

Neighbourhood Forum 5

Wollongong's Heartland



Coniston, Figtree,
Gwynneville, Keiraville,
Mangerton, Mount
Keira, Mount St
Thomas, North
Wollongong, West
Wollongong,
Wollongong City.

8th February 2018

Submission re the New South Wales Draft freight and ports plan

Neighbourhood Forum 5 operates under the auspices of Wollongong City Council. During 2017, freight transport issues have occupied much of Neighbourhood Forum 5's time and resources. This includes numerous letters and submissions (including to the National Freight and Supply Chain Strategy and the TfNSW 2056 draft on which this submission is in part based). The Forum adopted this submission at its meeting on 7th February 2018.

The discussion paper at <https://www.transport.nsw.gov.au/projects/strategy/nsw-freight-and-ports-plan> is seen as in need of major revision. It is light on freight where too many trucks impact on Wollongong other regional cities and rural roads (many of which were never built for B-Doubles).

In addition, acknowledgement should be given to the fact the shifting road freight to rail freight is an investment in road safety. Here, attention is drawn to statements on page 4 of the 2006-2031 Illawarra Regional Strategy of the Department of Planning as follows: *"It is important that the Region's transport networks support economic growth and maximise the efficiency of freight transport. In particular, what is required are strategic transport corridors to support development of the port of Port Kembla, **increase the proportion of freight transported by rail**, efficiently link regional centres and towns, and support public transport."*

Section 2.5 of the draft notes in part "The NSW Government supports the use of rail for the movement of freight. While there is sufficient rail capacity in the short to medium term, freight rail access to Port Kembla is recognised by Infrastructure Australia as an initiative of national priority."

Why was completion of the long awaited 35 km Maldon Dombarton rail link omitted from the draft? It needs inclusion in the final draft.

The final paper, after extensive revision, should reflect this goal for the Illawarra. Moreover, *increasing the proportion of freight transported by rail or sea or conveyors or pipelines* and *reducing the proportion of freight transported by road* should be a statewide goal.

Given the increase in fatalities on NSW roads involving heavy trucks (from 56 in 2016 to 81 in 2017) and the fatalities on 15 th and 16 th January 2018 on truck - truck crashes (near Newcastle and Grafton) and the semitrailer hitting cars and another truck near Dubbo on 16 th January 2018, Neighbourhood Forum considers that Priority Area number five to “Reduce regulatory burden on industry” should be withdrawn.

In summary, Neighbourhood Forum 5 calls for the final strategy to:

1. increase the proportion of land freight transported by rail;
2. support completion of the Maldon Dombarton link
3. increase safety regulation of the trucking industry;
4. introduce a more rigorous impact assessment process;
5. establish effective road user charging for trucks;
6. require realistic estimates of external costs, eg air pollution;
7. means to effect a reduction of truck noise;
8. significant augmentation of rail infrastructure.

As noted below, these issues have been raised by Neighbourhood Forum 5 since 2009 in response to development applications seeking approval to put more freight on road to move coal, grain and quarry products.

A. Too many trucks

The official website <http://www.rms.nsw.gov.au/about/corporate-publications/statistics/traffic-volumes> gives access to traffic counts on the Mt Ousley road that show in 2017, the average daily traffic count on this road is 53,018, and of this, 13 % are trucks.

That is nearly 6900 truck movements a day on this road. What other city in Australia has to put up with this imposition?

The 2006 - 07 draft Sydney Wollongong Corridor Strategy released by the federal Department of Transport and Regional Services with the support of the NSW Government as part of the former AusLink programme identified many issues relating to present and projected demands in moving people and freight between Sydney and Wollongong.

The strategy noted that the demands on the existing road and rail network will be compounded by the further development of Port Kembla and an expected growth in the number of people commuting between Wollongong and Sydney as well as between Wollongong and Campbelltown/Western Sydney. The projected “rapid growth in corridor freight” was also noted as imposing additional challenges.

The final Sydney Wollongong Corridor Strategy noted (p13) that the Mount Ousley Road is already at capacity in the morning peak (AADT 34 500 in 2003 including about 5500 heavy vehicles). In the intervening ten years to 2017, traffic on the Mt Ousley Road has increased, and, it is congested for more hours of each week day than it was in 2007.

