



26 February 2020

Chief Executive Officer
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RE: Proposed Domestic Container Deposit Scheme Recycling Centre – Part Lot 9006 Crane Circle, Karratha

RFF acts on behalf of North West Recycling in relation to this application to develop a domestic container deposit scheme site on part Lot 9006 Crane Circle, Karratha. Attached with this cover letter is the following:

- Application for planning approval signed by the current landowner, the Western Australian Land Authority
- Certificate of Title for the premises
- Scale site plan, floor plans and elevations of the proposed development.

Please contact info@nwrecycling.com.au for payment of the application fee.

The proposed development is an important improvement in the recyclable supply chain for the City of Karratha and operations are required to commence when the scheme is officially launched on the 2nd July 2020. We are seeking support from the City to provide timely consideration and determination of this proposal in two distinct aspects:

- **Stage 1:** Early civil works typically associated with subdivision to prepare the land for development.
- **Stage 2:** Land use and development approval for the development of infrastructure to support the container deposit scheme's commencement of operations.

This approach is sought given the very short-time frame to complete the development and the requirements for the City in relation to the proposed use which must be advertised and considered by Council.

Details supporting the proposed land use and development having regard to the relevant strategic and statutory town planning considerations are included in this letter.

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1. Background

The WA Container Deposit Scheme commenced 2 June 2020. Once commenced, it will enable people to take their empty beverage containers to a refund point and receive 10 cents for every eligible container returned. The aim of the scheme is to:

- increase recovery and recycling of empty beverage containers
- reduce the number of empty beverage containers that are disposed of as litter or to landfill, currently 44% of landfill is made up of redeemable containers
- ensure that first responsible suppliers of beverage products take product stewardship responsibility
- provide opportunities for social enterprise and benefits for community organizations
- create opportunities for employment; and
- complement existing collection and recycling activities for recyclable waste.

Western Australia Return Recycle Renew (WARRRL) is a non-for-profit organization established to set-up and run the container deposit scheme in Western Australia. North West Recycling has subsequently been awarded the contract to manage refund points in Karratha, Wickham, Pannawonica and Onslow. The organizations head office is planned to operate from Karratha.

NW Recycling subsequently identified the subject site as the preferred location to establish a container deposit scheme recycling centre and main office centre due to its convenient, accessible and visible location.

To operate our over the counter refund point at the chosen location will be central for community access. This is important for multiple reasons, including:

- employment opportunities; being accessible for those that may have been out of the workforce or new to the workforce. If located in the LIA for instance, that makes it difficult for a student or person without a vehicle to access;
- to make it appealing to those that may only have a few containers to return, some people may not drive the additional 20km round trip.
- providing access this location via footpaths that join the city together, whether this be walking, riding or via the established public transport route allowing the community to partake in the scheme safely.

2. About North-West Recycling

North-West Recycling has been formed with an aim is to make recycling as easy as possible and inclusive for the West Pilbara. This will enable the West Pilbara, and the City of Karratha communities to reduce their environmental footprint.

Aside from operating the primary collection centre in Karratha, NW Recycling will be operating a flexible Refund Point Truck to other communities and interested community groups. This will also include a pickup and delivery service, for bulk container storage bins.

The implementation of the container deposit scheme will also incorporate:

- Education of customers and the community on eligible containers for refunds and the benefits of participating in the scheme;
- promoting the kerb-side recycling opportunities for other recyclable products;
- developing partnerships with the City of Karratha which led to increased participation in broader recycling efforts.

NW Recycling will employ local employees, including partnering with Clontarf Academy to offer casual employment to Clontarf students. This gives a real sense of employment to young aboriginal men and provides a link to future employment opportunities.

NW Recycling have also discussed the opportunity to partner with Roebourne PCYC to provide youth with recycling bags/tools and educational visits to the centre, to increase their awareness of the scheme and opportunity to be involved.

3. Site Details

Part Lot 9006 on Deposited Plan 408312 is located within the Crane Circle light industrial area on the northern end of the Karratha City Centre. Whilst the site forms part of the broader lot containing the Karratha Key Worker Accommodation project, the site is separated by the Crane Circle connection to through to Bayview Terrace. It has a total land area of 4,901m².

The site is located within the Crane Circle commercial area which includes a number of similar service and light industry uses such as Hunter mechanical, Troys Tyres 2 U, Auslec, Tyrepower, Pilbara Metal Group and Print sync amongst others.

The current landowner is the WA Land Authority who has entered into an agreement to sell the part lot subject to subdivision of the land from the broader land parcel and required conditions of subdivision approval being completed including provision of services, filling and draining the site to enable the property capable of development.

The site is vacant. There is remnant civil infrastructure on the site from the historical Pelago workforce camp which will entirely remove from the site.

Formalized drainage and rock battering of filled area on the eastern side of the site will be excluded from the final site created through subdivision. It is expected this infrastructure will be amalgamated into the adjoining road reserve or be placed into a Crown Reserve.

