

## D12 – Temporary/Transient Workforce Accommodation

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**History** Adopted dd mmmm yyyy (Resolution No. xxxxxx.xx)

**Statutory Context** Planning and Development Act 2005  
Planning and Development (Local Planning Schemes) Regulations 2015  
Shire of Narrogin Local Planning Scheme No. 3 (LPS3)  
State Planning Policy 2.5: Rural Planning  
WAPC's Position Statement on Workforce Accommodation

### Introduction

This is a Local Planning Policy prepared under Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 and the Shire of Narrogin Local Planning Scheme No. 3. This policy may be cited as Local Planning Policy (LPP) – Temporary/Transient Workforce Accommodation

### Purpose

This Local Planning Policy ("the Policy") provides guidance for the establishment of temporary or transient workforce accommodation within the Shire of Narrogin. It aims to ensure that such accommodation is developed in an appropriate location, to a high standard, and in a manner that delivers lasting benefits to the community. The Policy aligns with the Western Australian Planning Commission (WAPC) state planning framework for workforce accommodation and establishes criteria to manage workforce housing proposals, so they support the Shire's long-term planning objectives and community wellbeing. In doing so, the Policy seeks to balance the short-term needs of industry with the sustainable growth of Narrogin's permanent residential population.

The Shire will have due regard to this policy when determining applications but is not bound by it. Where there is an inconsistency between this policy and LPS3, the provisions of LPS3 shall prevail.

This policy aims to:

- Align with State Planning Policies – Ensure consistency with relevant State planning policies and WAPC guidelines for workforce accommodation and land use planning, including the WAPC's Position Statement on Workforce Accommodation and State Planning Policy framework.
- Appropriate Zoning and Location – Identify suitable land for workforce accommodation (including the Shire's freehold "inglobo" residential landholding and similarly zoned areas) and outline any necessary zoning or scheme amendments. Facilitate the preparation of a Structure Plan to guide rezoning, site layout, and integration of workforce accommodation with intended future land uses.
- Best Practice Integration – Incorporate best-practice principles from other jurisdictions (e.g., Town of Port Hedland, Shire of Wyndham–East Kimberley) to ensure workforce accommodation is well-designed, integrated with the town, and not developed as isolated "camps." The Policy encourages high-quality design that can serve longer-term purposes and fosters social cohesion.
- Infrastructure and Servicing Contributions – Require proponents to provide or fund necessary infrastructure extensions to service the development (e.g., sewer, water, power) and to demonstrate how the site will connect to or augment existing utilities. Ensure that workforce accommodation proposals include plans for infrastructure delivery that can also support future permanent housing on the site.
- Legacy Housing and Community Benefit – Prioritise proposals that offer lasting community benefits. Accommodation villages should be designed for transitional use, capable of conversion into permanent housing or other legacy community assets after the temporary workforce need has passed. In particular, the Shire encourages models that can evolve into over-50s lifestyle villages or other forms of housing for the local community. Wherever feasible, workforce accommodation should be developed in a manner that allows the housing units or facilities to be retained by the Shire or community for long-term use (e.g., seniors' accommodation or lifestyle village) once the transient workforce demand subsides.

- **Statutory Compliance and Defensibility** – Ensure the Policy provisions and approval conditions are clear, justifiable, and capable of withstanding appeal to the State Administrative Tribunal (SAT). This includes referencing relevant legal precedents (such as the City of Kalgoorlie–Boulder SAT case) to support the imposition of conditions (e.g., time-limited approvals 2 -5 years) and other requirements that uphold orderly and proper planning.

## **Application**

This Policy applies to all development applications for “Workforce Accommodation” (also referred to as transient or temporary workforce accommodation) within the Shire of Narrogin, made under Local Planning Scheme No. 3 (“the Scheme”). For the purposes of this Policy, Workforce Accommodation is defined as per the Planning and Development (Local Planning Schemes) Regulations 2015 and the Scheme:

*“premises, which may include modular or relocatable buildings, used:*

*(a) primarily for the accommodation of workers engaged in construction, resource, agricultural or other industries on a temporary basis; and*

*(b) for any associated catering, sporting and recreation facilities for occupants and authorised visitors.”.*

This Policy is concerned with temporary workforce housing (typically to service a defined project or short-term need) rather than standard permanent residential development.

