

9 REPORTS OF OFFICERS

9.1 EXECUTIVE MANAGER OPERATIONS

9.1.1 SHIRE SUBMISSION TO DRAFT BUNBURY-GEOGRAPHE SUB-REGIONAL STRATEGY

Location	Shire of Donnybrook Balingup
Applicant	Shire of Donnybrook Balingup
File Reference	TRS 09
Author	Kira Strange, Principal Planner Steve Potter, Executive Manager Operations
Responsible Manager	Steve Potter, Executive Manager Operations
Attachments	9.1.1 (1) - Schedule of Shire Comments
Voting Requirements	Simple Majority

Recommendation
<p>That Council:</p> <ol style="list-style-type: none"> 1. Acknowledges the draft Bunbury–Geographe Sub-regional Strategy as advertised by the Western Australian Planning Commission; and 2. Endorses Attachment 9.1.1 (1) (Schedule of Comments) as representing the formal views of the Shire of Donnybrook Balingup in response to the draft document and instructs the Chief Executive Officer to forward the Shire’s comments to the Department of Planning, Lands and Heritage; and 3. Authorises the Chief Executive Officer to liaise further with the Department of Planning, Lands and Heritage to advocate on behalf of the Shire consistent with the views contained in Attachment 9.1.1 (1).

STRATEGIC ALIGNMENT

The following outcomes from the Corporate Business Plan relate to this proposal:

Objective	1.0	A strong, diverse and resilient economy
Outcome	1.2	Available land for residential, industrial and commercial development
Strategy	1.2.1	Support and promote appropriate development of land within the district

EXECUTIVE SUMMARY

In November 2020, the Department of Planning, Lands and Heritage (DPLH) released the draft Bunbury-Geographe Sub-Regional Strategy (BGSRS) for public comment. The draft BGSRS sets broad, high level planning objectives for the future growth of the Bunbury-Geographe (BG) sub-region over a planning horizon of 10-15 years.

The Shire of Donnybrook Balingup is contained within the BG sub-region, and therefore it is important for Council to consider the objectives of the document and how they may impact the future growth of the Shire. Specifically, any future review of the Shire's Local Planning Strategy (Strategy) and Local Planning Scheme (Scheme) will need to give due regard to the BGSRS (once adopted) and therefore the current advertising period represents an opportunity for the Shire to provide feedback on pertinent matters that will facilitate the future growth of the Shire.

The document has been thoroughly reviewed by the Shire's Planning staff and several key components have been identified for Council's consideration. This has culminated in the creation of a Schedule of Comments (Attachment 9.1.1 (1)) and Council is requested to endorse the attachment for formal submission to the Department of Planning, Lands and Heritage (DPLH).

BACKGROUND

The BGSRS document incorporates all land contained within the City of Bunbury and the Shires of Harvey, Dardanup, Capel, Donnybrook-Balingup and Collie.

The draft BGSRS was prepared by the WAPC/DPLH over a period of 12-18 months and involved extensive consultation led by a Steering Group which was informed by a number of technical Working Groups covering the aspects of urban settlement, economy, environment, transport and utilities/services. The Shire was represented by Cr. Wringe on the Steering Group with appropriate staff sitting on each of the Working Groups.

At the conclusion of the consultation period, the WAPC issued instructions to the DPLH to prepare a draft document in line with the following instructions:

- 1. Adopt a planning horizon of 2050.*
- 2. Incorporate the draft vision, purpose and principles developed by the Steering Group, subject to editing as required.*
- 3. Promote Bunbury as Western Australia's Second City. In this context, Bunbury is to be understood as a single settlement that includes contiguous urban areas in the Shires of Capel, Dardanup and Harvey.*
- 4. Adopt a target population of 200,000. This is to be the population figure that State agencies/authorities can use as a reference point when considering the delivery of infrastructure and services. Specific land use strategic directions should be based on this target population.*

5. *Adopt an aspirational population of 300,000. This is to be woven throughout the document as a broad statement of confidence and intent. Specific land-use strategic directions should not be based on this population figure.*
6. *Designate East Treendale as an ‘urban expansion area’. East Treendale is defined as the land that is bound by Forrest Highway, Raymond Road and the alignment of the Bunbury Outer Ring Road.*
7. *Promote consolidation of the existing urban areas of Bunbury.*
8. *Identify new special residential and/or rural living areas contiguous or proximate to hinterland towns.*
9. *Apply relevant policy measures from the Western Australian Planning Commission’s State Planning Framework.*

The draft document was finalised and released for comment in late 2020 and consists of three main components:

1. Introduction: includes scope, context and analysis.
2. Part A: Strategy: includes vision, principles, strategic directions, further work, settlement hierarchy, urban expansion (East Treendale), Strategy Map, implementation, monitoring and review.
3. Part B: Profile: includes people/culture, population, urban settlement, environment, economy, transport and utilities/services.

BGSRS Vision

The draft BGSRS sets an aspirational vision for the sub-region as follows:

“In 2050 Bunbury-Geographe is a diverse, dynamic, creative, vibrant and connected region, that is recognised for its quality of life, environmental values and sustainability. The sub-region has a robust and diverse economy that is adaptive and offers enviable liveability.”

To achieve this vision, Part A of the BGSRS sets out seven overarching ‘themes’ as follows:

1. Intervention;
2. Urban Settlement;
3. Economy;
4. Environment;
5. Transport;
6. Utilities and Services; and
7. Lifestyle.

These overarching themes are divided into 11 ‘strategic principles’ and refined further into 56 individual ‘strategic directions’ (SDs), representing specific actions required to achieve the vision. Whilst the ‘Introduction’ and ‘Part B’ sections provide a range of supporting information, it is essentially *Part A: Strategy* and in particular the 56 SDs that will guide future planning in the sub-region and therefore will be the focus of staff’s response.

In considering the review of the draft BGSRS, it is noted that in October 2020 the Western Australian Planning Commission (WAPC) formally determined that a review of the Shire of Donnybrook-Balingup Local Planning Strategy and subsequent preparation of a new Local Planning Scheme is required. It is therefore important to consider the strategic direction of the BGSRS and any associated implications for the Shire in this light.

Land Supply

The BGSRS has been prepared concurrently and been directly informed by the *Bunbury/Geographe Land Supply Assessment (RLSA)*. This assessment was produced by the DPLH to assess land availability in the sub-region for future residential, industrial and commercial uses.