An informal drain and basin are located in the northern side of the property, running in a westerly direction. Discussions with engineering services at the City of Karratha have endorsed the realignment of this drain to run along the rear boundary in the crown land to the north. These works will be completed as part of the site development and is expected for form a condition of subdivision approval for the site.

The sites visibility from bay view terrace, proximity to the main commercial centers and relatively central location within Karratha makes the site ideal to develop a recycling centre where accessibility to all community members is a key feature in the programs success.

4. Proposed Development

The proposed development involves the establishment of a container deposit recycling centre on the premises. The development includes:

- Completion of all site civil works to prepare the land for development including realignment and formalization of existing drainage line;
- Development of a self-sorting recycling centre including with five bays including an awning;
- Parking and circulation areas on the eastern side of the premises including dedicated entry/exit points only;
- Adequate parking noting the expected high quick turnover of visitors;

- An 18m² office where NW recycling will coordinate its site operations and operations across the broader West Pilbara region;
- A recycled compacted Asphalt area on the western side of the public interface which will act as the pickup and drop-off point for full/empty containers from the premises;
- Garrison fencing and landscaping across the full frontage of the premises.

Buildings on the premises are proposed to have a 0m street setback from Crane Circle. Visually interesting and striking cladding will be installed on the façade of the building as shown on the elevations.

A 17.5m² (5m x 3.5m) wall sign will be installed on the main wall of the shed identifying the premises as the NW recycling centre.

The facility is largely a 'self-service' arrangement whereby customers will enter the premises, self-sort containers and place them in the respective bins in exchange for payment. The arrangement is effectively a large-scale vending machine.

The premises will be Trade from 9am to 5pm Monday to Saturday and closed Sundays.

The site will also be used as an initial storage point for cages and bins distributed in Karratha in conjunction with community organizations. The area to the West of the public interface will be used as the temporary storage area.

NW Recycling anticipates a maximum of 6 movements per day of an 8-tonne heavy rigid vehicle as part of the collection and distribution process.

All materials collected will be transferred to Cleanaway's site on the Tom Price road as they have the contract for overall logistics and processing of containers for the Pilbara region.

No processing will occur on the NW recycling site.

5. Town Planning Considerations

This section considers the key planning considerations for the project and is guided by the Western Australian Planning Commission's May 2019 Position Statement on Container Deposit Scheme Infrastructure (the Position Statement). The provisions and guidance set out in the Position Statement should be used to inform a decision on the proposed development.

We note the City may consider the draft City Centre Local Planning. In our view, the policy is not directly relevant to the proposal development as this policy was developed to provide comprehensive guidance to new multi-storey development projects in the City Centre as opposed to small scale service industry developments which reflect the scale and form of development on Crane Circle.

5.1. Proposed Land Use and Land Use Permissibility

The proposed development is considered to fall within the land use definition provided in section 5.2.3.6 of the Position Statement which describes a new use class of 'Container Deposit Recycling Centre' which is defined as:

container deposit recycling centre means premises used to return, consolidate, temporarily store and sort material associated with a container deposit scheme established under Part 5A of the

Waste Avoidance and Resource Recovery Act 2007 before transfer to a waste storage facility or resource recovery centre, and may also include the return of small consumer goods or products as an incidental use.

This use is not currently mentioned in the zoning table of the City of Karratha Local Planning Scheme No. 8 (LPS8) and therefore should be dealt with in accordance with Clause 3.2.5 of a LPS8 to determine whether the land use is permissible on the site. Clause 3.2.5 requires Council to consider and determine (by absolute majority) whether the proposed use is consistent with the objectives and purposes of the zone and precinct objectives and grant approval, subject to public advertising.

The subject site is zoned 'City Centre' and located within 'Precinct 2 – Commercial' in LPS6. The table below demonstrates the proposal is consistent with the objectives and purposes of the zone.

City Centre Objective	Justification of Consistency
To facilitate the appropriate and orderly and proper development of the City Centre based on sound urban design principles and which reflect the Scheme objectives.	The development represents an appropriate and complimentary development to existing service and light industry uses in crane circle. The form and type of development is also generally consistent with existing commercial industry style unit development within the Crane Circle area.
To create a vibrant and safe City Centre with a diversity of land uses including residential, commercial, retail, entertainment and civic uses.	The project will further diversify the style of commercial uses active in the City Centre.
To create a network of clearly legible pedestrian and vehicle movement networks.	The development will integrate in with the current road and pedestrian network.
To create enhanced pedestrian environments with pedestrian shelter, active ground floor uses and passive surveillance wherever possible.	The project will increase passive surveillance in the Crane Circle commercial area by drawing higher levels of public patronage into the space daily.
To encourage and facilitate the development and beautification of the City Centre.	The project will lead to the cleaning up of a legacy site in the city centre and deliver an attracted new development which complements existing development along the Crane Circle streetscape.

