



**Port Hedland Pony Club Inc**

P O Box 107, Port Hedland, Western Australia 6721  
Email: porthedlandponyclub@hotmail.com  
Secretary: 0427197309 Treasurer: 0417900446

M.J. (Mal) Osborne

Chief Executive Officer  
Town of Port Hedland  
PO Box 41  
Port Hedland WA 6721

RE: Proposed Land Transaction for Lot 300 on Plan 53035, Pretty Pool Port Hedland.

We would like to put this submission forward in regards to the proposed land transaction for Lot 300 on Plan 53035, Pretty Pool Port Hedland

With the proposal to put a "Caravan Park" on the site, but with looking at the proposal it has come to our attention that it is looking to cater for Single Room Accommodation and various bungalow accommodation.

Our concerns include, but are not limited to, are:

1. Extra traffic on Styles Road and Johnson Lane will directly affect the access to the Pony Club grounds and also the safety of our riding members who ride out across the road to the 4 Mile track.
2. Having a facility so close to a horse stables what are the Heath regulation?
3. Access to the beach for our members to take their horses for daily exercise will now be more hazardous trying to negotiate the limited access, therefore, putting our members in a potentially dangerous situation.
4. Having such a large facility next to a Pony Club where the majority of members are children, bring forth security and safety issues for the club such as trespassing, vandalism, theft, safety for the horses and the possibility of other undesirable behaviour putting our children at risk.
5. Members have issues with the safety of our junior members and families with having so many single room accommodation and the types of people this will bring to our area and close proximity to our club.
6. With the facility looking at catering for over 417 people at any one time, how will this affect the pretty pool area supplies i.e.; power, water and sewage?
7. The facility is building directly next to a tidal creek and on areas where the tidal waters go. Cyclone Christine threatened to flood all low lying land which this facility is building directly on the flood plains.
8. How is the facility protecting against the threat from crocodiles to their tent and caravan sites as it will be right along the creek where crocodiles have been sighted?
9. Our junior members, members and PHPC families have many concerns that we will be restricted or even lose our grounds in where we attend our horses that are a big part of our lives. We care for them twice a day providing them food and water, take them out for exercise. Horses are used as therapy and have been known to keep many children and people out of trouble. Horses are a big part of these members life providing much more than can be explained in a letter.

Port Hedland Pony Club membership is growing steadily, with many families with young children who love to come down to the grounds on a daily basis to enjoy the space and play with the horses. Unlike seasonal clubs we use and utilise our grounds all year around with over 18 horses stabled through the year and we have over 35 members who are actively involved in the club. The club is actively seeking ways to bring more horses and members back to the club and looking at the options of community horses for families and members of the public who may not have the time to commit to having a horse full time but still love to get involved when they can.

Pony Club is an International voluntary youth organisation affiliated with The Worldwide Association of Young Riders, known as The Pony Club. Originating in Britain as a scheme to encourage young people to learn to ride, it focused on riding instruction and fun. It has now become the largest association of riders in the world.

#### Objectives of Pony Club

- To encourage young people to ride and to learn to enjoy all kinds of sport connected with horses and riding
- To provide instruction in riding and horsemastership and to instil in members the proper care of their animals.
- To promote the highest ideals of sportsmanship, citizenship and loyalty, thereby cultivating strength of character and self-discipline

Along with being able to ride out to the beach and along the creek tracks, with horses being a naturally roaming animal they have minimal impact on the environment, in fact being able to ride peacefully up to and around without disturbing many other creatures unlike motorised vehicles.

With the close proximity, the school children catch the bus around to the club to feed, play and work their horse. Some families also ride bikes and walk to the stables to spend a pleasant morning or afternoon on the grounds.

In this last twelve months we have developed an agreement with 'Care For Hedland' by allowing them to put a community garden on our grounds and use the Horse manure in there composite for bigger and better vegetables, another way our grounds are helping the community

In closing, the members of the PHPC would recommend to the Town of Port Hedland, that all the benefits PHPC provides to the Port Hedland community may very well be lost if this development which appears to be catering for mining and not family communities goes ahead. Our families and young members would not have the opportunities to learn and gain the highest ideals of sportsmanship, citizenship and loyalty, which cultivate strength of character and self-discipline something that working with horses provides.

Thank you for your time in listening to the members of PHPC, we hope the best outcome will prevail.

