



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

Mr Andrew Sharpe
Chief Executive Officer
City of Albany
PO Box 484
Albany WA 6330

Dear Mr Sharpe

Albany Waterfront Local Structure Plan (LSP12), Proposed Amendment to Precinct 2

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 transport corridors from encroachment by incompatible land uses, particularly noise and vibration sensitive land uses such as residential dwellings. It is in this context that FLCWA would like to thank you for the opportunity to comment on proposed amendments to the Albany Waterfront Structure Plan on behalf of its industry members.

In a general sense, FLCWA sees the protection of freight corridors as a strategic priority, not only for industry, but also for adjacent communities. From industry's viewpoint, operational constraints resulting from encroachment represent a threat to the efficiency of related supply chains, with potentially damaging economic consequences at national, State and local levels. From communities' viewpoints, lifestyle and amenity considerations are at risk without protection from noise and vibration impacts associated with adjacent freight corridors.

FLCWA believes that the interests of industry and communities are not mutually exclusive. There is a middle ground where both are served. This viewpoint was recently articulated in the FLCWA submission to the review of State Planning Policy 5.4 which deals with freight noise impacts. A copy of this submission is attached for your information.

The practical application of FLCWA's thinking on this issue is no better illustrated than with the Albany Waterfront project. The efficient functioning of the Port of Albany, immediately adjacent to the project, is clearly vital to the economic interests of the country, the State and the broader Albany community. Any constraints on the key rail and road access corridors into the Port would obviously threaten that efficient functioning.



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However, consistent with its belief that a balance can be struck between industry and communities' interests in the protection of freight corridors, FLCWA does not object to the project *per se*. But the development must not be allowed to jeopardise Port operations, as was recognised in the original MoU between the State Government and the City of Albany underpinning the project.

FLCWA believes that several of the proposed modifications to the Structure Plan are inconsistent with the protection of vital freight transport corridors into the Port and thus the efficiency of the operation. In particular, the inclusion of permanent residential land use and developments as part of the project is not supported. Permanent residents have a greater risk of disturbance than temporary ones and will develop a lower threshold of tolerance to freight transport impacts, particularly during the night when sleep interruption may result.

In that context, FLCWA is disappointed that the proposal makes no reference to compliance with the Government's State Planning Policy 5.4 Road and Rail Noise, including the absence of a site-specific acoustic report that demonstrates the suitability of the location for the proposed land use and the effectiveness of Quiet House Package B.

Following the adoption of the Structure Plan in 2006, the City of Albany supported a modification in 2011 that enabled an increase in gross floor space and building height in order to enhance the commercial viability of the development. FLCWA understands that the current proposed modifications have that same objective. However, 40 per cent or 6,800 square metres of total development floorspace being for permanent residential cannot be considered a "limited" amount as claimed by the proponent of the proposed modification.

FLCWA is concerned that approval of the proposed Structure Plan modifications will erode the intent of the MoU and create a precedent for further changes to land use permissibility (including maximum floorspace requirements for permanent residential).

Moreover, the proposed modifications will introduce provisions that prioritise the location of tourism land uses where the greatest tourism amenity exists. This would mean that the increasing population of permanent residents would be located in areas exposed to the highest impact of freight transport noise and vibration.

Steps can be taken to ameliorate freight transport impacts on surrounding residents such as higher construction standards, larger building setbacks and caveats on titles. Notwithstanding the benefit of such initiatives, FLCWA's view is that permanent residential development as part of the Albany Waterfront project will inevitably lead to calls for operational restrictions on adjacent rail and road operations. That outcome would be disastrous for the efficiency of the Port and the international competitiveness of the goods it handles. The economic cost of such a result would far outweigh any local commercial benefit that might flow from changes to the original project MoU.



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FLCWA would like to thank you for this opportunity to comment on the issue and is available to meet with the Council to elaborate on the views put here.

Yours sincerely

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

Nicole Lockwood
Chair
12/04/2018

Copy:

- Hon Rita Saffioti, Minister for Transport; Planning; Lands
- Hon Alannah MacTiernan, Minister for Regional Development; Agriculture and Food
- David Caddy, Chairman, Western Australian Planning Commission
- Richard Sellers, Director General of Transport
- Gail McGowan, Director General of Planning