## Relationship to Scheme and State Acts

The provisions of this Policy are to be read in conjunction with the Scheme and the Deemed Provisions of the Planning and Development (Local Planning Schemes) Regulations 2015. Where there is any inconsistency, the Scheme and Regulations prevail to the extent of that inconsistency. It is noted that certain mining or resource-related camps may be exempt from local planning approval under the Mining Act 1978 or State Agreement Acts; however, the Shire will use this Policy to guide its recommendations or responses in such cases, to advocate for outcomes consistent with the Policy’s objectives.

## Assessment Guidance

In exercising discretion for workforce accommodation proposals (a use class defined in the Scheme), Council shall have due regard to this Policy as a local planning policy under Schedule 2, Clause 67 of the Regulations. Matters addressed in this Policy – including location, design quality, infrastructure servicing, management, and duration of approval – will form key considerations in determining applications. Proponents should address each relevant section of this Policy in their development application submission.

## Exclusions

This Policy does not retroactively apply to workforce accommodation developments already approved prior to its adoption, except where an applicant seeks to amend or extend such an approval. It is also not intended to govern standard residential housing or tourist accommodation (which are covered by other provisions), nor “fly-camps” or informal transient quarters established under emergency or short-term (less than 3 months typically) arrangements (these may be dealt with case-by-case or under separate policy if needed).

## **Policy Provisions**

### 1. Alignment with State Planning Framework

- 1.1. **State Planning Policies:** Workforce accommodation proposals must be consistent with the State Planning Framework, including the State Planning Strategy and any relevant State Planning Policies (SPPs). In particular, SPP 3 – Urban Growth and Settlement promotes a sustainable settlement pattern that builds on existing towns and communities. Consistent with this, the WAPC’s Position Statement on Workforce Accommodation (2018) directs that, where practicable, workforce accommodation should be located within established townsites in a manner suited to the local context, to support ongoing town sustainability. The Shire will have regard to these state policy principles, seeking to ensure that workforce accommodation developments complement rather than detract from Narrogin’s long-term growth and community development.

- 1.2. Local and Regional Strategies: The Shire's Local Planning Strategy and any regional planning strategies should be considered. Proposals need to demonstrate consistency with strategic objectives for housing and population. (For example, if the Shire's strategy identifies a need to grow the permanent population or provide more seniors' housing, a workforce accommodation project that can transition into such housing would align with strategic goals.) The proponent should outline how their proposal supports the strategic intent for the subject land and does not undermine planned future uses.
- 1.3. Sustainability of Towns: The Shire supports the widely held planning position that temporary workforce accommodation should not become an entrenched substitute for permanent housing in the community. FIFO/DIDO (fly-in/fly-out or drive-in/drive-out) workforce practices should be managed so they do not erode the liveability or economic base of regional towns. This Policy uses tools (such as time-limited approvals and integration requirements) to encourage workers to reside within the community where possible, in line with the findings of the Parliamentary inquiry into FIFO impacts and WAPC policy direction.