Yours sincerely

Vice President - Philip Murray 0438 722 291, Secretary - Emily Melbourne 0419087570 & Treasure - Camile Mathews 0417 990 446



WESTERN AUSTRALIA

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Tourism WA File: IPD/1521

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Mr M Osborne  
Chief Executive Officer  
Town of Port Hedland  
PO Box 41  
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08/09/2011

Dear ~~Mr Osborne~~ *mal*

### PROPOSED LAND TRANSACTION FOR LOT 300 ON PLAN 53035, PRETTY POOL PORT HEDLAND

I refer to the business plan being advertised by the Town of Port Hedland in accordance with the Local Government Act 1995, to develop Lot 300 Pretty Pool Port Hedland for Transient Workforce Accommodation.

The business plan proposes the development of 348 single room accommodation units, 9 bungalows, 36 caravan sites, 19 tent spaces, 24 backpacker beds and a central facilities building. The site is 5.5ha in size and is well located adjacent to the residential locality of Pretty Pool. It is classified in the local planning scheme for Parks and Recreation, and is reserved for the purposes of a caravan park with a lease term of up to 21 years. A request to amend this purpose to 'caravan park, holiday accommodation and tourism' has been made to the Department of Lands.

Tourism WA identifies caravan parks as being an essential form of tourism accommodation, particularly in geographically dispersed regional areas which rely on self-drive leisure visitors to deliver economic benefits. Despite the importance of caravan parks, over the past decade there have been a significant number of closures due to increasing land values and operating costs, along with competing demand for other land uses such as residential and transient workforce accommodation.

While it is acknowledged that the majority of visits to Port Hedland are for business purposes, the resources sector has placed significant demands on accommodation, both for long stay and short stay purposes. High demand has resulted in traditional short stay accommodation facilities (such as hotels and caravan parks) being fully occupied, and/or charging extremely high rates which makes them an unviable option for leisure visitors.

Notwithstanding, the self-drive market (namely caravanners) rely on the availability of safe places to stop and rest along key drive routes, whether it be for a night or a week. There are a limited number of locations available in Port Hedland which may be suitable for a new caravan park. The subject site is reserved for this purpose and contains the key physical attributes needed for a desirable caravan park, namely size, location and aspect.

In 2011, Tourism WA commissioned the preparation of the report, 'A Strategic Approach to Caravan and Camping Tourism in WA', which identified Port Hedland as a high priority area for additional caravan parks due to high annual occupancy rates and average takings.



As a result of this report, the Caravan and Camping Action Plan 2013-2018 was developed and endorsed by the State Government. Funding has now been received through Royalties for Regions to implement the 11 recommendations of the Action Plan via a number of agencies, including Department of Parks and Wildlife, Main Roads WA, Department of Local Government and Communities, and Department of Planning. I've attached the Action Plan for your information.

Recommendation 2 seeks to deliver up to five new caravan parks in areas of high priority, by facilitating the land assembly processes and providing headworks infrastructure. Tourism WA is the lead agency for this recommendation and is working with a number of stakeholders including local governments and Department of Lands to remove the development barriers on Crown Land sites.

Tourism WA engaged Brighthouse Consultants to undertake an assessment of the Pretty Pool business plan. In summary, Brighthouse notes that the proposal is essentially for the installation of a 357 room transient workers accommodation camp with a minimal number of caravan and camping sites and a small number of backpacker rooms. It is estimated that the site has the capacity to provide up to 200 tourist accommodation units and caravan and camping sites, under an alternative holiday park proposal.

The assessment highlights multiple concerns with the proposed development. In particular, the proposal is not compliant with the Town's Strategic Community Plan 2012-2022, Local Planning Scheme No.5, the Caravan Park and Camping Grounds Regulations 1997, and the draft Non-Residential Workforce Accommodation Strategy, in addition to the purpose of the reserve for a caravan park. Please find attached Brighthouse Consultant's report on the business plan which forms part of this submission.

While Tourism WA strongly objects to the proposal to develop Lot 300 Pretty Pool for transient workforce accommodation, we would welcome the opportunity to work with the Town of Port Hedland on the development of the site for a tourist focused caravan park, including assistance with funding of a prefeasibility study and business case.

I am planning to visit Port Hedland in mid-April to gain further insight into the transient workforce accommodation issue, and I look forward to discussing these matters further with you and your staff at this time.