The description for the City Centre Commercial Precinct is as follows:

To promote a diversity of development in the Commercial Precinct with active ground floor uses facing the street. Whilst the predominant use is envisaged to be offices, other tenancies with a gross floor area less than 1000m², comprising comparison retail, showrooms, and other commercial uses are also encouraged. Multiple dwellings are encouraged on upper levels and may be permitted to face secondary streets where the local government considers that active commercial uses are not required.

The proposed development further diversifies the form and type of land uses within the precinct. The recycling centre will also deliver constant patronage into the City Centre at ground level, activating the street and surrounding area. The type of use is another 'commercial use' and therefore consistent with and suitable for development.

Having regard to the both the zone objectives and commercial precinct statement, the proposed use is therefore in our view capable of approval by the Council.

5.2. Position Statement: Container Deposit Scheme Infrastructure (WAPC 2019)

The WAPC adopted and published the Position Statement in 2019 and is intended to apply in relation to any proposed container deposit scheme infrastructure proposed for development in Western Australia. Section 5.2.3 of the Position Statement sets out key considerations in assessment container deposit scheme (CDS) infrastructure which have been considered below in the context of the proposed development and demonstrate the subject site and the nature of the development is consistent with the provisions outlined in the Position Statement.

Development Assessment Considerations	
General Assessment Considerations	
Assessment Criteria	Response
Does the infrastructure fit in with the surrounding built context	The proposed use is a style of use and development consistent with other land uses in the Crane Circle commercial precinct. Other uses in the precinct are of a bulky/ commercial arrangement which includes occasional movements of heavy vehicles.
Does it impact upon visual amenity, or result in the vegetation removal which requires offset	The final project design will make a positive contribution to the amenity of the city centre by providing an attractive façade and signage to buildings, quality fencing and landscaping along the street frontage. Development of the site will also see activation of currently vacant land in the City Centre which has remnants of the previous temporary workforce camp which was demolished following completion of the Pelago project.
What are its hours of operation and timing of service vehicles attending the return point	Proposed hours of operations are 9am – 5pm. Service vehicles will arrive and depart from the premises between these hours. No early or late movements will occur.
Is additional parking required to service the return point	The proposed development includes five car parking bays on-site. This number of bays is considered satisfactory to address demand based on NW recycling experience operating other recycling centre historically in other states.
Will it impact the existing car parking requirements of the site	The site is a greenfield site with dedicated parking proposed.
Is it universally accessible	The site and functionality will be universally accessible.
Will its location have an impact on pedestrian or vehicular circulation	No.
Is appropriate maneuvering space provided to allow service vehicle access	Adequate maneuvering space for heavy rigid vehicles which will service the site is provided for on the eastern side of the main public interface.
Does the infrastructure necessitate the provision of waste bins to dispose of goods that are not accepted by the CDS in a tidy manner	Additional general waste bins will be provided onsite to manage goods which can't be accepted by the Scheme. This will exist in parallel to a community education campaign focused on ensuring the community is aware of how the container deposit scheme will work.
What size and scale is appropriate for signage or screens	Signage is proposed as per the elevation on the development plans. Additional information can be provided on request from Council or addressed as a condition of approval.
Does its location allow for passive surveillance, and what form of lighting is provided	Garrison fencing allows for passive surveillance of the street and into the property. Operations will not occur at night.

Container Deposit Recycling Centre Criteria	
Assessment Criteria	Response
The development should integrate seamlessly with surrounding development, and not propose outdoor sorting or storage which is visible from the public realm	The project has a built form outcome and use which reflects the form and style of development along Crane Circle. All sorting will occur in the main shed without door areas being used for temporary storage only. Garrison fencing and landscaping along the street frontage will provide adequate screening of the temporary storage areas.
Generally, only the return, sorting and storage of material associated with the CDS should occur	The only proposed activities proposed are the sorting and storage of material associated with the CDS should occur

5.3. Strategic Community Plan Alignment

The City's Strategic Community Plan 2016 – 2026 includes several key points regarding recycling including:

- *Investigate and implement new waste management technologies to improve resource recovery and recycling outcomes;*
- *Enhance community use of waste and recycling facilities through promotional activities.*

The development of the NW recycling centre at the proposed location will provide enhanced recycling infrastructure and NW recycling is also committed to ongoing promotional activity with the support of the Town.

6. Conclusion

This proposal to develop a container deposit scheme recycling centre will deliver a new service to the Karratha community and improve opportunities for the City's residents to participate in the renewable and recyclable economy. The subject site and the nature of the proposed development will contribute to the enhancement of the Crane Circle commercial precinct by developing otherwise neglected vacant land.

The proposed land use is consistent with the objectives and statements of the City Centre zone and Commercial Precinct. The development proposal also appropriately responds to the key development considerations outlined in the WAPC Container Deposit Scheme Infrastructure Position Statement.

We therefore consider development approval should be granted at the earliest opportunity by the City of Karratha.

Regards



Owen Hightower
RFF