulations 1997</i> . Stantec also recommended that following management measures to reduce the impact on surrounding sensitive areas: <ul style="list-style-type: none"> - Vehicles using the site carpark should be fitted with broadband type reversing alarms (referred to as "quakers" or "croakers") as opposed to "beepers". - Personnel may be notified in the site induction to arrive and leave the car park in an orderly fashion, to minimise / manage noise (i.e. no slamming of doors) so as to not disrupt colleagues or the community. 	
					C. A camp near the hotel would invite difficult social behaviour	It is noted that antisocial behaviour cannot be controlled through the planning framework. The Applicant will implement and enforce its Code of Conduct Policy with regards to anti-social behaviour of its workforce. The Applicant's operates various existing mining and construction operations that are located in, or in close proximity to other Towns of similar size to Onslow within the State of Western Australia – the Applicant has implemented and enforced its Code of Conduct Policy successfully at these locations.	

19	21100709	Wendy Carson	PO BOX 105, ONSLow WA 6710	OBJECT	<p>A. The contradictions are recorded within the documents. A great many of the reports are desktop assessments and reviews of "available information" some of the references used by the consultant's date back to 1991, 2001, pre-Onslow Salt Pty Ltd building 72 residential houses in town, 2009, 2012, & 2017 which predate the completion of the SO Chevron Australia homes including swimming pools. They have plagiarized references and other historical reports completed for past Onslow projects on sites unlike Lot 300 Back Beach Road.</p>	<p>The information contained in the development application has been sourced from available databases and includes the most up-to-date information available at the time of preparing the application documentation.</p> <p>For the purposes of a development application the information submitted is consistent with the standard required for submission.</p>	
					<p>B. Desktop Contamination Assessment, Desktop Flora and Fauna Surveys, six 20-minute bird surveys, three hours of active searching and opportunistic records. Flora field survey completed between 19th & 21st July for a 20.45-hectare site is not acceptable.</p> <p>No soil or groundwater investigations were undertaken at the site.</p> <p>There is also the assumption that offsite contamination and possible remediation associated with former fuel infrastructure has occurred. The consultants have been unable to locate any reports outlining scope of work, effectiveness of remediation or if in fact it has ever been instigated. But the risk to the site according to the consultant is considered to be LOW.</p>	<p>The field survey undertaken was a detailed vegetation and basic fauna survey. The field survey consisted of traversing the site (effort can be seen in Figure 3 of the Fauna and Fauna Report – Appendix B), sampling 6 flora quadrats, making opportunist flora records, undertaking 6 fauna habitat assessments, 6 20min bird surveys, and opportunistic fauna signs (sightings, calls, scats, tracks and diggings) were recorded throughout the site. A total of 30 person hours were spent on site, breaking down to 0.8 hrs per hectare.</p> <p>The detailed flora and basic fauna surveys were carried out in accordance with the relevant EPA guidelines.</p> <p>A Targeted Terrestrial Survey shall be undertaken to confirm the presence and significance of <i>Lerista onslowian maryani</i>.</p> <p>A full breakdown of the 'Marine' and 'Shorebird' species identified through an additional desktop assessment can be found in Section 3.10.1 of the EAR and Appendix F. A Targeted Fauna Survey shall be undertaken to confirm the presence and significance of these species.</p> <p>The risk was assessed as low based on the fact that the former tanks to the north were previously classified as Contaminated – Remediation required, that AECOM (2010) indicated remediation was being undertaken. Also the site is no longer classified/listed in the Contaminated Sites Database, suggesting that remediation has been undertaken to the satisfaction of the Department of Water and Environmental Regulation (DWER).</p>	
					<p>C. The estimation that 100 to perhaps 850 vehicles per day will have no significant impact on surrounding road network. They fail to mention Onslow Primary School on Simpson Street, the school and kindergarten complex is not fenced or gated unlike most Perth schools.</p>	<p>Refer to response to Submission No. 10 Item C.</p>	

				<p>D. <u>Water Servicing - Potable Water Supply and Wastewater Disposal</u></p> <p>The proposal states the Onslow Water Supply Scheme is operating close to full capacity and the current water supply scheme can supply the expected occupancy rate of around 300 workers residing on-site at any one time. Approvals for connection the Water Corporation reticulated sewerage system is based on the same 300 people residing on-site at any one time</p> <ul style="list-style-type: none">• Do the other 200 workers not have showers and cross their legs for the duration of their work cycle?• Does the water supply and disposal also include the 20 new homes [presumably with swimming pools] MRL intend to build? [Onslow Salt Pty Ltd is also adding to their housing stock and propose a further 5 new builds 2022]• Without available water how will dust suppression during bulk earthworks and building construction be managed?• Without adequate scheme water supply how will the proposed "water efficient irrigation system" work?• How would plants, trees and an oval be established and maintained or is the intention to use artificial turf and plants? If so, this is not evident in the proposal. <p>MRL maintain groundwater for irrigation has not been considered as it has been identified as an unfeasible source and the water quality is poor.</p> <p>Greywater and blackwater have been considered as potential sources but calculated volumes will not significantly reduce the scheme water use demand [there is currently not enough scheme water available for humans let alone irrigation purposes] The conclusion that the high capital costs associated with a greywater system construction and the associated stringent maintenance and operational requirements make it a non-cost-effective solution and unfeasible.</p> <p>There are no guarantees the Water Corporation proposed desalination plant will be operational by 2024.</p>	<p>Refer to the referral comments provided by the Water Corporation below. Water and wastewater services are available to the subject site and the Applicant has been in contact and is working closely with the Water Corporation to provide servicing to the development site.</p> <p>The Applicant is committed to continue liaising with the Water Corporation and relevant stakeholders to ensure the development is adequately serviced.</p>	
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				<p>E. Onslow Village Economic Assessment</p> <p><i>[1] Onslow is well supported by existing health infrastructure such as Onslow District Hospital and Silver Chain – Onslow Day Centre.</i></p> <p>Where did the consultants get this information from?</p> <p>Onslow does not have a resident doctor 24/7. Onslow Health Service has an Emergency Department Service and a Hospital Service and is open 24 hours a day. But there is not a doctor present 24 hours a day. Currently three doctors fly in from Perth, one comes weekly and stays for several days, another runs a chronic health clinic once a month for approx. 3 days and a female health doctor comes every three months again for 2 to 3 days. Teleconferencing is available for medical emergencies. Government Dentist provides a monthly service and other ancillary services are provided by Nicol Bay Hospital monthly - Physiotherapist, Dietician etc. these limited services can be provided with a doctor's referral.</p> <p>X-Rays, CT Scans, General Surgery, Orthopaedic, Cardiothoracic, Paediatric, Vascular and Urology Referrals etc. residents have to travel to Karratha, Port Hedland or Perth for specialist appointments.</p> <p>The WA Country Health PATS scheme is a total fiasco, both the elderly and less advantaged members of our community wait months for reimbursement for travel and accommodation, some never get their money at all. It is a very dictatorial com passionless government department.</p> <p>Silver Chain cannot attract or retain staff in Onslow and their service is run by desktop managers in another town or city.</p> <p>When Chevron Australia commenced construction in Onslow, they employed Aspen Medical a global provider of health services, who have a major focus on assisting rural and remote communities in responding to emergency and critical situations. First Aid stations, nurses, paramedics and ambulances were on site for all employees and sub-contractors to access, right through to medivac situations that occurred during their project. This was provided so the Onslow Health Service or RFDS were not impacted by any medical emergency.</p> <p>Will the proposed Onslow Village medical centre provide the same level of service?</p> <p>In the development application plan the floor plans indicate this would not be possible.</p> <p>Chevron have since contributed to the building of Onslow's new hospital and new St John Ambulance volunteer sub centre.</p> <p>What will MRL contribute?</p>	<p>The Medical Centre located at the development will be used primarily for triage purposes only. The Applicant will consider a range of strategies to ensure we minimise any additional strain on local medical services, as well as continue to consult with the community to identify opportunities for the Centre to be accessible to members of the Public where feasible and appropriate.</p> <p>The Applicant strive to develop and maintain strong community and stakeholder relationships as part of its social licence to operate and to build capacity.</p> <p>The Applicant is committed to community sponsorship.</p> <p>The Applicant makes a significant positive contribution to the community by capacity-building in the not-for-profit and charitable sectors. All corporate charitable contributions, sponsorships and in-kind services promote our business goals, create positive visibility and demonstrate our social responsibility.</p> <p>It is the Applicant's intention to build on its relationship with the Shire of Ashburton, the community and other stakeholders to identify and contribute to community investment opportunities that fit within the Applicant's sustainability profile.</p>	
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				<p>H. <u>Social Impact Statement -Transient Workforce Accommodation – Onslow</u></p> <p>The Social Impact Statement prepared by EMM Consulting Pty Ltd to support the Application for Development Approval is a dynamite read, the misinformation is so preposterous it is embarrassing.</p> <p>Has the social planner who prepared the report ever visited Onslow as in one part of the report Onslow is referred to as suburb.</p> <p><i>[1] The Onslow Village will provide a much needed, high-quality transient workers accommodation</i></p> <p>Why does Onslow need another transient accommodation precinct, there is already a vacant one at Beadon Creek?</p> <p>How will it be high quality when the water scheme cannot supply the water requirements of such a village?</p> <p>[2] Various Positive Impacts - employment opportunities for local residents. Those local residents who want to work already have employment. If more people come to town looking for work, where will they live?</p> <p><input type="checkbox"/>3 Onslow Village, once developed, will accommodate up to 500 persons employed by large-scale resource projects - so the accommodation is not for MRL direct employees? It is intended for use by others in resource industries?</p> <p><input type="checkbox"/>4 The shared recreational facilities within the Onslow Village will assist in contributing to positive social outcomes - it is a fenced facility with a manned gatehouse. Accessed by employees by swipe card. Swipe cards were invented to prevent unauthorised access and provide increased security. How will the general public get access to amenities like the tavern or restaurant?</p> <p>Will RG&L permit a Tavern Licence?</p> <ul style="list-style-type: none"> The density of existing liquor licences in Onslow [currently there are 6 - Beadon Bay Hotel, Onslow Supermarket & Liquor Store, Onslow Sports Club, Discovery Parks, Onslow Beach Resort & Mackerel Island] The close proximity of a liquor venue to MR L's proposed on-site child day care centre/ creche Existing alcohol-related problems in the area <p>[5] Other Comments in the Social Impact Assessment prepared by EMM</p> <p>3.1 Population Change Will the development result in significant change/s to the local area's population (either permanently and/or temporarily)?</p> <p><i>Negative impacts: No negative impacts associated with population increase have been identified.</i></p> <p>3.2 Housing Will the proposal result in a positive or negative impact on the availability and affordability of housing in the locality/and/or Shire?</p> <p><i>Negative impacts: No negative impacts on housing have been identified.</i></p> <p>3.3 Accessibility Will the development improve or reduce physical access to and from places, spaces and transport?</p> <p><i>This question was not answered perhaps it was too hard?</i></p>	<p>EMM Consulting was engaged by the Applicant to conduct a desktop Social Impact Statement (SIS) based on information outlined in Section 2.1 of the SIS. This included engagement specifically with BTAC as the registered native title holders, in addition to the outcomes of a community session held on 16 August 2021, whereby the Applicant presented the concept plans to the community.</p> <p>With respect to referring to Onslow as a suburb, it is noted 'suburb' is the Australian Bureau of Statistics (ABS) Classification assigned to Onslow for the purposes of data collection and is a valid use in the context of the SIS.</p> <p>[1] As previously outlined, the provision of nearby high-quality workers' accommodation is required in order to facilitate the Applicant's existing and propose mining operations within the region.</p> <p>The Applicant considered various potential locations for the development – including both vacant land and existing buildings as options.</p> <p>Lot 300 has been selected as the most suitable (and available site) that provides the Applicant the ability to;</p> <ul style="list-style-type: none"> Conservatively develop and enhance an area within the Town of Onslow – allowing the community and the Applicant's workforce to integrate. Provide the community with new and state of the art facilities. Provide the Applicant's workforce with an environment that is community and neighbourhood orientated and breaks away from traditional FIFO accommodation. <p>As outlined in the Servicing Report prepared by Pritchard Francis, the Water Corporation data indicates that the development can be serviced by the existing services.</p> <p>[2] As outlined in Section 3.2 of the SIS, there is currently no existing housing shortage in Onslow with approximately 11 properties for rent and 27 available for purchase.</p> <p>[3] The accommodation on Lot 300 is intended to be for the Applicant's direct employees only.</p> <p>[4] The facilities (i.e. restaurant and tavern) are available for community use to encourage inclusion, social interaction and assimilation. Therefore, it is intended that the community will be granted access for these purposes.</p> <p>The Applicant has considered an amendment to the proposal for facility access based on feedback received to date.</p> <p>With respect to the Department of Racing, Gaming and Liquor, these permits are subject to a separate approval process, which will be assessed at the time of the relevant application(s) being lodged with the DRG&L.</p> <p>Accessibility was assessed as not having an impact.</p> <p>Following the completion of the SIS, the Applicant also undertook a Community Engagement Session which was held on 26 October 2021. The Applicant is committed to continuing to engage with BTAC and the community.</p>	
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				<p>3.4 Community and Recreation Services/Facilities Will the development increase, decrease or change the demand or need for community, cultural and recreation services and facilities?</p> <p><i>It is also recommended that MRL liaise with Ashburton Shire Council and health service providers in Onslow</i></p> <p>3.5 Cultural and Community Significance Is the development likely to impact on any items or places of cultural or community significance?</p> <p><i>MRL should continue their engagement with BTAC to ensure consent is maintained throughout the application and development process, including reaching compensation agreements, where required</i></p>	
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				<p>3.6 Community Identity and Sense of Belonging</p> <p><i>Negative impacts: No negative impacts related to community identity have been identified.</i></p> <p>3.7 Health and Well-being Is the development likely to increase or reduce opportunities for healthy lifestyles, healthy pursuits, physical activity, and other forms of leisure activity?</p> <p><i>Negative impacts: No negative social impacts related to health and wellbeing have been identified.</i></p> <p>3.8 Crime and Safety Is the development likely to increase or reduce crime or safety in the community? Positive impacts: The Project may have a positive social impact in reducing crime in the community</p> <p>3.9 Local Economy and Employment Opportunities Will the development increase or reduce the quantity and/or diversity of local employment opportunities (temporary or permanent)?</p> <p><i>Negative impacts: No negative social impacts on the local economy or employment opportunities have been identified.</i></p> <p>3.10 Needs of Specific Population Groups Will the development impact on specific population groups including an increase or decrease in social, cultural, recreational, employment, governance, transport opportunities?</p> <p><i>Negative impacts: No negative social impacts related to the needs of specific population groups have been identified.</i></p> <p>3.11 Impact on amenity of place and surroundings (pleasantness) Will the development impact on the amenity or enjoyment of the area by the existing/future community?</p> <p><i>Negative impacts: there is a potential to cause minor negative social impacts related to the amenity and enjoyment of the site for a short time period.</i></p> <p>4 Outcome of assessment</p> <p>3.5 Cultural and Community Significance Is the development likely to impact on any items or places of cultural or community significance?</p> <p><i>MRL should continue their engagement with BTAC to ensure consent is maintained throughout the application and development process, including reaching compensation agreements, where required</i></p> <p><i>if the recommended measures to avoid, reduce, or mitigate the potential negative social impacts are considered and applied, the likelihood of any negative social outcomes from the development of the Onslow Village facility will be significantly reduced.</i></p> <p><i>Someone is attempting to present us an entire bucket full of excrement with this report</i></p>	<p>The desktop review is capable of indicating the existing services and their associated capacity for the purposes of the Engineering Servicing Report.</p> <p>Detailed civil engineering designs and documentation will be necessary to validate all design levels and gradients to ensure compliance with the Australian Standards, Austroads and relevant authority Guidelines.</p>	
				<p>I. Onslow Township Village Engineering Servicing Report Pritchard Francis [Civil and Structural Engineering Consultancy]</p> <ul style="list-style-type: none"> State a site visit has not been conducted as part of this desktop study [another desktop review]. 		