Three road closures on Mt Ousley in a six month period from November 2016 to April 2017 from road crashes involving heavy trucks suggest that this road is now operating at capacity as well, and more bulk freight to and from Port Kembla should be going by rail.

A major road haulage task on Mt Ousley is moving coal by giant trucks (up to 11 axles) to the Port Kembla Coal Terminal. In 2009, approval was given by the NSW Department of Planning under Major Project MP 2008/9 to allow up to 7.5 million tonnes per annum (mtpa) of coal on public roads, with the potential to go to 10 mtpa.

The original Council consent provided for a limit of two mtpa of road haulage of coal to the Port Kembla Coal Terminal with a long standing curfew. Wollongong people have been remarkably tolerant in accepting levels of about 5 mtpa of road haulage. Port Kembla is the only coal export terminal in Australia that receives coal by road as all coal for export from Queensland and Port Waratah at Newcastle arrives at the respective ports by rail.

Incredibly, the limit was raised in 2015 from to 7.5 mtpa to 10 mtpa, and, with no public consultation.

Neighbourhood Forum 5 notes that in regards to external costs, the 1990 Report of the Wollongong City Council Coal Transportation Task Force noted, inter alia, that the NSW Roads and Traffic Authority had then suggested that an average external cost of pavement wear and tear due to bulk haulage is 3 cents per net tonne kilometre; also a 1995 report (re St Marys Maldon-Dombarton rail link) commissioned by Wollongong City Council made recommendations including *"...establishment of an effective road use charging system whereby road coal freight vehicles pay for the full external costs"* such as pavement damage, congestion, noise and environmental costs.

The additional coal was on top of car imports through Port Kembla that had started in 2008. There was a condition that 20 per cent were supposed to be moved by rail by 2011. However, the next train to leave Port Kembla carrying cars will be the first one.

Not content with Wollongong's main roads to Port Kembla having no shortage of heavy trucks on public roads with over five mtpa of coal, with approvals for 10 mtpa, plus car imports, there was cargo from expansion of the Port Kembla outer harbour. Here, in June 2010, the Submissions Report for the Port Kembla Outer Harbour Expansion released by the Department of Planning included comment by the NSW Roads and Traffic Authority that after consideration of the impact of Stage 1 Port Kembla outer harbour traffic volumes stated if the predicted rail mode share could not be achieved, there would be likely *"...unacceptable impacts to road safety and traffic efficiency as well as environmental issues such as amenity, noise and air quality."*

However, the NSW authorities then were asked to approve more road haulage of grain to the Port Kembla Grain Terminal (PKGT). Although most grain arrives by rail at Port Kembla, in recent years, the condition of many grain lines in Western and South Western NSW have been allowed to run down, thus increasing an incentive to use more trucks.

Neighbourhood Forum 5 recommended that

- a. A nominated maximum tonnage of grain by road (no more than 50 per cent increase over the then present limit of 200,000 tonnes per annum).
- b. An estimate of all the external costs of additional grain haulage on road.

- c. A code of conduct for grain truck drivers (as per coal truck drivers).
- d. An outline of measures to encourage more grain onto rail. These should include a surcharge on road deliveries to cover the external costs.

Instead, approval was given to up to 500,000 tonnes per annum, with no external costs being requested from those putting more loads on roads. (Thanks a lot, Sydney.)

Next were two approvals to increase quarry products on Mt Ousley and other Wollongong roads. In 2011, Hanson Construction Materials Pty Ltd (Hanson) wanted to expand the rate of production at its Bass Point Quarry from a present level of about 1.5 million tonnes per annum (mtpa) to 4 mtpa over time, using both road and ship transport; and, to cease the use of sea transport (thus throwing more trucks onto busy roads in Wollongong and Sydney_

Neighbourhood Forum 5 (in submissions to the NSW Department of Planning) called, inter alia, for a levy of \$5 per tonne to be applied to additional road haulage of quarry products from Bass Point to Sydney, with the proceeds being applied to road improvements on the Mt Ousley Road. The amount of \$5 per tonne was based on estimates of external costs or road and rail freight as noted by the 2012 report of the Independent Pricing and Regulatory Tribunal of New South Wales *Review of Access Pricing for the NSW Grain Line Network*.