In this respect, the BGSRS focuses on the larger townships in the sub-region (rather than entire LGAs) which includes the township of Donnybrook. Based on the 2016 Census, Donnybrook township had 1094 dwellings with relevant identified or zoned land under the Shire’s endorsed Scheme / Strategy catering for a further 1640 dwellings. If the average household size of 2.5 occupants is adopted, this equates to an additional 4,100 residents. Based on historical growth rates, it would take decades to utilise all identified land, however, there are a number of challenges in this regard which are addressed in this report and will be further considered in detail as part of the Shire’s future Strategy / Scheme review.

Settlement Hierarchy

Section 8 of Part A (Settlement Hierarchy) categorises settlements within the BG Region into a hierarchy based on their population, location and function. The following table taken from the BGSRS (p. 21) demonstrates where the Shire’s settlements fit into the regional context in this regard:

Settlement type	Settlement
Regional City	Bunbury
Sub-regional Centre	Collie
Major Towns	Capel, Donnybrook , Harvey
Towns	Balingup , Boyanup, Brunswick Junction, Dardanup
Villages	Allanson, Binningup, Burekup, Cookernup, Kirup , Mullalyup , Myalup, Peppermint Grove Beach, Roelands, Wokalup, Yarloop

It is noted that the above table does not include Yabberup, which officers consider should be included as a 'Village'. This is addressed further in the report.

FINANCIAL IMPLICATIONS

The BGSRS will inform the future review of the Shire's Strategy and Scheme which represents a significant project that will require adequate resourcing.

LOCAL POLICY COMPLIANCE

Not applicable.

STATUTORY COMPLIANCE

State Planning Policy 1 State Planning Framework (SPP1) establishes that sub-regional strategies guide change and are a basis for cooperative action to be taken by State and local government on land use and development.

CONSULTATION

The draft BGSRS was advertised for public comment from 9 November 2020 with submissions due 12 February 2021. However, due to the nature of monthly Council Meetings, the DPLH granted an extension for local governments to make submissions up to 12 March 2021.

OFFICER COMMENT/CONCLUSION

In providing Shire comment to the draft BGSRS, it is important to note that it is a high level planning instrument that seeks to provide a strategic overview for the entire BG sub-region. It is largely an informing document that provides strategic guidance for more granular level planning such as local planning schemes and strategies and as a result, does not contain the level of detail that would normally be found in these other documents. In light of this, it is recommended that any responses the Shire provides should also be made at a suitably high level, rather than focusing on localised issues that are more appropriate to be addressed through the review of the Strategy / Scheme in the future.

The approach that staff have undertaken in collating a series of succinct responses to the document is to identify the main planning issues / constraints based on local knowledge and professional experience that affect the Shire and review the strategic directions (SDs) contained in Part A of the document through this lens.

In addition to the above, Part B has also been reviewed, with particular emphasis on accuracy of information and ensuring there have been no errors or omissions.

All suggested comments have been compiled into a single document (Attachment 9.1.2 (1)), Schedule of Comments) which is proposed to form the basis of the Shire's formal response as per Point 2 of the Resolution.

Part A: Strategy

In undertaking this exercise, the following have been identified as being the most pertinent local issues:

1. Provision of critical infrastructure to facilitate urban expansion
2. Ensuring available land product meets market demand (including rural residential and low density residential)
3. Provision of suitable 'economic land' to generate local employment and economic diversification.
4. Ageing population
5. Bushfire planning requirements
6. Development adjacent to Main Roads WA controlled roads
7. Uncertainty surrounding the disused Greenbushes – Picton rail line
8. Impact of industrial buffers (Donnybrook stone quarries) on surrounding land
9. Heritage considerations

Each of these will be addressed individually in the following manner:

1. Issue to be briefly explained;
2. Identification of relevant 'strategic directions' (SDs) in Part A of BGSRS; and
3. Officer comment and proposed Shire response(s).

It is important to note that planning is often complex and in addressing the identified issues, there are many inter-relationships and crossovers between them.

Issue 1: Provision of critical infrastructure to facilitate urban expansion.

Issue:

Lack of critical infrastructure, particularly in the form of reticulated sewer in the Shire's main townsites of Donnybrook and Balingup limits the development of appropriately zoned land to achieve its full potential.

The comparatively low value of land, coupled with the high costs of infrastructure provision results in a situation in which it is often financially unviable from a developer perspective to pre-fund the necessary infrastructure and this has implications for the growth of residential, commercial and industrial development. The limited reticulated sewer also eliminates the opportunity for further low-scale residential infill, particularly in the Donnybrook townsite.

The BGSRS document recognises this challenge and states:

"The feasibility of urban land development has been inhibited by low demand and high costs, relative to land values, of providing utility services and fill, especially in hinterland towns."

BGSRS: Strategic Directions

Strategic Directions	
Number	Direction
8	Support the growth of Major Towns and Towns to reinforce their ongoing role in the settlement network.
15	Encourage local governments to prepare townsite strategies for hinterland towns to review supply of residential, industrial and commercial land and to identify and respond to opportunities and constraints.
45	Direct future urban growth to locations that are well serviced by existing infrastructure networks.
46	Support the provision of sufficient utility, transport, health, education and community infrastructure / services to cater for a growing population and economy across the sub-region.
47	Support the provision of catalyst infrastructure to stimulate economic investment and service the needs of Bunbury Geographe communities.
52	Collaborate with infrastructure providers to audit current capacity of electricity, water and sewer infrastructure to help quantify existing growth capacity and thresholds for upgrades.

Officer Comment and Proposed Shire response:

It is considered that there are a combination of approaches that could be adopted to support the growth of the hinterland towns where infrastructure provision by the private sector is deemed unviable and the following comments are proposed:

1. Include an additional ‘Strategic Direction’ as follows:

Theme: Urban Settlement

Principle: Promote a diverse urban form to cater for a range of lifestyle options and affordable housing choices

Proposed New Strategic Direction:

Support low-density residential development permitting on-site sewer provision on the peripheries of Collie, Major Towns, Towns and Villages where it is financially unviable to extend and/or install reticulated sewer.

