

Director General
Department of Mines and Petroleum
Mineral House 100 Plain Street
East Perth WA 6004

 **COPY**

Dear Sir

CITY OF KARRATHA RECOMMENDATION TO THE MINISTER FOR MINES AND PETROLEUM - APPLICATION FOR EXPLORATION LICENCE 47/2740 – STONEFORM HOLDINGS PTY LTD

The City of Karratha is generally supportive of the important role mining plays in the Pilbara and is appreciative of the ability to be able to make recommendation on applications such as this through the Mining Act. In this instance, the City of Karratha maintains its objection to the granting of this exploration licence as was outlined by the City in correspondence to the applicant's consultant representative (being M & M Walter Consulting) dated 21 January 2012, which was cc'd to the Mining Registrar and which is attached with this correspondence.

The City, in accordance with Section 25 (3B) of the *Mining Act 1978* and as requested in recent correspondence from the Director General dated 15 March 2016, provides the following information and recommendation in regard to activities applied for under Exploration Licence 47/2740.

The City of Karratha recommends that application for Exploration Licence 47/2740 not be granted.

An exploration licence is presumably to determine what minerals are present within the land, with the ultimate aim of the licence holder to mine those minerals. The exploration activity itself is not supported in this location. From a land use planning perspective the City does not support E47/2740 for the following reasons:

- a) The Karratha City of the North and Karratha Growth Plan 'earmark' significant areas within E47/2740, to the south of Karratha Hills, for possible future development. The City would not support the issuance of mining tenements in this area that limits its potential for being used as future expansion areas. Once issued, mining tenements and their holders often preclude other land uses for lengthy time periods. The considerable strategic planning that has been undertaken within the townsite boundary of Karratha should not be jeopardised by mining exploration and mining activity in general. The land should be freely available into the future to perform one of the key functions of a townsite; to allow for future expansion without the constraint of a mining tenement over such a large area.
- b) Stemming from the KCN document the City has recently expended considerable resources in preparing a Draft Local Planning Strategy (LPS) which provides the strategic planning framework for land use out to 2031. Proper planning for future growth includes the preservation of land areas to the south of the Karratha Hills for possible industrial expansion. Council has supported Scheme Amendment 21 which provides for rezoning of land to 'Industrial Development'. Again, Council would not support the alienation of this land nor any mining activities that may compromise potential future development.

- c) The proposed licence area and resultant mining exploration activities within this area would not be compatible with the relevant zoning objectives of TPS8, nor the future strategic land use planning as set out within the Draft LPS for this area. It is noted that through the more detailed consideration of planning for any future development in this area the relevant environmental and cultural factors will be addressed in the most balanced way possible but that the higher level strategic planning undertaken does not contemplate mining activity in this area.
- d) The greater area of the proposed mining tenement south of the Karratha Hills is visible from the North West Coastal Highway, Madigan Road and De Witt Road. E47/2740 also includes large areas of land to the north of the Karratha Hills. The City does not support mining activity in clear view of the two entrance roads into town as this is not considered a desirable entry statement for Karratha. Furthermore, the Karratha Hills is a natural landscape feature that provides an important visual back drop to those entering Karratha from the Highway and those residents living within Karratha. The City would not support an exploration licence that could see mining activity occurring in the Karratha Hills and that would be highly visible to residential properties and entrance roads into Karratha.
- e) Under the City's TPS.8 the Karratha Hills are largely zoned as Conservation, Recreation and Natural Landscapes. The proposal to undertake mining activities in the Karratha Hills is not commensurate with the zoning of the land.
- f) It is understood that the area subject of the proposed exploration licence is of importance to the Ngarluma people; the determined Native Title holders of the area. The City is currently working with the Ngarluma Aboriginal Corporation (NAC) to consider (amongst other things) the future management strategies for the Karratha Hills. An exploration licence over this area would likely jeopardise important cultural sites and future management of the Karratha Hills.
- g) E47/2740 includes numerous Reserves, some of which are vested in the City. It is understood that none of these Reserves are for the purpose of mining exploration and that on this basis, this use would not be permitted by the Department of Lands within these reserves unless a change to the purpose of the reserve is supported by DoL. In regard to Reserves within E47/2740 and that are under Management Authority to the City, the City would not support any exploration activity within these reserves as the activity would likely be detrimental to the current use of the Reserves and would not meet the purpose of the Reserves.

It is recommended that any applicant seeking to apply for such licences in the future approach the City prior to submitting an application to the DMP. This would enable the applicant to gauge any City concerns, understand the strategic land use planning context and direction and land use constraints. Similarly, it is recommended that applicants give consideration to the cultural significance of an area by consulting with registered native title holders prior to submitting applications.

The City would like to be kept informed by the DMP of any decision it makes in regard to E47/2740.

Should you have any queries please do not hesitate to contact me on 9186 8674 or at chris.sayer@karratha.wa.gov.au.

Yours sincerely


Chris Sayer
Principal Statutory Planner
6 April 2016