					<p>J. <i>The project incorporates the provision of a 500-person permanent Onslow Village style accommodation and facilities, which will eventually be repurposed for tourism use and will therefore contribute to boost tourism to Onslow and the broader region generally.</i></p> <p><i>How long do portable buildings last?</i></p> <p><i>With proper care, temporary modular buildings have a service life of at least 25 to 30 years, after which the components are typically repurposed or recycled.</i></p> <p><i>Who are MRL trying to kid? Why would we sanction the destruction of a beautiful, natural - Conservation, Recreation and Nature Landscape precinct, an existing tourism attraction that Onslow has for visitors to enjoy in exchange for a FIFO camp with 143 accommodation pods? After 30 years what condition do, they expect the transportable buildings to be in, particularly with our harsh climatic conditions. They will just be handing over end-of-cycle rubbish and walking away scot-free. This will not be an asset for tourism in any way, shape or form.</i></p>	<p>The Development contains a mixture of:</p> <ul style="list-style-type: none"> ▪ Traditional Insitu Buildings (Central Facilities); and ▪ Modular Buildings (Accommodation) <p>Modular Buildings must meet the same construction standards as traditional buildings by law and must be designed and constructed to meet:</p> <ul style="list-style-type: none"> ▪ the National Construction Code requirements; and ▪ applicable Australian Standards and state building codes. <p>In addition to the legislative responsibility to achieve (at minimum) the requirements of the relevant Construction Codes and Australian Standards - as part of the design development process the Applicant has further tasked its design team to identify and recommend key materials and finishes that may be suitable to an increase in specification to improve longevity based on the location of Lot 300 – and that would otherwise not be required if the same Modular Buildings were located elsewhere.</p> <p>The consistent design requirements across the building types (Modular and Traditional Insitu Buildings) would by design maintain an equal life expectancy.</p> <p>In relation to <u>Service Life</u>, all buildings are designed to a 'structural design life' that is determined by the applicant depending on their needs. Transportable buildings have capacity to be designed to a structural design life equal to in-situ buildings</p> <p>Following on from structural design, all equipment, materials, and finishes have an inherent life expectancy that is generally shorter than the structural design life - as a result most buildings (both insitu and modular) are generally refurbished at some point in their structural lifetime.</p> <p>All buildings are engineered in response to local context – being cyclone region D, climate zone 1, coastal proximity (~250m from ocean). Materials have been carefully selected to ensure low maintenance and to maximise longevity.</p> <p>All transportable buildings are being designed to allow for removal and relocation.</p>	
20	21100710	Fiona Allen	8 CAMERON AVENUE, ONSLOW WA 6710	OBJECT	<p>A. The flora and fauna native to this conservation area will not survive if this footprint was to go ahead and our nesting turtles on that part of the beach would be seriously compromised by light and noise.</p> <p>B. A proposed 500-man FIFO camp should not take precedence over our beautiful piece of nature right in our town. There are other land options around town that would suffice or a camp at the Red Hill mine site like most mines have would be fine also. This would prevent some 850 extra vehicular movements a day around our school and quiet residential streets.</p>	<p>Refer to response to Submission No. 15 Item A.</p> <p>Refer to response to Submission No. 5 Item C.</p>	

21	21100711	Felicity Brennan	71 SECOND AVENUE, ONSLOW WA 6710	OBJECT	<p>A. The site chosen for this development is totally unacceptable for so many reasons, the following being just a few of my concerns.</p> <p>Like many, I consider this a local park area close to town, and love walking through and observing the animals and bird life. It's very peaceful and that won't be the case if this development is allowed to be constructed.</p> <p>I walk through the area every day, I see how the tourists love it as well, so it would affect the tourism aspect as well.</p> <p>I believe this development would destroy this area.</p> <p>There are so many conflicting statements right across the Mineral Resources submission, it's beyond crazy to submit the community to this, no one wants it.</p> <p>The Environmental Assessment - Att: 3.</p> <p>I believe it to be totally incorrect as to what Fauna inhabits the area, 24 hrs and no trapping or cameras does not cut it. I have observed way more fauna than is counted.</p> <p>It does not address Light Spill and it's affects on Turtles which nest on the beach below the proposed Camp area.</p>	Refer to responses to Submission No. 5 Item C and No. 15 Item A.	
22	21100712	Todd & Nicole Morley	19 CLARKE PLACE, ONSLOW WA 6710	OBJECT	<p>B. The traffic to and from the Camp is unacceptable for a quiet Residential area and don't even start me about going past the School.</p> <p>A. As a property and landowner in the town of Onslow WA, we welcome a development in Onslow & the positive outcomes likely to follow such a development, however, we oppose the location put forward for the Onslow Village (DA 21-67) on Back Beach Road within this submission due to the proximity of the school, beach & damage likely to occur to native bushland.</p>	Refer to response to Submission No. 10 Item C. Refer to response to Submission No. 5.	
23	21100713	Chevron		SUPPORT	<p>A. Will the Social Impact Statement and its current list of perceived impacts be revised based on community consultation engagement?</p> <p>B. The addition of 500 people will have a significant impact on the small Onslow population, representing ~50% increase. What is the number of people transiting through the town and on what sort of rosters?</p>	<p>The Social Impact Statement ('SIS') was prepared by EMM Consulting in accordance with the requirements of the Shire of Ashburton Local Planning Policy – Social Impact Assessment ('LPP 20'). In this regard, it is not a requirement of LPP 20 for the SIS to be revised following the outcomes of community consultation.</p> <p>Notwithstanding, specific matters raised with respect to the SIS (as a result of public advertising) have been addressed by the Applicant and its consultant team as part of this response to the schedule of submissions.</p> <p>The Applicants personnel and transition roster is not fixed and will be subject to change to suit the operational requirements of the business.</p> <p>The Development Application includes Modular Accommodation Buildings with a total of 500no. beds.</p> <p>However, within its application and considering R&R, the Applicant has nominated a <u>maximum peak occupancy</u> of 300 persons, to include;</p> <ul style="list-style-type: none"> ▪ 50 resort operational staff ▪ 250 mine operational staff <p>The Applicant expects that peak occupancy will be progressive and gradual over several years post construction. The Applicants immediate occupancy forecast upon construction completion is 150 persons.</p>	

					<p>C. What are the perceived impacts on the current flight schedule to Onslow and public seat availability? The statement that 'Onslow is also accessible via plane through Onslow Airport which provides direct flight routes to Perth, Brisbane, Sydney, and Melbourne' is incorrect. Flights only occur between Perth and Onslow.</p>	<p>The Applicant will consult with the airlines about opportunities to add additional commercial services</p> <p>The Applicant also intends to charter non-commercial flights to and from Onslow from various locations.</p> <p>The Applicant anticipates that it will use a combination of existing and additional commercial and non-commercial flight services - the balance and mix between commercial and non-commercial will be developed based on the Applicants operational requirements.</p>	
					<p>D. How is the establishment of facilities such as an additional pool and gym likely to affect the patronage of Shire-run community facilities? Has there been a consideration of the impacts to the Shire and local rate payers if an increase in fees and charges is required to keep these existing facilities operational if competing facilities are available in a small town?</p>	<p>It is the intent of the Applicant to provide the community with access to facilities that improve well-being and lifestyle to its residents on a best-for-Onslow basis.</p> <p>The Applicant is mindful of not having a detrimental impact to existing facilities of similar nature and will continue to engage with and consider feedback from the community and Shire with regards to facility access.</p> <p>The Applicant has considered an amended proposal for facility access based on feedback received to-date.</p>	
					<p>E. Will Village residents be able to have personal vehicles and boats at the camp? If so, have the recreational impacts to other parts of town and surrounding areas been assessed and provision for parking included?</p>	<p>The Applicant does not anticipate for its workforce to require private vehicles (or boats) when accommodated at the resort.</p>	
					<p>F. Has the impact on fish stocks been assessed and the impact 500 people may have on access to the Beadon Creek jetty, 4 Mile, local islands, and other recreational locations? Water supply is an issue in Onslow which is being addressed via a new desalination plant led by the Water Corporation. Has the proponent engaged the Water Corp to ensure their project planning caters for an additional oval, 50m pool and accommodation camp?</p>	<p>Refer to response to Submission No. 19 Item D.</p>	
					<p>G. There is no mention of engagement around the significance of this area for non-indigenous Onslow residents. This is potentially an unknown impact.</p>	<p>As previously outlined, during the public advertising period on 26 October 2021, a community session was held at the Onslow Community Resource Centre to engage with the wider Onslow community. Approximately 100 community representatives attended the community engagement sessions.</p>	
					<p>H. Social stratification is a key issue in a small community, even with residential workforces. What are the considerations for integrating the FIFO workforce into the town's community? What additional community services will the proponent be supporting in addition to their Onslow Village?</p>	<p>The Applicants proposal to provide community access to the resort facilities are a key part to promote the integration of the community and the Applicant's direct workforce.</p> <p>The Applicant strives to develop and maintain strong community and stakeholder relationships as part of its social licence to operate and to build capacity.</p> <p>The Applicant is committed to community sponsorship.</p> <p>The Applicant makes a significant positive contribution to the community by capacity-building in the not-for-profit and charitable sectors. All corporate charitable contributions, sponsorships and in-kind services promote our business goals, create positive visibility and demonstrate our social responsibility.</p> <p>It is the Applicant's intention to build on its relationship with the Shire of Ashburton, the community and other stakeholders to identify and contribute to community investment opportunities that fit within the Applicant's sustainability profile.</p>	
					<p>I. What are the projected impacts around the increased pressure on Health services? What measures will be put into place to mitigate the potential for a FIFO workforce introducing COVID-19 to a vulnerable community?</p>	<p>The Applicant will comply with State Government mandated vaccinations for workers on mining and resources sites, people who work in remote operations, or run critical infrastructure, including remote train and port control, as well as workers engaged in building, maintenance or construction services.</p> <p>In addition to State Government mandates, the Applicant has implemented its own mitigation strategies, including the engagement of dedicated team of nurses to continually monitor the health of the Applicant's employees via temperature checks and other methods.</p>	

				<p>J. It is important to note that crime and safety is not solely based on the boredom of local residents. There is a risk of an increase in antisocial behaviours of transient workers being located in town. How will the project manage the potential antisocial behaviour of a transient workforce including the Village's construction workforce?</p>	<p>The Applicant will implement and enforce its Code of Conduct Policy with regards to anti-social behaviour of its workforce.</p> <p>The Applicant's operates various existing mining and construction operations that are located in, or in close proximity to other Towns of similar size to Onslow within the State of Western Australia – the Applicant has implemented and enforced its Code of Conduct Policy successfully at these locations.</p>	
				<p>K. Regarding road safety, an influx in What are the 100 vehicle movement projections based on? What are the traffic movement projections during construction? Are there any perceived impacts to town parking constraints, eg outside the supermarket?</p>	<p>The projected traffic volumes are based on the anticipated transport operations, as described within the Application. Construction traffic has not yet been determined, however, construction traffic will be the subject of a separately approved Construction Management Plan prior to the issuance of the relevant Building Permit.</p>	
				<p>L. What measures will be taken to ensure there is no site contamination prior to construction works commencing?</p>	<p>Regarding measures to be taken to ensure no site contamination prior to construction, a number of recommendations were provided in the Environmental Assessment Report. For example:</p> <ul style="list-style-type: none"> • A UXO survey • A HAZMAT survey • Review of available reports describing investigation and/or remediation associated with former fuel infrastructure • Review site development plans to determine if ASS would be disturbed by development. • Depending on the above, we then recommended consideration of intrusive investigations onsite to look at potential contamination associated with the former bulk fuel storage areas and pipelines and assess for potential asbestos presence <p>As outlined within the response to the Shire's Request for Additional Information, the abovementioned matters can be conditioned as part of the planning approval.</p> <p>360 Environmental's final recommendation includes the development and implement an Unexpected Finds Protocol (UFP). The UFP should provide advice and procedures for managing potential contamination during the construction, and includes wording such as:</p> <p>- <i>For all excavations, construction personnel are to continuously monitor excavations for signs contamination, including:</i></p> <ul style="list-style-type: none"> • <i>Unusual odour (e.g. fuel, rotten egg or sewage smells)</i> • <i>Change in colour (e.g. dark staining, yellow or other unusually coloured material)</i> • <i>Changes in consistency (e.g. layers of gravelly material)</i> • <i>Foreign objects (e.g. construction waste, possible asbestos containing materials, military items)</i> • <i>Oily sheens on collected rain or groundwater</i> • <i>Ash or tar in the soil</i> • <i>Anything different or unusual with respect to the surrounding soils.</i> <p>The UFP then outlines the process to follow if suspected contamination is identified, which includes:</p> <ul style="list-style-type: none"> • Stop the excavation/construction • Inform the responsible person/site manager • Make the area safe (there are further details on what this entails) • If safe and practicable remove the suspected contaminated material, place on an impervious material and cover • A nominated environmental consultant should inspect the suspected contaminated material and collect samples for analysis if applicable • Assess results of analysis against relevant criteria and advise on appropriate action (there are further details based on the various potential outcomes) • Provide a final clearance report on completion. 	

					<p>M. Has the proponent engaged WA Police on additional law enforcement for Onslow to accommodate the projected increase in population?</p> <p>N. Has there been consideration of the potential impacts during construction as well as during steady state operations?</p> <p>O. Given the proximity to the Onslow School, what strategies are in place to ensure behaviour is well managed during construction?</p> <p>P. How does the proponent intend to balance the provision of local employment opportunities with the impact on local businesses retaining staff? Are there any further details around Australian Industry Participation commitments for Mineral Resources, Village Management etc?</p>	<p>The Applicant has not received an objection, comment or proposed amendment from WA Police in response to its Development Application.</p> <p>The Applicant expects the <u>maximum peak occupancy</u> of 300 persons will be progressive and gradual over several years post construction. The Applicants immediate occupancy forecast upon construction completion is 150 persons.</p> <p>The Applicant's intention to progressively and gradually increase resort occupancy will provide for ongoing consultation and as may be required by WA Police.</p> <p>Matters such as noise, dust and vehicle movements will be controlled through a Construction Management Plan during the construction process.</p> <p>The Applicant and any associated contractors during construction will implement and enforce its Code of Conduct Policy with regards to anti-social behaviour of its workforce.</p> <p>The Applicant's recruitment process will provide for a number of permanent, project and fixed term opportunities – the Applicant will advertise employment vacancies nationally and will not sole source from the existing local employment pool only. As part of the Applicants strategy to integrate within the community – the Applicant will however encourage locals to apply for employment opportunities.</p> <p>The Applicant offers apprenticeship, trainee and graduate programs as part of its existing training and development program – these opportunities are available for locals to apply.</p>	
24	21100714	Bryan & Dianne Sheehan	14 THIRD AVENUE, ONSLOW WA 6710	OBJECT	<p>A. Access to and from the proposed development is to be from an extension to Third Avenue. During construction we will be subjected to heavy haulage trucks bringing in large earth moving equipment for up to and exceeding a year. The ensuing machinery noise and the enormous amount of dust that will be generated by the earthworks will be extremely detrimental to the quality of our lifestyle.</p> <p>B. Then we have heavy haulage trucks bringing the buildings and infrastructure to site as well as the associated trade vehicles going to site each day. May we also point out that the shire has just paid to have Third Avenue and Hedditch Street and Simpson Street repaved because heavy trucks ripped the road surface up.</p> <p>C. Once completed I believe that the work shifts wanted by MRL are 12hrs (6am-6pm, 6pm-6am) with the fleet of 16 large buses to transport the workers to site. Now allowing for standard 'toolbox' handover at the change of shift we will have buses and heavy vehicles using Third Avenue and Simpson Street at possibly 4.30am to 5.30am in the morning 7 days a week. The amount of noise from this amount of traffic will be extremely detrimental to sleeping in ours and other residential houses.</p> <p>D. For the day to day running of the associated accommodation and infrastructure we will have heavy delivery trucks bringing food and supplies to site on a constant basis. Also there will be private and company vehicles using Third Avenue and Simpson Street at all hours of the day and night because they will be a 24hr operation.</p>	<p>Refer to response to Submission 23 Item K.</p> <p>A Construction Management Plan (which includes traffic movements during construction) will be prepared and approved prior to any construction works commencing onsite.</p> <p>The Construction Management Plan will include a dilapidation report that records the condition of existing infrastructure in proximity to the site including any pre-existing damage. Any further damage to this infrastructure that has been caused by construction activities will be remediated by the Applicant.</p> <p>Refer to response to Submission 10 Item D.</p> <p>The Applicant's traffic impact statement has considered its operational delivery requirements which has been included in the reported maximum vehicle trips to the site. Typical delivery vehicles will be consistent in size and weight to those that currently operate within the current town road network (i.e., no heavy haulage vehicles for bulk supply deliveries).</p> <p>Refer to response to Submission No. 23 Item E in response to private vehicles.</p> <p>Refer to response to Submission No. 24 Item C in response to proposed workforce transport arrangements.</p>	

					E. The operating noise from the infrastructure (which is all on the town side of the proposed development) will be extremely disruptive to our lifestyle because they will need to cater for half of the shift crews that will be offshoot.	Refer to response to Submission No. 2 Item E.	
25	21100716	James Britton	9 SIMPSON STREET, ONSLOW WA 6710	OBJECT	A. traffic down Simpson street	Simpson Street is identified as an Arterial/Primary Distributor Road in the Onslow Townsite Expansion Structure Plan and is therefore, capable of withholding the anticipated traffic volumes.	
					B. underground services that are not on the plans and will impact my both of the property's	Detailed civil (services) design will be undertaken post-approval as part of the building permit process. This will include the identification of any existing / underground services.	
					C. noise form services in the camp	Refer to response to Submission No. 2 Item E.	
					D. ratio of men to women in the town	Refer to response to Submission No. 2 Item B.	
26	21100748	Kerry White		OBJECT	A. Noise during construction and after construction as my house is no more than forty metres from the site I will have to endure the constant movement of machinery and extra vehicles driving past my house.	During construction noise and vehicle movements will be controlled through a Construction Management Plan.	
					B. Traffic up Simpson Street past the school and into Third Avenue, Attachment 7 page 4 EST 100 vehicle trips per day but could be up to 850 vehicles per day, can the applicant please clarify. Please take note the width of Third Avenue would not allow for trucks and road trains usage of this road. Trucks would be constantly be using this road bringing in supplies in and after construction. The Traffic management plan fails to recognise travelling past the school.	Simpson Street is identified as an Arterial/Primary Distributor Road in the Onslow Townsite Expansion Structure Plan. Post-construction delivery vehicles will generally be consistent in size and type to those that currently operate within the current town road network. The additional 750 vehicles per day relate to members of the public accessing the various shared facilities within the site. However, in response to public submissions it is now proposed to limit the extent of public access throughout the day, resulting in a reduced traffic flow of a maximum of 350 vehicles per day accessing these facilities. A Construction Management Plan (which includes traffic movements during construction) will be prepared and approved prior to any works commencing onsite.	
					C. Environmental Assessment 6.6 Page 44 . states that this was only a desk top review, why did they not do a proper assessment? No trapping of mammals identifies four species but does not name them, we know that there are Northern Quails and Dunnats etc up there and why have they not informed the wild life conservation and environmental protection authorities? They mention only thirteen bird species and only one reptile species, why was no sound equipment used in identifying the birds it only identifies the Zebra Finches and we know that there are many more including fairy wrens etc. fails to identifies the short nosed echidnas and the Kanagroos that live on that block of land, commonly known as our Kings Park.	The field survey undertaken was a detailed vegetation and basic fauna survey. The field survey consisted of traversing the site (effort can be seen in Figure 3 of the Fauna and Fauna Report – Appendix B), sampling 6 flora quadrats, making opportunist flora records, undertaking 6 fauna habitat assessments, 6 20min bird surveys, and opportunistic fauna signs (sightings, calls, scats, tracks and diggings) were recorded throughout the site. A total of 30 person hours were spent on site, breaking down to 0.8 hrs per hectare. The detailed flora and basic fauna surveys were carried out in accordance with the relevant EPA guidelines. A full breakdown of Conservation Significant fauna species identified through the desktop assessment can be found in Appendix C of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B). A full breakdown of recorded fauna species can be found in Appendix D of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B). A full breakdown of potential fauna species can be found in Appendix A of the Lot 300 Back Beach Road, Onslow, Flora and Fauna Survey (EAR Appendix B). A Targeted Terrestrial Survey shall be undertaken to confirm the presence and significance of <i>Lerista onslowian maryani</i> . A full breakdown of the 'Marine' and 'Shorebird' species identified through an additional desktop assessment can be found in Section 3.10.1 of the EAR and Appendix F. A Targeted Fauna Survey shall be undertaken to confirm the presence and significance of these species.	

