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FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA

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City of Cockburn  
PO Box 1215  
Bibra Lake DC WA 6965

Dear Sirs

**Robb Jetty Local Structure Plan**

The Freight and Logistics Council has had a number of communications with the City of Cockburn about the Cockburn Coast development, our primary concern being to ensure that the heavy rail freight operation to Fremantle Port, which passes through the area, is not compromised by future development.

Against that background, the Council would like to comment on the Robb Jetty Local Structure Plan (the Plan).

It should be confirmed at the outset that Fremantle Port is a key element in the economic well-being of Western Australia. This \$1 billion pa business is, in turn, dependent on a highly efficient and sustainable freight rail service. The service currently removes 100,000 truck movements from the road network. This figure will grow rapidly as trade through the Port increases and rail's share of the market grows. State Government policies will continue to support this growth.

It would seem appropriate, therefore, that the Plan refers to State Planning Policy 1, whose focus is the balance of economic and community interests in Western Australia. The Policy provides clear direction in this respect, for example, *"planning for land use and development in a manner that allows for the logical and efficient provision and maintenance of infrastructure..... protecting key infrastructure, including ports, airports, roads, railways and service corridors from inappropriate land use and development."*

Turning to the specific issue of how the Plan deals with impacts associated with rail freight operations in the area, we would like to make a number of points:

- The imagery in the Plan is grossly misleading, particularly the artist's impression on the Plan's cover. The lack of fencing, level crossings and general controls of pedestrians/motor cars would, in fact, render the service inoperable on safety grounds. (We have brought the document to the attention of the Office of the Rail Safety Regulator.)
- In addition to changing this sort of misleading imagery, the Plan should also include for rail, the sort of cross section analysis provided for road (pages 84-86). Moreover, it should provide noise contour maps for rail to facilitate appropriate spatial planning in the area.
- While we do not take issue with the Plan's forecast average train movements of 24 per day, we would point out that State Planning Policy 5.4 requires a transport planning horizon of 15-20 years be used. The Plan refers to movements in 2017 as a planning horizon.

- Moreover, it is inaccurate to state (page 54) that train movements will be limited to non-peak periods. This is not the case. The rail service will be unrestricted as to the hours it can operate.
- Rail noise amelioration initiatives are discussed in Section 4.7.2 (page 66). However, it is not clear from this section what precisely is proposed. We suggest that it be reworded to add clarity on this important aspect.
- The discussion in respect of vibration associated with train movements (page 67) is also confusing. The document suggests that residential developments within Curve 1.4 will not be permitted without some vibration attenuation. It then goes on to mention barriers as a possible response. However, barriers will offer no protection against vibration (as they will be equally ineffective for noise attenuation in surrounding buildings higher than two stories). Vibration suppressing mechanisms are available and have been used in the vicinity of this rail line. Their use should be discussed.

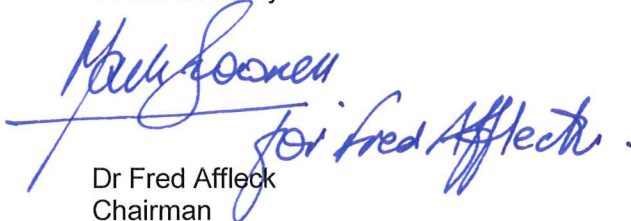
We believe that the protection of the rail freight operation must be secured within statutory planning instruments to the maximum extent possible. That will require:

- formal recognition in the Town Planning Scheme of the proposed buffer along the rail line of 150 metres (page 12) to manage noise and vibration impacts on, and changes to, adjacent land use;
- any changes to adjacent land use within the defined buffer to take fully into account maximum noise and vibration levels and mandate an established set of design standards/building materials;
- design standards/building materials to be specified in the Town Planning Scheme;
- design standards/building materials to be the basis of approval for Development Applications and Building Licences by the local authority; and
- design standards/building materials to be issued with Certificates of Title, including memorials on titles to alert purchasers to the proximity of the rail freight line.

The Freight and Logistics Council would welcome the opportunity to further discuss the points made here. (Please note that this submission need not be treated as confidential.)

In conclusion, we would note that while a valued member of the Council, the Department of Planning would prefer not to take a position on matters discussed here because of its role in subsequent assessment of the Cockburn Coast development initiative.

Yours sincerely

 *for Fred Affleck*

Dr Fred Affleck  
Chairman

17 / 12 / 2012

cc: Chairman, Western Australian Planning Commission