



Ingo Koernicke ph:97100624  
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23 March 2018

Mr Damien Colclough  
Executive Director  
Freight Industry,  
Freight Strategy and Planning  
Transport for NSW

Dear Mr Colclough

**NSW Draft Freight and Ports Plan 2017  
Future Transport 2056**

[In response, please quote File Ref: GR/10/223145]

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

Being situated approximately 20km south of Port Botany, the Sutherland Shire's close proximity to the Port and the Sydney Kingsford Smith Airport has historically been a strong influence on the development of light industry in the area and as a major destination for the shire's workforce.

In light of the forecast growth for Sydney and inherent pressure on the transport network, the NSW Freight and Ports Plan comes at a pivotal time and opportunity to best guide and prioritise measures that will facilitate the supply, movement and distribution of freight over the next 40 years.

While the focus on freight has long been linked to the development of major road, rail and ports infrastructure, the rapid densification of Sydney, application of emerging disruptive technologies and changing community expectations requires a shift in emphasis to the local level where freight logistics is increasingly becoming more challenging. In response, it is vital that the final NSW Freight and Ports Plan be able to create an effective framework for all levels of government and key stakeholders to work holistically and address the many complex issues that lie ahead.

Within this context the following comments are made with respect to the NSW Draft Freight and Ports Plan:

**Constraints on the Southern Sydney / Illawarra Road and Rail Network**

The movement of freight within and through the Sutherland Shire is heavily reliant on the performance of the State's arterial road network in particular, the Princes Hwy (M1 and M6), Heathcote Rd, Alfords Point Rd, Taren Point Rd and Captain Cook Drive.

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The importance of these links cannot be emphasised more due to the local road network's limited permeability to the north and north-west. Constrained to three (3) road bridge crossings over the Georges River any congestion or incidents along these routes can result in major delays and poor logistical performance of freight.

As an alternative to the road network, the Illawarra rail line enables freight to be transported through the Sutherland Shire between Port Kembla / Illawarra and Port Botany / Sydney. Because the Illawarra line is limited to two tracks south of Hurstville it requires freight movements to not only share the track but also give priority to passenger services. As a result any breakdown of freight trains on the Illawarra line (which is not uncommon), can have a major impact on the performance and reliability of Sydney Trains passenger services on the T4 line – which includes both local and interregional services.

The tight winding alignment of the rail line between Waterfall and Bulli is a major constraint that hinders the opportunity for the faster and more effective transport of freight by rail between Sydney and the Illawarra. The track alignment together with the limited track capacity of the Illawarra line, significantly compromises the attractiveness and performance of rail for freight and passenger service use.

- **General Movement of Freight**

The proposal in the Draft Freight and Ports Plan to create a Cargo Movement Coordination Centre to help optimise the transportation and distribution of cargo through Sydney, Port Botany, Port Kembla and regional NSW is supported. It is important that Local Government (via the Regional Organisation of Councils) also be given some form of representation at the Centre to ensure that a coordinated and consistent approach to freight transport is applied at the local level for all stakeholders.

- **RMS Pinch Point Programs**

The RMS Pinch Point Program identifies and addresses constraints in the road network that is vital for freight movement. Its targeting of key network bottlenecks and areas of high congestion has had a positive outcome across Sydney and is supported.

- **Heathcote Rd**

The expansion of residential development and employment opportunities in south western Sydney is likely to generate significant increases in freight and general vehicle traffic on Heathcote Rd due to its strong links to the Sutherland Shire and Illawarra. The recommended improvement and safety upgrade for Heathcote Rd in the Draft Freight and Ports Plan is supported.

- **Maldon Dombarton Rail Line**

Increasing demand for passenger services is occurring in the Sutherland Shire with the result that the majority of peak passenger services are experiencing

major overcrowding. The Maldon Dombarton Rail Line is a vital regional link that when built will provide greater operational capacity and reliability to passenger services on the Illawarra Line by enabling freight trains to use an alternate and dedicated rail line.