2. Include an additional 'Strategic Direction' as follows:

Theme: Utilities and Services

Principle: Ensure sustainable regional outcomes by coordinating the provision of infrastructure to support growth.

Proposed New Strategic Direction:

State Government to provide increased support to the growth of hinterland towns by:

- a. reinvesting in the Infill Sewerage Program to expand existing sewer networks,*
- b. establishing and implementing a cost sharing arrangement with the private sector for pre-funding critical infrastructure to support residential, commercial and industrial growth in hinterland towns.*

Issue 2: Ensuring available land product meets market demand (including rural residential and low density residential)

Issue:

Many people choose to live in hinterland towns for lifestyle and there needs to be a range of choice available to potential residents, catering for a variety of financial circumstances and changing life-stages. This needs to include first homebuyers, 'tree-changers', those looking to upgrade (second or third homebuyers) and those looking to downsize, including the ageing population.

Under the current planning framework, the WAPC is generally supportive of standard residential type development in accordance with State policies, particularly Liveable Neighbourhoods and the Residential Design Codes (R-Codes).

However, it is considered that a significant proportion of potential residents are seeking a country lifestyle that does not involve being on a standard residential sized property within a townsite. Further consideration therefore needs to be given to support the creation of low-density residential and rural residential land product that many potential residents seek in moving to a country town to provide them and their families with the lifestyle they desire.

Whilst it is acknowledged that it is important to retain and protect priority agricultural land, there is rural land in proximity to townsites that has limited productive capability due to a range of

factors including soil type and steep terrain. Officers consider such land should be able to be utilised for alternative purposes, including low density residential and rural residential, subject to any proposals complying with appropriate criteria.

In terms of the Shire, there are existing low-density residential and rural residential developments in proximity to each of the Shire’s main towns which are largely complete. However, there is a limited amount of identified land for further low-density / rural residential type developments into the future.

In recent years, the WAPC has generally opposed new rural residential type development for a range of reasons including:

- it is considered to be an inefficient use of land;
- it results in the fragmentation of viable agricultural land, resulting in smaller unproductive lots; and/or
- it has the potential to create land use conflicts between agricultural and residential users.

BGSRS: Strategic Directions

Strategic Direction	
Number	Direction
14	Support the identification of new Rural Living areas contiguous or proximate to Collie, Major Towns, and Towns, subject to the criteria contained in <i>State Planning Policy 2.5: Rural Planning</i> . New Rural Living areas are to be identified by local governments in local planning strategies and/or townsite strategies.
18	Encourage proponents of urban land developments to investigate alternative models of utility service delivery that provide a standard of service appropriate for the intended use, and that are capable of regulation by the Economic Regulatory Authority.
27	Protect priority agricultural land from incompatible land uses.
53	Embrace the Bunbury-Geographe lifestyle as a key attraction for new residents and visitors to the sub-region.
54	Recognise and value the sub-region’s unique and connected communities.

Officer Comment and Proposed Shire response:

Shire staff acknowledge that SD14 above appears to support the creation of rural living areas for hinterland towns, however staff have some concerns with regards as to how this will be implemented.

Furthermore, it is considered that SD14 should be extended to include ‘Villages’ – in the Shire context, this would include Kirup, Mullalyup and Yabberup. Many of these smaller settlements have minimal opportunity for growth and the creation of appropriate low density and rural residential type areas in these locations, will support the growth of these smaller settlements.

In terms of a response to the BGSRS, the following comments are suggested:

1. The Shire is supportive of SD14, which acknowledges the importance of Rural Living options for the growth of hinterland towns. The Shire holds concerns with regard to the implementation of this strategic direction and considers a sub-regional policy will need to be established to provide sufficient guidance.
2. SD14 should be amended to include ‘Villages’, in addition to Collie, Major Towns and Towns.
3. With regard to SD18, the Shire supports the use of appropriate innovative approaches to utility provision including solar energy generation and use of ATUs for wastewater disposal. It is recommended that the BGSRS provide LGAs with discretion to support developments and individual landowners to implement technological solutions to utility service delivery to be supported through local planning schemes. This will support the implementation of any technological advances that may be introduced during the life of the document.
4. With regards to SD53, the Shire considers that providing an alternative land product (low density residential / rural residential) is a key component to attracting new residents to hinterland towns.

Issue 3: Provision of suitable ‘economic land’

Issue:

The availability of suitable ‘economic land’ to create local business opportunities and employment is critical to the long-term health of the Shire. Much of the Shire’s population travels outside of the Shire to undertake employment and the provision of increased local opportunities has the potential to encourage local investment and appeal to working aged people / families to re-locate to the Shire.

The BGSRS (Cl. 3.3.2, p. 12) identifies the complex task of planning to generate employment and states:

“Planning for employment land is a complex process that takes place within a highly dynamic market. Economic conditions and population growth interact to drive demand for industrial and commercial growth.”

BGSRS: Strategic Directions

Strategic Directions	
Number	Direction
3	Provide for the growth of the sub-region’s population to 200,000 by identifying sufficient residential and employment land to cater for this target population.
8	Support the growth of Major Towns and Towns to reinforce their ongoing roles in the settlement network.
15	Encourage local governments to prepare townsite strategies for hinterland towns to review supply of residential, industrial and commercial land and to identify and respond to opportunities and constraints.
21	Ensure an adequate supply of industrial and commercial land across the sub-region to facilitate local employment.
24	Facilitate the expansion and diversification of the tourism industry.
26	Retain identified light and general industrial areas for industrial use and protect from the encroachment of sensitive land uses.
42	Promote the sub-region’s tourist routes in planning instruments.
46	Support the provision of sufficient utility, transport, health, education and community infrastructure / services to cater for a growing population and economy across the sub-region.

Officer Comment and Proposed Shire response:

Officers consider the Shire has a range of strategic benefits that would support its growth from a commercial / industrial perspective. In particular, Donnybrook is located at the junction of two significant vehicle routes (SW Highway and Donnybrook – Kojonup Rd) which encounters a

high level of use from a range of industries including agriculture, forestry and mining. As such, there is an opportunity for the Shire of Donnybrook Balingup to become a hub for some of these operators, subject to suitable land being available. An example of where this has recently occurred within our Shire is the expansion of the fruit packing facility in Kirup, which has seen significant investment to increase its capacity.