## 2. Location and Zoning Requirements

- 2.1. Permissible Zones: Under LPS No.3, "Workforce Accommodation" is a discretionary land use in limited zones (e.g., Rural Townsite and Rural zones) and is not permitted ("X") in most other zones, including the standard Residential zone. Accordingly, new workforce accommodation should be sited on land where the use is permissible or on land that can be appropriately rezoned or designated for that purpose. The Shire identifies the following lands as potentially suitable, subject to detailed planning:
  - 2.1.1. Shire "Inglobo" Residential Land – The Shire's freehold residential development land (held inglobo) within but on the perimeter of Narrogin townsite is a primary candidate for transient workforce accommodation, given its ownership and intended development purpose. This land is currently zoned Urban Development (or a similar deferred urban zoning) under LPS3, meaning a structure plan is required prior to subdivision or development. The Shire may support a Scheme Amendment or Special Use Zone to facilitate workforce accommodation on this site, provided it is implemented via an endorsed Structure Plan (see 2.2) that coordinates the use with future residential outcomes.
  - 2.1.2. Other Urban Development or Future Residential Areas – Any other land zoned "Urban Development" (or earmarked for future residential expansion) could be considered for temporary workforce accommodation if a planning framework is put in place to integrate the use with the long-term development of the area. This would typically involve structure planning and possibly a temporary Special Use classification to allow workforce accommodation for a defined period or stage.
  - 2.1.3. Rural and Rural Townsite Zones – Proposals in the Rural zone (e.g., for an agricultural workforce or a remote construction camp) or in a Rural Townsite (small settlement) zone will be assessed on their merits. The location should be close to the workforce's place of employment or an established settlement. Isolated camps in pure rural areas are generally discouraged unless no reasonable alternative exists, and impacts can be managed (see 3.3).
  - 2.1.4. Industrial/Commercial Zones – The Scheme currently prohibits workforce accommodation in industrial and commercial zones (use class "X"). The Shire will not support workforce accommodation in core industrial estates or the town commercial centre, as this is inconsistent with zone objectives. (For example, SAT has agreed that permanent workforce accommodation in industrial zones can hinder industrial land use potential and conflict with zone purpose.) However, if a proposal can demonstrate a unique circumstance (e.g., use of under-utilized industrial land on a strictly temporary basis without sterilizing future industry), a Scheme Amendment to allow a time-limited "Additional Use" might be contemplated, subject to strict conditions and alignment with this Policy's objectives.
- 2.2. Structure Plan Requirement: For any large-scale workforce accommodation village, or any proposal on land zoned Urban Development or similarly requiring coordinated planning, a Local Structure Plan

(or Local Development Plan, as applicable) shall be prepared and approved in accordance with the Planning and Development Regulations 2015. The structure plan must indicate land use layout, road/access network, servicing strategy, open space, interface with surrounding areas, and the staged transition of the site to long-term uses (e.g., conventional housing). This ensures that the workforce accommodation is not ad hoc, but rather forms an integrated part of the planned development of the area. The structure plan should designate specific precinct(s) for the workforce accommodation and demonstrate how those precincts can be converted to permanent housing or other compatible uses in the future. Rezoning to a Special Use zone may be used to implement this, with conditions in the Scheme tying development to the structure plan.

- 2.3. **Rezoning and Land Use Controls:** Where the current zoning of a site does not allow workforce accommodation, proponents must secure the appropriate zoning or approval pathway before development can proceed. The Shire may consider initiating a Scheme Amendment to facilitate a well-planned workforce accommodation proposal, particularly on Shire-owned land or strategic sites, provided the proponent agrees to the Policy's requirements (including time limits and legacy outcomes). Any such amendment should include mechanisms (such as sunset clauses or scheme text provisions) to ensure the workforce accommodation use is either time-limited or can transition to an acceptable long-term use in line with the local planning strategy.
- 2.4. **Avoidance of Sensitive Locations:** Workforce accommodation should not be located in areas that would conflict with existing sensitive land uses or constrain the intended function of zones. For instance, siting a transient workforce camp adjacent to established residential neighbourhoods is generally inappropriate due to potential amenity impacts. Likewise, locating a camp in a planned growth area without proper structure planning could prejudice the orderly development of that area. Proponents must carefully select sites that minimise land use conflicts and are either within or directly adjacent to built-up areas (to maximise integration benefits) or completely separated if integration is not feasible (in which case self-contained camps must be justified as a last resort).

