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Shire of Dundas
PO Box 163
NORSEMAN 6443

Attention: Planning Services

Dear Sir/Madam

**Application for Development Approval – Workers' Accommodation Facility
Lots 109-112 (Nos. 70, 72, 74 and 76) Goodliffe Street, Norseman**

Rowe Group acts on behalf of Resource Accommodation Management Pty Ltd ('**Client**'), the landowner for Lots 109-112 (Nos. 70, 72, 74 and 76) Goodliffe Street, Norseman ('**subject site**'). We have been instructed by our Client to prepare and lodge this Development Application ('**Application**'), for the Southern Goldfields Development Assessment Panel's ('**DAP**') consideration. This Application seeks approval for a Workers' Accommodation Facility to support the Pantoro Gold Mining operation within the town of Norseman.

In support of this application, please find enclosed the following:

- A completed and signed DAP Form 1;
- A copy of the current Certificates of Title;
- A copy of the proposed development plans; and
- The accompanying Traffic Impact Statement.

SUBJECT SITE

The subject site is situated within the municipality of the Shire of Dundas ('Shire'), located within the town of Norseman, and is located approximately 161 kilometres south of Kalgoorlie-Boulder, being the nearest major centre.

Refer **Figure 1 – Regional Location** and **Figure 2 – Local Location**.

The subject site is approximately 4,048m² in total size and is bound by Goodliffe Street to the west, Alsopp Street to the south and existing residential to the north and east.

The Pantoro Gold Mine is located immediately west of the Norseman townsite.

Refer **Figure 3 – Site Plan**.



The subject site comprises of four (4) separate land parcels, legally described as follows:

STREET ADDRESS	LOT NO.	PLAN/DIAGRAM	VOLUME/FOLIO	REGISTERED PROPRIETOR
70 Goodliffe Street	112	222909	117/151	Resource Accommodation Management Pty Ltd
72 Goodliffe Street	111	222909	117/151	Resource Accommodation Management Pty Ltd
74 Goodliffe Street	110	222909	1840/256	Resource Accommodation Management Pty Ltd
76 Goodliffe Street	109	222909	441/52A	Central Norseman Gold Corporation Ltd

Table 1: Cadastral Information.