				<p>D. Electricity. Fails to mention Horizon Powers report regarding the town being a state trail to run the town completely on solar. States in their report that they will not be going solar because of the cost. Why is there not a full report from Horizon Power?</p>	<p>The Applicant has conducted preliminary investigations into solar contribution for the development – the Applicant’s subject expert consultant has at this time made the following commentary regarding the suitability of a solar for the development.</p> <p>General</p> <ul style="list-style-type: none"> Given the location of the site (being in a cyclonic region) the extra requirements for structural robustness of the solar panel array support system may become unviable Initial investigations have revealed that a large “solar field” area would be required <p>Specifically</p> <ul style="list-style-type: none"> Solar for Hot Water: Considered not the most viable solution given the inherent energy efficiencies associated with the proposed alternatives. Solar for Power Generation and Storage: Noted that additional switchboards for interfaces with solar and diesel generation systems may be required as design development (potential). <p>The Applicant notes that these are preliminary investigations and further determination on solar suitability will be determined during detailed design.</p> <p>The Applicant cannot provide comment on the reasons why a report from Horizon Power has not been provided.</p> <p>The Applicant acknowledges the Horizon Power Onslow Distributed Energy Resource (DER) Project – it is noted that it’s Project relates to the Horizon’s network infrastructure.</p>	
				<p>D. We have been informed that these facilities are not for the use of the public, the tavern and restaurant hours are 6am to 9am. And 5 to 9 pm. The tavern hours are 4 to 8pm.these are wet mess hours not Tavern Normal hours.</p> <p>Attachment 3 point 4 states that the proposed facilities will be made available to the local community including restaurant, gym multipurpose sports hall and outdoor pool.</p> <p>Page 33 states that the site will be gated FIFO accommodation.</p>	<p>It is the intent of the Applicant to provide the community with access to facilities that improve well-being and lifestyle to its residents on a best-for-Onslow basis.</p> <p>The Applicant is mindful of not having a detrimental impact to existing facilities of similar nature and will continue to engage with and consider feedback from the community and Shire with regards to facility access.</p> <p>The Applicant has considered an amended proposal for facility access based on feedback received to-date.</p> <p>The facilities available to the community and their operating hours will be confirmed following the consultation and feedback process.</p>	
				<p>E. Critical Issues.</p> <p>Point 3 . Point 7 operational requirements of the cyclone shelter, note on the development plan 4.33 point 4 allocation of requirement for back up around the cyclone shelter? I cannot find any cyclone shelter on the development plan nor can I find the proposed culture centre.</p>	<p>1. Cyclone Shelter</p> <p>The Development Application nominates the Restaurant as the proposed designated ‘Cyclone Shelter’ - the necessity for a nominated and designated cyclone centre as well as its design guidelines, will be established during design development in collaboration with the Applicant and its design consultant team.</p> <p>It is noted that there is no statutory requirement to nominate a building as designated cyclone shelter in developments of this nature. The nomination of designated cyclone centre within the Development Application is in response to the Applicant’s design brief requirements.</p> <p>All buildings at the development (both insitu and modular) will be designed and constructed to Region D – Severe Cyclonic and engineered to withstand up to Region D cyclonic winds.</p> <p>2. Cultural Centre</p> <p>There is no Cultural Centre facility proposed as part of this Development Application.</p>	

27	21101011	Onslow Salt	COMMENT	<p>Thank you for providing Onslow Salt with an opportunity to respond to application DA 21-67 residing on Lot 300 Back Beach Road, Onslow with reference DAP/21/02078 – Transient Workers Accommodation – Onslow Village (herein Lot 300).</p> <p>In providing comments on proposed purpose of Lot 300, Onslow Salt wishes to point out that it seems that on the surface Onslow Salt has not been appropriately consulted, only first being notified of Lot 300 at the evening community briefly which have been limited.</p> <p>Please understand that Onslow Salt is not simply a nearby landowner or occupier, Onslow Salt holds the largest residential workforce and property portfolio within the Onslow township and Onslow Salt ought to be consulted in advance where there is reasonable expectation that impact may occur to its residents given the volume of residents that Onslow Salt holds.</p> <p>With this in mind, we note the following:</p> <ol style="list-style-type: none"> 1. Onslow Salt carries out noise generating activities which is within close proximity to Lot 300. Given that Lot 300 would likely include a transient workforce that includes shift workers, Onslow Salt is concerned that Mineral Resources Limited (MRL) have failed to appropriately consider the impact of this, as Onslow Salt existing activities are unlikely to change and Onslow Salt will not be expected to adjust its operations as a result of Lot 300. 2. It is reasonable to consider that during Construction and post Construction phase of Lot 300 that traffic within Onslow School and the surrounding areas will substantially increase. These concerns are real and critical as the risk profile and impact would need to be strongly considered. MRL had advised Onslow Salt that to address these concerns activities around Lot 300 would only take place outside of school hours, drop off's and pick up's and as such MRL see limited risks associated to school children. <ol style="list-style-type: none"> a. <u>Onslow Salt asks that MRL substantiate this point further and identify how they come to the conclusion that there would be limited risks to Onslow school children and when activities will take place for Lot 300?</u> b. <u>Onslow Salt also asks the Shire of Ashburton to identify what risk assessments they have undertaken as custodians of the Onslow township?</u> 3. It is inevitable that during construction at Lot 300 the Onslow township will be inundated with visitors and workers which will impact the facilities. Following discussions with MRL on the matter, Onslow Salt was advised that the Shire of Ashburton had confirmed that the Onslow township and its facilities can comfortably accommodate a population of at least 10,000 residents. <ol style="list-style-type: none"> 1. <u>Onslow Salt welcomes the Shire of Ashburton to identify how they have determined that the Onslow Town and its facilities can accommodate these numbers that MRL have advised us of.</u> <p>There are additional concerns that Onslow Salt has for this project outside of Lot 300 but considers it appropriate that the Shire of Ashburton and MRL respond to the above in writing. Should you have any questions please do not hesitate in reaching out.</p>	<ol style="list-style-type: none"> 1. The Acoustic Report prepared by Stantec has considered the existing Acoustic Environment and impact from Onslow Salt and specifically assessed the impact from Onslow Salt on the proposed accommodation pods. Section 3 and Section 4 of the Acoustic Report outline the assessments undertaken and provides various noise attenuation measures (i.e. external wall materials, external glazing and roof construction materials). <p>A detailed noise survey review and update to the suggested noise attenuation measures will be undertaken as a condition of development approval. Furthermore, the design of the accommodation pods will ensure the internal noise levels accord with Australian Standard AS2107:2016.</p> <p>Notwithstanding, the Applicant also notes:</p> <ul style="list-style-type: none"> o Lot 300 is surrounded by existing residential properties that are in similar proximity to the Onslow Salt Operations, with a number of residences within closer proximity than the location of the accommodation pods; and o Lot 300 has a similar proximity to the Onslow Salt site to Development WA's 'Barranara Onslow' residential development. In this regard, it is noted that the 'Onslow Residential Design Guidelines' do not require, mandate or recommend any additional acoustic treatments for residential buildings to be constructed within the 'Barranara Onslow' development. 2. (a) Refer to response to Submission No. 10 Item C. (b) Shire of Ashburton to respond. 3. With respect to Point 3, we note that the discussions between the Applicant and Onslow the Applicant has been advised by the Shire of Ashburton on several occasions that the town has facilities to support a population of 10,000 people. The Applicant's current planning indicates a peak construction workforce of between 200 – 300 personnel that will be accommodated in town and strict protocols will be in place to manage social behaviours. 	
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Submission Number (Records No.)	Submission Agency	Description of Affected Property (if relevant)	Support, Object, Comment	Submission Details	Applicant Comment
1	Tristan Clark – DPLH – Aboriginal Heritage		SUPPORT	<p>Thank you for your enquiry dated 21 September 2021 to the Department of Planning, Lands, and Heritage (DPLH) regarding the proposed Transient Workers Accommodation - Onslow Village (500 Person) at Lot 300 Back Beach Road, Onslow (the Land).</p> <p>A review of the Aboriginal Heritage Register of Places and Objects as well as the DPLH Aboriginal Heritage Database concludes that the Land intersects with the boundary of Aboriginal site ID 8920 (Onslow 1) — therefore approval under the <i>Aboriginal Heritage Act 1972</i> (AHA) will be required.</p> <p>The DPLH advises the developer to contact Aboriginal Heritage Operations, via AboriginalHeritage@dph.wa.gov.au, during the planning phase of the proposed development — regarding requirements under the AHA.</p> <p>It is noted that the developer, Mineral Resources Limited, is consulting with the Buurabalayji Thalanyji Aboriginal corporation RNTBC, who represent the intersecting Thalanyji native title determination (WCD2008/003), regarding the proposed development.</p>	Noted.
2	Matt Calabro – Water Corp		SUPPORT	<p>Thank you for your letter dated 24 September 2021. We offer the following comments regarding this proposal. Water Corporation has no objections to the proposed development.</p> <p>Water and wastewater servicing are available to the site. The proponent has been in contact and is working closely with the Water Corporation to provide servicing to the development site.</p>	Noted.
3	Buurabalayji Thalanyji Aboriginal Corporation		SUPPORT	<p>Buurabalayji Thalanyji Aboriginal Corporation (BTAC) is the registered native title body and prescribed body corporate for the Thalanyji People, the determined Native Title holders over Onslow and the surrounding area in Western Australia through native title determination 'WCD2008/003 - Leslie Hayes & Ors on behalf of the Thalanyji People v The State of Western Australia and Others'.</p> <p>I write to you on behalf of BTAC to express support for the development proposal of Lot 300 Back Beach Road, Onslow for the following reasons:</p> <ul style="list-style-type: none"> The construction and operation phases of the development have the potential to provide employment opportunities for local residents, with workers potentially contributing to a flow-on effect of increased business for local food and retail outlets Onslow Village, once developed, will accommodate up to 500 persons employed by large-scale resource projects, addressing the need for additional accommodation in the Shire of Ashburton, while stabilising the demand on local housing in the longer term The location and design of Onslow Village to facilitate integration with the established community will likely spread economic benefits through to businesses and services in the Onslow townsite through local spending by the transient workforce on daily activities and local goods The shared recreational facilities within the Onslow Village will assist in contributing to positive social outcomes by creating a sense of belonging for the workforce in the community and providing more opportunities for the existing community to engage in recreational activities The Onslow Village design also enhances the location and surroundings of the site by maximising the topography of the landscape and viewpoints, while providing facilities for the community to better enjoy the amenity and surroundings of the site The incorporation of health and wellness facilities and outdoor recreational spaces will facilitate social integration and provide positive physical and mental health benefits to the transient workforce residents The development will showcase Thalanyji culture and history The development will highlight traditional knowledge and encourage a two-way science approach to environmental management <p>I have attached a Social Impact Statement by ENM Consulting Pty Ltd outlining the potential social impacts and benefits for Thalanyji People of the proposed development of Lot 300 Back Beach Road, Onslow.</p>	Noted.
4	Department of Education		SUPPORT	<p>Thank you for your letter dated 24 September 2021 providing the Department of Education (the Department) with the opportunity to comment on the abovementioned proposal. The Department has reviewed the information submitted in support of the proposal and provides the following comments:</p> <p>The Transient Workforce Accommodation (TWA) including associated ancillary facilities is proposed to the north of Onslow Primary School (Primary School) across from Simpson Street. Having regard to the Western Australian Planning Commission's Operational Policy 2.4 -</p>	Noted.

				<p>Planning for School Sites, careful consideration of land uses in close proximity to schools such as licensed premises is required since schools are deemed to be sensitive land uses.</p> <p>The Department acknowledges the TWA development is the predominant land use while the Tavern, Recreation - Private and Restaurant are incidental uses. Given that the proposed tavern and other amenities are located behind the proposed accommodation units at a considerable distance from the Primary School, there is unlikely to be any adverse impacts to the safety of students and amenity of the Primary School.</p> <p>The proposal seeks to construct 500 TWA in lieu of a 200 person for a Type A Camp as per the Shire of Ashburton's Local Planning Policy 13 - TWA However, based on the technical reports that supplemented the proposal including traffic, noise, rubbish disposal, effluent disposal, social, economic and coastal hazard assessment, it appears the proposal is unlikely to have any significant impact on the Primary School.</p> <p>In view of the above, the Department has no objection to the proposal subject to the following condition be imposed:</p> <ul style="list-style-type: none"> A Construction Management Plan (CMP) be established to address noise, odour and dust emissions mitigation. The CMP is to include how car parking, delivery vehicles and traffic impacts associated with construction will be managed so as not to jeopardise the safety of the school community, particularly during peak school drop off/pick up times. 	
5	21100746	Department of Water and Environmental Regulation	COMMENT	<p>Thank you for referral of the above application for planning approval, received on 21 September 2021. The Department of Water and Environmental Regulation (Department) has reviewed the information provided and offers the following comments.</p> <p><i>Clearing native vegetation advice</i></p> <p>Please be advised that under section 51C of the <i>Environmental Protection Act 1986</i> (EP Act), clearing of native vegetation is an offence unless undertaken under the authority of a clearing permit, or the clearing is subject to an exemption. Exemptions for clearing that are a requirement of written law, or authorised under certain statutory processes, are contained in Schedule 6 of the EP Act. Exemptions for low impact routine land management practices outside of environmentally sensitive areas (ESAs) are contained in the Environmental Protection (Clearing of Native Vegetation) Regulations 2004 (the Clearing Regulations).</p> <p>Based on the information provided, the proposed clearing is unlikely to be exempt and a clearing permit is likely to be required. The Department has not received a clearing permit application for this proposal. Application forms are available from https://www.der.wa.gov.au/our-work/clearing-permits/46-clearing-permitapplication-forms.</p> <p>Additional information on how to apply for a clearing permit is available from https://www.der.wa.gov.au/images/documents/your-environment/nativevegetation/Fact_sheets/Fact_Sheet_-_how_to_apply.pdf</p> <p>Information regarding clearing permit fees can be found here: https://der.wa.gov.au/our-work/clearing-permits/fees/faqs.160996</p> <p>It is the applicant's responsibility to determine compliance with these exemptions and therefore whether a clearing permit is required. If further clarification is required, please contact DWER's Native Vegetation Regulation section by email (admin.nvp@dwer.wa.gov.au) or by telephone (6364 7098).</p> <p><i>Rights in Water and Irrigation Act 1914 / water resource protection</i></p> <p>The proposed activities occur within the proclaimed Pilbara groundwater and surface water areas and are subject to licensing requirements under the Rights in Water and Irrigation Act 1914 (RIWI). If the proponent needs to use groundwater or surface water for any purpose, including construction, onsite fire hydrants or groundwater dewatering, they will need to apply for a 5C licence to take water and a 26D licence to construct any new water supply bores.</p> <p>It is recommended that during the construction phase of the accommodation village, hydrocarbons, chemicals, and potentially hazardous substances are stored and disposed of in accordance with the Departments' Guidelines and Water Quality Protection Notes.</p> <p>These notes and guidelines provide recommendations on best practice measures to protect water resources, they are available from: http://www.water.wa.gov.au/search-publications</p> <p>Recommended notes include:</p> <ul style="list-style-type: none"> WQPN 10: Contaminant spills – emergency response. WQPN 65: Toxic and hazardous substances – storage and use. <p><i>Potential contamination and reporting requirements under the Contaminated Sites Act 2003.</i></p>	<p><u>Clearing native vegetation advice:</u></p> <p>A clearing permit will be lodged with DWER</p> <p><u>RIWI:</u></p> <p>Applications for 5C or 26D licences will be submitted if access to ground or surface water is required</p> <p><u>Contamination:</u></p> <p>The Applicant is aware of its obligations under Section 11 of the CS Act</p> <p>The contamination management responses proposed in the Desktop Contamination Assessment be implemented to address the 6 Areas of Potential Concern (AOPCs) highlighted will be implemented.</p>