In considering the type of land required, it is considered that the Shire needs to cater for a range of potential users, including ‘start-ups’, commercial users that require minimal space (retail), service commercial, light industrial and general industrial. Consideration needs to be given to identifying and providing opportunities for businesses to grow and re-locate locally if necessary, rather than being inhibited from expansion due to the unavailability of suitable land or alternatively, requiring them to re-locate to a more suitable location outside of the Shire.

The Shire’s Strategy and Scheme identify land for future commercial and industrial growth (light and general industry), however it is considered that much of the identified land is highly constrained which makes it difficult and/or unviable to develop. For example, the Shire’s Strategy identifies a significant area of land in the vicinity of Sandhills Road for industrial expansion, however the land is owned by the Crown, is almost entirely covered with native vegetation and has undulating topography which makes development both difficult and expensive.

In addition to the above, the infrastructure constraints as per Issue 1 also apply with the development of commercial / industrial land and therefore officers are recommending similar responses in this regard.

Finally, officers consider it important that a flexible approach be undertaken to facilitate appropriate commercial use of ‘non-commercial’ zoned land. By way of some examples, home based businesses have increased exponentially in recent years with the growth of the internet and rural property owners are often seeking to diversify through introducing tourist type uses such as chalets to support their agricultural pursuits. Land use permissibility is largely facilitated through the local planning scheme and will be addressed at the appropriate time.

Through the Shire’s review of its Strategy / Scheme, significant thought will need to be given as to how opportunity can be provided to support local business and encourage additional investment. In reviewing the BGSRS, the following comments are recommended:

1. The Shire acknowledges that SD3 recognises that provision of suitable economic land is required to support the sub-region’s growth.
2. The Shire welcomes that SD21 recognises the importance of providing adequate industrial and commercial land across the sub-region, including hinterland towns, to provide for local employment.
3. Include an additional ‘Strategic Direction’ as follows:

Theme: Economy

Principle: Strengthen and diversify our economy

Proposed New Strategic Direction:

Support commercial / light industrial developments in or proximate to hinterland towns proposing on-site sewer where it is financially unviable to extend and/or install reticulated sewer.

4. With regards to SD24 and SD42, the Shire is supportive of the expansion and diversification of the tourism industry and considers that rural based tourism is a key component in this regard. Flexibility will need to be demonstrated to facilitate a range of tourism based land uses in local planning schemes.

Issue 4: Ageing population

Issue:

The Shire has a median age of 47 years which is 10 years above the State average. This is identified in the BGSRS which states:

“The Shire has a relatively elderly population with a median population at the 2016 Census of 47 years, the highest of the six local governments in the sub-region. 46.3 per cent of the Shire’s population is aged 50 years and above, compared with 32 per cent for the State. Below 50 years the only age cohort above the State average is 10-14 years.”

BGSRS: Strategic Directions

Strategic Direction	
Number	Direction
46	Support the provision of sufficient utility, transport, health, education and community infrastructure / services to cater for a growing population and economy across the sub-region.
53	Embrace the Bunbury-Geographe lifestyle as a key attraction for new residents and visitors to the sub-region.
54	Recognise and value the sub-region’s unique and connected communities.

Officer Comment and Proposed Shire response:

The Shire would ideally like to attract younger individuals and families and it is considered that this is inextricably linked to a range of factors including access to appropriate and affordable housing; local employment; and services such as recreation, health and education.

Whilst the BGSRS operates at a sub-regional level, this issue is largely a local one that will need to be addressed when reviewing the Scheme / Strategy. To achieve this, the Shire will need to determine what it needs to do to attract younger people and families, possibly informed through undertaking market research.

It needs to be noted that at one level, all LGAs are in competition to attract new residents and therefore the SoDB will need to identify its comparative advantages as well as any gaps in its offering that may prevent younger people from choosing to live in the Shire.

Whilst not exhaustive, it is considered the following may be contributing factors:

- Lack of appropriate land for first home buyers (sub \$150k);
- Lack of rental properties;
- Proximity to employment opportunities;
- No senior high school (DHS only);
- Lack of other young families; and/or
- Perception of the Shire as being for more 'mature' people.

In light of the above, officers recommend the following in terms of responses:

1. The Shire is supportive of SD46 which identifies the importance of providing essential community infrastructure / services to cater for a growing population across the sub-region.
2. The Shire considers that there is a need in the short-medium term to expand Donnybrook District High School into a Senior High School to cater for the Shire's growing population. Donnybrook is a Major Town and the provision of a Senior High School will enable local children to be educated locally and encourage further young families to move to the district. To this effect, the following additional 'Strategic Direction' is recommended:

Theme: Utilities and Services

Principle: Ensure sustainable regional outcomes by coordinating the provision of infrastructure to support growth.

Proposed New Strategic Direction:

Department of Education and Training to establish clear 'triggers' for the expansion of Donnybrook DHS to Senior High School status.

3. Include an additional 'Strategic Direction' as follows:

Theme: Lifestyle

Principle: Retain, protect and leverage our regional character and the Bunbury-Geographe lifestyle.

Proposed New Strategic Direction:

Acknowledges that strong representation of people across all ages is critical for the health of local communities and supports appropriate measures to rectify imbalances.

Issue 5: Bushfire Planning

Issue:

In 2015 State Planning Policy (SPP 3.7 – *Planning in Bushfire Prone Areas*) and associated Guidelines came into effect which has had a profound impact on development in rural LGAs, particularly those which contain a significant amount of native vegetation (including the SoDB).

BGSRS: Strategic Directions

Strategic Direction	
Number	Direction
37	Support intensification of land use only where bushfire risk can be understood to be low and/or capable of being appropriately mitigated.

Officer Comment and Proposed Shire response:

The planning framework as it relates to bushfire has resulted in at least one Scheme amendment for rural residential development proposal in the SoDB being refused by the WAPC due to it not addressing bushfire planning requirements. The Shire will need to carefully consider the implications of managing bushfire risk in the preparation of its revised Strategy / Scheme.

Further, it is noted that the bushfire planning requirements have resulted in a significant increase in workload for the Shire's Planning and Building Services staff, who are required to assess and implement the additional requirements. There has been limited resourcing and/or support from a State level in this regard which means that both the additional workload and risk associated with assessing and approving relevant bushfire management plans etc. falls onto the local government.

