



---

FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

---

Ms Rhonda Hardy  
Chief Executive Officer  
Shire of Kalamunda  
PO Box 42  
KALAMUNDA WA 6926

Dear Ms Hardy

**FREIGHT AND LOGISTICS COUNCIL OF WA INC. SUBMISSION  
CITY OF KALAMUNDA LOCAL STRUCTURE PLAN – FORRESTFIELD NORTH: RESIDENTIAL PRECINCT**

The Freight and Logistics Council of Western Australia Inc (FLCWA) comprises senior decision makers from industry and Government whose charter is to provide independent policy advice to the Minister for Transport on issues impacting the provision of freight and logistics services in this State.

Since its inception, FLCWA has been strongly focussed on the threat to strategic freight corridors from encroachment by incompatible land uses, particularly residential developments. It is in this context that FLCWA would like to thank you for the opportunity to comment on the proposed Forrestfield North Local Structure Plan: Residential Precinct (the Structure Plan) on behalf of its industry members.

The FLCWA was a member of the City's Forrestfield North Local Structure Plan Technical Advisory Group, to represent the interests of our members in relation to the strategic protection of Roe Highway on the eastern boundary and the freight rail main line, freight rail infrastructure (intermodal terminal, marshalling yards and workshops) and several key freight and logistics operations located on the western boundary of the structure plan precinct.

Enclosed is a plan illustrating the location of Roe Highway, the freight rail main line and the abutting freight related operations, all of which rely on the unrestricted operation of the freight rail line for supply chain efficiency and operational productivity, in relation to the Structure Plan area.

Regarding the impact of road and rail noise and the protection of strategic freight transport corridors, it is acknowledged that the Structure Plan area is:

- Outside of the area affected by vibration impacts from the freight railway;
- Outside of the area affected by noise impacts from the freight railway; and
- Affected by road noise from Roe Highway (and several local roads within the Structure Plan).

The FLCWA encourages the consideration of road and rail noise during the earliest stages of the planning process, to ensure that suitable land uses are proposed to abut freight transport corridors to respond to noise impacts on urban amenity, and in particular on noise-sensitive land uses such as residential dwellings.



---

FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

---

In that context, the FLCWA supports the inclusion of conditions for subdivision and development, within the Structure Plan, to:

- guide decisions on the use, subdivision and development of land affected by road noise;
- require the provision of site specific noise assessments for some areas of land; and
- guide the imposition of appropriate conditions of approval to manage and mitigate noise impacts to acceptable levels for the benefit of future residents;

which in turn, affords a greater a level of protection for the continued, unfettered operation of Roe Highway.

It is noted that the Lloyd George Acoustic Transportation Noise Assessment illustrates the benefits of the construction of a 4m high noise wall along the eastern boundary of the Structure Plan area, abutting Roe Highway to mitigate the impact of road noise.

Whilst the FLCWA supports the inclusion of a condition of subdivision and/or development approval requiring the construction of an acoustic wall, where the predicted noise levels are above 65dB LAeq(Day), further consideration should be given to the wording of Condition 3.4, which currently reads:

*“3.4 In respect to residences proposed alongside Roe Highway, where the predicted noise levels are above 65 dB LAeq(Day), a suitably designed noise wall is to be provided.”*

The term “alongside Roe Highway” is ambiguous and requires further clarification and/or replacement with “in proximity to Roe Highway”.

Lloyd George Acoustics illustrated the benefits of an acoustic wall abutting Roe Highway, along the entire length of the Structure Plan boundary, however the current wording of the condition is ambiguous as to the location of a required noise wall. This raises a question over the effectiveness, visual amenity and limitations on passive surveillance that would result from the construction of several independent, non-contiguous noise walls on individual lots.

Further consideration should be given to the inclusion of the construction of a contiguous acoustic wall along the eastern boundary of the precinct, abutting Roe Highway, within a Development Contribution Plan and the need, or otherwise, for the acoustic wall to be pre-funded and constructed ahead of subdivision and/or development.

The FLCWA strongly encourages the consideration of road and rail noise impacts at the earliest stage of the planning process to ensure that land use, subdivision and development deliver the best outcomes for both freight efficiency and urban amenity.



---

FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

---

The FLCWA would like to thank you for this opportunity to comment on the proposed Structure Plan and would welcome the opportunity to meet to elaborate on the views put here.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'N Lockwood'.

Nicole Lockwood  
Chair

29 June 2018

Enc

- Forrestfield North Structure Plan Precinct: Context Plan (SITE planning + design 180629 17-033 FFN FSP-B-001)

Cc

- David Caddy, Chairman, Western Australian Planning Commission
- Gail McGowan, Director General, Department of Planning
- Nina Lyhne, A/Director General, Department of Transport