The withdrawal of the ship, the Claudia I, was reported by the Sun Herald on 10 July 2011 (p19) in an article "Ship out, congestion in". In summary, More than 200 extra trucks are now on inner -city roads after a ship which used to carry more than 9000 tonnes of gravel into Sydney Harbour each week was withdrawn from service by Hanson Concrete of Glebe. The ship Claudia 1 which made three return trips a week from the company's quarry at Bass Port to Glebe, carried 3100 tonnes per trip. The company was reported as looking for a replacement vessel. However, it was also noted that this could take some time.

The second quarry allowed to put more trucks on our roads was Boral. Neighbourhood Forum 5 resolved in 2013 to make a submission objecting to increasing road haulage of quarry products by 500,000 tonnes per annum rather than rail haulage.

Here, the Environmental Assessment (EA) noted that (3.3.3 Alternatives) " Boral has consulted with Pacific National Rail about the availability of additional rail paths to rail product to the St Peter's terminal. Pacific National indicated that they were unable to identify a suitable additional train path"

Again, an approval was given, with no compensatory levies. This is despite the need for road upgrades such as the Appin Highway and grade separation of a busy and dangerous intersection at the foot of Mt Ousley. Or better monitoring of truck noise.

B. Noise and air pollution

More effort should be made by NSW government authorities to reduce truck noise, including late at night and in the early hours of the morning.

The RTA notes (<http://www.rta.nsw.gov.au/heavyvehicles/reducingnoise.html>) noted, "Noise from heavy vehicle engine compression brakes is a significant and on-going cause of complaint for many NSW residents."

This website notes that a pilot fixed noise camera site was constructed at Mt Ousley and has been operational since November 2007. Yet, truck noise has not abated since then. Nor have additional noise cameras being installed.

Neighbourhood Forum 5 (by letter dated 21 December 2017 from Parl. Sec. Anderson) has been advised that further measures are contingent on some action by the National Transport Commission. However, this issue has been with the National Transport Commission for years.

Both diesel trucks and diesel trains are responsible for air pollution and small particle emissions. However, to move quarry products, trucks use about three times more diesel than trains to move a tonne of freight. This leads to three times the air pollution.

C. Rail adequacy questions

When the NSW Government granted approval, c2004, for the expansion of Port Kembla to accommodate car carriers, Wollongong people were assured that the existing road and rail infrastructure would be adequate. However, the NSW Parliamentary State Development Committee after conducting an Inquiry into Port Infrastructure in New South Wales in a report released 17 June 2005 made two important recommendations:

Recommendation 12. *That following the anticipated transfer of general cargo stevedoring to Port Kembla in 2006, the NSW Government re-examine the freight task out of Port Kembla to ensure that the anticipated increase in freight traffic is supported by the necessary improvements in road and rail infrastructure.*

Recommendation 13. *That the NSW Government consider the feasibility of expanding rail infrastructure into Port Kembla, including consideration of the Maldon to Dombarton line, in conjunction with the AusLink program.*

Note the date of the recommendations – 2004. Note also the 2007 federal parliamentary committee report called "The Great Freight Task - Is Australia's transport network up to the challenge." and the Committee Chairman Mr Paul Neville MP, comment that despite some progress, ***"it is now even more obvious that bold measures will be necessary to see a more serious movement of freight from road to rail."***

D. Encouraging rail and equitable road/rail access pricing

Keeping heavy haulage of bulk commodities by road through Wollongong at reasonable levels requires much more effort by the NSW government.

Clearly, more investment is needed into rail infrastructure. In addition, road freight subsidies through failure to ensure user pays pricing with mass distance pricing for the heavier long distance trucks (including coal trucks) and failure to charge for external costs needs to change.

E. External costs

The draft freight and ports plan is very light on the question of external costs including emissions. This needs remedying in the final report, where acknowledgement should be given to the fact that some road freight is in receipt of hidden subsidies and that rail freight is more energy efficient than road freight.

F. Oil vulnerability

The draft freight and ports plan does not appear to regard this as a potential issue. This should be remedied in the final report.

