



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

**MID WEST 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 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.

## **EXECUTIVE SUMMARY**

During the public comment period for the Mid West Regional and Infrastructure Framework, the Association sought comment from the Local Government sector to inform a representative submission to the Western Australia Planning Commission.

This submission reflects the main issues and concerns raised by the Association and local government in relation to the proposed Framework.

## **COMMENT AND RECOMMENDATIONS**

### ***General Comments and Recommendations***

The Association is concerned about the reliance on outdated data and information forming the basis of a number of assumptions in the Framework. Considering the potential impact of the developments identified together with projected population and tourism growth, it is critical that the accurate and up to date assessments are undertaken to ensure adequate planning for the region.

Secondly, whilst the Framework provides a concise summary of the issues and challenges facing the region, it fails to set out clear guidance as to how these challenges can be best resolved. It is suggested that the introduction of clear targets/aims would help to provide a sharper focus for emerging local and sub-regional planning policy and strategies supporting the delivery of the regional objectives. In addition, the introduction of targets, albeit notional, would enable more robust policy justifications at the local and sub-regional level. Furthermore, this would also help ensure that policy guidance and strategies developed at the local level are more consistent across the region and also more closely aligned with the vision/objectives of the regional Framework.

Considering that a number of the major new developments identified will have significant impacts on the region, there is a concern that the issue of waste has not been properly addressed. The construction of these projects, the projected growth in commercial projects and the general population will all impact greatly on the amount of waste produced. The disposal of waste, at least, should be given priority status.

The Association is also concerned about the apparent lack of consultation with the Local Governments impacted. The feedback that the Association has received from those who manage waste sites in the region indicates that the impact on waste for the region has not been taken into account. This lack of consultation is reflected in the Framework.

Finally, the Association recommends that the Framework is more consistent in its use of terminology. For example, within the document, Local Government is also referred to as 'local authorities' and 'shires'. The preferred term is 'Local Government'.

## **Specific Comments**

### **1.1 Vision**

*'an innovative region that embraces technology to add value to its industries, support the delivery of services and stimulate new technology-based enterprises'*

The Framework states that the vision for the region is for a green region and one that embraces technology and new technology based enterprises. However it is evident that reference to renewable energy sources and minimizing waste is absent in the vision. It is suggested that the vision is expanded to include a direct reference to these issue as many of the initiatives set out in Table 4 are intrinsically linked to ensuring development within the region is sustainable.

There is an expectation that the Framework would support innovative ways to address waste management challenges across the region, especially as the Framework will be taken into account in the preparation and review of emerging planning strategies and policies. As such, this should be apparent in the vision. Alternative waste treatment (AWT) facilities not only offer an alternative to landfills, but also produce compost and reduce emissions to landfill. Waste-to-energy plants could also present an opportunity to not only reduce waste to landfill (where there is adequate feedstock) but also deliver power to communities.

Recommendation:

- The Association recommends that the Vision clarifies the meaning of a 'green region' and is expanded to include the promotion of sustainable forms of development and the efficient use of resources and waste minimisation.

### **1.4 Background**

*'Both the Geraldton Region Plan (Western Australian Planning Commission, 1999) and Mid West Infrastructure Analysis (Western Australian Planning Commission, 2008) were considered when preparing the Mid West Regional Planning and Infrastructure Framework'*

Given the absence of regional land-use strategy, it is acknowledge that the Framework will refer to the Geraldton Regional Plan. However given the date of its publication, the Framework should also make it clear that regard has been given to more recent policy guidance, particularly those at the state and commonwealth level. How this guidance has been used to inform the Framework should also be explained.

Recommendation:

Section 1.4 is expanded to include all relevant guidance that the Framework has given regard to.

### **2.1.1 Mining**

*'The proposed mining and mining related infrastructure projects, including port expansions at Geraldton and creation of a new port at Oakajee, will require significant investment in infrastructure provision including rail networks, power and water'*

There is a concern that waste infrastructure is not included here. The development of the new port and port expansions will not only produce a large amount of waste, once in operation those who use these facilities will also produce waste. The disposal/recycling of this material should be included in the planning document.

Recommendation:

- That waste is added to list of infrastructure provision that require investment.