				<p>The proponent is to be made aware of its obligations, as under section 11 of the Contaminated Sites Act 2003, site owners, occupiers or a person who knows or suspects that they have caused or contributed to contamination must report the site to the Department. If the proponent suspects a site to be contaminated it is to be reported as soon as reasonably practical, however, if the proponent knows a site is contaminated it must be reported within 21 days of the proponent first being aware of the contamination. Failure to do so is considered an offence under the Act.</p> <p>The Department recommends that the contamination management responses proposed in the Desktop Contamination Assessment be implemented to address the 6 Areas of Potential Concern (AOPCs) highlighted.</p>										
6	21100747	Department of Fire and Emergency Services	SUPPORT	<p>RE: VULNERABLE LAND USE - LOT 300 BACK BEACH ROAD, ONSLOW – TRANSIENT WORKERS ACCOMMODATION - ONSLOW VILLAGE (500 PERSON) - JDAP DAP/21/02078</p> <p>I refer to your letter dated 21 September 2021 regarding the submission of a Bushfire Management Plan (BMP) (Version 1), prepared by Linfire and dated 25 August 2021, for the above development application.</p> <p>This advice relates only to <i>State Planning Policy 3.7: Planning in Bushfire Prone Areas</i> (SPP 3.7) and the <i>Guidelines for Planning in Bushfire Prone Areas</i> (Guidelines). It is the responsibility of the proponent to ensure the proposal complies with relevant planning policies and building regulations where necessary. This advice does not exempt the proponent from obtaining approvals applicable to the proposal including planning, building, health or any other approvals required by a relevant authority under written laws.</p> <p>The proposal was also referred to DFES's Built Environment Branch (BEB) for initial comment. Development plans will need to be provided to DFES BEB for assessment as required by Regulation 18B of the Building Regulations 2012 (as amended). There appears to be an intent to provide an on-site pump and tank-fed booster and hydrant system. Although specific design details were not clearly stated in the referral documentation, any such system intended to serve Class 2-9 buildings (exceeding 500m2 Total Floor Area) will be expected to be designed in accordance with AS2419.1-2005 and meet with the FES Commissioner's Operational Requirements. The hydraulic capability of this system must meet the performance requirements for the structures which it is serving and any requirements for Bush Fire suppression must be considered over and above this demand.</p> <p>Assessment</p> <p>1. Policy Measure 6.5 a) (ii) Preparation of a BAL contour map</p> <table border="1"> <thead> <tr> <th>Issue</th> <th>Assessment</th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>Landscape Management Plan</td> <td> <p>The BMP is reliant on a Landscape Management Plan (LMP) to establish and maintain APZ's (identified in Figure 5 of the BMP) and remaining vegetated areas of Plot 11 as managed to a low threat state, in accordance with AS3959.</p> <p>However, the submitted LMP does not reference APZ Schedule 1: Standards for Asset Protection Zones contained in the Guidelines, nor does it specify how excluded areas will achieve low threat status under AS3959. DFES recommends inconsistencies between the BMP and LMP are addressed to ensure the vegetated areas within the site are established and maintained in accordance with Schedule 1 of the Guidelines</p> </td> <td> <p>Modification to the BMP is required. Decision maker to be satisfied that vegetation within the site is established and maintained in accordance with Schedule 1 of the Guidelines.</p> </td> </tr> <tr> <td>BAL Contour Map</td> <td> <p>DFES notes Figure 1 of the BMP (Development Plan) depicts a 15 metre wide separation distance between the project area boundary and proposed buildings. 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Decision maker to be satisfied that vegetation within the site is established and maintained in accordance with Schedule 1 of the Guidelines.</p>	BAL Contour Map	<p>DFES notes Figure 1 of the BMP (Development Plan) depicts a 15 metre wide separation distance between the project area boundary and proposed buildings. The BMP also states all proposed</p>	<p>Modification to the BMP is required.</p> <p>Decision maker to be satisfied the required 15 metre separation distance can be achieved.</p>	<p>Issue: Landscape Management Plan</p> <p>The BMP has been amended to reflect the latest clearing extent and stipulates that all managed vegetation is to consist of APZs compliant with Schedule 1 of the Guidelines, and with all other excluded vegetation compliant with low threat vegetation as per AS 3959 Clause 2.2.3.2 (f).</p> <p>Issue: BAL Contour Map</p> <p>The lack of clarity appears to be due to line width. All relevant figures have been amended to reflect the latest clearing extent and vegetation exclusions and now clearly depict all buildings in areas with direct interface to unmanaged vegetation, will have an appropriately sized APZ and are located in BAL-29.</p> <p>Issue: Location, and Siting & Design</p> <p>The BMP and all relevant figures have been amended to reflect the latest clearing extent and vegetation exclusions and now clearly depict all buildings in areas with direct interface to unmanaged vegetation, will have an appropriately sized APZ and are located in BAL-29.</p> <p>Issue: Vehicular Access (A3.2)</p> <p>The BMP has been amended to reflect that the existing public road network is outside the Proponents control, however while a full audit of the existing public roads was not conducted, during the site inspection, there didn't appear to be any significant deficiencies noted that would impede access or egress (narrow width, steep grades etc).</p> <p>Issue: Vehicular Access (A3.5)</p> <p>The BMP has been amended to clarify that there is no statutory requirement to create a public roads within the development, however given the use of the limited internal driveway network by larger vehicles (delivery and garbage trucks, buses etc), the driveway width is will typically be at least 6 m anyway, which would comply with the public road specification (Column 1 of Table 6).</p> <p>Issue: Bushfire Emergency Evacuation Plan (BEEP)</p> <p>The BEEP has been reviewed to ensure compliance with the Guidelines.</p>
Issue	Assessment	Action												
Landscape Management Plan	<p>The BMP is reliant on a Landscape Management Plan (LMP) to establish and maintain APZ's (identified in Figure 5 of the BMP) and remaining vegetated areas of Plot 11 as managed to a low threat state, in accordance with AS3959.</p> <p>However, the submitted LMP does not reference APZ Schedule 1: Standards for Asset Protection Zones contained in the Guidelines, nor does it specify how excluded areas will achieve low threat status under AS3959. DFES recommends inconsistencies between the BMP and LMP are addressed to ensure the vegetated areas within the site are established and maintained in accordance with Schedule 1 of the Guidelines</p>	<p>Modification to the BMP is required. Decision maker to be satisfied that vegetation within the site is established and maintained in accordance with Schedule 1 of the Guidelines.</p>												
BAL Contour Map	<p>DFES notes Figure 1 of the BMP (Development Plan) depicts a 15 metre wide separation distance between the project area boundary and proposed buildings. The BMP also states all proposed</p>	<p>Modification to the BMP is required.</p> <p>Decision maker to be satisfied the required 15 metre separation distance can be achieved.</p>												

	buildings are sited in BAL29 and below. However, Figure 4 of the BMP appears to depict buildings partially located in areas of BAL40, specifically, buildings located in the south western portion of the project area adjacent to Plot 2. DFES recommends any inconsistencies between Figure 1 and 4 are addressed to ensure the required 15 metre separation distance is achieved between Plot 2 and proposed buildings.	
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2. Policy Measure 6.5 c) Compliance with the Bushfire Protection Criteria

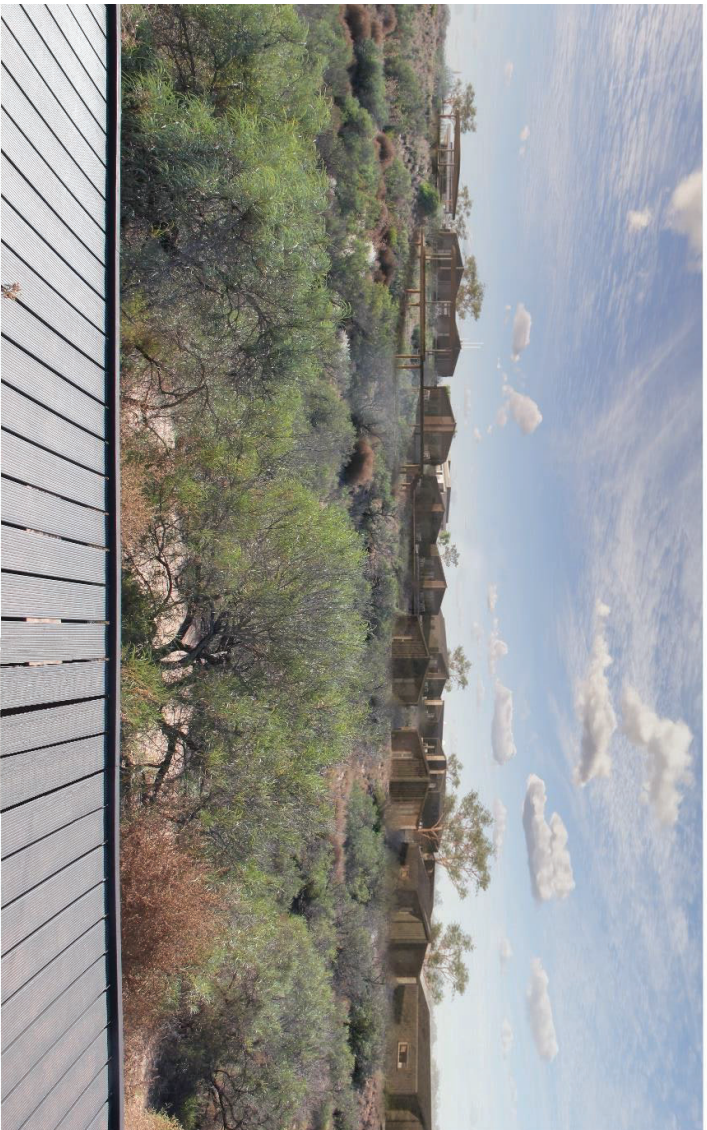
Element	Assessment	Action
Location, and Siting & Design	A1.1 & A2.1 – not demonstrated The BAL ratings cannot be validated for the reason(s) outlined in the above table.	Modification of the BMP required. The decision maker to be satisfied that compliance with Element 1 and Element 2 can be achieved.
Vehicular Access	A3.2 – not demonstrated The BMP states: <i>The existing public roads sighted whilst travelling to the site appeared compliant with public road specifications of the Guidelines and will be sufficient for emergency egress or firefighter access to the site.</i> The BMP has not validated that the public road network meets the full technical requirements of the Guidelines.	Modification to the BMP is required. The decision maker to be satisfied that compliance with A3.2 can be achieved.
Vehicular Access	A3.5 – not demonstrated DFES considers the proposal to be of a scale that requires a private road network rather than a driveway. The proposal has the potential to accommodate up to 500 occupants. The private driveway should be upgraded to meet the technical requirements of column 1 Table 6 of the Guidelines. A3.5 is generally for use where a single house on a single lot is being proposed.	Modification to the BMP is required. The decision maker to be satisfied.

Issue	Assessment	Action
Bushfire Emergency Evacuation Plan (BEEP)	The referral has included a <i>'Bushfire Emergency Evacuation Plan'</i> for the purposes of addressing the policy requirements. Consideration should be given to the Guidelines Section 5.5.2 'Developing a Bushfire Emergency Evacuation Plan'. This contains detail regarding what should be included in a BEEP and will ensure the	Comment only.

					<p>appropriate content is detailed when finalising the BEEP to the satisfaction of the Shire.</p> <p>Recommendation – supported subject to modifications</p> <p>The development application and the BMP have adequately identified issues arising from the bushfire risk assessment and considered how compliance with the bushfire protection criteria can be achieved. However, modifications to the BMP are necessary to ensure it accurately identifies the bushfire risk and necessary mitigation measures. As these modifications will not affect the development design, these modifications can be undertaken without further referral to DFES.</p> <p>The required modifications are listed in the table(s) above.</p> <p>As this planning decision is to be made by a Joint Development Assessment Panel please forward notification of the decision to DFES for our records.</p>	
7	21100810	Department of Planning, Lands and Heritage	SUPPORT	<p>Thank you for giving the Department of Planning, Lands and Heritage the opportunity to comment on development application DA21-76 for workforce accommodation proposed at Lot 300 Back Beach Road, Onslow.</p> <ol style="list-style-type: none"> 1. The Department notes the Registered Native Title Body Corporate, Buurabalayji Thalanyji Aboriginal Corporation (BTAC) has consented to the application as the future landowner of Lot 300 on DP422325, currently in order for dealings. 2. The Department notes the proposal is consistent with the Shire of Ashburton Local Planning Strategy which identifies Lot 300 as an investigation area workforce accommodation and short stay accommodation. 3. The Department notes the consistency of the Bushfire Management Plan against State Planning Policy 3.7 – Planning in Bushfire Prone Areas. 4. The Department notes the existence of registered Aboriginal Heritage sites on Lot 300 and recommends a note advising the applicant of its responsibilities under the <i>Aboriginal Heritage Act 1972</i>, including undertaking consultation with BTAC. 5. With respect to State Planning Policy 2.6 – State Coastal Planning Policy and the adopted <i>Onslow Township Village Coastal Hazard Risk Management and Adaptation Plan</i> which identifies Lot 300 being highly likely to be impacted by coastal processes in the long term, the Department recommends the following condition: <ol style="list-style-type: none"> A. Development approval shall be limited to a period of not more than 30 years from the date of approval for development within the proposed 30m coastal foreshore reserve, at which point the approval will lapse, and <ol style="list-style-type: none"> (i) The development shall be removed; and (ii) The land shall be rehabilitated to its pre-development condition, to the specifications and satisfaction of the local government, at the applicant's cost. <p>The Department has no objections to the proposed development of workforce accommodation at Lot 300 Back Beach Road, Onslow.</p>	Noted.	

Attachment One

Renders from Boardwalk





Attachment Two

Environmental Assessment Technical Note

Our Ref: 4755 Rev3

25 November 2021

Rowe Group
C/- Adrian Dhue
369 Newcastle Street
NORTHBIDGE WA 6003
Via Email: Adrian.Dhue@rowegroup.com.au

Dear Adrian

Request For Information – Application for Planning Approval DA 21-67 / DAP 21-02078 – Transient Workers Accommodation – Onslow Village – Lot 300 Back Beach Onslow

Further to your recent email correspondence (dated 11 November 2021), it is understood that the Shire of Ashburton has requested further information in relation to the abovementioned development application.

360 Environmental has reviewed the additional information requested by the Shire of Ashburton and we provide the following detailed response to those environmental considerations raised.

Request for Information (RIF)

Clearing of Vegetation

The submitted documentation including the Bushfire Management Plan (Attachment 1.0) and Environmental Report (Attachment 5.0), identify that clearing of natural vegetation is to occur on the site. However, the degree and amount of clearing is not clearly identified in the lodged documentation and associated plans with contradictions occurring between the above documents.

Please provide a Clearing Plan that illustrates the areas of native vegetation on the site that is proposed to be cleared as part of this development (this includes areas to be cleared for APZ).

Response

The Bushfire Management Plan (BMP) and Environmental Assessment Report (EAR) identify that clearing of natural vegetation will be required to enable the construction of the proposed transient workers accommodation at the site.

The exact areas of clearing were not included in either of the abovementioned reports as under Part V of the *Environmental Protection Act 1986* an application for Native Vegetation Clearing

Permit (NVCP) will be prepared, separate to this application. The NVCP application will address clearing associated with the proposed development.

To assist the Shire of Ashburton with understanding the proposed clearing for this development application, we have prepared an indicative Clearing Plan for the assessment of the proposed development (Figure 1). The indicative Clearing Plan is based upon the draft NVCP application (which has yet to be formally lodged with the DWER). The indicative Clearing Plan identifies the following:

- Those areas to be cleared with no exemptions as per the NVCP requirements (7.71 ha)
- Those areas to be cleared exempt as per the NVCP requirements (6.62 ha)
- Those areas to be retained (6.13 ha).

The Bushfire Management Plan (BMP) reflects the fire management measures applicable to clearing in the development site (refer to Attachment 1.0).

Bushfire Risk

It has been noted within the external agency response from the Department of Fire and Emergency Services (DFES), that modifications to the Bushfire Management Plan (BMP) are necessary to ensure it accurately identifies the bushfire risk and necessary mitigation measures.

1. Policy Measure 6.5 a) (ii) Preparation of a BAL contour map

Issue	Assessment	Action
Landscape Management Plan	The BMP is reliant on a Landscape Management Plan (LMP) to establish and maintain APZs (identified in Figure 5 of the BMP) and remaining vegetated areas of Plot 11 as managed to a low threat state, in accordance with AS3959. However, the submitted LMP does not reference APZ Schedule 1: Standards for Asset Protection Zones contained in the Guidelines, nor does it specify how excluded areas will achieve low threat status under AS3959. DFES recommends inconsistencies between the BMP and LMP are addressed to ensure the vegetated areas within the site are established and maintained in accordance with Schedule 1 of the Guidelines	Modification to the BMP is required. Decision maker to be satisfied that vegetation within the site is established and maintained in accordance with Schedule 1 of the Guidelines.