Bushfire planning requirements have added a level of complexity to the planning process and represent an additional regulatory hurdle for landowners / developers to overcome. However, the recent events in the Perth Hills demonstrate the importance of integrating bushfire mitigation with the planning process and whilst there are issues associated with bushfire planning as outlined above, officers are generally supportive of the intent of SD37 and this is reflected in the comment provided. However, it is considered that more can be done to support local government staff and achieve a consistent approach across the sub-region which is needed to provide certainty to developers, landowners and relevant agency staff. As such, the following comment is proposed:

- The Shire is supportive of the established planning framework as it relates to bushfire management however considers that an increased level of support is needed for local governments in administering the requirements. To this effect, the following additional ‘Strategic Direction’ is recommended:

Theme: Environment

Principle: Protect people and property from natural hazards

Proposed New Strategic Direction:

Supports the development of a regional approach to bushfire policy to find an appropriate and safe balance that provides a level of consistency across the sub-region whilst facilitating continued development and economic growth.

Issue 6: Development adjacent to Main Roads WA controlled roads

Issue:

The Shire contains a significant number of properties adjacent to roads managed and administered by Main Roads WA (MRWA). Many of these are also on the Shire’s main tourist routes including the SW Highway and Donnybrook-Kojonup Road.

It is commonplace for the Shire to receive development proposals from the owners of such landholdings, which due to the access / egress onto a MRWA managed road is referred to that agency for comment, prior to determination. As a result of this referral process, it is not unusual for proposals to be recommended for refusal by MRWA, or alternatively conditions are recommended requiring significant works be undertaken by the applicant to construct slip lanes and the like which often make the proposal unviable.

BGSRS: Strategic Directions

Strategic Direction	
Number	Direction
24	Facilitate the expansion and diversification of the tourism industry.
38	Support initiatives to connect and link Bunbury to the hinterland towns to create an integrated network, including public transport and regional bike network.
42	Promote the sub-region’s tourist routes in planning instruments

Officer Comment and Proposed Shire response:

Whilst officers appreciate that the intent of MRWA's stance is to ensure the safety of road users, many proposals on adjacent land are of a minor nature that do not warrant the proposal being refused and/or the extent of works required.

As per the SDs contained in the above table, if the intent is to provide opportunities for economic diversification and the growth of the tourism industry in rural localities, it needs to follow that such uses are supported without having significant imposts, particularly when proposed uses are ancillary in nature.

In light of the above, it is recommended the following comments be provided:

1. With regard to SD24 and SD42, the Shire considers that the growth of the local tourism industry and the ability for rural landowners to diversify through low-level tourism initiatives is being curtailed by the requirements of MRWA. To this effect the following additional 'Strategic Direction' is recommended:

Theme: Economy

Principle: Strengthen and diversify our economy

Proposed New Strategic Direction:

Support low impact uses on land adjacent to MRWA controlled roads without the need for prior referral to MRWA, to be addressed in local planning schemes.

Issue 7: Uncertainty surrounding the disused Greenbushes – Picton rail line

Issue:

The currently defunct Greenbushes to Picton rail line runs through the Shire of Donnybrook Balingup's main towns including Donnybrook, Kirup, Mullalyup and Balingup. Despite the fact that it has not operated for over 20 years, the railway line's existence (and uncertainty about its future), results in it acting as a constraint to the efficient planning of the Shire's town centres.

The railway acts as a significant divider in many cases and any proposals are subject to approval by the leaseholder of the railway reserves (Arc Infrastructure). If approvals are granted to undertake certain activities, they are usually subject to conditions that any structures are removable should the railway open again in the future, which has implications for design and choice of materials. It also has the capacity to result in significant future costs if installations are later required to be removed and the rail reinstated.

The BGSRS notes that the Department of Transport's draft *South West Supply Chain Strategy (2020)* identifies the Greenbushes to Picton rail line as a potential supply chain to support the Talison Lithium Mine.

BGSRS: Strategic Directions

Strategic Direction	
Number	Direction
41	Support increasing the capacity of the existing freight rail network and future strategic rail network.

Officer Comment and Proposed Shire response:

Without indicating its support for one option or the other (re-opening versus not re-opening the railway) the SoDB Council passed a motion in 2019 urging the State Government to make a firm decision on the future of the railway in a timely manner due to the impacts of indecision on the Shire. It is understood further work is occurring within State Government in this regard, however officers are unaware of any progress.

Consistent with Council’s previous position on the matter, staff suggest the following comment:

1. The Shire considers a firm decision needs to be made on the future of the Greenbushes to Picton rail line in the short term, to enable affected local governments to suitably plan for the future of their townsites.

Issue 8: Impact of industrial buffers (Donnybrook stone quarries) on surrounding land

Issue:

The Shire’s Scheme identifies Special Control Area 4 (SCA4) related to established Donnybrook Stone quarries. The purpose of SCA4 as provided in the Scheme is as follows:

“The purpose of the Established Donnybrook Stone Special Control Area is to ensure that land use and development within the Special Control Area is compatible with the protection and long-term management of established Donnybrook Stone.”

In effect, this seeks to protect the resource from being restricted by limiting ‘sensitive land uses’ within the identified buffer areas. This includes the construction of residential dwellings and has implications for the potential identification of any future rural residential type development in the affected areas.

BGSRS: Strategic Directions

Strategic Direction	
Number	Direction
26	Retain identified light and general industrial areas for industrial use and protect from the encroachment of sensitive land uses.

Officer Comment and Proposed Shire response:

Officers are aware that the existence of SCA4 has been a point of discussion for a number of years and there have been several approaches to the Shire to have this aspect of the Scheme reviewed.

This issue is considered a local one that will need to be reviewed in consultation with the DPLH and Department of Mines, Industry Regulation and Safety (DMIRS) at the appropriate time.

The intent of SD26 is to protect appropriately industrial zoned land from sensitive uses that can result in significant land use conflict. This is a significant issue for some of the neighbouring local governments, however the SoDB is generally well positioned from this perspective. As a result, the recommended response is that the Shire is supportive of the general principle. Such a response does not preclude the Shire from exploring options around SCA4 as part of the local Scheme / Strategy review.