Yours sincerely



STEPHANIE BUCKLAND  
Chief Executive Officer

26 March 2014

Att: Caravan and Camping Action Plan  
Brighthouse Submission on Business Plan

ICR46767

**Iron Ore**



31 March 2014

Mr Mal Osborne  
Chief Executive Officer  
Town of Port Hedland  
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Dear Mr Osborne

**LEASE AND DEVELOPMENT OF A MIXED USE CARAVAN PARK LOT 300 (RESERVE 29044)  
STYLES AND SHERIDAN ROADS, PRETTY POOL (SUBJECT SITE)**

I refer to the 'Mixed Use Caravan Park' Business Plan that has been advertised by the Town of Port Hedland (Town). BHP Billiton Iron Ore (BHP Billiton) does not support the Business Plan.

The Business Plan provides the following description of the proposed development:

*The proposal involves the development of the site to accommodate 18 tent spaces, 36 caravan sites (with recreation and kitchen amenities), 24-backpacker beds accommodated in 6 rooms all of which dedicated solely to tourism, plus 9 bungalows and 348 single room accommodations.*

The stated purpose of the development being a 'Mixed Use Caravan Park' is misleading. The proponent intends to make accommodation units available for both short term use and operational Fly-In Fly-Out (FIFO) workers. The development is really intended to operate as a Transient Workforce Accommodation (TWA) facility. Even if the Town seeks to impose restrictions to prevent its use by operational FIFO workers, enforcement of those restrictions will at best be problematic. If the proponent intends to develop a TWA facility on the Subject Site, then the Business Plan should expressly state that this is the intended use of the facility.

More importantly, the Town has advertised a proposed Non-Residential Workforce Accommodation Strategy (NRWA Strategy) for public comment. The NRWA Strategy will prevent industry from providing a range of accommodation options to support our workforce who may or may not reside in Port Hedland – including residential dwellings and also facilities like Port Haven that cater for FIFO workers. It is inconsistent and discriminatory for the Town to promote the NRWA Strategy whilst at the same time give consideration to allowing third parties under the guise of a 'Mixed Use Caravan Park' to provide FIFO worker accommodation.

BHP Billiton is not commenting on whether a TWA facility is appropriate for the Subject Site.

Yours sincerely

Mark Donovan  
Head of Corporate Affairs  
BHP Billiton Iron Ore

ICR46741

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**LAVAN** LEGAL  
Leaders in Law

31 March 2014

Mr Mal Osborne  
Chief Executive Officer  
Town of Port Hedland  
PO Box 41  
PORT HEDLAND WA 6721  
**By Email:**  
council@porthedland.wa.gov.au

cc **Minister for Planning**  
**Minister for Local Government**  
**Councillors**  
**Clients**

Dear Sir

**Submission on proposal by the Town of Port Hedland to enter into a major land transaction with Mac Services Group Pty Ltd via a request for a proposal to lease and development a mixed use caravan park on Reserve 29044 and Lot 300 on Deposited Plan 53035, Port Hedland, for a term of 21 years**

- 1 We act on behalf of:
  - 1.1 Dubois Group;
  - 1.2 The Esplanade Hotel,
  - 1.3 The Walkabout Motel,
  - 1.4 The Hospitality Inn; and
  - 1.5 The Ibis Styles,(collectively my **Clients**).

- 2 My Clients have instructed me to make a submission on the advertised proposal by the Town of Port Hedland (**Town**) to enter into a major land transaction with Mac Services Group Pty Ltd (**MAC**) for Part Reserve 29044 and Lot 300 on Deposited Plan 53035 (**Land**), located at the northeast corner of Styles and Sheridan Roads, Pretty Pool (**Proposal**).

## Summary

- 3 My Clients have significant concerns in relation to the Proposal advertised by the Town. In particular, my Clients' concerns with the Proposal can be broadly classified into 4 distinct categories, including:
- 3.1 The lack on detail provided on the actual proposal put forward by MAC.
  - 3.2 The presentation of the proposed 350+ bed Transient Workers Accommodation (TWA) facility as a "mixed use caravan park" (which is not a defined term under the Town's Town Planning Scheme No.5 (LPS5)),
  - 3.3 The current lack of appropriate adopted policy regarding the development of TWA.
  - 3.4 The Town should be deferring consideration of any TWA developments until it has made a decision on the advertised Non- Residential Workforce Accommodation Strategy; and
  - 3.5 The failure of the Town to comply with the Business Plan requirements as set out in the the *Local Government Act 1995 (WA) (LG Act)*;