### 3. Design, Integration and Best Practice

- 3.1. **Integration with Community:** The design and location of workforce accommodation should facilitate integration with the local community rather than isolation. Urban integration is the preferred model, meaning accommodation villages should be within or near Narrogin's townsite (or the relevant settlement) and linked to existing commercial and community services. By being in proximity to shops, recreation, and town infrastructure, the workforce residents are more likely to patronise local businesses and participate in community life. This reciprocal benefit approach is a key aim – the development should, wherever possible, function as part of the town, not a closed compound. Proposals that are located far from any town or that are designed as self-sufficient "quasi-towns" with no need for residents to leave the site are strongly discouraged unless no other practical solution exists for the project's location.
- 3.2. **Site Planning and Amenity:** High-quality site planning and built form are required for workforce accommodation projects. The development should be laid out in a manner akin to a residential neighbourhood or lifestyle village, with appropriate road hierarchy, landscaping, outdoor recreation areas and building orientation that considers climate and privacy. Demountable or modular buildings (if used) must be arranged and treated (e.g., with facades, colours, and screening) to present an aesthetically pleasing, locally appropriate design. The aim is to avoid a sterile "mining camp" look and instead create a pleasant living environment that is harmonious with the character of Narrogin. Use of landscaping (including retention of existing vegetation where possible) is important to soften the development's appearance and provide shade and amenity for occupants. The Policy recognises that these facilities may be temporary in nature, but it encourages designs that can perform longer-term functions rather than being disposable after a short use.
- 3.3. **Best Practice Examples:** In formulating and assessing proposals, reference should be made to successful approaches in other regions:

- 3.3.1. Town of Port Hedland – Port Hedland’s Workforce Accommodation Policy emphasises integration into town fabric, multi-purpose design, and high-quality built form that can endure beyond the life of the resource project. For example, it encourages workforce housing near commercial centres so that facilities serve a dual purpose in the community. Narrogin’s Policy similarly encourages central or well-connected locations for workforce accommodation to leverage existing services.
- 3.3.2. Shire of Wyndham–East Kimberley – This Shire distinguishes between permanent workforce accommodation and temporary construction camps, ensuring each is treated with appropriate controls. Notably, it views workforce accommodation for agriculture/tourism as a “semi-permanent facility for seasonal workers” and discourages it where adequate permanent housing in town is available. The lesson is to use workforce housing as a solution only when ordinary housing supply cannot meet demand. Narrogin will likewise consider local rental housing availability – if a project’s needs can be met by existing accommodation stock or new standard dwellings, purpose-built camps may not be supported.
- 3.3.3. Shire of Waroona – The Shire of Waroona’s policy provides useful guidance on management and social integration. It requires that workforce accommodation be accompanied by management plans and has provisions to ensure developments do not negatively impact town amenity or social cohesion. Narrogin’s Policy adopts a similar stance: proponents must demonstrate how they will manage worker behaviour, facility security, and interaction with the community to avoid adverse impacts (see 3.5 below).
- 3.4. Development Standards: Workforce accommodation developments should, at minimum, meet the development standards ordinarily applicable to residential or tourist developments of a similar scale. This includes compliance with health and building codes for lodging, bushfire safety requirements if in a bushfire prone area (per SPP 3.7), and appropriate parking and vehicle access standards. Provision for vehicle parking should consider buses or shuttles if used to transport workers, as well as private vehicles if workers will keep cars on-site. Waste management, lighting (avoiding light spill to neighbours), noise control (e.g., generators, recreation facilities), and security must all be addressed in the design phase. Any onsite facilities (mess hall, gym, etc.) should be centrally located and accessible to occupants, and their scale should be ancillary to the accommodation use (not serving the general public like a commercial operation, unless approved separately).
- 3.5. Management Plan: Council shall require a detailed Workforce Accommodation Management Plan with any development application. This plan should outline:
- 3.5.1. Staffing and supervision arrangements for the facility (e.g., presence of a camp manager or 24/7 supervisor).
  - 3.5.2. Rules and code of conduct for occupants, including measures to control noise, antisocial behaviour, and interaction with the public. For example, policies on alcohol consumption on-site, visitor protocols, and any curfews or quiet hours should be detailed.
  - 3.5.3. Strategies for encouraging positive integration, such as providing information to workers about local services, events, and encouraging patronage of local businesses.
  - 3.5.4. Security measures (lighting, fencing, access control) that keep the site secure without unduly isolating or fortress-like designs. (A balance is needed between security and welcoming appearance).
  - 3.5.5. Complaints management process for nearby residents or businesses, with a nominated liaison person to address any issues arising from the workforce accommodation.
  - 3.5.6. Decommissioning and Transition Plan (see also 5.2) outlining how the facility will be removed or repurposed when no longer required for workforce housing.

