



**INTERIM SUBMISSION TO THE
WESTERN AUSTRALIA PLANNING COMMISSION**

GASCOYNE REGIONAL PLANNING AND INFRASTRUCTURE FRAMEWORK

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INTRODUCTION

The Western Australian Local Government Association (WALGA) is the united voice of Local Government in Western Australia. The Association is an independent, membership-based group representing and supporting the work and interests of all 140 Local Governments in Western Australia.

The Association provides an essential voice for 1,249 elected members and approximately 14,500 Local Government employees as well as over 2 million constituents of Local Governments in Western Australia. The Association also provides professional advice and offers services that provide financial benefits to the Local Governments and the communities they serve.

The comments contained in this submission have not yet been considered or endorsed by WALGA's State Council, as such, please be advised that this is an interim submission and that the Association reserves the right to modify or withdraw the comments as directed by State Council.

COMMENT AND RECOMMENDATIONS

During the public comment period for the Gascoyne Regional Planning and Infrastructure Framework (RPIF), the Association reviewed the Framework with a view to outlining the main issues and concerns in relation to the proposed policy.

1.2 Objectives

The Framework's objectives relate poorly to the vision for the Gascoyne which focuses heavily on enhancing and promoting the regions environment assets. Whilst the objectives state that the RPIF will provide an 'overview of the issues' and will identify the priority planning and infrastructure actions, it is not clear how the progression of planning and infrastructure actions will be achieved whilst protecting the regions environmental assets.

Recommendation:

- That the Framework's objectives are revised to better reflect the stated vision for the Gascoyne and also to identify the goals for the region's environmental assets.
- That the fourth objective should include sustainability in its goal to facilitate economic and population growth in the Gascoyne as there should be a clear level of sustainable economic and population growth in the area if environmental assets are to be protected.
- That the Framework includes an objective to identify economic opportunities within the region that are sustainable and will protect of the regions significant environmental assets as outlined within the Frameworks vision.

2.1 Economy and employment

The third paragraph of this section is confusing. Which economy is the Framework referring to, is it the regional, state, or national economy and what growth is the economy driving?

Why should 'land' be available and affordable to a range of income earners? Is the Framework attempting to say that affordable housing land should be available to a range of income earners or alternatively that suitable, affordable land should be available to a range of users, including social and economic users?

Recommendation:

- That the Framework clarifies what the impact of the economy is for the region and clarify the comments relating to affordable land being provided.

2.1.1 Tourism

The Framework states that tourism is by far the most valuable industry within the region. As such, it is important to consider the demographic and expectations of tourists visiting the region as well as identifying the destinations that they will visit, before planning to cater to their needs. In some instances, Local Governments have had to manage expectations from visitors to the region that expect the same level of service provision that they receive in metropolitan areas (such as recycling facilities). Some areas of the Gascoyne experience higher numbers of tourists than others. This places additional stress on pre-existing infrastructure.

The Framework refers to the documents Australia's Coral Coast Tourism Development Priorities 2010-2015, and Australia's Golden Outback Development Priorities 2010-2015 (Tourism WA) as being used to identify priorities for tourism product and infrastructure in the region. Both documents identified that basic tourist amenities were lacking for the region (particularly outside of the population hubs). In providing tourist amenities, there needs to be consideration of how to manage services including the management waste generated by those based outside of the region.

The Framework notes that significant numbers of tourists are visiting the Gascoyne. This raises questions as to how the additional waste generated from visitors is managed and by whom. It is unreasonable to expect Local Governments with a small rate base (table 4 states that the population of the entire region is in the order of 10,000), to manage the large volume of waste generated by those from outside of the region.

Recommendation:

- That the Framework clarifies how the necessary tourism infrastructure and services will be provided for.

Figure 2 Value of Industry activities

The economic value of the various industries given in Figure 2 is based on outputs from a number of different years. In order to present a more accurate representation of the Gascoyne regions economic drivers, consistent and comparable industrial activity data should be provided.

Recommendation:

- That the Framework makes the contribution of various industries to regional economy clear and consistent.

