

14 June 2019

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

(sent by email to mrs@planning.wa.gov.au)

Dear Ms Fagan

**FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC SUBMISSION
METROPOLITAN REGION SCHEME AMENDMENT 1353/57
LOT 33 HOPKINSON ROAD, CARDUP**

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 focused on engaging with State and Local Government to inform strategic and statutory land use and transport planning and policy to identify, protect and defend strategic supply chain infrastructure, such as ports, intermodal terminals, road and rail corridors.

It is in this context that FLCWA would like to thank you for the opportunity to comment on, and inform, the consideration of Amendment 1353/57 ('the Amendment') to the Metropolitan Region Scheme ('MRS'), which proposes to rezone 118.4ha of 'Rural' land to 'Urban Deferred'.

FLCWA is focused on securing supply-chain efficiency through the protection of strategic infrastructure and raises issues/concerns over the Amendment on the following grounds:

- a) The site abuts the planned, reserved and Federally funded Tonkin Highway extension;
- b) The Tonkin Highway extension is a critical piece of infrastructure within the WA supply chain;
- c) The proposed Amendment has the potential to introduce noise sensitive land uses abutting a strategic freight route;
- d) In FLCWA's experience, it is preferable to address potential land use conflict issues as early as possible through the planning process; and
- e) Should the site be rezoned 'Urban Deferred', the next opportunity to address the issue of land use conflict will be at the Structure Planning phase.

STRATEGIC SUPPLY CHAIN SIGNIFICANCE OF THE FUTURE TONKIN HIGHWAY EXTENSION

The proposed Tonkin Highway extension, abutting Lot 33:

- Is reserved 'Primary Regional Road' under the Metropolitan Region Scheme ('MRS');
- Has been allocated \$404m in Federal funding towards the total \$505m project cost;
- Is designated as a 'Primary Freight Road' under the South Metropolitan Peel Sub-Regional Planning Framework ('Sub-Regional Framework');

- Forms a primary freight connection between the South-West, Great Southern and Peel regions with metropolitan Perth and through to North-Link and the Western Australia's North West region;
- Directly connects to Perth's key strategic industrial areas, including Kenwick, Welshpool, Kewdale IMT and the future Mundijong IMT, as well as the future South Bullsbrook IMT and industrial area (via North-Link); and
- Will connect to Kwinana Outer Harbour via Thomas Road/Mundijong Road (4km north of the site) and Mundijong Road (6km south of the site), thereby further increasing the strategic importance of Tonkin Highway as a primary freight route.

Whilst Tonkin Highway extension is yet to be constructed, the route is reserved under the MRS and the project has secured Federal funding. In that regard, consideration should be given to the impact of the operation of the Tonkin Highway extension on proposed and future land use interface, including Lot 33 Hopkinson Road, the subject of the MRS amendment.

Clause 7.1(a) of the Draft State Planning Policy 5.4: Road and Rail Noise ('SPP5.4') states that "*Strategic planning documents such as sub-regional frameworks... should: Seek to avoid the risk of future land use conflict with noise by identifying compatible land use zones and/or reserves to provide spatial separation*". This provision is directly applicable to the Amendment and future land use conflict should therefore be taken into account through the MRS amendment assessment process and subsequent planning stages.

PROPOSED URBAN DEFERRED MRS ZONING

The proposed 'Urban Deferred' zoning is consistent with the Sub-Regional Framework, which identifies Lot 33 for 'Urban Expansion'. The Sub-Regional Framework also identifies the future extension of Tonkin Highway as a 'Primary Freight Road'.

In that context, the FLCWA encourages the applicant, Shire of Serpentine Jarrahdale and DPLH to give detailed consideration to the land use interface between the proposed 'Urban Deferred' zone and the future Tonkin Highway extension in subsequent stages of detailed planning.

Specifically, during the structure planning undertaken to support a request to lift the 'Urban Deferred' zone, which will result in the land being zoned 'Urban' under the MRS and likely to be concurrently zoned under the local planning scheme.

The FLCWA is also mindful that a request to lift the 'Urban Deferred' zone will not be advertised for public comment and that the next opportunity to comment on the future land use, subdivision and development will be the advertising of a structure plan.

In our experience, and consistent with State Planning Policy 5.4 Road and Rail Noise (SPP 5.4), the land use interface should be addressed as early in the planning process as possible, when there are a greater number of options available to mitigate the impact of transport noise on urban amenity.

CONCLUSION

It is acknowledged that if urban development is established ahead of the construction of the Tonkin Hwy extension, the onus will be on the State Government, through MRWA, to protect existing (noise sensitive) land uses from the impact of passing road noise.

Nevertheless, FLCWA has concerns over the ability to engineer solutions to mitigate road freight noise through the design/construction process, rather than avoiding these issues through appropriate interfacing with the road freight corridor.

The importance of the Tonkin Highway extension has been identified in several strategic and statutory planning documents, and although it is yet to be constructed, ignoring the future significance of this freight route is unwise. FLCWA would like to take this opportunity to raise these issues with the Department to ensure they are appropriately considered through the planning process as early as possible in order to avoid conflict, secure supply-chain efficiency and enhance urban amenity.

FLCWA would welcome the opportunity to elaborate on the points made here and we can be contacted by email at secretariat@flcwa.com.au.

Yours sincerely,



NICOLE LOCKWOOD
Chair
Freight and Logistics Council of Western Australia

14 June 2019

CC:

- Rita Saffioti, Minister for Transport; Planning; Lands
- David Caddy, WAPC Chairman
- Richard Sellers, Director General Transport
- Gail McGowan, Director General DPLH