Requiring a robust management plan will help ensure the facility operates smoothly and mitigates potential negative impacts on the community, making the development more acceptable in a town setting. The management measures will be enforced via conditions of approval.

- 3.6. Need and Justification: The onus is on the proponent to demonstrate the need for a workforce accommodation facility. In line with best practice, applications should include a Needs Assessment detailing: the project or industry the accommodation is serving; why existing housing or rentals cannot adequately host the workers; the number of workers, their roles (construction vs operational, etc.), and the expected duration of their stay (project timeline). Proposals of a speculative nature (e.g., a “open” workforce camp not tied to a specific project or proponent) will generally not be supported, as they can undermine local housing investment and are harder to integrate. The workforce accommodation should be linked to a particular employer, project, or industry cluster, and not serve as an indefinite cheap lodging option. Council will assess whether the scale of the proposal is commensurate with the demonstrated need and may refuse or require downsizing of camps that significantly exceed the justified demand.

#### 4. Infrastructure and Servicing Contributions

- 4.1. Servicing Plan: All workforce accommodation proposals must include an Infrastructure Servicing Plan showing how the development will be supplied with essential services – water, wastewater disposal, electricity, and road access – to a standard acceptable to the Shire and relevant service agencies. Wherever feasible, the accommodation should be connected to existing town infrastructure networks to enable quality service and facilitate future permanent use of the site. If the site is within or near the Narrogin townsite, connection to the reticulated sewerage system and town water supply will be required. The proponent is responsible for any extensions of mains or network upgrades necessary to service the development. For electricity, connection to the grid is preferred; if mains power is unavailable, on-site generation may be considered but must comply with noise regulations and be interim only. All service designs must adhere to the standards of the utility providers (e.g., Water Corporation, Western Power).
- 4.2. Proponent Contributions: As a condition of approval, developers of workforce accommodation will be required to undertake or fund infrastructure upgrades to support their development. This includes, but is not limited to:
  - 4.2.1. Roads and Access – Upgrading of access roads to an appropriate standard (seal, widen, install drainage) if increased traffic from the camp will impact local roads. Intersection improvements or new access points must meet Main Roads standards where applicable. Internal roads within the facility should be all-weather, drained, and safe.
  - 4.2.2. Water & Sewer – Extension of water pipelines and sewer lines to the site (or construction of approved onsite wastewater treatment systems if reticulation is truly not available and or needs to be staged be post the initial temporary workforce planning needs). The capacity of existing sewer/water infrastructure in town must be analysed; if the development’s demand requires augmentation (e.g., pump station upgrades, additional water supply capacity), the proponent will either fund these works or contribute an appropriate share in accordance with State Planning Policy 3.6 – Infrastructure Contributions and the Shire’s developer contributions framework, if any.
  - 4.2.3. Electricity – Any necessary extension of the electricity network (new transformers, substations, or lines) to serve the site shall be at the cost of the development. Backup power or renewable energy integration is encouraged to improve reliability, but primary reliance on diesel generators is discouraged for anything but short-term use, due to noise and pollution.
  - 4.2.4. Drainage – The site must be drained such that stormwater is managed on-site or through suitable discharge without impacting surrounding properties. If connection to the town stormwater system is needed, capacity impacts should be assessed and mitigated by the developer.

4.2.5. Other Services – Telecommunications (internet/phone) should be provided to a modern standard to serve the occupants. Waste collection arrangements must be made (e.g., kerbside pickup if available or private waste removal). Any common facilities (canteen, laundry etc.) must have appropriate trade waste connected to sewer or otherwise approved disposal. Proponents should engage early with service agencies to confirm requirements and include evidence of such consultation in their application.