### **2.1.5 Tourism**

*'With population growth expected to place pressure on the region's coastal areas and with overall improved accessibility for tourists to the region (intrastate, interstate and international), it is imperative that potential tourism opportunities are developed in a strategic and sustainable manner'*

It is imperative that the impact on all services and infrastructure be considered in the Framework due to increased population and tourism. The impact needs to be assessed using up-to-date figures (figures used in the document refer to 2004/05).

Recommendation:

- That up-to-date figures are used to highlight the impact of visitor spending within the Region.

## **2.2 Transport and Infrastructure**

Recommendation:

- Waste infrastructure, both current and future, need to be included here to ensure that infrastructure is able to adequately deal with the region's needs.

### **2.2.7 Public Transport**

*'Geraldton is currently serviced by eight bus routes operated by Geraldton Bus Services under arrangement from the Public Transport Authority. Provision of an adequate public transport system in a largely car dominated region is a challenge'*

The purpose of the paragraph and the intentions of what the framework is seeking to achieve are not clear.

Recommendation:

- The Framework should clarify the regions public transport objectives/intentions.

### **2.2.8 Social Infrastructure and Services**

*'The Mid West Development Commission, through the Mid West Investment Plan, is working with Mid West local governments and other key stakeholders to identify local and regional infrastructure priorities with a focus on social infrastructure and services.'*

The Association has received advice from Local Government is that there has been no consultation on waste management infrastructure and services. Waste services are a key feature of social infrastructure, however it has not been included in the Framework.

Recommendation:

- That the Mid West Development Commission consults Local Governments to ensure that waste management infrastructure is included through the Mid West Investment Plan review of infrastructure priorities.

### **2.2.9 Challenges**

*'Reducing car dependency by promoting travel alternatives'*

Reducing car dependency will require funding as well as the promoting alternative forms of transport.

Recommendation:

- That the sentence is re-written to state *'reducing car dependency by 'funding and' promoting travel alternatives'*.

*'Ensuring that communities have adequate access to regional and local social infrastructure and services'*

There is an expectation that waste services and infrastructure will be included. For example, different classes of landfill should be considered to cope with overflow of Construction and Demolition (C&D) and Commercial and Industrial (C&I) waste from developments in the Gascoyne-Pilbara regions. Meru is the only Class III landfill north of the Perth metropolitan area. Consideration should be given to the development of a Class IV landfill beyond Red Hill (Perth metropolitan area).

Recommendation:

- It is recommended that the section is expanded to include the challenges facing waste management and that consideration given to the development of a Class IV facility, serving the region.

### **2.3.1 Biodiversity**

*'Two IBRA regions, the Murchison and Avon Wheatbelt, are under represented in the National Reserve System. High priority should be given to protecting ecosystems in these areas.'*

The Framework states that the Murchison and Avon Wheatbelt IBRA regions are under-represented in the National Reserve System and that a high priority should be given to protecting the ecosystems within these areas. It is clear that any re-zoning or the introduction of policies protecting the ecosystems within these regions will need to be fully justifiable on the basis of robust research and assessments. Actions or targets should be identified as to how and when this should be achieved. Additional regard should also be given to the funding implications for the protection of ecosystems; this includes funding initial research through to supporting any maintenance/land management required.

The Framework also comments that due to a lack of flora and fauna information at the regional level, there is no comprehensive conservation plan for the region. Therefore, in addition to the initiatives underway and proposed within the Geraldton sub-region, regional wide priorities/initiatives should be identified to resolve this issue.

Recommendation:

- Actions are identified to ensure adequate protection for the ecosystems within the Murchison and Avon Wheatbelt IBRA regions and also that actions are identified to address the lack of flora and fauna information in the region.

### **2.3.4 Climate Change**

This section is brief and largely discusses what the impacts of climate change are likely to be across the region. It would be helpful if the Framework drew attention to Federal and State level policies and strategies addressing climate change and provided an interpretation of the impact of these policies for the region.

Recommendation:

- That the Climate Change section is expanded and gives regard to regional, State and Commonwealth level plans/policies.
- This section should also include a reference to the Batavia Regional Organisation of Councils Climate Change Adaptation (2010), and the Mid West Region Council, Climate Change Risk Assessment and Adaptation Plan (2010).

### **2.3.5 Cultural heritage**

*'It is important that both the Aboriginal and European heritage of the region is identified, protected and managed as their significance will increase over time.'*

It is unclear why the significance of cultural heritage will increase.

Recommendation:

- The Framework should clarify the importance of preserving regions heritage assets.

