



23 March 2018

The Hon Melinda Pavey MP
Minister for Roads, Maritime and Freight
GPO Box 5341
SYDNEY NSW 2001

Online web submission

Dear Minister

Re: NSW Draft Freight and Ports Plan

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of eleven local councils in the area south of Sydney harbour - central, inner west, eastern and southern Sydney. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member Councils cover a population of over 1.7 million, one third of the population of Sydney.

The SSROC Secretariat appreciates that the Transport for NSW has called for submissions on the NSW Draft Freight and Ports Plan. We are pleased to provide comments in the sections below.

SSROC appreciates the significance of Port Botany and Sydney Kingsford-Smith Airport operations to state and national economies. We know that a high proportion of our regional population works with these organisations or in associated freight industries. We understand that the Airport and Port need to work with maximum efficiency to meet growing trade and tourism demand, and so we welcome the strategic focus on freight and ports as well as the opportunity to consult with the NSW Government.

In addition to our support of economic stability and growth, SSROC is also committed to the well-being of our communities. It is our responsibility to bring to your attention the less desirable impacts of forecast exponential growth in road freight. These negative impacts – noise and vibration, pollution, accidents, road asset degradation – occur at the local level. They have significant impacts on local economic and community health outcomes. It is therefore essential that Councils participate in the development and implementation of the strategy to ensure these impacts are addressed and mitigated to the best of our combined abilities.

Therefore, SSROC and its member Councils are very keen to understand the strategy and implications, and to work with the NSW Government in support of its implementation in way that delivers economic benefits within our region and beyond, but which minimises the negative impact on the communities negatively affected.

GENERAL COMMENTS

SSROC commends the focus of the draft plan on safe, efficient and sustainable freight access to places, facilitation of technologies that reduce freight costs and impacts, and strengthening of partnerships between industry, state and local governments to find solutions to freight challenges.

SSROC welcomes the commitment of Transport for NSW to:

1. Expand the road and rail network to improve connectivity and accessibility for high productivity vehicles and efficient rail wagon loading; and
2. Build strategic road freight networks in partnership with local government.

The draft plan's vision of metropolitan consolidation points to regional landfills and processing, and investigations for co-location of waste transfer and processing facilities with rail is supported. SSROC has experience in off-site regional-based waste management facilities and waste recycling and will welcome the opportunity for deliberations with Transport for NSW on options.

The SSROC supports the following committed 0-10 Years Initiatives:

- Detailed planning to support the Port Botany Precinct and Kingsford Smith Airport as primary international trade gateways. This should be in collaboration with councils.
- Establish a Cargo Movement Coordination Centre to improve freight rail and road efficiency and reliability through to ports, including implementing the recommendations of the Port Botany Rail Operations Group. Councils should be represented in the Centre.

SSROC further supports the following 0-10 Year Initiatives that the NSW Government plans to investigate:

- Completion of the duplication of the Port Botany Rail Line and capacity upgrades to Foreshore Road at Port Botany;
- Freight technology improvements and solutions towards mode shift to rail over time;
- Metropolitan rail transfer station, an intermodal terminal to handle bulk waste and recycling materials originating in the growing Sydney metropolis;
- Completion of Port Botany Rail Line duplication of the final 3kms of single line track
- Enhancement of South Coast Rail to provide additional capacity;
- Investigate improving ferry and ground transport capacity and connections to White Bay cruise terminal.

SSROC supports, and asks that the NSW Government to bring forward to 10 years, the 10-20 year investigation initiative for the following:

- Outer Sydney Orbital - construction of Stage 1, including dedicated freight rail to connect the National Land Transport Network with intermodal terminal precincts;
- Provision of additional or dedicated capacity for freight in the Southern Highlands and the Illawarra Rail lines;
- Construction enhancements to provide additional capacity to support expected growth in freight traffic on the Southern Sydney Freight Line.

Similarly, initiatives to address long term capacity constraints to Port Botany and South East, such as new train and road links, should not be scheduled for 20 years and over. These should be explored during the 10-20 year period.

SPECIFIC COMMENTS

Port Botany Freight Rail Duplication and the “Sydney Gateway” Project

Prioritising the Port Botany Rail freight line duplication to support and relieve road corridors in the Bayside Council area is important for the regional economy. The draft Eastern City and Infrastructure Australia reports document well the importance of the duplication in enhancing the

functional capacity of the port and managing future container volumes through the Port. Road networks connecting to the port are increasingly congested, and with a more than triple increase in container movements expected over a 25-year period, the road network around Port Botany will certainly be overstretched.

SSROC recommends that the NSW Freight and Ports Plan detail links with the previously proposed ‘Sydney Gateway’ project that was contained in the NSW 2014 State Infrastructure Strategy. This will remove any doubt as to whether the overhaul of the access roads to international air and sea ports in the Botany Bay region is still to be pursued.