- 4.3. Staging of Infrastructure: In some cases, a workforce accommodation project may be developed in stages (for example, initially 50 units expanding to 100 units if a second project phase commences). The Shire may allow staging of infrastructure provision accordingly, but the approval will clearly condition which works are required before occupancy of each stage. Essential services for health and safety (potable water, firefighting supply, effluent disposal, etc.) must be operational from day one; later stages might trigger upgrades like doubling of wastewater capacity or additional accommodation blocks. The structure plan (if applicable) and servicing plan should outline any such staging.
- 4.4. Integration with Future Networks: The infrastructure installed for the workforce accommodation should be planned with a view to servicing future development on the site or vicinity. For example, if a sewer line is extended to the site for the camp, its alignment and capacity should consider the ultimate residential subdivision (legacy) so that it can be re-used. The Shire may require the proponent to oversize certain infrastructure (at the proponent's cost or via cost-sharing if other parties benefit) to avoid redundant works later. In some instances, the State Government or Shire may seek development contributions from the project towards broader community infrastructure, especially if a large influx of workers places demands on community services (e.g., health, recreation). Any such contributions will be negotiated in line with legal frameworks (e.g., via voluntary agreement or a Development Contribution Plan, consistent with SPP 3.6).
- 4.5. Financial Assurances: Council may require the proponent to enter into a legal agreement or provide bonds to ensure infrastructure commitments are delivered. For example, a condition may require a deed of agreement between the developer and the Shire/utility provider for specific works, or a bank guarantee to cover road damage from heavy construction vehicles. This protects the Shire and community from incurring costs related to the development.

## 5. Legacy and Long-Term Housing Outcomes

- 5.1. Transitional Design: A core principle of this Policy is that temporary workforce accommodation should leave a positive legacy. Proponents are strongly encouraged to design and construct facilities that can be repurposed into permanent housing or tourist accommodation, or otherwise serve the community after the transient workforce has gone. This may involve using transportable homes or units that can be converted to standard housing (for example, modular units that can be reconfigured into 1-2 bedroom dwellings for seniors) or constructing certain permanent structures (such as a clubhouse or communal facilities) that would form the nucleus of a future lifestyle village. The layout of the accommodation village should, if possible, mimic a future residential layout – for instance, road patterns and unit placements that could later become residential lots or long-term rental cabins. The proponent should outline in their application how each element of the development might be adapted or retained. Creative solutions are encouraged: e.g., developing an initial “workers village” that after 5-10 years is marketed as an over-50s lifestyle village with minimal retrofit. Prioritising single-storey, accessible designs and a mix of unit types can facilitate this transition to seniors housing (which is a noted need in the Narrogin community).
- 5.2. Decommissioning and Handover: A Decommissioning Plan must be submitted and will be conditioned as part of any approval. This plan should detail the trigger events or timeframe for decommissioning (such as the end of the construction project or a specified approval expiry date) and the actions to be taken. These actions may include removal of all temporary buildings and restoration of the site to a subdivisible standard (cleared of any temporary works); or, if conversion is intended, the steps to physically convert or refurbish buildings for their new purpose. The plan should also address the disposal of facilities – for example, will the dwellings be sold to the Shire or a community housing

provider at nominal cost, or will the proponent retain ownership and lease them as affordable housing? The Shire's preference is that assets created for workforce accommodation be retained locally rather than removed from the district, to maximise community benefit. To this end, the Shire may negotiate with proponents on legacy arrangements, such as transferring ownership of on-site infrastructure (dwellings, recreation buildings, etc.) to the Shire or a not-for-profit housing body after a certain period in exchange for example the Council permitting heavily discounted access and enjoyment of relevant suitable land during the interim period. While this Policy cannot mandate transfer of ownership, demonstrating a commitment to an enduring community housing outcome will make a proposal more favourable in Council's assessment.