## Submissions

- 4 My Clients' detailed submissions in relation to the Proposal are as follows:

### TWA use under management order for Reservation 29044

- 5 Reserve 29044 is vested in the Town subject to a management order which permits the Town, subject to complying with the provisions of the LG Act, to grant a lease for up to 21 years for the purpose of "caravan park".
- 6 The Proposal states that an application has been submitted to the State Lands Service to amend this purpose to "Caravan Park, Holiday Accommodation and Tourism".
- 7 However, Mac is proposing a large 350+ bed TWA facility, with only a small number of camping, caravan, and backpacker facilities (to be operated by a separate, but not specified operator).
- 8 The 350+ bed TWA component of the Proposal cannot be described as a "caravan park", "holiday accommodation" or "tourism" use.
- 9 On that basis, the authority for the Town to grant a lease in accordance with the Proposal is unclear.

### TWA use on land reserved "Parks and Recreation" under TPS5

- 10 The Land is reserved "Parks and Recreation" under TPS5.
- 11 Clause 2.2 of TPS5 states:

*"A person shall not carry out any development on..., or change the use of a reservation [under LPS5] without first applying for an obtaining written approval of the Council".*

12 Clause 2.3 of TPS5 states:

*"Where an application for planning approval is made [in accordance with clause 2.2 of LPS5] with respect to land within a reservation, the council shall:*

*a) have regard to the ultimate purpose intended for the reservation..."*

13 The ultimate purpose intended for the reservation should be determined by reference to, among other things, strategic planning documents and the management order which accompanies the vesting of the reserve.

14 In this case, the 350+ bed TWA proposed by MAC is not in accordance with the ultimate purpose for the reservation, and as a result, the discretion available to the Town is constrained with regard to granting a TWA use under LPS5 in that location.

15 In addition, and as raised with the Town in submission to a number of TWA proposals put forward in the last year or so, my Clients have concern that a decision to grant a lease in the circumstances will evidence the apprehension of bias and render the decision open to legal challenge.

16 The test for whether there is a reasonable apprehension of bias is to ask whether a fair minded observer, who is familiar with all the facts and circumstances of a case, would apprehend that there was bias, that is, when there is a reasonable apprehension that the decision maker might not bring an impartial and unprejudiced mind to the resolution of the question involved in it: *Laws v Australian Broadcasting Tribunal* (1990) 10 CLR 70; *Livesey v NSW Bar Association* (1983) 151 CLR 288.

17 The Proposal provides a number of examples through which a legal challenge to the ultimate decisions of the Council, under both the LG Act and the *Planning and Development Act 2005 (PD Act)*, on the basis of a reasonable apprehension of bias, may be made.

18 The Proposal contemplates the entering into of a lease for the purposes of a TWA facility prior to planning approval under TPS 5 being granted.

19 Not only is it likely that future assessment of development approval applications to support the land use will give rise to a reasonable apprehension of bias, it is also likely to amount to the potential fettering the Town's and the Council's discretion to determine applications under TPS5.

#### TWA landuse

20 The land use "transient workforce accommodation" is defined under TPS5 as:

*"Dwellings intended for the temporary accommodation of transient workers and may be designed to allow transition to another use or may be designed as a permanent facility for transient workers and includes a contractors camp and dongas".*



- 21 A "transient worker" is not defined under TPS5 and the only Town documents which attempt to classify a transient worker are the Town's Draft FIFO and TWA Strategy and the Town's Pilbara's Port City Growth Plan, which both provide by implication that transient workers are "operational and construction FIFO workers".
- 22 Operational workers are defined as skilled workers which are required on an ongoing basis whereas construction workers are required for a certain aspect of a project only.
- 23 Additionally, in all circumstances where a TWA land use is proposed, there should always be consideration given to effects on the amenity of the locality, and accordingly, all such applications may only be determined by the Council (and not by delegation).
- 24 As the Proposal has failed to identify what specific business or project the TWA will be catering to (ie, it does not elaborate on the what operational or construction workers it will be accommodating), it is questionable if the landuse proposed will meet basic requirements required for the Town to support a TWA in any event.
- 25 The nature of a TWA is intended to be short term, and temporary. The grant of a lease with a 21 year lifespan, with no reference to a need generated by a particular business or project, is contrary to that objective.