Issue	Assessment	Action
BAL Contour Map	DFES notes Figure 1 of the BMP (Development Plan) depicts a 15-metre-wide separation distance between the project area boundary and proposed buildings. The BMP also states all proposed buildings are sited in BAL29 and below. However, Figure 4 of the BMP appears to depict buildings partially located in areas of BAL40, specifically, buildings located in the southwestern portion of the project area adjacent to Plot 2. DFES recommends any inconsistencies between Figures 1 and 4 are addressed to ensure the required 15 metre separation distance is achieved between Plot 2 and proposed buildings.	Modification to the BMP is required. Decision maker to be satisfied the required 15 metre separation distance can be achieved

Response

Landscape Management Plan

The BMP has been amended to reflect the latest clearing extent and stipulates that all managed vegetation is to consist of APZs compliant with Schedule 1 of the Guidelines, and with all other excluded vegetation compliant with low threat vegetation as per AS 3959 Clause 2.2.3.2 (f) (refer to Attachment 1).

BAL Contour Map

The lack of clarity appears to be due to line width. All relevant figures have been amended to reflect the latest clearing extent and vegetation exclusions and now clearly depict all buildings in areas with direct interface to unmanaged vegetation, will have an appropriately sized APZ and are located in BAL-29 (refer to Attachment 1).

2. Policy Measure 6.5 c) Compliance with the Bushfire Protection Criteria

Element	Assessment	Action
Location, and Siting and Design	A1.1 and A2.1 – not demonstrated The BAL ratings cannot be validated for the reason(s) outlined in the above table.	Modification of the BMP required. The decision maker to be satisfied that compliance with Element 1 and Element 2 can be achieved.
Vehicular Access	A3.2 – not demonstrated The BMP states: The existing public roads sighted whilst travelling to the site appeared compliant with public road specifications of the Guidelines and will be sufficient for emergency egress or firefighter access to the site. The BMP has not validated that the public road network meets the full technical requirements of the Guidelines.	Modification to the BMP is required. The decision maker to be satisfied that compliance with A3.2 can be achieved.

Element	Assessment	Action
Vehicular Access	A3.5 – not demonstrated DFES considers the proposal to be of a scale that requires a private road network rather than a driveway. The proposal has the potential to accommodate up to 500 occupants. The private driveway should be upgraded to meet the technical requirements of column 1 Table 6 of the Guidelines. A3.5 is generally for use where a single house on a single lot is being proposed.	Modification to the BMP is required. The decision maker to be satisfied.

Response

Location, and Siting and Design

The BMP and all relevant figures have been amended to reflect the latest clearing extent and vegetation exclusions and now clearly depict all buildings in areas with direct interface to unmanaged vegetation, will have an appropriately sized APZ and are located in BAL-29.

Vehicular Access (A3.2)

The BMP has been amended to reflect that the existing public road network is outside the Proponents control, however while a full audit of the existing public roads was not conducted, during the site inspection, there didn't appear to be any significant deficiencies noted that would impede access or egress (narrow width, steep grades etc).

Vehicular Access (A3.5)

The BMP has been amended to clarify that there is no statutory requirement to create a public road within the development, however given the use of the limited internal driveway network by larger vehicles (delivery and garbage trucks, buses etc), the driveway width is will typically be at least 6 m anyway, which would comply with the public road specification (Column 1 of Table 6).

The BMP has been modified and updated to reflect abovementioned considerations in relation to the location, siting and design and vehicular access applicable to the proposed development (refer to Attachment 1).

Issue	Assessment	Action
Bushfire Emergency Evacuation Plan (BEEP)	The referral has included a 'Bushfire Emergency Evacuation Plan' for the purposes of addressing the policy requirements. Consideration should be given to the Guidelines Section 5.5.2 'Developing a Bushfire	Comment only.

Issue	Assessment	Action
	<p>Emergency Evacuation Plan'. This contains detail regarding what should be included in a BEEP and will ensure the appropriate content is detailed when finalising the BEEP to the satisfaction of the Shire.</p>	

Response

The BEEP has been updated and modified in accordance with the guidelines for 'Developing a Bushfire Emergency Evacuation Plan' (refer to Attachment 2.0).

Please provide an updated BMP and BEEP that addresses the requested modifications, as listed above.

Response

An updated BMP and BEEP have been attached, addressing the abovementioned matters raised by the decision makers (refer to Attachments 1 and 2).

Environmental

The Environmental Assessment Report submitted as part of this application, has been reviewed and it has been identified that additional information is required to undertake a full assessment of the environmental impacts of the development on the site. The matters that need to be addressed include:

The Environmental Assessment Report does not address potential groundwater flow direction and whether adjacent potentially contaminating activities may have impacted groundwater beneath the site.

Response

The EAR has been updated to include reference to the groundwater flow direction (refer to Section 3.5.1 of the EAR) and this is further detailed in the Urban Water Management Plan (UWMP) (refer to Attachment 3.0). Confirmation on whether the groundwater beneath the site is potentially contaminated will be further investigated as part of a Detailed Site Investigation, a separate process to the development.

It is not clear from the Environmental Assessment Report how much native vegetation will be cleared. It is important to quantify the extent of impacts i.e. how much vegetation is to be cleared for the development. The total area of clearing should be inclusive of bushfire management requirements (as noted above).

Response

360 Environmental has prepared an indicative Clearing Plan applicable to the proposed development (refer above). This indicative Clearing Plan is inclusive of bushfire management requirements with respect to clearing requirements.

The inclusion of species listed as 'Marine' and 'Shorebird' have not been included within the habitat assessments, given proximity of the site from the coast. Also, likelihood of occurrence rating (high, medium and low) has not defined.

Response

An additional desktop assessment has been undertaken to address the presence and significance of 'Marine' and 'Shorebirds' and are included in Section 3.10.1 of the EAR, including the likelihood of occurrence rating (Appendix F of the EAR). The DWER requirements for these Targeted Survey shall be undertaken between September and April. The Targeted Surveys can be fulfilled as a condition of development approval for the proposed development.

*The Environmental Assessment Report notes that *Lerista planiventralis maryani* (P1), utilises dune habitat in the bioregion and records indicate that it historically occurred within 1 km of the site and that a targeted terrestrial vertebrate survey utilising pitfall traps would be required to assess its presence or absence in the site with greater certainty.*

Response

A Targeted Terrestrial Vertebrae Survey may be necessary to determine the presence and significance of the *Lerista planiventralis maryani* species. The DWER requirements for this Targeted Survey shall be undertaken between September and April. The Targeted Survey can be fulfilled as a condition of development approval for the proposed development.

The inclusion of a Construction Environmental Management Plan (CEMP) as part of the development application.

Response

As stated in the EAR, the purpose of a CEMP is manage and mitigate those construction and development works that may impact on the existing environmental conditions of the site. A CEMP is generally warranted during the construction phase and can be fulfilled as a condition of development approval associated with the proposed development. The EAR sufficiently addresses those existing environmental conditions and associated environmental assessments, investigation and/or approvals (including the requirement for a CEMP). It is recommended that the CEMP be prepared and fulfilled as a development condition applicable to the proposed development.

Undertaking an Unexploded Ordinance (UXO) survey of the site prior to any works commencing on the site.

Response

The EAR (Section 4.7.3) and Desktop Contamination Assessment (Attachment 4) highlighted that an Unexploded Ordinance (UXO) survey of the site would be required prior to any works commencing on the site. It is recommended that this matter can be fulfilled as a development condition applicable to the proposed development.

Undertaking a HAZMAT site survey, to ascertain if the site has been impacted by asbestos containing materials (ACM), asbestos fines (AF) or fibrous asbestos (FA) are present at the site.

Response

The EAR (Section 4.7.3) and Desktop Contamination Assessment (Attachment 4) highlighted that a HAZMAT site survey would be required to confirm whether the site is impacted by ACM, AF, and FA. It is recommended that this matter can be fulfilled as a development condition applicable to the proposed development.

Soil or groundwater investigations being undertaken at the site, to ascertain if off-site contamination from former fuel infrastructure located to the north has impacted the site and if possible, remediation is required.

Response

The EAR (Section 4.7.3) and Desktop Contamination Assessment (Attachment 4) identified that further soil and groundwater investigations may be required to confirm whether or not contamination from the former fuel infrastructure has impacted the site. The risk has been considered low of offsite impacts. However, a Detailed Site investigation would address this. This is a separate process to the development application process and should be addressed accordingly.

An Acid Sulphate Soil (ASS) Assessment needs to be undertaken to identify if the site designated as 'moderate to low risk of ASS' being present on the site is 'potential' or 'actual' ASS.

Response

The EAR (Section 4.6.3) identified that a Self ASS Self-Assessment would be required to be undertaken to determine the 'potential' or 'actual' presence of ASS on the site. It is recommended that this matter can be fulfilled as a condition of development approval applicable to the proposed development

Please provide an updated Environmental Plan and associated documentation that addresses the above issues.

Response

The EAR and this supporting information address the environmental considerations that were raised by the Shire of Ashburton during their initial assessment of the development application. The EAR has been updated accordingly to address the environmental considerations (refer to Attachment 5.0). The BMP and BEEP have also been updated accordingly.

It is recommended that all of the environmental considerations raised above can be adequately addressed as conditions of development approval applicable to the proposed development. Further Targeted Fauna Surveys shall be undertaken in accordance with the EPA Guidance.

The Schedule of Submissions have been updated to reflect the information presented in the RIF and those matters addressed during the consultation period.

We trust this meets your requirements at this time. Should you have any questions or require further action please do not hesitate to contact Genelle Abolis or the undersigned on (08) 9388 8360. We look forward to hearing from you.

For and on behalf of 360 Environmental Pty Ltd

A handwritten signature in black ink, appearing to read 'Tamara Smith', written in a cursive style.

Tamara Smith Principal Environmental Consultant

Enc

Attachment 1.0 - Bushfire Management Plan

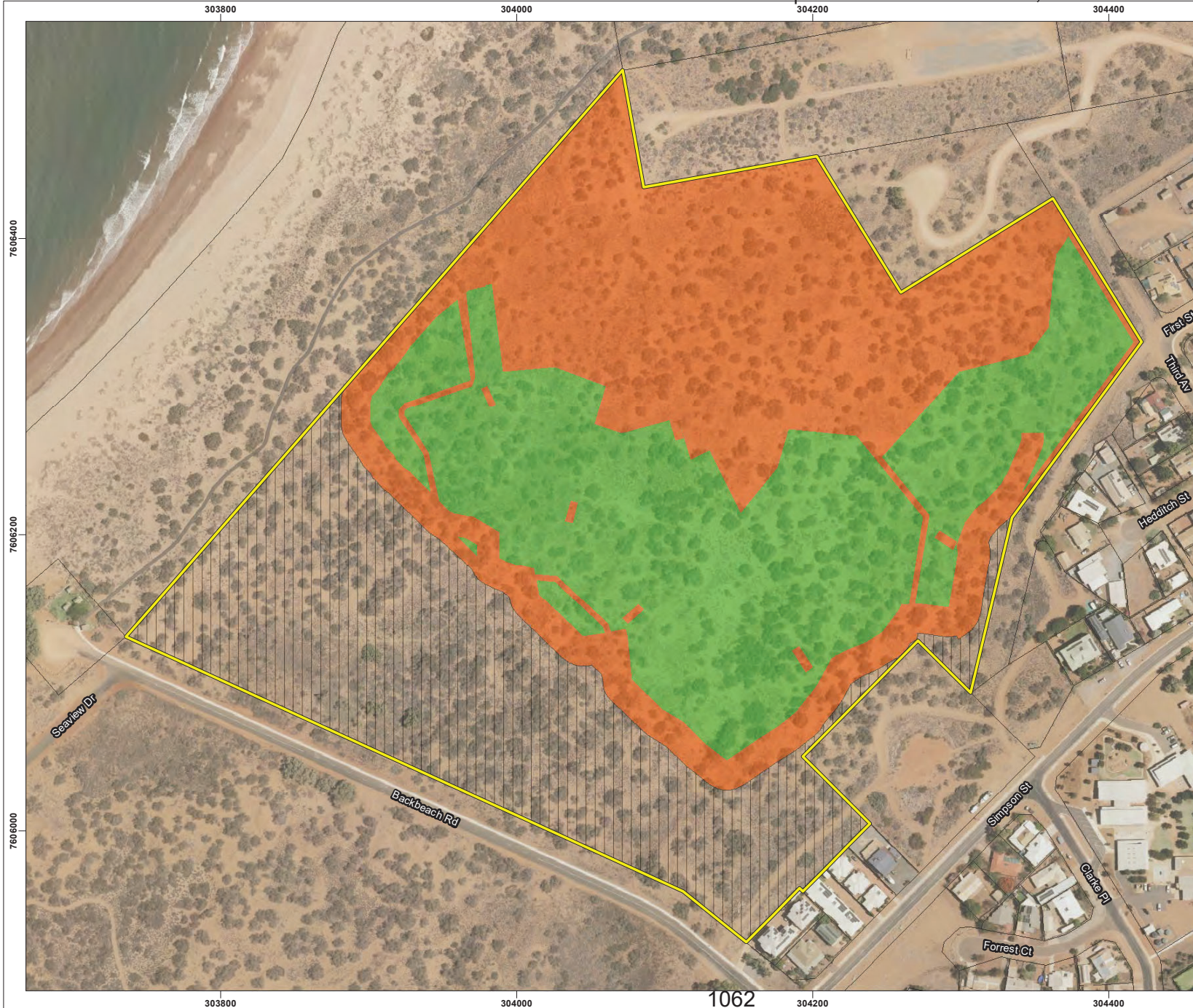
Attachment 2.0 - Bushfire Emergency and Evacuation Plan

Attachment 3.0 - Urban Water Management Plan

Attachment 4.0 - Desktop Contamination Assessment Report

Attachment 5.0 - Environmental Assessment Report

Attachment 13.2G - DAP/21/02078 -DA 21-67 | L300 Back Beach Road, Onslow

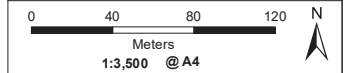


Legend

- Study Area Boundary (20.46 ha)
- Cadastral Lines
- Clearing (7.71 ha)
- Exempt of Clearing (6.62)
- No Clearing Proposed (6.13 ha)

- NOTE THAT POSITION ERRORS CAN BE >5M IN SOME AREAS
 - LOCALITY MAP SOURCED LANDGATE 2021
 - OTHER DATA SOURCED LANDGATE 2021
 - AERIAL PHOTOGRAPHY SOURCED LANDGATE 2021
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LOCALITY MAP



PROJECT ID 4755	DATE 18/11/2021		
HORIZONTAL DATUM AND PROJECTION GDA 1994 MGA Zone 50			
CREATED LF	CHECKED VM	APPROVED FJ	REVISION 0

Mineral Resources Limited
 Lot 300 Back Beach Road Onslow

Supporting EAR Request for Information

Figure
 Indicative Clearing Area

Attachments

Attachment 1.0
Bushfire Management Plan



Onslow Township Village Bushfire Management Plan

Date: 19 November 2021

Prepared For: Mineral Resources

Linfire Ref: 20210707149360ENV-BMP-001_2

Linfire Consultancy

ABN: 577 930 47299



Revision	Issue Date	Revision Description	Approved By
0	5 Aug 2021	Issued for Approval	Linden Wears (Level 3 BPAD 19809)
1	25 Aug 2021	Issued for Approval	Linden Wears (Level 3 BPAD 19809)
2	19 Nov 2021	Issued for Approval	Linden Wears (Level 3 BPAD 19809)

Disclaimer and Limitation

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2. errors or omissions in this report except where grossly negligent; and the proponent expressly acknowledges that they have been made aware of this exclusion and that such exclusion of liability is reasonable in all the circumstances.

If despite the provisions of the above disclaimer Linfire is found liable then Linfire limits its liability to the lesser of the maximum extent permitted by the law and the proceeds paid out by Linfire’s professional or public liability insurance following the making of a successful claim against such insurer.

Fire is an unpredictable force of nature. Changing climatic factors (whether predictable or otherwise) either before or at the time of a fire can also significantly affect the nature of a fire and in a bushfire prone area it is not possible to completely guard against bushfire. The mitigation strategies contained in this Bushfire Management Plan (BMP) are considered to be prudent minimum standards only, based on the standards prescribed by relevant authorities. It is expressly stated that Linfire do not guarantee that if such standards are complied with or if a property owner exercises prudence, that a building or property will not be damaged or that lives will not be lost in a bush fire.

Further, the achievement of the level of implementation of fire precautions will depend on the actions of the landowner or occupiers of the land, over which Linfire has no control. If the proponent becomes concerned about changing factors then either a review of the existing BMP, or a new BMP, should be requested. Linfire accepts no liability or responsibility whatsoever for or in respect of any use or reliance upon this report and its supporting material by any third party.

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1.0 Proposal details

1.1 Background

Mineral Resources (the Proponent) is seeking to lodge a development application for a proposed new campground on Lot 300 Back Beach Road, Onslow (the project area) in the Shire of Ashburton.