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FIGURE 2
LOCAL CONTEXT

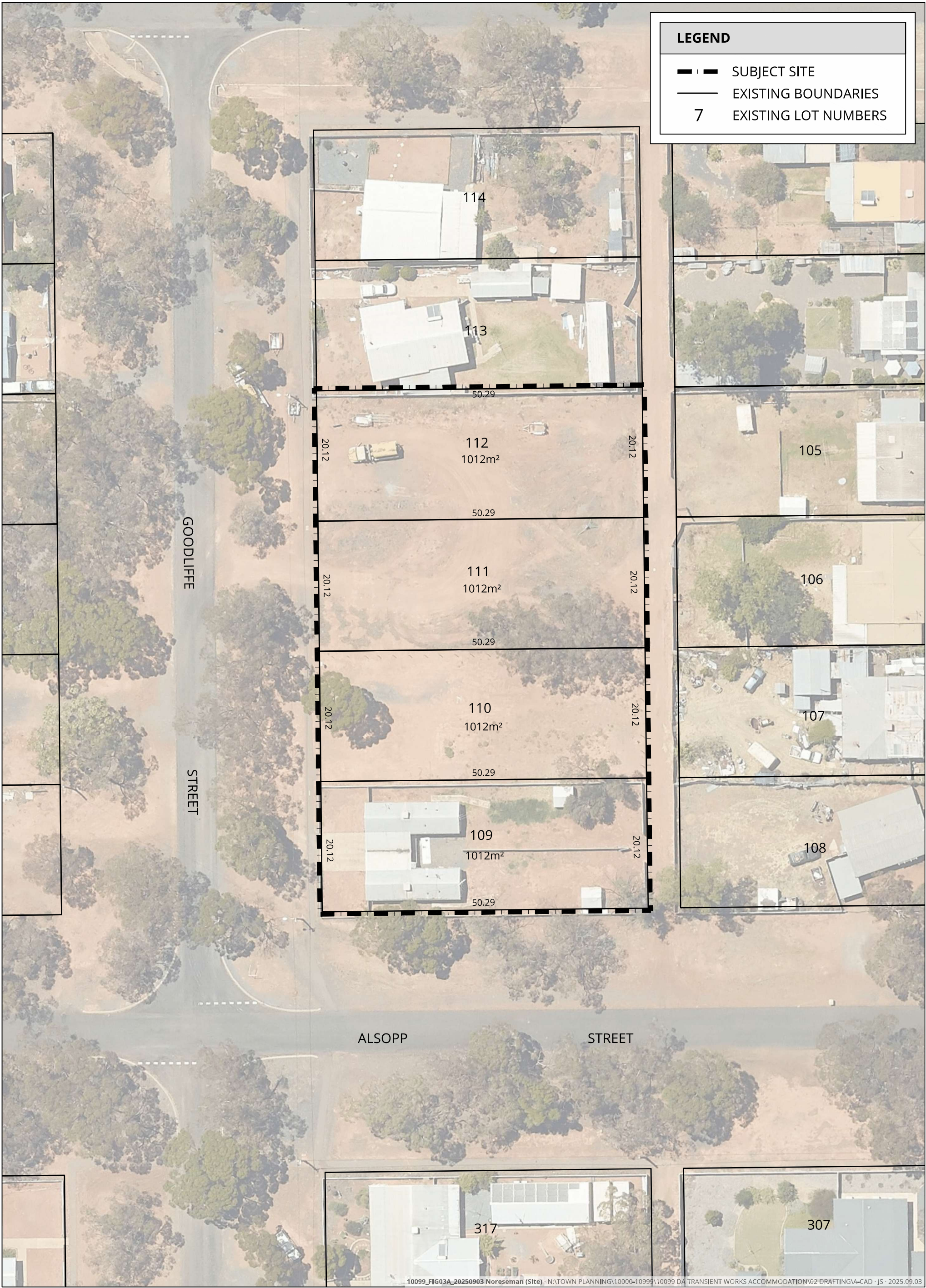


FIGURE 3
SITE PLAN



BACKGROUND

This development has previously been subject to an identical application direct to the Shire of Dundas in early 2025. The application, following assessment, was presented to the Shire of Dundas Council with a recommendation for a conditional approval at its July 2025 Ordinary Meeting. The recommendation included a number of required modifications to the verge carparking layout, laneway upgrade, and landscaping requirements.

Of particular note within the recommendation was 'Condition xi', which related to the 'temporary' nature of the development. The condition reflected the Shire's interpretation of the land-use definition, which refers to accommodation on a temporary basis, as relating to the development itself, rather than temporary occupancy. It resulted in the condition of approval being:

"The development approval expiring 10 years from the date of this approval being granted, unless prior to the expiry of this approval has been applied for, and been granted by the Shire of Dundas, to extend the validity of the development approval beyond the 10-year period"

As a result of the recommended condition of approval, the Client wrote to the Shire, with a request to remove the condition, and explaining that the intention of the development was not a temporary facility.

Upon considering the recommendation, Council raised an alternative motion for refusal, on the basis of the following reasons:

- (i) *Permanent use/occupancy of the proposed development – as requested by the proponent by letter to the Shire dated 28 July 2025 - is contrary to the meaning of 'workforce accommodation' described in the Shire's Local Planning Scheme 2;*
- (ii) *No evidence has been provided to support a longer approval period (eg. 30 years);*
- (iii) *No evidence has been provided that the type and structure of the proposed development is compatible with standards that support a longer life span and permanent use/occupancy of the proposed development.*

This motion was passed and the application for development approval refused. The application for development approval has been resubmitted for a DAP determination.

PROPOSED DEVELOPMENT

This Application proposes the development and use of a Workers' Accommodation Facility at the subject site. The proposed development comprises of 64 single occupancy accommodation rooms and associated service facilities including a communal barbeque shelter, associated open space and laundry facilities. The proposed development also includes the following in relation to the workers' accommodation facility:

- 25 sealed car parking bays, with 17 bays in the Goodliffe Street verge and the remaining 8 bays in the Alsopp Street verge;
- A new bus pick up zone within the Alsopp Street verge, adjacent to the 8 parking bays; and



- New garrison-style permeable perimeter fencing, new lighting for amenity and safety, and a bin store area.

Furthermore, the existing grouped dwelling and driveway on Lot 109 is to be retained for the site manager's residence and executive management (overflow) accommodation.

Refer **Attachment 2 – Development Plans**.

TOWN PLANNING CONSIDERATIONS

Shire of Dundas Local Planning Scheme No. 2

Under the provisions of the Shire of Dundas *Local Planning Scheme No. 2* ('**LPS2**'), the subject site is zoned 'Residential'. The objectives of the Residential zone are stipulated within LPS2 below:

- *"To provide for a range of housing and a choice of residential densities to meet the needs of the community;*
- *To facilitate and encourage high quality design, built form and streetscapes throughout residential areas; and*
- *To provide for a range of non-residential uses, which are compatible with and complementary to residential development."*

Alsopp Street to the south of the subject site is reserved as a 'Local Distributor Road' under LPS2, while Goodliffe Street holds local road status only.

