



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

Mr Andrew Sharpe
Chief Executive Officer
City of Albany
PO Box 484
ALBANY WA 6331

Dear Mr Sharpe

**SUBMISSION BY THE FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA
ALBANY WATERFRONT HOTEL, SHOP AND INCIDENTAL USES
(CITY OF ALBANY REF: A233900/PA79432/P2180499), LOT 3 TOLL PLACE, ALBANY**

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 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 City of Albany and the Southern Joint Development Assessment Panel's (JDAP) assessment and determination of the proposed Albany Waterfront Hotel, Shop and Incidental Uses development at Lot 3 Toll Place, Albany.

Whilst the FLCWA acknowledges that the proposed land uses (hotel, shop, office, restaurant/bar, meeting room and gym) are consistent with the current planning framework for the site, it is important to highlight the strategic and economic value of Albany Port (**the Port**) and the road and rail corridors that service it, all of which abut and/or are within close proximity to the proposed development.

As such, we would encourage the City and the Southern Joint Development Assessment Panel (JDAP) to give careful consideration to the minimum construction standards of the proposed building to mitigate noise exposure and protect the amenity of guests, employees and visitors and the 24/7/365 operation of the Port and transport corridors.

FREIGHT AND LOGISTICS ECONOMIC SCALE AND VALUE

The freight and logistics industry is a significant economic driver at the local, regional, state and national level. In 2014 the Australian Logistics Council and Acil Allen Consulting reported that:

- The Australian logistics industry was estimated to account for 8.6% of the national GDP, adding \$131.6 billion to Australia's economy and employing 1.2 million people in 2013;



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

- In 2011-12 BITRE estimated that the domestic freight task totalled almost 600 billion tonne kilometres – equivalent to about 26,000 tonne kilometres of freight moved for every person in Australia;
- An increase in Logistics total factor productivity of 1% is estimated to increase GDP by \$2 billion; and
- Many issues currently affecting Logistics will impact the industry's future productivity.

With Australia's freight task forecast to double in the next 20 years¹, Local Government will play a central role in planning to service the growing freight task, capitalise on the economic benefits, minimise the cost of living, and maintain the quality and amenity of urban environments.

To provide local and regional context, in regard to Albany Port, Southern Ports reports that:

- In 2017, the Port's total throughput per annum was **5.1 million tonnes (including grain, woodchips, silica sands, logs, fuel and fertiliser)**, representing **\$1.25 billion in value to the WA economy**;
- Between 1996 and 2017, total trade through the Port grew from **1.75 million tonnes to 5.1 million tonnes, representing 291% growth** across the period;
- Bulk grain and woodchip exports are produced by more than **1,300 farming families and 700 forestry workers**;
- These **2,000 direct jobs** support more than **4,000 indirect jobs** across the region

CBH Group reports that:

- Over the last 5 years, the Albany terminal has shipped an **average 2.9 million tonnes per annum**;
- The **historical five-year compound annual growth rate (CAGR)** of grain exports from Albany is **5.8%**;
- To March 2018, their operations support over **970 active deliverers** (excluding share farms and charities) in the region.

Regional producers, manufacturers and resource industries, such as the Great Southern's grain producers (wheat, barley, canola, lupins and oats), timber industry (pine logs, biomass pellets and woodchips) and extractive industries (silica sands) rely on efficient and unrestricted access to road and rail corridors and Albany Port to reduce transport costs and timeframes to remain competitive in the global market. Great Southern exports are sold to global markets that include Belgium, China, Dubai, France, Germany, Indonesia and Japan, to name a few.

Protecting the unfettered operation of freight transport corridors and hubs, maintaining the supply of suitable industrial zoned land and leveraging existing infrastructure within the region are key strategies for Local Government to support the forecast growth of the industry and capitalise on these economic benefits.

¹ *Inquiry into National Freight and Supply Chain Priorities Report March 2018, Commonwealth of Australia, Department of Infrastructure, Regional Development and Cities.*



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

PLANNING FOR FREIGHT AND LOGISTICS

Ensuring the efficiency of Australia's freight and logistics industry, intermodal hubs, industrial land and the links to them—on land, air and sea-sides—is of critical importance to the nation's economy.

The Federal Department is working closely with the states and territories and industry to develop and implement initiatives aimed at unlocking the full potential of the supply chain. These initiatives include an emphasis on the long-term planning of port infrastructure, supply chain visibility and the mapping of key freight routes that connect the nationally significant places for freight.

A key component to the Federal Government's agenda is the development and implementation of the National Freight and Supply Chain Strategy. The Strategy is in response to Infrastructure Australia's Australian Infrastructure Plan and is being prepared under the guidance of an expert panel that includes the Independent Chair of the Westport Taskforce and Chair of the Freight and Logistics Council of WA Inc.