### **2.3.6 Challenges**

*'Ensuring both resource utilisation and conservation of the Banded Iron Formations'*

The Framework is unclear as to whether the conservation or resource utilisation of the Banded Iron Formations is the greater priority.

Recommendation:

- The sentence should be reworded so that conservation comes before utilisation.

## **2.4 Governance**

This section refers to the cross government and agency committees and commissions at the local/regional level. However the framework should encourage better coordination and representation with State and Commonwealth bodies, especially given the importance of dealing with schemes of strategic importance.

Further, to ensure that the Framework is widely understood, where possible, commonly used terms should be used. Therefore the use of the terms such as 'deliberative governance' should be avoided.

Recommendation:

- The Framework should promote better co-operation across all sectors at all levels, including between local, State and Commonwealth governments and other stakeholders.

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- That the Framework clarifies why and where it is appropriate to engage with non-government bodies.

### **2.4.1 State Planning Framework**

#### *'Planning Reform'*

The relevance of the Planning Reform programme to the Mid West region is unclear. Are the initiatives identified going to happen specifically in the Mid West region any more than in other locations?

Recommendation:

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

*'One of the significant issues for regional areas is the acquisition of land for regional purposes such as future roads and rail transport corridors, regional parks and conservation areas'*

Similarly, regional landfill sites and alternative waste treatment sites are also difficult to secure.

Recommendation:

- The identification and preservation of future waste management sites should be listed as a priority.

### **2.4.5 Challenges**

Recommendation:

- The third bullet point contains a typing error and should be corrected.

### **3.1.2 Regional Infrastructure Planning & 3.1.3 Regional Infrastructure Priorities**

*'This information will be used to inform State Government on future decision making regarding infrastructure needs within the Mid West'*

There is a real concern that waste is not mentioned in the Framework. Consideration must be given to the planning of waste infrastructure (including siting) for Material Recovery Facilities (MRFs), transfer stations, landfills and AWT facilities, depending on what is considered appropriate. The introduction of a Container Deposit Scheme (the Bill for which was introduced October 2011) will also require transfer stations and regional drop off facilities.

The planning of any waste facility will also need to take into consideration the appropriate buffer distances required.

Recommendation:

- That the Department of Planning addresses the concerns expressed by the Association and that waste management issues are included and adequately addressed by the Framework.

### **3.1.4 Priority Mid West Regional Infrastructure Projects**

*'Oakajee deepwater port – This project is considered to be the driving flagship initiative for the region. It involves the development of a new deepwater port at Oakajee north of Geraldton, including associated road, rail, power and water infrastructure'*

Given the size of the project, it is important that waste sites are added to this list to address the large amount of construction and demolition (C&D) waste and also subsequent commercial and industrial (C&I) waste once it becomes operational. The waste impacts are unknown, as forecasts/estimates are not quantified.

Recommendation:

- The Waste Authority should be consulted regarding strategies as to where C&D and C&I waste from these projects go, for example, separation on site, or reuse of materials. Additionally, appropriate buffers for screening and crushing of C&D materials as recyclables will also be required.

*'Mid West Energy Strategy - ... and also in the viability of towns to support alternative energy sources, including renewables and waste-to-energy facilities'*

Recommendation:

- It is recommended that the potential feed-stocks for waste-to-energy plants, together with appropriate buffer zones for such facilities are investigated.

*Mid West regional water planning - 'Regional water planning is therefore essential to obtain a better understanding of the Mid West's water resources... 'Specific projects may include'*

*'Specific projects may include'* is ambiguous.

Recommendation:

- In order to make the statement clear, *'may'* should be deleted.

### **Table 2: Mid West Regional Infrastructure Projects**

Recommendation:

- Rail, no. 1 & 2, it is important that the possibilities of co-sharing rail networks/routes are encouraged and included in the two rail projects identified.
- Item 29 Mid West Rail Network Strategy, it would seem logical that the Strategy should be undertaken before other rail projects are done, this should be corrected.

### **3.3 Natural Resource Management**

*'Identification and resolution of environmental constraints of urban expansion'*

Recommendation:

- That *'constraints'* is replaced by *'issues'*.

*'Implementation of Better Urban Water Management Framework prior to the development of new residential and rural residential areas'*

This point should be more clearly expressed.

Recommendation:

- *'Incorporation of Better Urban Water Management Framework principles in the development of new residential and rural residential areas'*.