Refer **Figure 4 – Local Planning Scheme No. 2 Zoning**.

Land Use Permissibility

The proposed development is consistent with the 'Workforce Accommodation' land use classification, which is defined within Division 2, Clause 38 of LPS2 as follows:

"Workforce Accommodation – means 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 the occupants and authorised visitors.*

However, the land-use is not included within the LPS2 Zoning Table. As such, the proposed development must be assessed as a 'use not listed'. Clause 18(4) of LPS2 relates to Use Not Listed applications:

"4) The local government may, in respect of a use that is not specifically referred to in the zoning table and that cannot reasonably be determined as falling within a use class referred to in the zoning table -

- a) Determine that the use is consistent with the objectives of a particular zone and is therefore a use that may be permitted in the zone subject to conditions imposed by the local government; or*



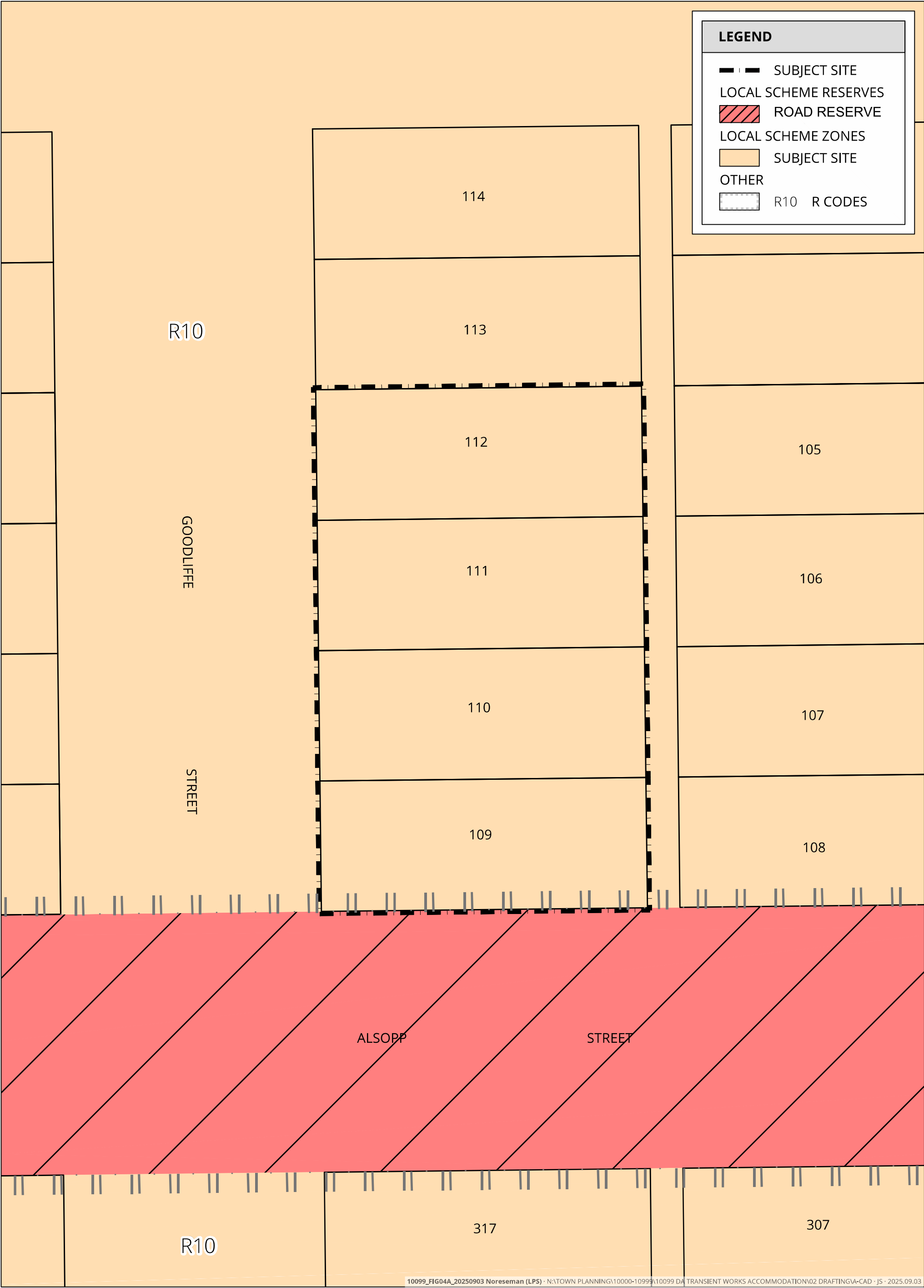
- b) *Determine that the use may be consistent with the objectives of a particular zone and give notice under Clause 64 of the deemed provisions before considering an application for development approval for the use of the land; or*
- c) *Determine that the use is not consistent with the objectives of a particular zone and is therefore not permitted in the zone.”*