Issue 9: Heritage considerations

Issue:

Local governments within the sub-region are home to a high number and variety of heritage places that make a significant contribution to a sense of place and the local community. They also act as an attractor for visitors and tourists. As such, it is important that they are offered a level of protection under the planning framework and this is provided for through the *Planning and Development (Local Planning Schemes) Regulations 2015*.

BGSRS: Strategic Directions

Strategic Direction	
Number	Direction
52	Collaborate with local governments to undertake/review local heritage surveys, and designate heritage lists and/or areas.

Officer Comment and Proposed Shire response:

The main issue involving protection of heritage places is the significant reduced level of support provided to local governments in this regard. Whereas in recent years, the State Government funded heritage advisors and provided assistance to support local governments, this has largely disappeared, leaving local governments to shoulder the burden in this regard.

As such, the following response is recommended:

1. With regard to SD52, the Shire recommends this be re-worded as follows:

Support local governments to undertake/review local heritage surveys, and designate heritage lists and/or areas by providing financial and professional assistance.

Additional Comment – Part A

Section 11 of Part A (Implementation) outlines how the ‘vision’ for Bunbury-Geographe will be achieved. In summary, it suggests that the principles and strategic directions in the BGSRS will be implemented by the WAPC in performing its functions under the *Planning and Development Act 2005* including:

- Administering the Greater Bunbury Region Scheme (not relevant to SoDB);
- Ensuring local planning strategies and schemes are consistent with the BGSRS, and advising the Minister on such instruments;
- Monitoring and forecasting land supply for the timely supply of affordable residential land;
- Making statutory decisions on a range of planning application types, such as structure plans and subdivisions.

Staff consider the above are general in nature and possibly fail to take into account the complexities of the range of strategic directions that are contained within the BGSRS from an implementation perspective. As a result, it is considered likely that many of the SDs may be difficult to achieve given existing constraints.

Section 7 of Part A (Further work) outlines additional work required to support the BGSRS and staff consider this should include a detailed Implementation Plan that identifies policy or other potential barriers that exist and determines what interventions or policy changes may be required from a State government perspective to achieve the outcomes identified. A suggested comment to this effect is included in Attachment 9.1.1 (1).

Part B: Profile

Part B of the BGSRS provides a summary profile and maps for each Shire within the strategy area. The profile is broken into seven key sections:

1. Section 13 – People and Culture;
2. Section 14 – Population;
3. Section 15 – Urban Settlement;
4. Section 16 – Environment;
5. Section 17 – Economy;
6. Section 18 – Transport; and
7. Section 19 – Utilities and Services.

Staff have reviewed Part B of the document and make the following comments which are reflected in Attachment A.

General Comments

- Part B could be more succinct and avoid repeating information contained elsewhere in the document by focusing on key facts and statistics (rather than commentary) and make greater use of visual aids such as graphs, charts etc.
- The Shire of Donnybrook-Balingup contains the following river catchments:
 - Preston Valley
 - Capel River (Busselton Coast)
 - Blackwood River (Lower and Middle)
- There is no mention of the Bibbulmun Track which traverses through Balingup and Collie and is considered a key tourist attraction to the sub-region.
- Yabberup should be identified within this document as a ‘Village’ with statistical details included below.

Section 13 – People and Culture

- The number of State Heritage Places within the Shire is 12, not 11 (clause 13.5 Historic Heritage).

Section 14 – Population

- Staff are not supportive of the use of the term ‘relatively elderly population’ in relation to the SoDB and consider an alternative wording or preferably, use of a graph display be used (Clause 14.6: Shire of Donnybrook-Balingup).

Section 15 – Urban Settlement

- Balingup is located in the Blackwood River precinct, not the Preston River precinct (clause 15.10 Balingup).
- Kirup is located in the Capel River precinct (clause 15.15 Kirup).
- Mullalyup is located in the Blackwood River precinct (clause 15.16 Mullalyup).
- Yabberup should be identified within this section as a Village with the following wording attached:

“Yabberup is a village within the Shire of Donnybrook-Balingup, situated 18 kilometres east of Donnybrook within the Preston Valley precinct. In the wider locality, there was a population of 160 residents in 66 dwellings at the 2016 Census, with a median age of 45 years.”

Section 17 – Economy

- The Basic Raw Materials Demand Study for the Bunbury and Busselton Region referenced in clause 17.6 (Basic Raw Materials) did not include the Shire of Donnybrook-Balingup. The Shire contains a number of significant established quarries, some of which hold State Heritage status and should be identified.
- Similarly, these should be identified on Map 10: Basic Raw Materials.

Officer Conclusion

As evidenced from the content of this report and the BGSRS document, there are many aspects to consider when planning at a sub-regional level. In preparing a response to the draft BGSRS, Staff have focused attention on the issues that are considered to have the greatest impact on the future growth of the Shire. It is hoped that by putting forward the Shire's position on these key aspects, the DPLH / WAPC will consider making the necessary amendments to the final document that will further support the future development of the Shire's revised Scheme and Strategy. Whilst it may be unrealistic to hope that all suggestions will be supported by the DPLH, it is considered important for the Shire to put its best foot forward and make the most of the opportunity presented in making a formal submission. As such, it is recommended that Council support the proposed resolution and associated attachment.

COUNCIL RESOLUTION 18/21

Moved Cr Mitchell

Seconded Cr Massey

That Council:

1. **Acknowledges the draft Bunbury–Geographe Sub-regional Strategy as advertised by the Western Australian Planning Commission; and**
2. **Endorses Attachment 9.1.1 (1) (Schedule of Comments) as representing the formal views of the Shire of Donnybrook Balingup in response to the draft document and instructs the Chief Executive Officer to forward the Shire's comments to the Department of Planning, Lands and Heritage; and**
3. **Authorises the Chief Executive Officer to liaise further with the Department of Planning, Lands and Heritage to advocate on behalf of the Shire consistent with the views contained in Attachment 9.1.1 (1).**