- 5.3. Over-50s and Lifestyle Villages: When designing legacy housing solutions, particular emphasis should be on housing for people aged 50 and over (retirees or downsizers) and "lifestyle village" style living. Narrogin, like many regional communities, has demand for quality seniors' accommodation that is low-maintenance and close to services. A workforce accommodation village that is planned to morph into an over-50s lifestyle village is an ideal scenario. This typically means incorporating features such as: a communal hall or recreation space (which could serve as a community centre for the lifestyle village), a pedestrian-friendly layout, gardens or communal open space, and universal design principles in the units (e.g., ramp access, wider doorways, etc., making them suitable for older residents). By embedding these features from the start, the proponent can avoid extensive modifications later. Council will look very favourably on proposals that include a documented pathway for transition to over-50s housing, including any partnership with the Council or aged housing providers. This not only addresses the transient workforce need but proactively contributes to Narrogin's housing diversity in the long term.
- 5.4. Community Ownership and Management: Legacy housing that is retained by the Shire or local community entities (such as a housing co-operative or community organisation, if relevant) is encouraged. The Policy supports innovative delivery models – for example, the Shire could lease its land to a proponent to build a workforce village, on the condition that after (say) 2-5 years, the buildings become the property of the Shire. Such arrangements would be subject to separate agreements and Council decisions, but this Policy framework is supportive of them. Any proposal suggesting community ownership transfer will still be assessed on planning merits, but the added social benefit will be taken into account. Proponents should note that any permanent retention of accommodation will likely require a fresh development approval (for the new use, such as a park home park or grouped dwelling development) at the transition stage – the Policy's encouragement of legacy outcomes does not guarantee automatic approval of the converted use, which must be consistent with the Scheme. Early dialogue with the Shire on how a camp could transition (zoning, permissibility, development standards for the new use) is recommended to ensure feasibility.
- 5.5. Avoiding Stranded Assets: In cases where workforce accommodation is approved without a clear legacy plan (for instance, a purely temporary construction camp using basic dongas), strict conditions will ensure that no disused or derelict infrastructure remains on-site at the end of the project. The proponent will be responsible for full removal and rehabilitation of the land (e.g., soil stabilisation, re-vegetation if in a rural area, or preparation for next stage development if in urban area). Bonds or guarantees may be required by the Shire to cover decommissioning costs if the proponent fails to carry them out. The intent is to avoid scenarios where a transient camp is abandoned and becomes a blight or safety hazard. This ties back to orderly planning – the end state of the site post-occupation must be addressed from the outset.

## 6. Approval Conditions and Legal Considerations

- 6.1. Time-Limited Approvals: The Shire of Narrogin will generally impose a time limit on development approvals for workforce accommodation. A standard approval period will be in the order of 2-5 years (or a timeframe aligning with the project construction period plus demobilisation time). This reflects the Policy position that workforce accommodation is a temporary land use and should be reviewed periodically. Granting an open-ended or permanent approval for what is essentially transient housing



is not supported, as it may unintentionally allow a “camp” to become a de facto permanent settlement contrary to the Scheme intent. Notably, the SAT has upheld the validity of time-limited conditions for workforce accommodation were justified by planning policy. In *Goldfields Villages Pty Ltd vs City of Kalgoorlie–Boulder* [2023] WASAT 6, the Tribunal confirmed that it is within a local government’s policy discretion to limit the duration of approval to encourage more permanent residency in the long run. Consistent with this legal precedent, Narrogin will apply temporary approval periods and require proponents to either cease the use or seek renewal upon expiry. Any renewal will be subject to assessment of ongoing need and compliance with the Policy at that future time (and may involve additional conditions or requirements to align with contemporary policy or community expectations).