The proposed development is therefore required to be consistent with the objectives of the Residential zone, as detailed above. The table below provides an assessment of the proposed development against the objectives of the Residential zone:

'RESIDENTIAL' ZONE OBJECTIVE	COMMENT
<i>To provide for a range of housing and a choice of residential densities to meet the needs of the community.</i>	The proposed development is consistent with this objective given that the proposal introduces a form of a workforce based residential accommodation, which will diversify the housing stock within Norseman. The proposal responds to a demonstrated need for workforce accommodation associated within regional mining and infrastructure projects and therefore provides accommodation options to meet the community's housing needs.
<i>To facilitate and encourage high quality design, built form and streetscapes throughout residential areas.</i>	The accommodation facility has been designed appropriately to complement the built form amenity of the local area. By incorporating landscaping, fencing and lighting, the proposed development enhances the streetscape by providing visual amenity for both occupants and the surrounding residents. Furthermore, the use of durable materials for the built form, the provision of communal open space and the orientation of buildings all contribute to an attractive built form outcome that is compatible with the surrounding residential context.
<i>To provide for a range of non-residential uses, which are compatible with and complementary to residential development.</i>	Although the proposed development constitutes a land-use for non-permanent residents, it is compatible with the function and amenity of the local area. The inclusion of communal facilities (dining, laundry, recreation) internalises activity, which ensures it does not generate adverse impacts upon the surrounding area. In conjunction with clear behavioural policies and service delivery arrangements which are to be overseen by an on-site manager, the proposed development is considered to complement, rather than detract from, the residential character of the area.

Table 2: Assessment against Objectives of the Residential zone.

Based on the above, the proposed land-use and development is considered consistent with the objectives of the Residential zone and therefore capable of approval.



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FIGURE 4
SHIRE OF DUNDAS LOCAL PLANNING SCHEME No.2 ZONING

Local Planning Scheme No. 2 – Development Standards and Requirements

Clause 32 of LPS2 sets out the General Development Standards and Requirements for development, with Clause 32 (2)(a) relating to the Residential zone within the Norseman Townsite:

“(2) Residential Zone

a) To retain the predominant low density character of the existing residential area except in selected localities where the local government may approve medium density development on the merits of the particular application. The local government is prepared to consider a range of activities within the zone to satisfy the needs of and to promote tourist and related activities within the Norseman Townsite.”

The proposed development is considered to be adherent with this provision for the following reasons:

- The proposed development achieves a low-density character through its single-storey design and low site coverage. Given the proposal incorporates four standard residential lots, the layout of the buildings enable generous setbacks, landscaping buffers and open space areas which ultimately maintains a development pattern that is visually and spatially consistent with the surrounding area;
- The subject site is located in close proximity to Norseman’s commercial zone and key transport infrastructure (i.e. the Coolgardie-Esperance Highway), therefore making an appropriate location for a higher intensity of land use;
- LPS2 contemplates a mix of activities within the Residential zone in order to further contribute to the economic and tourism functions of Norseman. The proposed development directly supports the continued operation of mining and construction projects within the region, in which these projects generate economic activity, ultimately underpinning tourism, retail and service provisions within Norseman; and
- The proposed development has been specifically designed to preserve the amenity of the local area through appropriate setbacks, boundary fencing and building orientation. Operations will be managed by an on-site manager, with site rules and procedures in place to ensure no adverse impacts are imposed on the surrounding area and affecting the residential amenity.

Clause 32(2)(e) refers to a table of land-uses where lot size, frontage, setbacks and carparking applies. In this instance, the table is limited to five (5) particular land-uses only, and for which Workforce Accommodation is not listed. Therefore this is taken to mean no on-site carparking is required.

No on-site parking is proposed due to vast majority the occupants of the accommodation being transported to/from the Pantoro gold mine, and to/from the nearby Norseman aerodrome.

Notwithstanding, the construction of roadside verge parking is proposed. This approach is consistent with similar previous approvals by the Shire, where parking has been permitted on existing verge bays. As no bays currently exist within proximity of the subject site, previous advice from the Shire confirms the verge contains sufficient area to construct new bays, albeit with additional landscaping replacing any vegetation removed as part of the construction of the bays.