The development application is for the Onslow Township Village, which will be the permanent resort style accommodation facility and will be designed and built as long-term accommodation and facilities to cater for the mine operations workforce. The village will be designed to support 500 rooms, and will include central facilities and utilities that are also available for use by the public.

The development plan (see Figure 1) identifies that the proposed development will comprise the following elements:

- Village Buildings
 - Entrance Gatehouse
 - Accommodation Pods
 - Field Store with Laundries
 - Restaurant
 - Tavern
 - Administration building
 - Training and inductions building
 - Creche and Communications building
 - Medical and Wellness building
 - Indoor recreation building
 - Gym building
 - Multi-purpose courts
 - Bin Room
 - Maintenance Shed
 - Storage Shed
 - Fire pump room
 - Water pump room
- Other elements
 - Raw/Firewater and Potable water storage tanks
 - Outdoor Pool
 - Outdoor Volleyball
 - Outdoor Golf
 - Outdoor Cricket
 - Sports Oval
 - Transformer and SMSB
 - Carpark
 - Internal driveways
 - Onsite landscaping, paths and boardwalks
 - Perimeter fencing and gates
- Cultural Significant Area – retained vegetation within the south-western part of the site with a potential future Cultural Centre (subject to future planning application)

1.2 Site description

The project area comprises approximately 20.45 ha within Lot 300 and is surrounded by (see Figure 2):

- Remnant coastal dune vegetation to the north-west, north and west, with the ocean further in all these directions
- Back Beach Road is located to the south-west, with remnant shrubland and scrub vegetation within Unallocated Crown Land further to the south-west.
- Existing developed residential land to the south, south-east and east of the project area, with minor remnant vegetation within the undeveloped Lot 300 Simpson Rd (Unallocated Crown Land) and First Street road reserve adjacent to the south-eastern boundary.

The project area is currently undeveloped and contains remnant coastal shrubland and scrub vegetation.

The project area is designated as bushfire prone on the *Map of Bush Fire Prone Areas* (DFES 2021; see Plate 1).

1.3 Proposed development occupancy

It is anticipated that peak occupancy levels at the proposed development would be at full capacity in the winter months when conditions are milder and dryer, in particular during school holiday periods. Notwithstanding, given the proposed use for mining short-term accommodation, it is expected there will be relatively steady occupant numbers expected throughout all times of the year.

The Proponent has confirmed the following maximum anticipated occupancy at any one time during peak operation:

- approximately 300 overnight guests
- up to 50 staff
- approximately 50 public visitors

Although the above represents the maximum anticipated occupant load for the site totalling 400 occupants at peak use, however an occupancy of 80% of this would be a more accurate.

This occupancy information is based on preliminary estimates and will need to be reviewed and updated following development construction.

1.4 Purpose

This Bushfire Management Plan (BMP) has been prepared to address requirements under Policy Measure 6.5 of *State Planning Policy 3.7 Planning in Bushfire-Prone Areas* (SPP 3.7; WAPC 2015) and *Guidelines for Planning in Bushfire-Prone Areas* (the Guidelines; WAPC 2017).

The proposed development is considered to be a vulnerable land use which triggers additional requirements under Policy Measure 6.6 of SPP 3.7. This BMP has been prepared in accordance with Sections 5.4 and 5.5 of the Guidelines, which require development applications for vulnerable be accompanied by a bushfire emergency management plan (BEMP) which details the emergency management and evacuation arrangements for the development. The BEMP for the project accompanies this BMP.

1.5 Other plans/reports

Linfire has prepared a BEMP (Linfire 2021) as a requirement of Policy Measure 6.6 of SPP 3.7. The BEMP should be read in conjunction with this BMP.

There are no known bushfire or assessments that have been prepared previously for the project area.



Plate 1 : Map of Bush Fire Prone Areas (DFES 2021)

1072



Figure 1: Development Plan





Legend

- Proposed Development
- Project Area
- 100m Assessment Area
- 150m Assessment Area
- Cadastre

Scale 1: 4,000



0 60 120 180 Metres



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Mineral Resources

Onslow Township Village

Figure 2: Site Overview

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2.0 Environmental considerations

2.1 Native vegetation - modification and clearing

The project area is currently undeveloped and contains remnant native vegetation, much which will be cleared as part of the proposal. Table 1 provides a summary of a search of free publicly available environmental data.

Environmental impacts resulting from implementation of the proposal will need to be addressed under standard State and Federal environmental assessment and referral requirements under the Environmental Protection Act 1986 and Environment Protection and Biodiversity Conservation Act 1999.

Linfire assumes that all relevant environmental studies and clearing and environmental approvals will be sought prior to commencing on-site vegetation modification.

Table 1: Summary of environmental values

Environmental value	Not mapped as occurring within or adjacent to the project area	Mapped as occurring within or adjacent to the project area		Description
		Within	Adjacent	
Environmentally Sensitive Area	✓			The project area and adjacent land, is not identified as Environmentally Sensitive Areas.
Swan Bioplan Regionally Significant Natural Area	✓			No Regionally Significant Natural Areas were identified.
Ecological linkages	N/A	N/A	N/A	This layer not available at the time of document preparation. Additional studies may be required to assess.
Wetlands	✓			No wetlands identified within the project area or directly adjacent. No Ramsar sites are mapped as occurring within or adjacent to the project area.
Waterways	✓			No waterways or lakes within or adjacent to the project site.
Threatened Ecological Communities listed under the EPBC Act	✓			No Threatened Ecological Communities were identified within or adjacent to the project area
Threatened and priority flora	N/A	N/A	N/A	This layer not available at the time of document preparation. Additional studies may be required to assess.
Fauna habitat listed under the EPBC Act	✓			No EPBC Act-listed fauna habitat occurs within or adjacent to the Project Area.

Environmental value	Not mapped as occurring within or adjacent to the project area	Mapped as occurring within or adjacent to the project area		Description
		Within	Adjacent	
Threatened and priority fauna	N/A	N/A	N/A	This layer not available at the time of document preparation. Additional studies may be required to assess.
Bush Forever Site	✓			No protected Bush Forever sites have been identified within the project area or surrounding land.
DBCA managed lands and waters (includes legislated lands and waters and lands of interest)	✓			No DBCA managed or legislated land and waters were identified within or adjacent to the project area.
Conservation covenants	✓			No information has been provided by the client regarding Conservation Covenants.
Aboriginal Heritage		✓	✓	The project area and immediate surrounds are mapped as registered Aboriginal Heritage sites. Land to the south is also mapped as Other Heritage Place.

2.2 Revegetation / Landscape Plans

No revegetation is proposed as part of the proposal.

Almost all vegetation within the project area, other than the Cultural Significant Area, will be modified to either non-vegetated elements (buildings, roads, buildings, paths etc) or low threat vegetation through tree removal and management of understorey vegetation. Asset Protection Zones (APZs) are also required where buildings directly interface unmanaged vegetation to limit exposure of proposed assets to bushfire impact, and perimeter firebreaks will be required around most of the site. Ongoing management of the APZ and all low threat vegetation is to be by the Proponent or facility manager.

Any landscaping proposed within the project area will consist of low threat and managed gardens and lawn in accordance with AS 3959 Clause 2.2.3.2 (f), with the APZ complying with Schedule 1 of the Guidelines (refer to Appendix 2).

3.0 Bushfire assessment results

3.1 Assessment inputs

3.1.1 Vegetation classification

Linfire assessed classified vegetation and exclusions within 150 m of the project area through on-ground verification on 20 July 2021 in accordance with AS 3959—2018 *Construction of Buildings in Bushfire-Prone Areas* (AS 3959; SA 2018) and the *Visual Guide for Bushfire Risk Assessment in Western Australia* (DoP 2016). Georeferenced site photos and a description of the vegetation classifications and exclusions are contained in Appendix 1 and depicted in Figure 3 and Table 2.

Vegetation within and adjacent to the project area is typically a scrub structure that contains trees (height between 2m – 4m high) with a shrubby understorey, presenting as Class D scrub. In several areas there is a lack of the taller trees, resulting in a small plots of Class C shrubland where the predominant vegetation structure is less than 2 m high.

Currently small portions of the adjacent 150 m assessment area can be excluded from classification, including:

- existing non-vegetated areas devoid of vegetation including buildings, roads, footpaths and firebreaks, water bodies, beach excluded under Clause 2.2.3.2 (e)
- existing low threat vegetation including managed gardens/road verges, irrigated turf, street trees with managed understorey and non-flammable coastal succulent species excluded under Clause 2.2.3.2 (f).

3.1.2 Effective slope

Linfire assessed effective slope under classified vegetation through on-ground verification on 20 July 2021 in accordance with AS 3959. Results were cross-referenced with Landgate 5m contour data and are depicted in Table 2 and Figure 3.

Site observations indicate that land within the project area undulates with the surrounding assessment area around the proposed development, tending to rise toward the higher elevation within the site. There are steeper slopes on the north-western, western and southern interfaces, with gentler slopes to the north, north-east and east.

3.1.3 Summary of inputs

Table 2 illustrates the anticipated post-development vegetation classifications and exclusions following completion of development works and modification of existing vegetation to a non-vegetated or low threat state, throughout the development and new public road. The post-development vegetation classifications/exclusions and effective slope are summarised in Table 2.

Table 2: Post-development vegetation classifications/exclusions and effective slope

Vegetation plot	Vegetation classification	Effective slope	Comments
1	Class D Scrub	Flat/upslope (0°)	Plots with low shrubby understorey but with sufficient trees (2-4 m high) to be considered scrub
2	Class D Scrub	Downslope >0-5°	
3	Class D Scrub	Downslope >5-10°	vegetation. Occurs mostly within the project area, and land to the south-west
4	Class D Scrub	Downslope >15-20°	
5	Class C Shrubland	Flat/upslope (0°)	Isolated plots with low shrubby

Vegetation plot	Vegetation classification	Effective slope	Comments
6	Class C Shrubland	Downslope >0–5°	structure and without taller trees prevalent in the scrub vegetation.
7	Class C Shrubland	Downslope >5–10°	Occurs along the coastline, on steep land and in low lying areas
8	Class C Shrubland	Downslope >15–20°	
9	Class A Forest	Flat/upslope (0°)	Small plot of tall trees to south of project area.
10	Excluded – Non-vegetated and Low threat (Clause 2.2.3.2 [e] and [f])	N/A	Existing non-vegetated elements (roads, paths, buildings) and low threat vegetation (managed gardens, maintain lawn) surrounding the project area
11	Excluded – Non-vegetated and Low threat (Clause 2.2.3.2 [e] and [f])	N/A	Modified to non-vegetated elements and low threat vegetation as part of this development



Legend

- Site Photo
- Proposed Development
- Project Area
- 100m Assessment Area
- 150m Assessment Area

Asset Protection Zone

- 11m
- 15m
- 17m
- Vegetation Plot

Classified Vegetation

- A. Forest
- C. Shrubland
- D. Scrub
- Excluded Clause 2.2.3.2(e&f)
- Modified to non vegetated and low threat

Scale 1: 4,000

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Onslow Township Village

Figure 3: Post-development vegetation classification and effective slope

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3.2 Assessment outputs

3.2.1 Bushfire Attack Level (BAL) contour assessment

Linfire has undertaken a BAL contour assessment in accordance with Method 1 of AS 3959 for the project area (see Figure 4). The Method 1 procedure incorporates the following factors:

- state-adopted FDI 80 rating
- vegetation classification
- effective slope
- distance maintained between proposed development areas and the classified vegetation.

The BAL rating gives an indication of the level of bushfire attack (i.e. the radiant heat flux) that may be received by proposed future development and subsequently informs the standard of building construction and/or setbacks required for proposed habitable development to potentially withstand such impacts.

The BAL contours are based on:

- the post-development vegetation classifications and effective slope observed at the time of inspection
- the proposed on-site clearing extent including proposed Asset Protection Zones, firebreaks and resultant vegetation exclusions and separation distances achieved in line with the Development Plan

Should there be any changes in development design or classified vegetation extent that results in a modified BAL outcome, then the BAL contours will need to be reassessed.

The results of the BAL contour assessment are detailed in Table 3 and illustrated in Figure 4. The highest BAL applicable to the proposed buildings and elements is BAL-29 or less.

Table 3: BAL contour assessment results (to proposed buildings)

Method 1 BAL determination					
Plot	Vegetation classification	Calculation method	Effective slope	Separation (m)	BAL
1	Class D Scrub	Method 1	Flat/upslope (0°)	17 m	BAL-29
2	Class D Scrub	Method 1	Downslope >0-5°	15 m	BAL-29
3	Class D Scrub	Method 1	Downslope >5-10°	34 m	BAL-19
4	Class D Scrub	Method 1	Downslope >15-20°	45 m	BAL-12.5
5	Class C Shrubland	Method 1	Flat/upslope (0°)	47 m	BAL-12.5
6	Class C Shrubland	Method 1	Downslope >0-5°	70 m	BAL-12.5
7	Class C Shrubland	Method 1	Downslope >5-10°	17 m	BAL-19
8	Class C Shrubland	Method 1	Downslope >15-20°	28 m	BAL-19
9	Class A Forest	Method 1	Flat/upslope (0°)	>100 m	BAL-Low
10	Excluded – Non-vegetated and Low threat (Clause 2.2.3.2 [e] and [f])	N/A	N/A	N/A	N/A

Method 1 BAL determination					
Plot	Vegetation classification	Calculation method	Effective slope	Separation (m)	BAL
11	Excluded – Non-vegetated and Low threat (Clause 2.2.3.2 [e] and [f])	N/A	N/A	N/A	N/A

Table 4 lists the BAL applicable to each building or element within the proposed development.

Table 4: BAL applicable to each building/element

Building / element	Initial BAL	APZ	Revised BAL
Entrance Gatehouse	BAL-FZ	Interfacing APZs, site landscaping* and extension of Third Ave**	BAL-19
Accommodation Pods	BAL-FZ	15m – 17 m wide APZs to the vegetation interface and site landscaping*	BAL-29, BAL-19, BAL 12.5 and BAL-Low
Field Store with Laundries	BAL-FZ	Interfacing APZs and site landscaping*	BAL-19, BAL 12.5 and BAL-Low
Restaurant	BAL-FZ	11 m wide APZ to the vegetation interface and site landscaping*	BAL-29
Tavern	BAL-FZ	Interfacing APZs and site landscaping*	BAL-12.5
Administration building	BAL-FZ	Interfacing APZs and site landscaping*	BAL-12.5
Training and inductions building	BAL-FZ	Interfacing APZs and site landscaping*	BAL-12.5
Creche and Communications building	BAL-FZ	Interfacing APZs and site landscaping*	BAL-12.5
Medical and Wellness building	BAL-FZ	Interfacing APZs and site landscaping*	BAL-12.5
Indoor recreation building	BAL-FZ	Interfacing APZs and site landscaping*	BAL-Low
Gym building	BAL-FZ	Interfacing APZs and site landscaping*	BAL-Low
Multi-purpose courts	BAL-FZ	Interfacing APZs and site landscaping*	BAL-12.5
Bin Room	BAL-FZ	15m wide APZ to the vegetation interface and site landscaping*	BAL-29
Maintenance Shed	BAL-FZ	15m wide APZ to the vegetation interface and site landscaping*	BAL-29

Building / element	Initial BAL	APZ	Revised BAL
Storage Shed	BAL-FZ	15m wide APZ to the vegetation interface and site landscaping*	BAL-19
Fire pump room	BAL-FZ	Interfacing APZs, site landscaping* and extension of Third Ave**	BAL-12.5
Water pump room	BAL-FZ	Interfacing APZs, site landscaping* and extension of Third Ave**	BAL-12.5

* The interior of the development to be modified to non-vegetated elements and low threat landscaping as depicted on Figure 3.

** Third Avenue is to be extended to the site, creating permanent separation to surrounding unmanaged vegetation



- Legend**
- Proposed Development
 - ▭ Project Area
 - - - 100m Assessment Area
 - - - 150m Assessment Area
- Asset Protection Zone**
- ▭ 11m
 - ▭ 15m
 - ▭ 17m
 - ▭ Vegetation Plot
 - ▭ Cadastre
- BAL Contours**
- ▭ BAL FZ
 - ▭ BAL 40
 - ▭ BAL 29
 - ▭ BAL 19
 - ▭ BAL 12.5
 - ▭ BAL Low

Scale 1: 4,000



0 60 120 180 Metres



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Figure 4: BAL Contour Plan

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4.0 Identification of bushfire hazard issues

4.1 Bushfire context

The project area is located adjacent to a built-up residential area, namely Onslow townsite, which is comprised of non-vegetated buildings and infrastructure, roads and managed low threat vegetation, with bushfire hazards limited to isolated and fragmented patches of vegetation to the south-east and east. The proposed development will clear almost all vegetation within the portion of the project area outside the Cultural Significant Area, which will retain all existing native vegetation.

The greatest bushfire threat to the proposed development is from south-west and south of the project area where fires through predominantly shrubland vegetation can approach the site over long fire runs. The vegetation in this direction is fragmented by various non-vegetated elements such as salt production beds and associated runoff, Onslow airport, Wheatstone LNG facility, local waterbodies and the coastline. The disruption to the vegetation continuity means that bushfires are unlikely to be able to spread toward the project area from distances greater than 6 km long. The vegetation is also very low, likely less than 0.5 m high in most instances, and as such unlikely to support significant bushfire behaviour, although it may spread quickly through this vegetation.