2.1.4 Mining

WALGA is concerned that the Framework does not provide clear guidance as to the future of mining in the region. It appears that mining is viewed as an increasingly valuable sector for the Gascoyne and that the expansion and diversification of the regions mining sector is encouraged. There is a danger that this view, could promote a reliance on a relatively short term industry. No mention has been made in this section as to the constraints that mines are to operate within, in order to protect the environmental assets of the region. Additionally, the Framework does not dwell on the infrastructure and services required, including the treatment of waste, in the construction and operational phases of these operations.

Recommendation:

- That the Framework clarifies the expected contribution of the mining industry to the region and how the regions environmental assets will not be affected by this industry.

2.1.6 Economy and Employment Opportunities

- EE2 The Framework should provide some clarification on what export markets they are looking to develop. Is it developing an emerging export market in mining or livestock? This emerging export market could have additional impacts on the existing infrastructure that would have to be considered.
- EE6 Are sustainable water sources and suitable undeveloped land available for the horticultural industry? Section 2.2.5 states that there is generally limited recharge of the regions aquifers. The Framework should identify where is the additional water source coming from.
- EE9 EE9 requires amending so that all aspects of sustainability are included. WALGA suggests employing the terminology used in the Ningaloo Coast Regional Strategy.
- EE10 Developing strategic and sustainable tourism and recreation infrastructure could consider the increased use of renewable energy sources within the area. For example, this could include the use of solar panels on accommodations and visitor centres.
- EE12 The use of the term 'playground' is inappropriate. This use of this terminology does not promote the responsible use of the region and its social and environmental assets.

What is the justification for restricting tourism marketing promotions only to the labour market working within the Pilbara region? Is there any evidence to suggest that targeting this market would be especially effective and is there any evidence to suggest that this market and the regions tourism assets are compatible?

Given the close proximity of the region and in particular, the proximity of its northern settlements to the Pilbara region, it is vital that all the potential social and economic impacts of promoting the Gascoyne to the Pilbara workforce are properly considered. Such assessments will need to include examining the potential impact of longer-term and business visitors on local communities within the Gascoyne. There is the potential that by primarily focusing on attracting the Pilbara workforce, there may be disadvantages for international visitors and other domestic visitors who compete for flights, accommodation and other limited services.

- EE15 In accordance with the Frameworks vision, a caveat should be added to opportunities EE15 and EE16 so opportunities for mineral and oil and gas exploration will only be carried out on the basis that the regions environment assets, including the World Heritage designation are not affected. It is important that full public consultation is undertaken with local residents and Indigenous groups in the area.
- EE19 Is the local community supportive of efforts to promote the region as a source/base for fly-in fly-out mining operations. Has a socio-economic cost benefit analysis of this been undertaken, particularly to determine the impact of fly-in fly-out mining operations on social services and resources, such as the affordability of housing?

Recommendation:

- That the Framework provides further details and clarifies the economy and employment opportunities EE2, EE6, EE10, EE12 EE15, EE16 and EE19.

2.2 Transport and Infrastructure

The Framework does not address the maintenance and level of service of the existing road infrastructure and whether/ how this is adequately funded at present and into the future, thereby failing to satisfy the Framework's fourth objective.

Recommendation:

- That the Framework clarifies how the existing road infrastructure network will be maintained.

The Framework acknowledges the need for regional planning and infrastructure decisions to be integrated, but fails to address waste management issues. Given that tourism, a large waste generating industry, plays a major role in the region's economy, the potential expansion of the resource extraction industry and also the fact that the region is prone to experiencing severe weather events, waste management is particularly important.

Recommendation:

- A detailed investigation into the current and future waste management infrastructure (inclusive of recycling, resource recovery and disposal facilities) requirements and provision within the region.

2.2.2 Aviation

The Framework fails to provide reference to the State Aviation Strategy which is currently under development. Furthermore, the Framework does not address the sustainability of the existing aviation infrastructure within the region. There is currently a degree of uncertainty surrounding the capacity for Local Government to be able to sustain and develop the airports under their control. Whilst this may be addressed by the State Aviation Strategy, reference to these issues should be included within the Framework.