Industry has identified a number of measures as important to the Strategy, a number of which have relevance, including:

- preservation of transport corridors and protection of access corridors (including shipping channels) and freight precincts from encroachment which reduces efficiency and capacity of key national port, airport and intermodal terminal assets;
- integrated land use and transport planning to ensure adequate land transport and site capacity, including airport/port/intermodal terminal master planning; and
- rail access to ports and intermodals.

Submissions on the Inquiry into National Freight and Supply Chain Priorities Discussion Paper highlighted urban encroachment, port (air, sea and land) corridor protection and the need for planning frameworks that acknowledge the importance of freight movement as key challenges to the supply chain achieving its full potential. The final strategy is expected to be delivered in September 2019.

State and Local Governments play a central role in the long-term planning, provision and management of transport networks, including Port transport corridors, that service Australia's growing freight task thereby ensuring that Australian exports remain competitive and in turn support the growth of local and regional economies.

Beyond protecting physical infrastructure, it is equally important to protect the 24/7/365 operation of hubs and corridors by preventing encroachment by incompatible land uses to reduce land use conflict and road congestion.

KEY CONSIDERATIONS FOR INTEGRATED LAND USE AND TRANSPORT PLANNING

The following key considerations for integrated land use and transport planning to deliver positive outcomes for both supply chain efficiency and urban amenity provide the context to the FLCWA's comments on the Strategy, outlined in the following sections.



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

- State significant economic infrastructure, such as the Albany Port, require protection through the planning framework to support 24/7/365 operations by preventing encroachment by incompatible land uses;
- Strategic road and rail freight corridors that connect freight hubs (such as ports) with inland industrial land, producers (agricultural + forestry) and extractive industries, require protection through the planning framework to support 24/7/365 operations by preventing encroachment by incompatible land uses;
- Freight hubs, such as ports and intermodal terminals, need to be supported by suitably located, connected and sized inland industrial lots to support the operation of off-port/off-intermodal freight and transport customers, which in turn supports the efficient and productive operation of the port/intermodal terminal; and
- The need for appropriate building design and minimum construction standards for noise sensitive land uses that are exposed to road, rail and Port operational noise, where it cannot be avoided, to protect the amenity of residents, tourists and/or employees.

DRAFT ALBANY LOCAL PLANNING STRATEGY

The City of Albany recently advertised the Draft Albany Local Planning Strategy for public comment.

The Strategy outlines a number of statements that acknowledge and reinforce:

- a. The status and strategic significance of Albany Port and the freight network that supports the Port's operations as a regional and state asset, being fundamental to economic development within the Great Southern;
- b. The role and function of the Port and the supporting freight network, and the importance of protecting its continued and unrestricted operation and preventing encroachment by incompatible land uses;
- c. Giving precedence to Port functions and operations over land uses that may detrimentally impact these operations;
- d. The intention to restrict urban growth (sensitive land uses) to areas designated 'Urban Growth' under the Strategy and zoned 'Future Urban' under the Local Planning Scheme;
- e. The maintenance of the Port of Albany's Special Control Area;
- f. The role and function of the priority regional roads, upgrades required and the Albany Highway Port Link;
- g. The role and function of the freight rail network, its connections to the Port, Perth and CBH's grain receival bin network and the need to prevent encroachment from incompatible land uses;
- h. The need for SPP5.4 Road and Rail Noise to be implemented through the Local Planning Scheme and/or a local planning policy - with preference for implementation through the scheme, supported by a local planning policy; and
- i. The need to review the planning framework for the Waterfront Precinct as it relates to the operation of the Port and road/rail freight corridors.

The Strategy places a strong emphasis on the importance of protecting the Port's operational requirements, and it is important to consider the proposed development within this context.



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

PROPOSED HOTEL, SHOP AND INCIDENTAL USES – ALBANY WATERFRONT HOTEL DEVELOPMENT

The FLCWA acknowledges that the proposed hotel, shop, office, restaurant/bar, meeting room and gym are permitted, discretionary or incidental uses as per the City of Albany Local Planning Scheme No. 1 (LPS1) and the Albany Waterfront Structure Plan.

Accordingly, we do not raise an objection to the proposed land uses, but seek to draw your attention to the need for the effective implementation of minimum construction standards that reflect the LAmax noise metric to mitigate noise exposure within the proposed development, to ensure the strategic protection of:

- The amenity of the guests, employees and visitors, in-turn protecting the long-term sustainability of the proposed commercial operations; and
- The 24/7/365 operations of the Port and the road and rail corridors.