The fire runs from the west, north-west and north are locally constricted by the coastline, and are through coastal dune vegetation which will be unlikely to ignite, and would be over relative short fire runs less than 300 m long. The bushfire threat from these directions is not considered as great as a fire from the south-west or south. Similarly, a fire from the south-east would be through very minor plots of retained vegetation within undeveloped lot and road reserves to between the project area and Onslow townsite, which are also very short fire runs and not considered able to develop to a steady-state bushfire.

Based on the above, bushfire impact on the proposed development is expected to be from the south-west or south, but impact would likely relatively short, given the quick residence time associated with bushfire spreading through the shrubland and scrub vegetation plots. Linfire consider it unlikely that the discontinuous fuel structure would result in the peak bushfire behaviour anticipated by AS 3959, however, if left unprotected, the project area would be expected to receive moderate levels of radiant heat and ember attack from a bushfire approaching the development.

4.2 Bushfire hazard issues

Examination of the environmental considerations (Section 2.0) and the bushfire risk assessment (Section 3.0) has identified the following bushfire hazard issues:

1. The existing extent of unmanaged vegetation external to the project area, in addition to the retention of the vegetation within the Culturally Significant Area within the project area, will result in proposed buildings being subject to an initial BAL of BAL-FZ. Providing sufficient separation from unmanaged vegetation will be required to reduce the BAL impact to tolerable levels.
2. Access to the site will be via an unconstructed public road reserve to the east. Ensuring a compliant public road access will be critical, in addition to compliant internal driveways.
3. There are limited firefighting appliances in the local area, however there are fire appliances capable of using a firefighting water supply when they turn out to a bushfire event. Providing sufficient bushfire fighting water supply for the development will be required.
4. The proposed short-term accommodation constitutes a vulnerable land use. A BEMP has been prepared in accordance with Policy Measure 6.7 of SPP 3.7 to address the emergency evacuation plan for the site (refer to Linfire 2021).

4.3 Bushfire safety strategy

The following bushfire safety strategy is proposed to demonstrate compliance with the Bushfire Protection Criteria of the Guidelines and address the bushfire hazards identified above:

1. Create sufficient separation between the proposed buildings and surrounding classified shrubland and scrub vegetation, by establishing APZ at critical interfaces, compliant with the APZ standards of the Guidelines. Additionally, all land within the habitable development is either non-vegetated or low threat vegetation to reduce the chance of bushfire ignition and spread within the site.
2. Ensure the new public road and onsite vehicular access within the project area, is compliant with the requirements of the Guidelines
3. Ensure a secure bushfire fighting water supply by providing sufficient static water supplies onsite, to supplement the existing street hydrants within the public road network to the south.
4. To ensure occupant safety, it will be critical that onsite staff at the proposed development are prepared for bushfire emergencies and are aware how best to manage evacuation of the site in a bushfire event, to prioritise protection of life. The strategy for this will be outlined within this BMP and the project BEMP.

It is acknowledged that the bushfire risk to the proposed development posed by these hazards can be managed through a combination of standard application of acceptable solutions under the Guidelines.

5.0 Assessment against the bushfire protection criteria

5.1 Compliance table

An acceptable solutions assessment against the bushfire protection criteria is provided in Table 5.

Table 5: Compliance with the bushfire protection criteria of the Guidelines

Bushfire protection criteria				Linfire response		
Element	Intent	Performance Principle	Acceptable solutions	Method of compliance	Proposed bushfire management measures	Compliance Comment
Element 1: Location	To ensure that strategic planning proposals, subdivision and development applications are located in areas with the least possible risk of bushfire to facilitate the protection of people, property and infrastructure.	<u>Performance Principle P1</u> Development location The strategic planning proposal, subdivision and development application is located in an area where the bushfire hazard assessment is or will, on completion, be moderate or low, or a BAL-29 or below, and the risk can be managed. For unavoidable development in areas where BAL-40 or BAL-FZ applies, demonstrating that the risk can be managed to the satisfaction of the Department of Fire and Emergency Services and the decision-maker.	<u>A1.1 Development location</u> The strategic planning proposal, subdivision and development application is located in an area that is or will, on completion, be subject to either a moderate or low bushfire hazard level, or BAL-29 or below.	Acceptable Solution	The BAL contour map (see Figure 4) indicates that all proposed buildings and infrastructure can be sited in an area of BAL-29 or lower, upon completion of development and implementation of the Asset Protection Zones (APZs) and low threat vegetation.	<ul style="list-style-type: none"> Compliance of the Performance Principle and Intent of Element 1 is achieved through compliance with Acceptable Solution A1.1
Element 2: Siting and design of development	To ensure that the siting and design of development minimises the level of bushfire impact.	<u>Performance Principle P2</u> The siting and design of the strategic planning proposal, subdivision or development application, including roads, paths and landscaping, is appropriate to the level of bushfire threat that applies to the site. That it incorporates a defensible space and significantly reduces the heat intensities at the building surface thereby minimising the bushfire risk to people, property and infrastructure, including compliance with AS 3959 if appropriate.	<u>A2.1 Asset Protection Zone (APZ)</u> Every habitable building is surrounded by, and every proposed lot can achieve, an APZ depicted on submitted plans, which meets the following requirements: Width: Measured from any external wall or supporting post or column of the proposed building, and of sufficient size to ensure the potential radiant heat impact of a bushfire does not exceed 29kW/m ² (BAL-29) in all circumstances. Location: the APZ should be contained solely within the boundaries of the lot on which the building is situated, except in instances where the neighbouring lot or lots will be managed in a low-fuel state on an ongoing basis, in perpetuity (see explanatory notes) Management: the APZ is managed in accordance with the requirements of 'Standards for Asset Protection Zones' (see Guidelines Schedule 1).	Acceptable Solution	On completion of development, most of project area (other than the Cultural Significant Area and small plots along the south-western boundary) is to be non-vegetated or landscaped and maintained in a low threat state, with APZs nominated where buildings directly interface unmanaged vegetation to limit exposure of proposed assets to bushfire impact. The nominated interface APZs are depicted on Figure 3, and are between 11 m and 17 m wide to ensure buildings remain in BAL-29 or lower. All APZs are to be implemented and maintained in accordance with Schedule 1 of the Guidelines (see Appendix 2). All other vegetation within the village area that is to be excluded from classification, but is outside of nominated APZs, is to be modified to non-vegetated or low threat vegetation in accordance with AS 3959 Clauses 2.2.3.2 (e) and (f). This can include the use of cultivated and managed gardens, managed sports fields (i.e. lawn), parkland managed landscaping, windbreaks etc as per Clause 2.2.3.2 (f) or implementation of vegetation to the APZ standard in accordance with Schedule 1 of the Guidelines.	<ul style="list-style-type: none"> Compliance of the Performance Principle and Intent of Element 2 is achieved through compliance with Acceptable Solution A2.1
Element 3: Vehicular access	To ensure that the vehicular access serving a subdivision/development is available and safe during a bushfire event.	<u>Performance Principle P3</u> The internal layout, design and construction of public and private vehicular access and egress in the subdivision / development allow emergency and other vehicles to move through it safely and easily.	<u>A3.1 Two access routes</u> Two different vehicular access routes are provided, both of which connect to the public road network, provide safe access and egress to two different destinations and are available to all residents/the public at all times and under all weather conditions.	Acceptable Solution	While there is only single public road accessing Onslow, the town is considered to be a suitable safer place on the following basis: <ul style="list-style-type: none"> There is a significant portion of Onslow that is not designated as bushfire prone (see Plate 2) which will enable people to be 300-400 m from bushfire prone land Review of publicly available fire history datasets (Firewatch and DBCA-060 – see Plate 3), shows no evidence of bushfires within 10 km of the townsite 	<ul style="list-style-type: none"> Compliance of the Performance Principle and Intent of Element 2 is achieved through compliance with Acceptable Solution A3.1, A 3.3, A3.5 and A3.8

Bushfire protection criteria				Linfire response		
Element	Intent	Performance Principle	Acceptable solutions	Method of compliance	Proposed bushfire management measures	Compliance Comment
					<ul style="list-style-type: none"> Onslow, while still a relatively small town, is of sufficient size and resources to manage a bushfire emergency, with local police, volunteer firefighters, a hospital and an airport. The vegetation surrounding the town is typically very low shrubland, which is unlikely to support significant landscape scale bushfire behaviour. Additionally, the main fire run from the south-west is fragmented by various non-vegetated elements. <p>Based on the above, it is reasonable to expect that while there appears to be limited bushfire activity close to the town, the size of Onslow townsite is sufficient to ensure it will provide a place of relative safety for occupants to seek refuge in a bushfire emergency.</p> <p>The proposed development will be connected to the existing public road network, namely First Street, via extension of the currently undeveloped portion of Third Avenue.</p> <p>From Third Avenue, travel will be possible to First Street, where occupants with the option of travelling to more than two different destinations:</p> <ul style="list-style-type: none"> Continue south along the existing part of Third Avenue, where travel can be in several directions at the intersection with Simpson Street Travel east on First Street to Second Avenue and south to Simpson Street, where travel can be in several directions <p>In this regard, the proposed development is provided with at least two access routes which meets the requirements of Acceptable Solution A3.1.</p>	
			<p><u>A3.2 Public road</u> A public road is to meet the requirements in Table 2, Column 1.</p>	Not applicable	<p>Third Avenue is to be extended to the vehicular entrance to the village. This will be a new cul-de-sac road compliant with A3.3. No other public roads are proposed as part of the development.</p> <p>While a full audit of the existing public road network has not been conducted given it is outside the Proponents ability to modify, the existing public roads viewed around the project area whilst conducting the site inspection, appear to be in reasonable condition and are appear compliant with public road specifications of the Guidelines. On this basis, the existing road network is considered sufficient for emergency egress or firefighter access to the site.</p>	
			<p><u>A3.3 Cul-de-sac (including a dead-end-road)</u> A cul-de-sac and/or a dead-end road should be avoided in bushfire prone areas. Where no alternative exists (i.e. the lot layout already exists and/or will need to be demonstrated by the proponent), detailed requirements will need to be achieved (refer to the Guidelines for detailed cul-de-sac requirements).</p>	Acceptable Solution	<p>A new cul-de-sac is proposed as part of the development, to extend the undeveloped portion of Third Avenue to the main entrance to the site.</p> <p>The proposed cul-de-sac will be less than 200 m in length, will include minimum 17.5 m diameter turn-around head and will be constructed to the relevant technical requirements of the Guidelines (see Appendix 3)</p>	
			<p><u>A3.4 Battle-axe</u> Battle-axe access leg's should be avoided in bushfire prone areas. Where no alternative exists, (this will need to be demonstrated by the proponent) detailed requirements will need to be achieved (refer to the Guidelines for detailed battle-axe requirements).</p>	Not applicable	<p>No battle-axe legs are proposed as part of the development and the project area is not serviced by an existing battle-axe.</p>	

Bushfire protection criteria				Linfire response		
Element	Intent	Performance Principle	Acceptable solutions	Method of compliance	Proposed bushfire management measures	Compliance Comment
			<p><u>A3.5 Private driveway longer than 50 m</u> A private driveway is to meet detailed requirements (refer to the Guidelines for detailed private driveway requirements).</p>	Acceptable Solution	<p>All proposed internal roads to be constructed as part of the development (within the project area) will be in accordance with the technical requirements of the Guidelines for private driveways (see Appendix 3) including compliant turn-around areas, passing bays if driveways are longer than 200 m and less than 6 m wide.</p> <p>It is noted that the extent of the internal driveway is relatively limited, primarily providing access to the restaurant, ancillary buildings, and the onsite carpark. Notwithstanding, given the use will include delivery and garbage trucks and buses, the proposed driveway width is generally at least 6 m wide, rather than the 4 m permitted for private driveways, which would comply with the public road specifications.</p>	
			<p><u>A3.6 Emergency access way</u> An access way that does not provide through access to a public road is to be avoided in bushfire prone areas. Where no alternative exists (this will need to be demonstrated by the proponent), an emergency access way is to be provided as an alternative link to a public road during emergencies. An emergency access way is to meet detailed requirements (refer to the Guidelines for detailed EAW requirements).</p>	Not applicable	<p>The proposed development does not require Emergency Access Ways (EAWs) to provide through access to a public road.</p>	
			<p><u>A3.7 Fire service access routes (perimeter roads)</u> Fire service access routes are to be established to provide access within and around the edge of the subdivision and related development to provide direct access to bushfire prone areas for fire fighters and link between public road networks for firefighting purposes. Fire service access routes are to meet detailed requirements (refer to the Guidelines for detailed fire service access route requirements).</p>	Not applicable	<p>The proposed development does not require fire service access routes (FSARs) to achieve access within and around the perimeter of the project area.</p>	
			<p><u>A3.8 Firebreak width</u> Lots greater than 0.5 hectares must have an internal perimeter firebreak of a minimum width of three metres or to the level as prescribed in the local firebreak notice issued by the local government.</p>	Acceptable Solution	<p>On completion of development, the project area outside the Cultural Significant Areas, will be developed with non-vegetated surfaces, cleared land or low threat landscaping including nominated APZs.</p> <p>While access within the development will be by internal driveway, it is considered appropriate that perimeter firebreaks are created around the main development to enable fire appliance access at the interfaces with unmanaged vegetation. As such, the Proponent is to comply with the current Shire of Ashburton annual firebreak notice (refer to Appendix 5), including any approved variations (should they exist).</p> <p>The firebreak notice requires that perimeter firebreaks are implemented on all properties within the townsite that exceed 2000 m². The perimeter mineral earth firebreak is to be no less than 5 m wide and 4 m high and must be immediately inside the external property boundary. A proposed perimeter firebreak layout has been proposed on Figure 5, which largely follows the external lot boundary, but is rationalised in several locations to align with the development layout, and to avoid sharp turns along lot boundary, especially the south-western boundary.</p>	

Bushfire protection criteria				Linfire response		
Element	Intent	Performance Principle	Acceptable solutions	Method of compliance	Proposed bushfire management measures	Compliance Comment
Element 4: Water	To ensure that water is available to the subdivision, development or land use to enable people, property and infrastructure to be defended from bushfire.	<u>Performance Principle P4</u> The subdivision, development or land use is provided with a permanent and secure water supply that is sufficient for firefighting purposes.	<u>A4.1 Reticulated areas</u> The subdivision, development or land use is provided with a reticulated water supply in accordance with the specifications of the relevant water supply authority and Department of Fire and Emergency Services.	Acceptable Solution	The proposed development will be connected to reticulated water supply via surrounding development in accordance with Water Corporations Design Standard 63 requirements (refer to Appendix 4). Existing street hydrants are located along First Street and Simpson Street to the east and south of the project area, the closet approximately 90 m from main site entrance (see Figure 5). While street hydrants will enable the attending fire appliances to access the town main water supply, given the supply characteristics of the town main are unknown, and the overall size of the proposed development, the main bushfire fighting water supply is likely to be accessed from the dedicated onsite fire hydrant system detailed below in A4.2 below. This will provide attending fire fighters with hydrant coverage of the site and access to a firefighting water supply at the site.	<ul style="list-style-type: none"> Compliance of the Performance Principle and Intent of Element 4 is achieved through compliance with Acceptable Solutions A4.1 and A4.2
			<u>A4.2 Non-reticulated areas</u> Water tanks for firefighting purposes with a hydrant or standpipe are provided and meet detailed requirements (refer to the Guidelines for detailed requirements for non-reticulated areas).	Acceptable Solution	The proposed development is to have an on-site fire hydrant system, complete with two dedicated firewater storage tanks and booster connection. This hydrant system provides attending fire fighters with fire hydrant coverage of the project area, as well as access to water for bushfire fighting purposes. The tanks are to be sized to have an additional capacity of 50 kL for bushfire fighting purposes, with an overall minimum capacity of 200 kL. The fire hydrant system is to be designed, installed and maintained in accordance with the National Construction Code and relevant Australian Standards.	
			<u>A4.3 Individual lots within non-reticulated areas (Only for use if creating 1 additional lot and cannot be applied cumulatively)</u> Single lots above 500 m ² need a dedicated static water supply on the lot that has the effective capacity of 10,000 L.	Not applicable	The proposed development is being addressed in accordance with A41 and A4.2	



Plate 2: Designated bushfire prone area surrounding Onslow

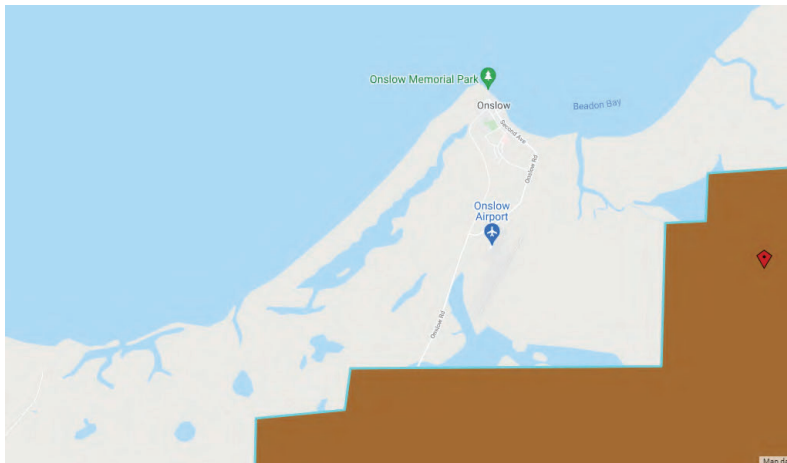


Plate 3: Firewatch and DBCA fire history



6.0 Bushfire management measures

Linfire makes the following additional bushfire management recommendations to inform ongoing planning stages of the development and increase the level of bushfire risk mitigation across the site. Where possible, these measures have been depicted on Figure 4.