**Failures of the Town to comply with the basic requirements of producing a Business Plan as set out in the the *Local Government Act 1995 (WA)*;**

Failure of the Town to describe the name of all other parties concerned

- 26 The Town has failed to adequately describe all other parties concerned with the Proposal as required under section 3.58 (4)(a) of the LG Act.
- 27 The Proposal does not detail what specific project or business the proposed residents of the TWA will identify with, as required to be considered under the any approval for a TWA use under TPS5.
- 28 The Proposal does not detail who the financiers or end users of the Proposal are.
- 29 The Proposal does not detail who MAC intend to operate the "tourism" component of the Proposal.
- 30 The Business Plan fails to identify which Town officer/ officers prepared the Business Plan.
- 31 As none of this information has been provided, there is no way to ascertain whether the Town, its officers or Councillors have any conflicts of interest with MAC, its contractors, or the businesses who's staff will utilise the TWA, contrary to the requirements of the LG Act.

Failure of the Town to detail the market value of the disposition

- 32 The APC Valuation provides a valuation for Lot 436 on the basis that, among other things, all relevant Local, State and Commonwealth government approvals are in

place, and in particular that the Land could be developed for, among other things, a 350+ room TWA as detailed in the Proposal.

- 33 This assumption is incorrect, as the Land is not approved for a TWA use under TPS5, and the Town does not currently have the power to grant a TWA use on the reserve pursuant to its management order (see paragraphs 5 –14 above).
- 34 Accordingly, as the valuation is premised on an incorrect assumption, there are potential issues that the Town has not met its requirement to properly value the Land pursuant to the requirements of the LG Act.

Failure of the Town to detail an overall assessment of the major land transaction

- 35 Due to all of the failures of the Town in preparing the Business Plan, as detailed above and below, the Town has failed to provide an overall assessment of the major land transaction in accordance with s.3.59(3) of the LG Act.

Failure of the Town to consider the Proposals expected effect on the provision of facilities and services provided by the Town for the extent of the lease term and extensions

- 36 The Town is required to detail its consideration of the Proposal’s expected affect on the provisions of facilities and services provided by the Town for the extent of the lease term and extensions in accordance with s.3.59(3)(a) of the LG Act.
- 37 Clause 3.3 of the Business Plan is deficient in achieving the minimum standards expected by s 3.59(3)(a) as:
- 37.1 The LG Act requires a consideration of both positive and negative effects the Business Plan therefore fails to consider the effect (both positive and negative) of the proposal on the provision of facilities and services provided by the Town for the extent of the lease term and extensions; and
- 37.2 The Town has failed to consider the “development costs” and “financial risks” for the development to the level required by the LG Act, and the effect that these will have on the provision of services by the Town, such as, among other things:
- 37.2.1 the risk of the proponent terminating prior to the completion of the 21 year term;
- 37.2.2 the risk of the development not achieving 80% occupancy for a significant proportion of the lease term;
- 37.2.3 the risk of the development not being completed;
- 37.2.4 the risk of permitting development within areas known to be vulnerable to flooding and storm surges. (for example, the risk that within the 21 year term of the lease, the Land floods, causing damage to the Proponents assets, and consideration of whether the Town will be partly liable for damages if it encouraged and permitting such a development to occur in a known vulnerable area); and

- 46.2 the risk of the development not achieving 80% occupancy for a significant proportion of the lease term;
- 46.3 the risk of the development not being completed;
- 46.4 the risk of permitting development within areas known to be vulnerable to flooding and storm surges. (for example, the risk that within the 21 year term of the lease, the Land floods, causing damage to the Proponents **assets**, and consideration of whether the Town will be partly liable for damages if it encouraged and permitting such a development to occur in a known vulnerable area); and
- 46.5 the risk of a challenge to the Proposal and subsequent planning application (if any), including significant legal costs likely in defending the Town's position to approve,
- 46.6 The financial risk to the Town, by flooding the market with TWA developments in circumstances where there is an oversupply, that legitimate, long term, high quality accommodation providers, who provide **services** not only to transient workers, but also to visitors and tourists, close their doors.