TRAFFIC CONSIDERATIONS

To demonstrate and confirm the low vehicle trip usage, a Traffic Impact Statement ('TIS') has been prepared by Shawmac in support of this Application, in accordance with the *Western Australian Planning Commission* ('WAPC') Transport Impact Assessment Guidelines for Individual Developments.

Both Goodliffe Street and Alsopp Street are classified as Access Roads under the *Main Roads WA Road Hierarchy*, with a 50km/h posted speed limit and are both constructed to a rural standard. The TIS estimates an existing daily traffic volume of less than 500 vehicles per day which is well below the 3,000 vehicles per day threshold for access streets, as identified by *Liveable Neighbourhoods*. The proposed development is expected to generate a low volume of additional traffic, primarily consisting of:

- One (1) light truck trip per day (maintenance);
- Two (2) vehicle (vans) trips per week (linen);
- Weekly bus trips between the airport and the accommodation;
- Up to ten (10) workers with company cars making direct trips to and from the mine site; and
- Four (4) bus trips per day transporting workers to and from the mine site during day and night shift changes.

The bus pickup and drop-off zone proposed along Alsopp Street is supported by a swept path analysis which demonstrates the safe manoeuvrability and access for 10-12 metre buses. Furthermore, the TIS confirms that the proposed 25 on-street car parking bays layout complies with AS2890.5 design requirements and the anticipated parking demand for the proposed development.

Based on the above, the TIS concludes that the proposed development is compliant with the provisions of the WAPC Transport Impact Assessment Guidelines for Individual Developments and that no adverse impacts will be imposed on the surrounding area.

LANEWAY UPGRADE

A recommended condition of approval resulting from the previously submitted development application was condition (ix), relating to the upgrading of the rear laneway (ROW).

This recommended condition of approval appears erroneous since the need and nexus for the upgrade has not been established. The laneway as it currently appears is of an unsealed constructions standard, and is trafficable. To apply such a condition, the following three-step test has been established (through Reid v WAPC):

1. **Planning Purpose** – The condition must serve a legitimate planning goal.
2. **Nexus** – There must be a factual connection between the condition and the consequences of the development.



3. **Reasonableness** – The condition must not be so unreasonable that no rational authority would impose it

In this instance, the TIS demonstrates only minimal additional movements will be generated as a result of this development. Further, that only the linen van will access the site directly from the ROW, with the remaining traffic being generated off-site, as described above.

The Shire's policy framework, in particular policy T11 - Asset Management Policy provides for the principles in which the Shire will consider its asset management. The policy does not however refer to minimum traffic rates for requiring upgrades to road surfaces, rather that *"Prior to the consideration of any major works for renewal or improvement to an asset, (the Shire will) undertake a critical review of the need of that asset."* In this instance, there are no known studies or reviews of the ROW.

Furthermore, as described above, Clause 32 of TPS2 outlines development standards. While it does not specify road sealing criteria directly, it empowers the Shire to impose conditions on development approvals—including infrastructure upgrades—based on planning merit and impact.

In this instance, and in consideration of the three need and nexus considerations outlined above, there is no impact or planning merit to require the upgrading of the ROW, since there is in effect no increase in traffic to justify sealing. As to reasonableness, there is no nexus for the entire ROW to be sealed when only one vehicle will utilise it – once per day – for the life of the development and in close proximity to the corner of the Laneway and Alsopp Street. It is therefore not reasonable to require the sealing of the ROW in its entirety.

Notwithstanding, the ROW is proposed to be upgraded with crushed gravel and lighting along the length of the ROW. This is a proponent led initiative to enhance the pedestrian movement safety of the ROW, rather than to enhance any vehicle trafficability.

Refer **Attachment 3 – Traffic Impact Statement.**



CONCLUSION

This Application is seeking approval for a Workers' Accommodation Facility at the subject site. The proposed development is adherent to the provisions of the Shire of Dundas Local Planning Scheme No. 2 and is considered to be consistent with the objectives of the 'Residential' zone. This Application is also supported by a Traffic Impact Statement that confirms the proposal will not cause any adverse traffic impacts upon the surrounding area.

The land-use is wholly related to transient mine workers, meaning the workers only use the accommodation on a temporary basis, where the accommodation is shared with another worker on an alternative roster, as is common throughout Western Australia. The built form is intended to be permanent, as is consistent with nearby previously approved developments of a very similar nature. Accordingly, the proposal is consistent with the Workforce Accommodation land-use definition and is capable of approval as such.

Accordingly, a favourable determination by the Southern Goldfields Development Assessment Panel for this Application is requested. Should you require any further information or clarification in relation to this matter, please contact the undersigned on 9221 1991.

Yours faithfully,

Peter Stuart

Rowe Group