In supporting population growth that has minimal adverse impact upon natural resources, coastal management issues and initiatives should also be supported by the Framework.

Recommendation:

- Coastal Management is added to the list of support initiatives as set out on page 28.

### **3.4 Activity Centres**

*'Expand the Mid West's population in accordance with the Activity Centres'*

Increasing the Mid West population does not relate to an Activity Centre principle. Nevertheless given that the two are intrinsically linked, the strategy should be to increase population appropriately within the Activity Centres, as set out by the Framework, to drive population increase across the region.

Recommendation:

- The Association recommends that the Framework clarifies Activity Centre strategy, AC1.

#### **3.4.1 Primary Centres**

Recommendation:

- The final sentence of the paragraph contains a typing error and should be corrected.

#### **3.4.3 Sub-Regional Centres**

*'There are four Sub-regional Centres within the Mid West, which provide goods and services for their surrounding hinterlands'*

Recommendation:

- The Framework does not make it clear what the four Sub-regional Centres are, these should be clearly identified.

#### **3.6.1 Batavia Coast**

*'The City of Greater Geraldton has a vision to transform Geraldton into a world class regional city of 100,000 residents over the next two decades. Major projects proposed for the sub-region, such as the Oakajee Port and Oakajee Industrial Estate, are expected to stimulate economic growth and employment, as will the further development and expansion of resource and other projects'*

The population projections for the City of Greater Geraldton, and the size of the Oakajee projects, indicate a future increase in waste generation across all waste streams. It is therefore imperative that the siting and development of appropriate infrastructure is listed as a priority within the Framework.

Recommendation:

- Actions to identify and address the waste infrastructure requirements for the Batavia Coast are in the Framework.

#### **3.6.2 North Midlands**

*'Following completion of the Indian Ocean Drive, there is increased potential for further development pressure and increased tourist numbers in the coastal areas of the sub-region'*

There is a concern that out-of-date information forms the basis of many assumptions within the Framework. For example, the Indian Ocean Drive is already in operation.

Recommendation:

- Up-to-date development impact assessments should be undertaken to ensure that the Framework adequately addresses all issues. This includes a more detailed and up-to-date analysis of the impacts of the newly opened Indian Ocean Drive.

### **Figure 7**

The purpose of Figure 7 is not clear, is the intention to highlight stakeholder contributions, the implementation framework and/or both? Furthermore it is not obvious if 'Liveable Region' is a strategy/policy document or an outcome. In addition, in the context of the diagram the meaning of 'green' is unclear, it should be clear that this relates to preserving and enhancing the environment.

Recommendation:

- The Association recommends that the purpose and information shown by Figure 7 are clarified. This includes ensuring that stakeholders, policy, and outcomes are clearly defined and differentiated.

### **Table 4: Implementation Actions**

The third objective of the Framework is to "identify the priority actions required to enable comprehensive regional and sub-regional planning". Table 4 of the Framework identifies these priorities as either 'underway' or 'proposed'. However these two designations, fail to establish the priority importance of these actions/initiatives. Therefore, in order to ensure that the objectives of the Frameworks are achieved, it is vital that the intended initiative prioritisation process is completed prior to publication. In addition, where possible an indication of when 'underway' initiatives are likely to be finalised would be valuable.

The Transport and Infrastructure section does not identify an 'Integrated Regional Transport Plan' as is set out on page 16 of the Framework. Likewise the table fails to identify any initiatives regarding the preservation of European and Aboriginal Heritage assets despite this been recognized as an important priority earlier in the document.

Recommendation:

- In particular, it is important that the priority for each of the actions outlined in Table 4 is identified.
- The proposed 'Integrated Regional Transport Plan' should be added to the list of actions.
- Item No.33... The lead agency should also include the Department of Planning.
- Item No.41...The Audit would be better titled 'Mid West Environmental Issues Audit' not 'Constraints'.
- Item No.46...The status of the Mid West Climate Change Assessment (proposed), and Climate Change Adaption Planning initiatives (underway) should be clarified/updated. The lead agency for these projects should include the Department of Planning.
- Actions to identify and preserved cultural heritage assets should be included in the Table and prioritised.

### ***Mid West Region Framework Map***

Recommendation:

- The inset scale on the Mid West region framework map is incorrect and should be corrected.

### **CONCLUSION**

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