G. Maldon Dombarton

Work on this 35 km rail link started in 1983, and by the time the project was stopped in 1988, it was about one third complete. It has been much studied ever since.

In February 2017, the Illawarra Mercury noted that “The Maldon-Dombarton rail line has received a big setback, after Infrastructure Australia recommended it not receive federal funding.”

This was despite Infrastructure Australia in earlier publications noting the potential of completing the 35 km Maldon-Dombarton rail link to improve access to Port Kembla. The least that the NSW Government could do is to improve its earlier business case.

It appears to Forum members that Infrastructure Australia, in its evaluation, has understated the congestion on the existing Sydney to Wollongong railway line, and totally ignored the increasing road congestion on the Mt Ousley highway.

The 2007 Sydney Wollongong Corridor Strategy (p 11) notes that the Illawarra rail line faces an effective restriction on freight train operations during peak periods (600 to 900 and 1500 to 1900hrs) and that the Maldon Dombarton line may be able to play a future role and could *"remove bulk freight from the Illawarra rail line and some other parts of the Sydney passenger rail network...."*

It is a fact that in 2014, the NSW Department of Planning gave approval to Boral to increase road haulage of quarry products from its Dunmore quarry, and stated that *"Boral is unable to increase the amount of product supplied by rail ...as it is unable to gain access to additional rail paths or utilise longer trains;..."*

The existing South Coast line is now operating at near full capacity during the day and for some of the night. The Moss Vale Unanderra line has severe speed-weight restrictions and extra distance for freight moving between Port Kembla and Western Sydney.

In 1983, it was proposed to construct the new railway in three years, and, that the new railway is one third completed already, that it should be able to be completed within three years. The February 2017 Infrastructure Australia report says five years, this, along with the indicated cost of completion of some \$800 million, should be questioned.

In addition, as more people live in Wollongong and work in Sydney (for housing affordability) attention is needed to the need to improve the passenger train service between Wollongong and Sydney, with more trains and faster trains. Much local sentiment is reflected in the Illawarra Mercury **Editorial** for Saturday 15 July 15, 2017'

Our readers have made it loud and clear through the columns of these pages as part of our Cut the Commute campaign.

The people of the Illawarra want a better service from our region to Sydney on both road and rail.

The NSW Government has been working on a proposal for the F6, but has been standing idly on the tracks in terms of a better rail prospect for this region.

And commuters and travellers have rightly had enough.

Now it seems the answer is staring them in the face and as much as the NSW Government doesn't want to hear it the numbers stack up.

The answer is plain to see.

The stalled Maldon-Dombarton rail link must be completed.

Documents revealed by Fairfax Media have revealed the true potential open to the people of the Illawarra.

A cabinet-in-confidence document entitled Rail Corridor Strategy: Sydney to Wollongong produced in 2014 has rated a rail link upgrade for Wollongong to Sydney in its benefit-cost analysis as "exceptional"....

In response to the findings, local politicians have called for action.

"If you untangle freight and passenger movements you get a much better outcome," Cunningham MP Sharon Bird told the Illawarra Mercury, adding South Coast Line delays often related to freight movements.

"To see this put in a document ... just leaves me with the question about why they [the NSW government] are so completely wedded to new toll roads."

This has the potential to be a complete game changer for this region and we need government representatives of every level in the Illawarra to be pushing in unison for this to be prioritised.

We must demand action and we must demand a better result for the people of the Illawarra who travel each day on our train lines.

We can no longer continue to accept inaction or being put in the "too hard" basket.

In this modern world we can put man on the moon, send spacecraft to Mars, replace people's failing body parts and even cure diseases once thought incurable.

We can do things that were once thought impossible.

Surely, we can invest in this region, do the impossible and finally, once and for all, **Cut the Commute.**

H. Conclusions

Whilst public exhibition of the draft freight and ports plan is acknowledged, the final version needs to articulate policies that will reduce over-reliance of heavy truck using public roads. The final version should put much more emphasis on improving heavy truck road safety and shifting freight to rail with infrastructure measures to assist this, including completion of the Maldon Dombarton rail link.

Attention should also be given to expediting the grade separated intersection at the foot of Mt Ousley.