Recommendations

1. The NSW Draft Freight and Ports Plan should prioritise the duplication of the Port Botany Rail Line. Being categorised under 0-10 year period for “investigation” is not good enough considering the importance and increasing urgency. The investigation of this important duplication should occur in 0-5 year period and be moved to the “committed” category.
2. The Plan should link to the proposed “Sydney Gateway” and provide clarity on the long overdue overhaul of the access roads and routes to Sydney Airport and port in Botany Bay.

Liveability and Freight in Botany Bay

The Greater Sydney Regional Plan and the Eastern City District Plan emphasise liveability for residents and local communities, including access to community facilities, recreation and open space. The NSW Draft Freight and Ports Plan recognises that freight and logistics can impact the amenity of local precincts and residents through road congestion and limited access to recreational and open space facilities.

Recommendation:

3. SSROC urges Transport for NSW, NSW Government and other stakeholders to engage with councils with port and related operations within or near their locality, especially in the very densely populated SSROC area, to enhance community access to open space, schools, health services, cultural and shopping destinations.

Integrated planning of ports and the local area

Ports and the freight industry associated with them, play key roles in the local, state and national economies. It is important that the strategic planning and development of ports such as Port Botany are integrated in a way that serves and enhances rather than suffocates the local economic, recreational and community life of host and neighbouring communities.

For example, major road routes in Bayside Council, particularly near Port Botany, have problems of congestion. Integrated planning is essential to improve safety for cyclists on local roads. Secure corridors for cyclists (and would-be cyclists) would enable them to cycle to work in the Botany Bay and employment precincts unhindered by freight and heavy trucks.

Recommendation:

4. NSW Government and agencies should engage and work with councils where ports are located and councils nearby, to explore and plan to leverage local economic opportunities.

The Illawarra Rail Network and the Maldon Dombarton Rail Line

The Illawarra Rail Line enables freight to be transported from Port Kembla, through southern Sydney to Botany and Sydney ports. The line has capacity limitations, with only two tracks beyond Hurstville to the south. This necessitates freight and passenger trains sharing the track with priority given to the latter. The topography and related winding rail alignment in parts of the Illawarra Line does not encourage faster and more effective freight transport services.

For situations such as this, the NSW Draft Freight and Ports Plan proposal for a Cargo Movement Coordination Centre to help optimise the transportation and distribution of cargo through Sydney and regional NSW is supported. There is a need for councils to be represented at the Centre to bring local perspectives and ensure a coordinated approach to freight transport in NSW.

The NSW Government should consider the Maldon Dombarton Rail Line. It will provide a vital regional link, greater operational capacity and reliability to passenger services on the Illawarra Line. Councils in southern Sydney such as Sutherland are witnessing increasing demand for passenger services as many of the residents work in the Sydney CBD and airport axis. As a result, overcrowded trains are common during peak times. Studies in the past have pointed towards completion of the rail line as a priority. Unfortunately, the NSW Draft Freight and Ports Plan does not .

Port Kembla is likely to play even more important roles in the freight industry as Port Botany approaches operational capacity. This makes the relevance of Maldon Dombarton Rail Line more important than ever.

Recommendations:

5. Councils should be represented in the operations of the proposed Cargo Movement Coordination Centre.
6. SSROC shares the view of member councils such as Sutherland that as a result of increasing pressure on the performance of regional road routes, further investigation on transporting freight from Port Kembla and Port Botany by rail be undertaken.
7. The identification and protection of freight corridors should be a high priority of the Draft Freight and Ports Plan. Local councils should be engaged early in the planning process.
8. SSROC supports the completion of the Maldon Dombarton Rail Line. It will increase passenger train capacity and improve the reliability of train services on the Illawarra Line, reduce heavy freight vehicle movements on the regional road network and support the regional strategic importance of the Kembla Port.

Safety of the Road and Freight Network

SSROC welcomes the emphasis and generally supports the Future Transport Strategy and the NSW Road Safety Strategy 2012-2021 strategies and stated objectives of massive reduction in fatalities and trauma. We appreciate the longer aspirational goal of zero fatalities by 2056. This will involve innovative strategies and SSROC will be pleased to contribute to this process.

As expressed in a separate response to the Draft Road Safety Plan, SSROC believes that the absence of street lighting as part of the mechanisms for road safety in the NSW Freight and Ports Plan is a significant omission. SSROC agrees with the principle set out in the Road Safety Plan that “roads, roadsides and vehicles need to be designed to minimise crashes and reduce forces if a crash happens”. The principle seems to assume that well designed roads will therefore be safe at night, but there is a need to focus on making roads safer at night, particularly in urban roads.