With that context in mind, the FLCWA:

- Supports
 - The proposed building orientation, internal layout and façade design, which will assist in minimising noise exposure and disturbance to guests, employees and visitors;
 - The proposed 39m setback to Princess Royal Drive, which is over and above the 25m setback required by the planning framework and the 19m setback proposed by the Albany Waterfront Structure Plan Modification. The increased separation to Princess Royal Drive and the freight rail line will assist in minimising noise disturbance within the proposed building, particularly within sleeping areas, which are of the greatest concern to the FLCWA as a result of the potential for sleep disturbance;
 - Comments on Page 18 outlining that the Princess Royal Drive façade should not be regarded as a main street elevation, given the implications for mitigating road and rail noise;
 - The absence of balconies on the building facades oriented towards the road and rail corridors. Access points to balconies, particularly sliding doors, weaken the effectiveness of construction standards to mitigate noise;
 - The limited openings (windows and doors) and glazing on the building facades oriented towards the road and rail corridors, which assists in minimising noise disturbance, particularly within sleeping areas; and
 - Reference to achieving a 55dB (LAmax) internal noise level. FLCWA consider that the LAmax noise metric should be used to inform land use and built form standards where land is adversely affected by low volume freight road and rail noise;
- Draws your attention to aspects of the Planning Solutions and Wood and Grieve reports in relation to noise modelling and construction standards, as per the Lloyd George Acoustics Peer Review (enclosed), as follows:
 - Clarification is required on the future train numbers (1 per hour used) regarding whether they are train numbers or train movements, where 1 train per hour equates to 24 trains across a 24hr period, equating to 48 train movements (i.e. 1 movement into the Port and 1 movement out of the Port per train)



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

- LMax noise levels have not been provided and therefore it is not possible to comment on whether the development can achieve the 55dB (LMax) internal noise level;
- Table 11 of the Wood and Grieve report illustrates that future (2038) predicted noise levels are significantly (7dB) above the noise limit outlined in SPP5.4. For context, a 3dB increase is perceived by the human ear as a doubling of the sound intensity and a 10dB increase is perceived as a doubling of the sound volume;
- Page 31, Clause 18.2 of the Planning Solutions report states that “*internal noise levels are in the range of 30 to 55dB*”, which has merged two noise criteria. The LAeq levels in bedrooms should be between 30 to 35dB and the LMax level should not exceed 55dB; and
- Page 31, Clause 18.2 of the Planning Solutions report states that “*30 to 35dB is inconsistent with Environment Noise Regulations for internal noise. The proposed development will comply with the relevant environmental noise regulations as detailed in the acoustic report (refer Appendix 4).*” The dominant noise source for this development is from the road and railway, which are exempt from the Regulations. An internal noise of 30 to 35 dB(A) is consistent with the criteria for sleeping areas contained within Australian and New Zealand Standard AS/NZS 2107:2016—Acoustics—Recommended design sound levels and reverberation times for building interiors, which form the basis of the criteria contained within the State Planning Policy 5.4 Road and Rail Transport Noise and Freight Considerations in Land Use Planning. Therefore, these criteria are relevant to this proposal.

In light of the above, the FLCWA respectfully requests that the City and Southern JDAP impose conditions of approval that require:

- Minimum construction standards that achieve a 55dB LMax (night) internal noise limit; and
- Internal noise monitoring to demonstrate the construction standards achieve a 55dB LMax (night) internal noise limit within the sleeping areas of the hotel rooms, prior to the City issuing an Occupancy Permit for the proposed development.

CONCLUSION

The City of Albany is an important node within the local, regional, state and national supply-chain. The freight network is highly valued by producers, industry and transport operators. Accordingly, any development within proximity to the Port and its road and rail corridors should be constructed to minimum standards that respond to, and mitigate, actual noise exposure levels, to ensure the strategic protection of:

- The amenity of the guests, employees and visitors, in-turn protecting the long-term sustainability of the proposed commercial operations; and
- The 24/7/365 operations of the Port and the road and rail corridors.

The proposed development provides an opportunity to create a best practice example of integrated land use and transport planning to deliver a long-awaited waterfront entertainment/tourism precinct and much needed higher-end accommodation options, that can co-exist along-side an operational port and key freight transport corridors, through the implementation of minimum construction standards that mitigate the LMax noise levels.



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

The FLCWA would like to thank you for this opportunity to comment on the proposed Albany Waterfront Hotel development application and would welcome the opportunity to meet to elaborate on the views put here.

If you require any further information, please contact Kellie Houlahan on 0419 831 635 or via email on kellie@flcwa.com.au.

Yours sincerely

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

Nicole Lockwood
Chair

14 November 2018

Cc

- David Caddy, Chairman, Western Australian Planning Commission
- Richard Sellers, Director General of Transport
- Gail McGowan, Director General of Planning