- 6.2. **Occupancy and Use Restrictions:** Conditions will tie the use of the development to workforce accommodation purposes only. Occupancy should be restricted to bona fide workers (and their supervisory staff) associated with the project(s) named in the application. The camp must not be used for general tenancy or tourist accommodation unless a separate approval is obtained for such use. This ensures the facility operates as presented in the proposal (serving a defined transient workforce) and not morph into an unregulated boarding house or caravan park. The Shire may require an annual (or periodic) report from the operator listing the number of occupants and confirming the continued workforce-related usage, as a means of monitoring compliance.
- 6.3. **Management and Conduct Conditions:** Key elements from the proponent’s Management Plan (per 3.5) will be enforced via conditions. For example, a condition may require the implementation of the submitted Code of Conduct for occupants at all times, or that an on-site manager be present. Non-compliance with these could lead to compliance action or jeopardise any extension of approval. Council can also impose specific operational conditions such as limits on music/noise after certain hours, lighting to be baffled, and no alcohol or drugs policy (particularly if that was a community concern). The aim is to legally solidify the commitments made by the proponent to ensure community amenity is protected.
- 6.4. **Infrastructure Contributions Conditions:** As noted in 4.4, conditions will be used to require necessary infrastructure works. For instance, a condition may state that “the developer shall, at its cost, connect the development to the town’s sewer and water network prior to occupation, to the satisfaction of the local government and service providers.” Another example is a condition for a bond to be lodged for road repairs. Such conditions must meet the legal tests for valid planning conditions (serving a planning purpose, fairly and reasonably related to the development, and not unduly onerous). This Policy provides the rationale that infrastructure upgrades are directly related to enabling the accommodation use, and therefore conditions or agreements for contributions are justified. The Shire will ensure any required contribution is proportionate to the proposal’s impact (for example, not asking a small 20-person camp to fund an upgrade far beyond what its presence necessitates).
- 6.5. **Link to Structure Plan or Staging:** If a Structure Plan is required (as in 2.2), a condition of development approval will typically mandate that the development comply with the adopted Structure Plan. If the workforce accommodation is only one stage of a larger development, the approval may be conditioned to lapse if the broader subdivision or development does not proceed, to avoid a standalone camp remaining without the planned context. The Scheme’s provisions for structure plans and staging will guide such conditions.
- 6.6. **SAT and Legal Defensibility:** In formulating this Policy, the Shire has considered relevant SAT determinations and legal guidance to ensure the Policy provisions are sound. Aside from the Kalgoorlie case mentioned, the Policy takes into account that certain requirements (e.g., demanding community “legacy benefits” or monetary contributions) cannot be imposed unless properly founded in planning law. This Policy uses encouragement and negotiates outcomes for legacy housing, rather than purporting to compel a developer to hand over assets, to remain on firm legal ground. Likewise, while community infrastructure contributions are desirable, any such condition will be based on established frameworks (such as a Developer Contribution Plan or voluntary agreement) consistent with SPP 3.6. By clearly documenting the assessment criteria and expectations in this Policy, Council’s decisions on

workforce accommodation are less likely to be seen as arbitrary if challenged. Each application will be judged against these published criteria, providing transparency. Conditions applied will directly reference Policy requirements (for example, time limit, management measures, servicing) that have a proven planning purpose. This approach positions the Shire to robustly defend its decisions, as the SAT gives weight to properly adopted local planning policies under the Planning and Development Act. Applicants are urged to familiarise themselves with this Policy and ensure their proposals are compliant, to avoid refusals or onerous conditions that could otherwise have been addressed at the design stage.

- 6.7. Monitoring and Review: The Shire will monitor the outcomes of approved workforce accommodation against the objectives of this Policy. If a development is found to consistently breach conditions or create unanticipated issues, it will inform future decisions (for instance, Council may be more restrictive or require additional safeguards on subsequent applications). This Policy itself may be reviewed and updated in response to evolving State policies or local experiences. Notably, should the State Government introduce any new legislation or policy specifically governing transient workforce accommodation, this Policy will be amended to align with those requirements.

– End of Policy

## References

- 1) Relevant sources and reference documents that have informed this Policy include:
- 2) WAPC Position Statement: Workforce Accommodation (January 2018).
- 3) State Planning Policy 3.6 Infrastructure Contributions and WAPC guidelines on developer contributions.
- 4) Town of Port Hedland Local Planning Policy 05/2020 Workforce Accommodation.
- 5) Shire of Waroona Local Planning Policy 14 Workforce Accommodation.
- 6) Shire of Wyndham–East Kimberley Local Planning Policy 11 Workforce Accommodation (2020) and LPP 12 Temporary Workforce Camps.
- 7) SAT case: Goldfield Villages Pty Ltd vs City of Kalgoorlie–Boulder [2023] WASAT 6 (upholding time-limited approval for workforce accommodation).
- 8) City of Kalgoorlie–Boulder Workforce Accommodation Policy (2021) and City of Karratha DP10 Workforce Accommodation Policy – for best practice context on integration and term of approvals.