



---

FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

---

21 February 2018

Western Australian Planning Commission  
Locked Bag 2506  
Perth WA 6001

Dear Sir / Madam

**Re: Draft State Planning Policy 4.1 Industrial Interface**

The Freight and Logistics Council of Western Australia Inc. (the Council) comprises senior decision-makers from both industry and Government and was established to provide independent policy advice to the State Minister for Transport on developments impacting the delivery of freight and logistics services throughout Western Australia.

Consistent with the Council's charter, this response is made on behalf of our industry members. In that regard, the Council appreciates the opportunity to provide a submission on the draft State Planning Policy (SPP) 4.1 Industrial Interface.

The Council commends the WAPC and Department of Planning, Lands and Heritage on the release of the draft policy and acknowledges the improvements which have been made, particularly in respect to statutory buffers through the form of Special Control Areas, to ensure that strategic industrial areas are protected from incompatible land uses. The Council also welcomes the requirement to have relevant decisions made at an early stage of the planning process and not to defer them to a later point of proceedings where their impact will be constrained.

The Council would like to make a number of additional comments that might be considered in the formulation of the final policy, viz:

1. From a freight and logistics viewpoint, the key imperative is the efficiency of the overall supply chain from origin to destination. While acknowledging that the focus of SPP 4.1 is on industrial nodes, protection of strategic industrial areas through appropriate buffers will only provide for efficiencies in supply chains if the corresponding road and rail corridors are protected similarly. To this end, we suggest that State Planning Policy 5.4 Road and Rail Noise and the need for coordinated land use planning with a whole of supply chain approach, be referenced within the policy.

The Port of Albany is an example of suboptimal planning outcomes, where the Port is protected through a special control area, however the strategic road and rail corridors are not protected through such a mechanism. As a result, the efficient operation of the Port and its supply chain is at risk from reduced access to the Port as a result of noise sensitive land use and development adjoining the rail and road infrastructure.

The Port of Esperance however, is an example of Local Government recognition and acknowledgement of the need to protect transport corridors along with strategic



---

FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA INC

---

infrastructure facilities, with both the Port and the transport corridors being protected through special control areas.

2. The Council has previously suggested the development of a new State Planning Policy on Economic Infrastructure. This would be a means of ensuring that land use planning decisions impacting the freight and logistics industry (and other key sectors of the economy) are appropriately coordinated. In the absence of such a State Planning Policy, those applying SPP 4.1 should seek similarly overarching consideration of outcomes.
3. The Council has concerns as to some of the language used in the draft policy. It appears to be unnecessarily general and open to interpretation. Greater certainty in outcomes and transparency in process is sought. For example:
  - The draft policy refers to industrial sites/facilities of State significance. It is unclear as to what industrial facilities are of State significance and how this is determined. A map of these facilities may assist in identifying existing facilities.
  - Similarly, the draft policy appears to focus on large-scale greenfield developments. It is unclear as to how the draft policy would be applied to existing brownfield sites, particularly in an urban context. Longstanding freight and logistics infrastructure, such as ports and intermodal terminals, frequently exist adjacent to the broader community and often need to expand as demand for their services grow.
4. The draft policy lacks clarity in respect of environmental controls, the circumstances where they apply and their relationship with industrial buffers. We are advised that the Kwinana buffer, for example, is based on air quality. How this relates to other characteristics of the industry requiring protection is unclear. There needs to be consistency and clarity between these various instruments or it makes it difficult for industry to plan with certainty.
5. The use of Special Control Areas as a statutory mechanism to enforce a buffer, as proposed in the draft policy, has the potential to deliver improved planning outcomes. However, decision making for land uses within any Special Control Area will rest with the relevant local government authority and achieving consistency in decision making across local governments may be problematic. The Council suggests that for industrial sites/facilities of State significance, that development within these Special Control Areas be referred to the WAPC for determination to ensure that protection of these facilities (such as Ports) is done in a consistent manner across the State with appropriate reference to broad strategic outcomes.

The Council appreciates the opportunity to provide comment and welcomes the opportunity to participate in any discussion with the Commission related to this submission.

Yours sincerely

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

Nicole Lockwood  
Chair