CARRIED 8/0 by En Bloc Resolution

Bunbury Geographe Sub-regional Strategy

Attachment 1: Schedule of Comments

Part A: Strategy				
Shire issue	Relevant Strategic Directions			Shire Comments
	Theme	Number	Wording	
Provision of critical infrastructure to facilitate urban expansion	Urban Settlement	8	Support the growth of major Towns and Towns to reinforce their ongoing role in the settlement network.	<p>1. Include an additional 'Strategic Direction' as follows:</p> <p><u>Theme:</u> Urban Settlement</p> <p><u>Principle:</u> Promote a diverse urban form to cater for a range of lifestyle options and affordable housing choices</p> <p><u>Proposed New Strategic Direction:</u></p> <p><i>Support low-density residential development permitting on-site sewer provision on the peripheries of Collie, Major Towns, Towns and Villages where it is financially unviable to extend and/or install reticulated sewer.</i></p> <p>2. Include an additional 'Strategic Direction' as follows:</p> <p><u>Theme:</u> Utilities and Services</p> <p><u>Principle:</u> Ensure sustainable regional outcomes by coordinating the provision of infrastructure to support growth.</p> <p><u>Proposed New Strategic Direction:</u></p> <p><i>State Government to provide increased support to the growth of hinterland towns by:</i></p> <p style="margin-left: 40px;">a. <i>reinvesting in the Infill Sewerage Program to expand existing sewer networks,</i></p> <p style="margin-left: 40px;">b. <i>establishing and implementing a cost sharing arrangement with the private sector for pre-funding critical infrastructure to support residential, commercial and industrial growth in hinterland towns.</i></p>
	Urban Settlement	15	Encourage local governments to prepare townsite strategies for hinterland towns to review supply of residential, industrial and commercial land and to identify and respond to opportunities and constraints.	
	Utilities and Services	45	Direct future urban growth to locations that are well serviced by existing infrastructure networks.	
	Utilities and Services	46	Support the provision of sufficient utility, transport, health, education and community infrastructure / services to cater for a growing population and economy across the sub-region.	
	Utilities and Services	47	Support the provision of catalyst infrastructure to stimulate economic investment and service the needs of Bunbury Geographe communities.	
	Utilities and Services	49	Collaborate with infrastructure providers to audit current capacity of electricity, water and sewer infrastructure to help quantify existing growth capacity and thresholds for upgrades.	
Ensuring available land product meets market demand (including rural residential and low density residential)	Urban Settlement	14	Support the identification of new Rural Living areas contiguous or proximate to Collie, Major Towns, and Towns, subject to the criteria contained in <i>State Planning Policy 2.5: Rural Planning</i> . New Rural Living areas are to be identified by local governments in local planning strategies and/or townsite strategies.	<p>3. The Shire is supportive of SD14, which acknowledges the importance of Rural Living options for the growth of hinterland towns. The Shire holds concerns with regard to the implementation of this strategic direction and considers a sub-regional policy will need to be established to provide sufficient guidance.</p> <p>4. SD14 should be amended to include 'Villages', in addition to Collie, Major Towns and Towns.</p> <p>5. With regard to SD18, the Shire supports the use of appropriate innovative approaches to utility provision including solar energy generation and use of ATUs for wastewater disposal. It is recommended that the BGSRS provide LGAs with discretion to support developments and individual landowners to implement technological solutions to utility service delivery. This will support the implementation of any technological advances that may be introduced during the life of the document.</p> <p>6. With regard to SD53, the Shire considers that providing an alternative land product (low density residential / rural residential) is a key component to attracting new residents to hinterland towns.</p>
	Urban Settlement	18	Encourage proponents of urban land developments to investigate alternative models of utility service delivery that provide a standard of service appropriate for the intended use, and that are capable of regulation by the Economic Regulatory Authority.	
	Economy	27	Protect priority agricultural land from incompatible land uses.	

	Lifestyle	53	Embrace the Bunbury-Geographe lifestyle as a key attraction for new residents and visitors to the sub-region.	
	Lifestyle	54	Recognise and value the sub-region's unique and connected communities.	
Provision of suitable 'economic land'	Intervention	3	Provide for the growth of the sub-region's population to 200,000 by identifying sufficient residential and employment land to cater for this target population.	<p>7. The Shire acknowledges that SD3 recognises that provision of suitable economic land is required to support the sub-region's growth.</p> <p>8. The Shire welcomes that SD21 recognises the importance of providing adequate industrial and commercial land across the sub-region, including hinterland towns, to provide for local employment.</p> <p>9. Include an additional 'Strategic Direction' as follows:</p> <p><u>Theme:</u> Economy</p> <p><u>Principle:</u> Strengthen and diversify our economy</p> <p><u>Proposed New Strategic Direction:</u></p> <p><i>Support commercial / light industrial developments in or proximate to hinterland towns proposing on-site sewer where it is financially unviable to extend and/or install reticulated sewer.</i></p> <p>10. With regard to SD24 and SD42, the Shire is supportive of the expansion and diversification of the tourism industry and considers that rural based tourism is a key component in this regard. Flexibility will need to be demonstrated to facilitate a range of tourism based land uses in local planning schemes.</p>
	Urban Settlement	8	Support the growth of Major Towns and Towns to reinforce their ongoing roles in the settlement network.	
	Urban Settlement	15	Encourage local governments to prepare townsite strategies for hinterland towns to review supply of residential, industrial and commercial land and to identify and respond to opportunities and constraints.	
	Economy	21	Ensure an adequate supply of industrial and commercial land across the sub-region to facilitate local employment.	
	Economy	24	Facilitate the expansion and diversification of the tourism industry.	
	Economy	26	Retain identified light and general industrial areas for industrial use and protect from the encroachment of sensitive land uses.	
	Transport	42	Promote the sub-region's tourist routes in planning instruments.	
	Utilities and Services	46	Support the provision of sufficient utility, transport, health, education and community infrastructure / services to cater for a growing population and economy across the sub-region.	
Ageing population	Utilities and Services	46	Support the provision of sufficient utility, transport, health, education and community infrastructure / services to cater for a growing population and economy across the sub-region.	<p>11. The Shire is supportive of SD46 which identifies the importance of providing essential community infrastructure / services to cater for a growing population across the sub-region.</p> <p>12. The Shire considers that there is a need in the short-medium term to expand Donnybrook District High School into a Senior High School to cater for the Shire's growing population. Donnybrook is a Major Town and the provision of a Senior High School will enable local children to be educated locally and encourage further young families to move to the district. To this effect the following additional 'Strategic Direction' is recommended:</p> <p><u>Theme:</u> Utilities and Services</p> <p><u>Principle:</u> Ensure sustainable regional outcomes by coordinating the provision of infrastructure to support growth.</p>
	Lifestyle	53	Embrace the Bunbury-Geographe lifestyle as a key attraction for new residents and visitors to the sub-region.	
	Lifestyle	54	Recognise and value the sub-region's unique and connected communities.	