6.1 Bushfire Emergency Management Plan (BEMP)

The proposed development constitutes a vulnerable land use. On this basis, a Bushfire Emergency Management Plan (BEMP) has been prepared to address the requirements of Policy Measure 6.7. The BEMP provides procedures to assist with the management of occupants during a bushfire emergency as well detailed site-specific information in order to assess the vulnerability of the development and location and extent of the hazard.

Given the lack of significant fuel loads, the size of the development, the location adjacent to the built-up residential area of Onslow, the bushfire emergency management strategy for the site will be to assess the bushfire scenario and if required, evacuate occupants to Onslow townsite. Upon becoming aware of a bushfire scenario with potential to impact the facility, the first action will be to advise all staff and guests of the bushfire status to commence evacuation preparations. Once organised, occupants can either be evacuated to the nominated off-site refuges.

6.2 Onsite Landscaping and staging buffers

The BAL contour assessment is reliant on all onsite excluded vegetation being implemented and maintained as low threat vegetation, with all nominated APZs within the project area to be modified and managed in a low threat minimal fuel condition in accordance with Clause 2.2.3.2 (f) of AS 3959 and Schedule 1: Standards for Asset Protection Zones from the Guidelines (see Appendix 2). These areas have been depicted on Figure 5. Responsibility for establishment and maintenance of low threat landscaping and APZs, as discussed above, is summarised in Section 7.0.

If the development (and therefore clearing) is to occur on a staged basis, clearing in advance will need to occur to ensure building construction is not inhibited by a temporary vegetation extent located within adjacent development stages yet to be cleared. This can be achieved by ensuring that each approved stage subject to construction is surrounded by a suitably sized, on-site cleared or low threat buffer to development (not including vegetation proposed to be retained. Once the buffers are created, they will need to be maintained on a regular and ongoing basis in accordance with AS 3959 Clause 2.2.3.2 (f) and Schedule 1 of the Guidelines (refer to Appendix 2). Management will need to achieve a low threat minimal fuel condition all year round, until such time that the buffer area is developed as part of the next development stage.

6.3 Emergency Pedestrian Gates

Emergency pedestrian gates are proposed in the fence surrounding the project area (refer Figure 5), to permit egress by on-site occupants into Onslow townsite, should offsite evacuation from the development be required.

The gates are to have a minimum width of no less than 3.6m to enable 2-3 people to pass through simultaneously. Both gates should be locked to restrict access, however a common key system is to be used with keys made available to onsite Emergency Response Team and to local fire brigade personnel. Installation and ongoing maintenance of the gates is to be the responsibility of the Proponent.

6.4 Road verge fuel management

Existing and proposed road verges that have been excluded as low threat are to be managed to ensure

the understorey and surface fuels remain in a low threat, minimal fuel condition in accordance with Clause 2.2.3.2 (f) of AS 3959. Ongoing road verge management is the responsibility of the Shire.

6.5 Staging of access

If development (and therefore construction of vehicular access) is to occur on a staged basis, vehicular access arrangements will need to ensure that all occupants are provided with compliant public access and internal driveways at all stages. This can be achieved via construction of access in advance of stages.

6.6 BAL compliance and/or BAL assessment report

A BAL compliance and/or BAL assessment report may be prepared at the discretion of the Shire following completion of construction works and prior to issue of certificate of occupancy to validate and confirm the accuracy of the BAL contour assessment; or demonstrate any change in the assessed BAL or other management measures documented in this BMP, which may occur as a result of changes in building location, vegetation class or bushfire management approach. The Shire or Building Certifier may also require a revised BAL assessment to confirm the BAL rating to buildings, prior to submission of building licence.

6.7 Building construction standards

Bushfire construction provisions of the National Construction Code require that Class 1, 2, 3 and associated Class 10a buildings comply with the bushfire specific construction requirements of AS 3959, in accordance with the assessed BAL. On this basis, the accommodation buildings within the proposed development are required to comply with AS 3959 to the assessed BAL rating as identified on Figure 4 or through subsequent BAL assessment.

6.8 Notification on title

Notification is to be placed on the Title of proposed lots subject to BAL-12.5 or higher (either through condition of subdivision or other head of power) to ensure landowners/proponents and prospective purchasers are aware that their lot is subject to an approved BMP and BAL assessment.

6.9 Compliance with annual firebreak notice

The Proponent is to comply with the current Shire of Ashburton annual firebreak notice (refer to Appendix 5), including any approved variations (should they exist).

The firebreak notice requires that perimeter firebreaks are implemented on all properties within the townsite that exceed 2000 m². The perimeter mineral earth firebreak is to be no less than 5 m wide and 4 m high and must be immediately inside the external property boundary. It is considered appropriate that perimeter firebreaks are created around the main development to enable fire appliance access at the interfaces with unmanaged vegetation, with a proposed route provided on Figure 5.















The firebreak notice also requires the following that may apply to the proposed development:

- Firebreaks around power and water supply infrastructure
- Firebreaks around fuel storage and stockpiled flammable material
- Burning times

Ongoing maintenance of the Shire firebreak notice, and any approved variations, will be the responsibility of the Proponent.



Legend

-  Emergency Pedestrian Gate
-  Onsite Fire Hydrant System Infrastructure
- Street Hydrant**
-  Street Hydrant
-  Proposed Development
-  Firebreak
-  Project Area
-  100m Assessment Area
-  150m Assessment Area
- Asset Protection Zone**
-  11m
-  15m
-  17m
-  Vegetation Plot
-  Cadastrate
- Classified Vegetation**
-  Modified to non vegetated and low threat

Scale 1: 4,000



0 60 120 180 Metres



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Mineral Resources

Onslow Township Village

Figure 5: Bushfire Management Measures

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7.0 Responsibilities for implementation and management of the bushfire measures

Implementation of the BMP applies to the Proponent (or landowner, facility manager) and the Shire to ensure bushfire management measures are adopted and implemented on an ongoing basis. A bushfire responsibilities table is provided in Table 6 to drive implementation of all bushfire management works associated with this BMP.

Table 6: Responsibilities for implementation and management of the bushfire measures

Implementation/management table	
<i>Proponent – prior to development occupation</i>	
No.	Implementation action
1	If required by the Shire or Building Certifier, individual BAL assessment prior to issuing of building permits.
2	Establish onsite low threat landscaping and nominated APZs across the project area, to the dimensions and standard stated in the BMP.
3	Construct the Third Avenue public road extension to the main entrance, to the cul-de-sac road standards stated in the BMP.
4	Construct the internal driveway to the private driveway road standards stated in the BMP.
5	Install the firefighting water tank and associated hardstand and turnaround areas to the standards stated in the BMP.
6	Adopt bushfire construction requirements of AS 3959 for all Class 1, 2, 3 or associated 10a buildings, to the assessed BAL.
7	Construct emergency pedestrian gates in the fence surrounding the project area with minimum width of no less than 3.6m, to the standards and location stated in the BMP. Where locked, keys are to be made available to onsite Emergency Response Team and to local fire brigade personnel.
8	Implement all requirements of the project Bushfire Emergency Management Plan.
9	Comply with the relevant local government annual firebreak notice issued under s33 of the Bush Fires Act 1954, including any approved variations, including the creation of all required perimeter firebreaks.
10	If development is staged, create suitably sized on-site staging buffers to prevent any temporary non-compliant BAL impacts on buildings. The buffer is to achieve exclusion under Clauses 2.2.3.2 (e) and (f) of AS 3959.
11	If development is staged, ensure vehicular access arrangements are implemented to provide compliant public access and internal driveways at all stages.
<i>Proponent – ongoing</i>	
No.	Implementation action
1	Maintain the onsite low threat landscaping and nominated APZs across the project area, to the dimensions and standards stated in the BMP.
2	Maintain the internal driveway to the standards stated in the BMP.
3	Maintain the firefighting water tank and associated hardstand and turnaround areas to the standard stated in the BMP.
4	Maintain buildings constructed in accordance with AS 3959 to the applicable standard.
5	Maintain the emergency pedestrian gates to the standards stated in the BMP. Where locked, ensure keys are available to onsite Emergency Response Team and to local fire

Implementation/management table	
	brigade personnel.
6	Review and implement all requirements of the project Bushfire Emergency Evacuation Plan, including all training and exercise drills.
7	Comply with the relevant local government annual firebreak notice issued under s33 of the Bush Fires Act 1954, including any approved variations, including maintenance of perimeter firebreaks.
<i>Local Government – ongoing</i>	
No.	<i>Implementation action</i>
1	Maintain road verges in a low threat minimal fuel condition as per Clause 2.2.3.2 (f) of AS 3959. This is to include the new Third Avenue cul-de-sac proposed as part of this development.

8.0 References

- Department of Fire and Emergency Services (DFES) 2021, *Map of Bush Fire Prone Areas*, [Online], Government of Western Australia, available from: <https://maps.slip.wa.gov.au/landgate/bushfireprone/>.
- Department of Planning (DoP) 2016, *Visual guide for bushfire risk assessment in Western Australia*, Department of Planning, Perth.
- Standards Australia (SA) 2018, *Australian Standard AS 3959–2018 Construction of Buildings in Bushfire-prone Areas*, Standards Australia, Sydney.
- Linfire 2021, *Bushfire Emergency Management Plan: Onslow Township Village*, Linfire Consultancy, Perth.
- Western Australian Planning Commission (WAPC) 2015, *State Planning Policy 3.7 Planning in Bushfire Prone Areas*, Western Australian Planning Commission, Perth.
- Western Australian Planning Commission (WAPC) 2017, *Guidelines for Planning in Bushfire Prone Areas*, Version 1.3 August 2017, Western Australian Planning Commission, Perth.

Appendix 1: Vegetation plot photos and description

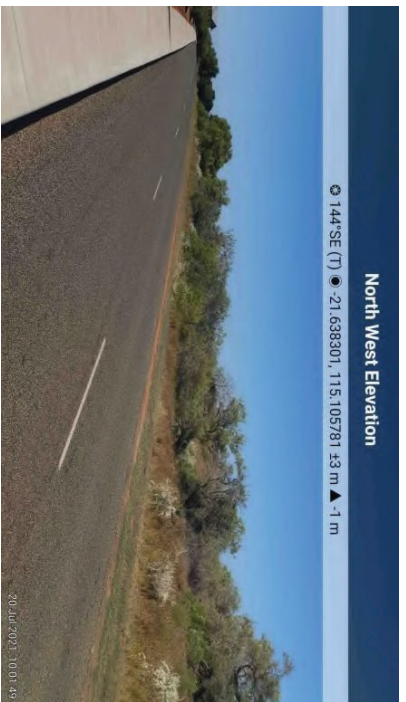


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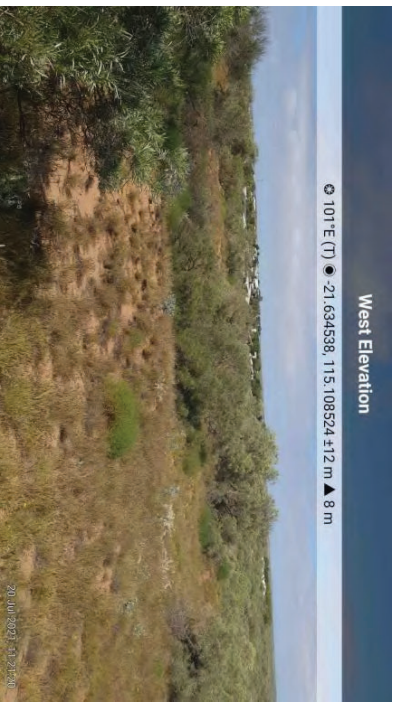


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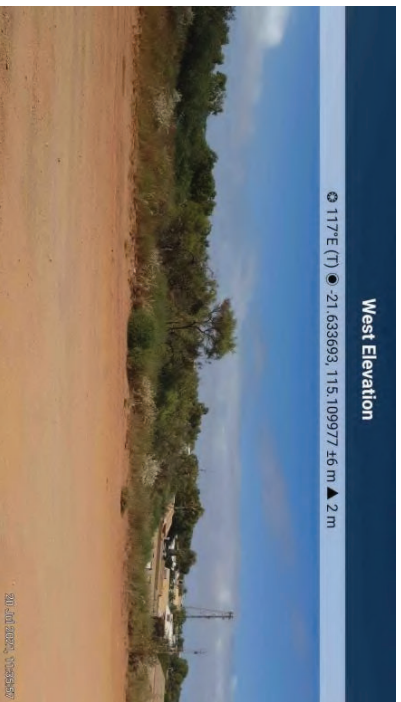


Photo ID: 1c

Plot number		Plot 1
Vegetation classification	Pre-development	Class D Scrub
	Post-development	Class D Scrub
Description / justification		Vegetation with a continuous horizontal and vertical structure, greater than 2 m high at maturity

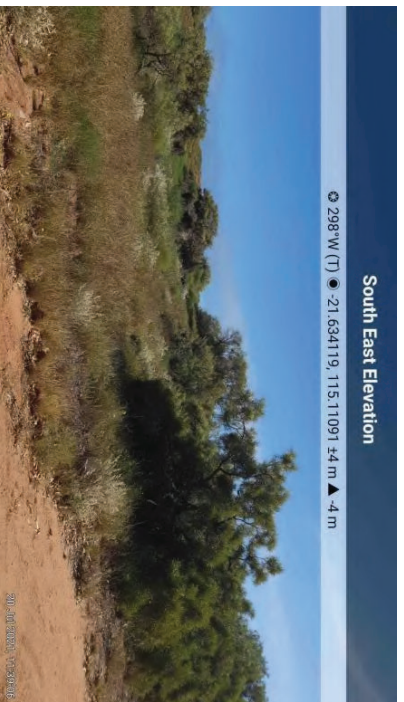


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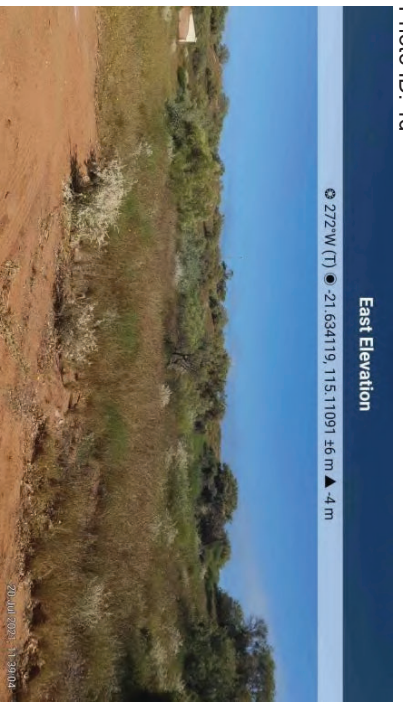


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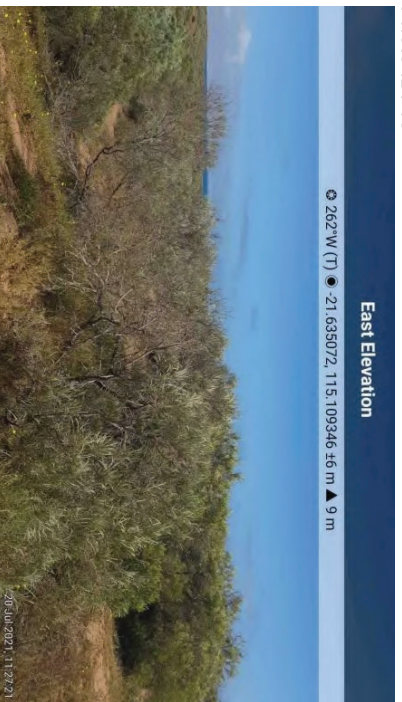


Photo ID: 1f

Plot number		Plot 1
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	Post-development	Class D Scrub
Description / justification		Vegetation with a continuous horizontal and vertical structure, greater than 2 m high at maturity



Photo ID: 19

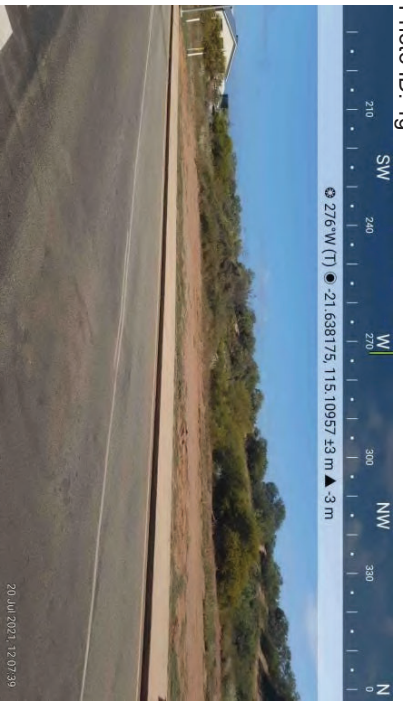


Photo ID: 18

Plot number	Plot 1	
Vegetation classification	Pre-development	Class D Scrub
	Post-development	Class D Scrub
Description / justification	Vegetation with a continuous horizontal and vertical structure, greater than 2 m high at maturity	