Recommendation:

- That the linkages between the Framework and the State Aviation Strategy are clarified together with how the Carnarvon Airport relocation Study will be coordinated.

2.2.4 Energy

It is stated that solar and wind power, are likely to have increasingly important role in the Gascoyne's future energy provision. It is also highlighted that a "substantial power station" is being developed at Carnarvon to meet the growing needs of the community. This is contradictory to the statement below which states that "the growth of renewable energy sector in the Gascoyne, however, will be limited by the size of the available market."

Horizon Power is currently involved in a project in the Shire of Roebourne, Ashburton and Port Hedland to retrofit LED streetlights into the four main towns in those areas. This project is jointly funded through the Community Energy Efficiency Program and will provide lower energy prices for Local Governments and more energy efficiency, longer lasting streetlights. This is type of development of energy infrastructure would be beneficial to many other regional towns future energy considerations and could be identified as an opportunity.

Recommendation:

- That opportunity (T17) strengthens its wording to “developing alternative and renewable energy generation in the short term as a real solution to provide on-going energy and lower energy costs to a potentially increased numbers of visitors.”

2.2.5 Water supply and wastewater

The Framework mentions that Carnarvon, Exmouth and Denham have a wastewater scheme operated by the Water Corporation and that further demand for these facilities is anticipated. Therefore appropriate monitoring is needed to facility upgrades through the planning system.

Recommendation:

- There is a potential to incorporate waste processing facilities within these areas, as the zoning and buffers required are already in place the possibility of incorporating waste treatment facilities into pre-existing sites allocated for ‘like’ industries should be investigated further.

2.2.8 Emergency Services

The Framework provides limited guidance on disaster mitigation and adaptation of climate change and its impacts. There could be the inclusion of additional infrastructure such as levies or sea walls that would reduce the risk and impact of flooding events.

Recommendation:

- That the Framework includes an opportunity (T13) to conduct a Climate Change Risk Assessment study to determine potential impacts of climate change on the region and determine the opportunities associated with increased infrastructure particularly along the coast line.

2.2.10 Transport and Infrastructure Opportunities

In addition to developing renewable and alternative energy generation solutions, given the importance of the horticulture industry to region and water resource constraints, opportunities should also be taken to use of water resources more efficiently and effectively.

Recommendation:

- That the Framework includes identifies suitable opportunities to use water resources more efficiently.
- T19 should be expanded to include the provision of waste management infrastructure.
- T111 is amended to include environmental considerations as well as social and economic considerations.

2.3.3 Water

Section 2.3.3 notes that the estuary systems in the region are largely unmodified, but increased nutrient loadings are expected with increased development in the region. Eutrophication of estuaries may cause algal blooms and increase growth rates of other aquatic plants. Both of these aspects will have a negative impact on tourism, as well as potentially harming local marine life.

Recommendation:

The Framework explains how the region's water resources and aquatic assets will be protected from the intensification of neighbouring land uses.

Section 3.4 Environmental and Heritage Planning

This section notes that a natural resource management plan must be set for the Gascoyne region. Natural resource management priorities have already been set by Rangelands NRM, and should be included in the Framework.

Recommendation:

- That the Framework gives consideration to environmental priorities defined by Rangelands NRM.

2.3.5 - Climate Change

This section discusses a research partnership to investigate the causes of the changing climate in Western Australia and develop projections of the State's future climate and how this may impact future land planning in this region; however there is no discussion on mitigation measures to reduce the impact, other than a limited focus on renewable energy sources.

There is also no mention of climate change adaptation strategies for the projected impacts of climate change. A Regional Coastal Vulnerability Assessment could be undertaken to assess the potential future risk to coastal infrastructure. This would be particularly important as it is indicated in section 2.4.4 that the four relevant Local Governments don't currently have local planning strategies and therefore it can be assumed that they also don't have local coastal plans.

This section notes future issues brought about by climate change, but fails to identify some of the opportunities available through Federal funding programs. The Commonwealth Government's Carbon Farming Initiative provides alternative revenue sources that are applicable within the region.

In addition, the Framework considers renewable energy options, but fails to examine funding opportunities such as the Commonwealth Government's Community Energy Efficiency Program (CEEP).