				<p><u>Proposed New Strategic Direction:</u></p> <p><i>Department of Education and Training to establish clear 'triggers' for the expansion of Donnybrook DHS to Senior High School status.</i></p> <p>13. Include an additional 'Strategic Direction' as follows:</p> <p><u>Theme:</u> Lifestyle</p> <p><u>Principle:</u> Retain, protect and leverage our regional character and the Bunbury-Geographe lifestyle.</p> <p><u>Proposed New Strategic Direction:</u></p> <p><i>Acknowledges that strong representation of people across all ages is critical for the health of local communities and supports appropriate measures to rectify imbalances.</i></p>
Bushfire Planning	Environment	37	Support intensification of land use only where bushfire risk can be understood to be low and/or capable of being appropriately mitigated.	<p>14. The Shire is supportive of the established planning framework as it relates to bushfire management however considers that an increased level of support is needed for local governments in administering the requirements. To this effect the following additional 'Strategic Direction' is recommended:</p> <p><u>Theme:</u> Environment</p> <p><u>Principle:</u> Protect people and property from natural hazards</p> <p><u>Proposed New Strategic Direction:</u></p> <p><i>Supports the development of a regional approach to bushfire policy to find an appropriate and safe balance that provides a level of consistency across the sub-region whilst facilitating continued development and economic growth.</i></p>
Development adjacent to Main Roads WA controlled roads	Economy	24	Facilitate the expansion and diversification of the tourism industry.	<p>15. With regard to SD24 and SD42, the Shire considers that the growth of the local tourism industry and the ability for rural landowners to diversify through low-level tourism initiatives is being curtailed by the requirements of MRWA. To this effect the following additional 'Strategic Direction' is recommended:</p> <p><u>Theme:</u> Economy</p> <p><u>Principle:</u> Strengthen and diversify our economy</p> <p><u>Proposed New Strategic Direction:</u></p> <p><i>Support low impact uses on land adjacent to MRWA controlled roads without the need for prior referral to MRWA, to be addressed in local planning schemes.</i></p>
	Transport	38	Support initiatives to connect and link Bunbury to the hinterland towns to create an integrated network, including public transport and regional bike network.	
	Transport	42	Promote the sub-region's tourist routes in planning instruments	
Uncertainty surrounding the disused Greenbushes – Picton rail line	Transport	41	Support increasing the capacity of the existing freight rail network and future strategic rail network.	<p>16. With regard to SD41, the Shire considers a firm decision needs to be made on the future of the Greenbushes to Picton rail line in the short term, to enable affected local governments to suitably plan for the future of their townsites.</p>

Impact of industrial buffers (Donnybrook stone quarries) on surrounding land	Economy	26	Retain identified light and general industrial areas for industrial use and protect from the encroachment of sensitive land uses.	17. With regard to SD26, the Shire is generally supportive of protecting identified light and general industrial areas from encroachment by sensitive land uses.
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Heritage considerations	Lifestyle	52	Collaborate with local governments to undertake/review local heritage surveys, and designate heritage lists and/or areas.	18. With regard to SD 52, the Shire recommends this be re-worded as follows: <i>Support local governments to undertake/review local heritage surveys, and designate heritage lists and/or areas by providing financial and professional assistance.</i>
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Additional Comment: Part A, Section 11 - Implementation

19. The Shire considers that the measures identified in Part A, Section 11 (Implementation) to achieve the vision for the BGSRS are general in nature and possibly fail to take into account the complexities of the range of strategic directions that are contained within the BGSRS from an implementation perspective. As a result, it is considered likely that many of the SDs may be difficult to achieve given existing constraints.

Section 7 of Part A (Further work) outlines additional work required to support the BGSRS and the Shire considers this should include a detailed Implementation Plan that identifies policy or other potential barriers that exist and determines what interventions or policy changes may be required from a government perspective to achieve the outcomes identified.

Part B: Profile

Section	Shire Comments
General Comments	20. Part B could be more succinct and avoid repeating information contained elsewhere in the document by focusing on key facts and statistics (rather than commentary) and make greater use of visual aids such as graphs, charts etc.
	21. The Shire of Donnybrook-Balingup contains the following river catchments: <ul style="list-style-type: none"> • Preston Valley • Capel River (Busselton Coast) • Blackwood River (Lower and Middle)
	22. There is no mention of the Bibbulmun Track which traverses through the Shires of Donnybrook Balingup and and Collie and is considered a key tourist attraction to the sub-region.
	23. Yabberup should be identified within this document as a 'Village' with statistical details included below (Comment 29).
Section 13 – People and Culture	24. There are 12 State Heritage Registered Places within the Shire of Donnybrook Balingup, not 11 (clause 13.5 Historic Heritage).
Section 14 – Population	25. The Shire is not supportive of the use of the term 'relatively elderly population' in relation to the SoDB and considers alternative wording or preferably, use of visual aids be used to compare median ages of residents across the sub-region (Clause 14.6: Shire of Donnybrook-Balingup).
Section 15 – Urban Settlement	26. Balingup is located in the Blackwood River precinct, not the Preston River precinct (clause 15.10 Balingup).
	27. Kirup is located in the Capel River precinct (clause 15.15 Kirup).

	28. Mullalyup is located in the Blackwood River precinct (clause 15.16 Mullalyup).
	29. Yabberup should be identified within this section as a Village with the following wording attached: <i>“Yabberup is a village within the Shire of Donnybrook-Balingup, situated 18 kilometres east of Donnybrook within the Preston Valley precinct. In the wider locality, there was a population of 160 residents in 66 dwellings at the 2016 Census, with a median age of 45 years.”</i>
Section 17 – Economy	30. The Basic Raw Materials Demand Study for the Bunbury and Busselton Region referenced in clause 17.6 (Basic Raw Materials) did not include the Shire of Donnybrook-Balingup. The Shire contains a number of significant established Donnybrook Stone quarries, some of which hold State Heritage status and should be identified.
	31. Similarly, the Donnybrook Stone quarries should be identified on Map 10: Basic Raw Materials.