



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA

Mr David Saunders
Chairman - Kwinana Buffer Review Committee
Western Australian Planning Commission
Albert Facey House
469 Wellington Street
Perth WA 6000

Dear Mr Saunders,

PROPOSED REZONING OF LAND ROCKINGHAM REGIONAL CENTRE - IMPACT ON THE KWINANA AIR-QUALITY BUFFER

The Freight and Logistics Council of Western Australia was established last year by the Minister for Transport, Hon Simon O'Brien, to provide him with independent policy advice on the range of issues covered by his portfolio. The Council comprises senior decision-makers from industry and Government with responsibilities bearing on the provision of efficient freight and logistics activities in this State.

One of the key areas of focus for the Council since its establishment has been the protection of freight corridors and associated activities. In that context, this letter concerns the City of Rockingham's proposal to rezone part of the Rockingham Light Industrial Area to 'City Centre' zoning under the Metropolitan Region Scheme (MRS) as part of the planning for the Rockingham Regional Centre.

The Council understands that the Western Australian Planning Commission has referred the City's rezoning application to the Kwinana Buffer Review Committee (KBRC) for advice on whether or not the rezoning should proceed.

The Council is concerned to discourage residential encroachment into buffer areas surrounding ports, which can threaten the long term viability of these vital strategic assets. The proposed scheme amendment is not supported by the Council due to its close proximity to, and likely adverse impacts on, the Rockingham Industry Zone (RIZ), which provides a buffer and corridor to essential port facilities in Cockburn Sound including the Kwinana Grain Jetty, the Kwinana Bulk Terminal and the freight rail line that services these facilities.

The RIZ and its related infrastructure form a basic part of the Western Trade Coast strategic industrial area and are regarded by the Government as vital to the State's

economy. Planning for the wider area needs to recognise this by ensuring that these significant assets are able to operate at their optimal capacity.

Currently, the Rockingham Light Industrial Area acts as a buffer between residential areas and the RIZ industrial precincts that service the port installations. The interface between these areas requires sensible planning to ensure land use compatibility. With the planned expansion of the Bulk Handling Jetty and rail and road infrastructure in the RIZ, it is more important than ever that this buffer is maintained.

The City's argument to justify the proposed rezoning that North Rockingham and Hillman residential areas are already closer to industry than the area proposed for rezoning is spurious. The fact that the current buffer arrangements are less than ideal does not constitute a valid reason for exacerbating the situation by eroding the buffer.

It is understood that the proposed amendment will not be initiated until a review of the *Environmental Protection (Kwinana)(Atmospheric Wastes) Policy 1992 (EPP)* is complete. It is noted that the purpose of this policy is to provide guidance on land use planning for the area surrounding the Kwinana and Rockingham industrial zones. However, the position is based on a limited range of air quality issues (namely SO₂ and total particulates) and does not cover other important impacts that need to be considered from a land-use planning perspective such as noise, other dust impacts, odour and risk.

Of more relevance to the proposed rezoning is the KBRC's review of the generic buffer covering all impacts for the Western Trade Coast strategic industrial area, as opposed to the somewhat limited scope of the EPP.

The KBRC's recommendations will play an essential role in promoting compatibility between industrial and non-industrial land uses in this area. It is vital that the issues discussed in this letter are fully considered in its review and subsequent findings

Against that background, the Freight and Logistics Council strongly recommends to the KBRC that:

- the Industry zoning remains in respect of the light industrial area in the MRS; and
- the current buffer boundary along Dixon Road remains as it currently exists.

If the light industrial area's zoning was to be changed to City Centre, Commercial or Service Commercial, even with land use controls prohibiting residential use in the local town planning scheme, there would be persistent and strong pressure from local landowners to introduce some forms of residential use because the area is close to transport routes and to the beach. In time, these applications for residential land use would win through the appeal process, eroding the buffer and constraining the efficiency of industry, transport routes and port infrastructure.

The Council notes that the Department of State Development, Fremantle Ports and the Kwinana Industries Council have all strongly opposed to the proposed rezoning.

However, it should also be acknowledged that the Western Australian Local Government Association, as a member of the Council, supports the proposed rezoning and wishes to have this position recognised.

Please take account of this submission in your consideration of the matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Pearce', with a long horizontal flourish extending to the right.

Bob Pearce
Deputy Chairman

6 10 2010

cc Mr Gary Prattley, Chairman WAPC