**Failure to consider the Proposals expected affect on matters referred to in the Town's current plan prepared under section 5.56:**

- 47 The Town is required to detail the Proposal's expected affect on the matters referred to in the Strategic Community Plan in accordance with s.3.59(3)(d) of the LG Act.
- 48 While the Town has attempted to identify how, under clause 3.6 of the Business Plan, the Proposal will comply with the Strategic Community Plan for the following 1-4 years. The Town does not identify how the Proposal will comply with the Strategic Community Plan for the following 5-21 years under which the lease may be in operation.
- 49 The Town has failed to consider how the TWA helps to retain a permanent population in the Port Hedland, *"a place that residents are proud to call home and establish themselves as permanent fixtures in the landscape"*, as required under the Environmental strategic theme of the Strategic Community Plan.
- 50 The Town has failed to consider how the TWA encourages families to grow and prosper in the community, as required under the Economic strategic theme of the Strategic Community Plan.
- 51 The Town has failed to consider how the TWA helps to unify and connect the community, as required under the Community strategic theme of the Strategic Community Plan.

**Inability of the Town to manage the undertaking or the performance of the transaction.**

- 52 The Town is required to detail how it has the ability to manage the Proposal over the extent of the lease term and the extensions in accordance with s.3.59(3)(e) of the LG Act.

- 53 The Town has failed to demonstrate how the management of the offer is within the resources and capacity of the Town as alluded to at clause 3.7 of the Business Plan.
- 54 The inadequacies and deficiencies identified in the Business Plan draw into question the Town's ability to manage complex, long term lease arrangements.

**Conclusion**

- 55 In light of the above, we submit that the Town and the Council should either:
- 55.1 refuse the Proposal; or
  - 55.2 defer the proposal in order to carefully consider the issues outlined above, including to:
    - 55.2.1 seek the advice from the Town's solicitors regarding the ability of the Town and/or the Council to approve any further proposals (and subsequent applications) over the Land; and
    - 55.2.2 introduce an urgent moratorium to refrain from determining any further development approvals or lease arrangements incorporating TWA facilities in the district until the Town can competently deal with the issues that inevitably arise.
- 56 Please note that copies of this correspondence have been provided to the Minister for Planning, Minister for Local Government and all Councillors in order to make them aware of the issues.
- 57 In the event that the Council does not promptly attend to our requests, or seek to take further action with respect to this or any TWA development before due consideration of the issues have been made, we have been instructed to immediately seek ministerial intervention.
- 58 My clients reserve all of their rights with respect to future legal challenges to your decisions in accordance with the relevant legislation, on, among other things, the grounds set out above.
- 59 If you have any questions relating to the above request, please contact Brendan Foley or me.

Yours sincerely



Craig Wallace  
Partner – Planning and Environment



ICR46766



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Mr Mal Osborne  
Chief Executive Officer  
Town of Port Hedland  
PO Box 41  
PORT HEDLAND WA 6721

Dear Mal

## **BUSINESS PLAN FOR MAJOR LAND TRANSACTION – MAC SERVICES GROUP PTY LTD**

I refer to the business plan being advertised by the Town of Port Hedland in accordance with the Local Government Act 1995, and note that the proposed transaction involves the lease and development of reserve 29044, lot 300, Port Hedland, for a term of 21 years.

The Pilbara Development Commission (Commission) appreciates the Town of Port Hedland's (ToPH) intentions for the site, however cannot support the major land transaction for the following reasons:

1. The reservation of the reserve is for a caravan park, and the proposed development is not a caravan park;
2. The development is inconsistent with the Pilbara Port Cities Growth Plan, which denotes the area for Residential purposes at either a low or medium density. It's recommended that the site be developed as part of the overall Eastend development;
3. Whether developed as Short Stay Accommodation or Transient Workforce Accommodation, anecdotal evidence suggests that these uses are already over catered for under a demand/supply analysis, considering existing approvals and endorsed business cases. It's recommended that the ToPH update their demand supply analysis; and
4. Any Short Stay Accommodation or Transient Workforce Accommodation approval on the site will likely compromise the ability of other already approved projects to proceed. i.e. South Hedland Hotel and Finbar developments.

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regional growth and development*

Should you require further contact with the Commission in this matter this should be directed to Mr Richard Bairstow, Coordinator Land Development, on 9338 3507 or via email at [Richard.Bairstow@pdc.wa.gov.au](mailto:Richard.Bairstow@pdc.wa.gov.au)

Yours sincerely

A handwritten signature in black ink that reads "Ken King". The signature is written in a cursive style and is underlined with a single horizontal stroke.

**Dr Ken King**  
**Chief Executive Officer**

6 April 2014