SSROC believes that there is a **one-time opportunity** to substantially improve safety outcomes of NSW road network by upgrading from the dominant yellow high-pressure sodium lighting on NSW main roads to the high quality white light provided by LEDs. The business case for LEDs has reached commercial maturity and the technology is being widely adopted by road authorities around the world to reduce long-term costs, reduce energy consumption and improve road safety.

SSROC realises that:

- Street lighting's primary function is to improve road safety at night to reduce accidents, injuries and deaths.
- Night time accidents may be costing the Australian economy billions of dollars annually;
- The globally recognised *Handbook of Road Safety Measures* recognises improved street lighting as having amongst the highest, if not the highest, benefit cost ratios of all available road safety measures; and
- Research by Clanton & Gibbons in the US (and others) has identified that significant reductions in driver reaction times can be achieved from deploying high quality white light as found in LEDs as compared to high pressure sodium lighting (which currently dominates NSW main roads).

More than 200,000 street lights in NSW are found on main roads. Approximately half of these on the most important traffic routes are co-funded by local councils and Roads and Maritime Services (via the NSW Traffic Route Lighting Subsidy Scheme). As ownership of street lighting generally rests with the three NSW electricity distributors, securing improvements clearly requires a multi-organisation response.

SSROC has been active for some time on street lighting issues through its [Street Lighting Improvement Program](#) which now covers about 40% of the street lighting across NSW.

Recommendation:

9. The NSW Freight and Ports Plan should identify adequate street lighting at night as a priority safety mechanism;
10. SSROC and its member councils should be approached as they are willing to work with relevant agencies to help achieve road safety improvements through improved street lighting.

Bipartisan Approach

A bipartisan approach is needed in finalising and endorsing the plan to provide more certainty for future direction and planning for the next 20-40 years. This is important as the directions and commitments set in NSW Draft Freight and Ports Plan inform planning decisions made now and in the future. Successful integration of land use and transport planning requires certainty of future investment priorities.

Recommendation:

11. NSW Government explore bipartisan and legislative approaches to provide certainty to the implementation of the strategy irrespective of which party is in government in the future. This also provides certainty for stakeholders, including councils, community, investors and industry.

Medium- and Long-Term Projects

SSROC is concerned that many of the projects listed in the 10-20 years band are only for future investigation and may not proceed. Moreover, no clear funding mechanisms have been identified

for such projects, or even the associated investigative studies. It is important that mechanisms are found to ensure that future governments will have an obligation to progress or deliver the longer-term projects. Such mechanisms could be supported by treasury guarantees.

Recommendation:

12. Clear funding mechanisms should be identified for projects, including associated investigative studies. Such mechanisms, where possible, should be supported by treasury guarantees.

The Last Mile

SSROC member councils are aware that the last few miles are usually completed through the local road network. Councils are concerned about the impact of Higher Mass Limit vehicles on local roads. Ensuring that new road pavements are provided as often as needed to accommodate larger and heavier vehicles could be difficult for local councils to finance.

It could be frustrating for councils that the National Heavy Vehicle Regulator no longer accepts rejections by local councils based on Last Mile impact.

The responsibility for local route assessments should be that of the freight industry or the Roads and Maritime Services rather than councils. The assessments should include pavement testing and evidence-base studies to demonstrate non-adverse effects of ameliorated environmental impacts on the local community and local access routes.

The issue of noise pollution associated with the concept of Last Mile is significant, particularly the trend towards night delivery. The trend is a response to growing day-time traffic congestion and accessibility constraints around major town centres and industrial areas, but which creates noise and environmental concerns for the community.

Recent years have witnessed a huge increase in online transactions and e-commerce, and the resulting need for delivery smaller freight vehicles has created increased pressure for parking and loading areas.

Recommendations:

13. The NSW Draft Freight and Ports Plan should articulate a mutually acceptable approach to address road maintenance and upgrading issues resulting from freight and heavy vehicles on local roads.
14. State-Local Government consideration of environmental performance standards for Last Mile delivery and distribution of freight: including lighting, air quality, safety, noise, air and water quality and community impact.
15. Last Mile environmental and evidence-base assessments should be the responsibility of industry or Roads and Maritime Service and not that of local council.
16. State-local council-industry collaboration in developing best practice guidelines for dock design and waste management facilities for residential, commercial and industrial land uses.

CONCLUSION

Thank you for the opportunity to provide comments on the NSW Draft Freight and Ports Plan.

In order to make this submission within the timeframe of the review, it has not been possible for it to be reviewed by councils or to be endorsed by the SSROC. I will contact you further if any issues arise as it is reviewed.

Yours faithfully,

Namoi Dougall
GENERAL MANAGER
Southern Sydney Regional Organisation of Councils