Recommendation:

- That the Framework considers developing a Regional Coastal Vulnerability Assessment, Climate Change Risk Assessment or a regional coastal plan to assess the impact of climate change and support future infrastructure decisions for the region.

- That the Framework identifies alternative revenue sources and funding available through new Climate Change policies.

2.3.7 Natural Resources and Cultural Heritage Opportunities

Section 2.3.2 notes that the Murchison bioregion is currently under represented in the National Reserve System and that protecting ecosystems in this area is considered to be a priority. Nevertheless this priority is not clearly reflected in the Natural Resources and Cultural Heritage Opportunities nor is it identified by Table 7 as an Implementation Action.

Recommendation:

- That the Framework addresses the need to better protect the Murchison bioregion.

2.4.1 State Planning Framework

'Planning Reform'

The relevance of the Planning Reform programme to the Gascoyne region is unclear, particularly as several of these initiatives are more State wide measures. Are the initiatives identified going to happen specifically in the Gascoyne region any more than in other locations?

Recommendation:

- That the Framework clarifies what the 'Planning Reform Programme' means for the Gascoyne Region and highlights the progress made thus far.

3.1 Population growth scenarios

WALGA congratulates the WAPC on recognising the effect that a seasonal influx of tourists into the region has on local and regional infrastructure. Planning for future infrastructure needs to be based on the projections of the tourists coming into the region, especially given that the existing infrastructure for a number of services cannot cope with the current demand. Ensuring that tourists have access to basic facilities and the infrastructure that enables service provision will reduce the environmentally detrimental instances of illegal camping and subsequent dumping of waste.

Recommendation:

- That the Framework provides greater direction as to how infrastructure will be developed to accommodate the needs of tourists to the region.

Table 5: Gascoyne Activity Centres

Recommendation:

- That the population figures given in Table 5 are consistent with the figures given in Table 4.

Table 6 Gascoyne Regional Infrastructure Projects (prioritised)

Item 22: What are the 'Gascoyne Townsite Infrastructure Planning' projects? Do all of these have the same priority status?

Recommendation:

- That the Framework clarifies what the 'Gascoyne Townsite Infrastructure Planning' projects are together with the priority status for each of these projects.

3.5 Carnarvon

Opportunity C4 states that sufficient and appropriately located land should be identified to accommodate growth. The following paragraphs state that the main drivers for growth are likely to be Carnarvon's status as a regional centre and its horticultural sector. However this conflicts with the WA Tomorrow population projects. All but the 'high growth' population forecasts set out by WA Tomorrow anticipate that the existing population of Carnarvon will decline, with some projections predicting a significant decline. Indeed, even the high growth model forecasts only a marginal increase in the size of the existing population in Carnarvon.

Recommendation:

- That the Framework explains how the WA Tomorrow population projections have informed the Framework. If there are any contradictions between the WA Tomorrow population projections for Carnarvon and the Framework, then the reasons for these differences shall be fully explained.

3.6 Exmouth

The population figure given for Exmouth differs from that given in section 3.1 and Table 4. Furthermore, as with the population projections for Carnarvon, the median, WA Tomorrow population projections predict a slight decline in the population of Exmouth whilst the Framework states that its population is expected to grow.

Recommendation:

- That the Framework explains how the WA Tomorrow population projections have informed the Framework. If there are any contradictions between the WA Tomorrow population projections for Exmouth and the Framework's population forecasts, the reasons for differences are fully explained.

Table 7: Implementation Actions**13: Building Local Government Planning Capacity Program**

The Association welcomes the Department of Planning's offer of assistance for Local Governments in the reviewing of local planning schemes and strategies. In order to explore the possible synergies between this process and Local Government support programs offered by WALGA, the Association would welcome further details of the Planning Capacity Program.

Recommendation:

- Further details of the Planning Capacity Program are discussed with the Association.

CONCLUSION

The Association recommends that the comments and recommendations outlined above are considered in the finalisation of the Gascoyne Regional Planning and Infrastructure Framework. In addition the Association kindly requests that it and its members be kept informed of the progress made in the preparation of the Framework.