The Draft Freight and Ports Plan notes that the role of Port Kembla is destined to become more prominent as the operational capacity of Port Botany is reached. Freight movement from Port Kembla to the south and south west via Maldon Dombarton is considered vital for the operational and economic performance of the Port. Based on the benefit to passenger services on the Illawarra line and various studies undertaken over past decades by previous Federal Governments, the completion of the Maldon Dombarton rail line should be brought forward and given greater priority in the Draft Freight and Ports Plan.

The development of the western inland rail link through Parkes will enable high volumes of freight to be transported more quickly and efficiently between Brisbane, Sydney and Melbourne. Incorporating the Maldon Dombarton rail line and Port Kembla into this rail freight network needs to be further investigated and given greater priority in view of its regional freight context and Port Kembla being one of the three major Ports servicing NSW.

#### Recommendation

- That due to the increasing pressure on the performance of regional road routes, transporting more freight by rail from Port Kembla and Port Botany needs to be undertaken. In this context, greater priority needs to be given to developing more dedicated rail freight lines and associated rail / transport corridors in Sydney and the Illawarra – this includes their identification and the application of appropriate planning measures to create and protect these future corridors.
- In view of the growing pressure on road capacity and diminishing performance and safety of regional roads from increased freight traffic between Sydney and key Ports at Botany and Port Kembla, the development of key road corridors such as the F6 is supported. Routes such as Mt Ousley and Princes Hwy, where major capacity constraints exist, alternative options for the movement of freight (such as dedicated rail lines or roads ) needs to be investigated, identified and given greater priority in the Freight and Ports Plan
- The RMS Pinch Point program is supported. It is suggested that a schedule of works needs to be contained under the Freight and Ports Plan to ensure that freight accessibility, network performance, timing of major projects and consistency with other State Plans is maintained.
- The overview of the supply chain for freight in the Draft Freight and Ports Plan shows that in most instances greater investment in rail infrastructure is needed. Where it improves transport safety, reliability and freight capacity, the Plan should give greater emphasis on the development and timely delivery of rail and associated intermodal freight infrastructure.

- The identification and protection of freight corridors should be a high priority of the Draft Freight and Ports Plan. Local Government input early in the planning process needs to be mandatory for State Government Agencies to enable appropriate land use planning responses that facilitate freight movement and do not sever or compromise existing or future local transport networks for passenger vehicles, public and active transport.

Dedicated road freight lanes, rail lines and corridors are supported where they have the potential to greatly improve safety, help minimise road and rail network delays and enable new transport technologies such as automated vehicles etc to be more effectively applied.

- The completion of the Maldon Dombarton freight rail line has long been recognised as
  - a) being pivotal to increasing passenger train capacity and improving the reliability of train services on the Illawarra line,
  - b) reducing heavy freight vehicle movements on the regional road network and
  - c) supporting Port Kembla's role as a major regional port.

Bringing forward the completion of the Maldon Dombarton rail line should be a priority due to its immediate benefits for freight distribution regionally and improvement for rail passenger travel / capacity between Wollongong and Sydney.

### **The Last Mile**

The last mile generally occurs on the local road network. The provision of new road pavements to accommodate larger and heavier vehicles is beyond the means of Local Government and cannot be achieved without funding from State and Federal Governments. The Draft Freight and Ports Plan needs to articulate how this issue can be addressed and industry expectations met.

How best to manage and accommodate freight movements in the last mile is important particularly with respect to

- How the application of movement and place principles are applied. Conflicting views between Local and State Government Agencies may occur with respect to function (the efficient movement of freight) vs amenity/ place (facilitate greater pedestrian and economic activity through place making) particularly where major arterial roads occur in major town centres.
- Addressing community expectations about noise and air pollution. This includes the potential adverse environmental, amenity and safety impacts on local residents from delivery activity occurring between 7pm to 7am in response to avoiding growing traffic congestion and accessibility constraints around major town centres and interface with industrial areas.

- Growth in e-commerce and potential for the proliferation of smaller freight vehicles / vans creating increased pressure for parking and loading areas
- The appropriate planning and location of freight distribution hubs, waste transfer stations etc. by Local and State Government. How best to protect key areas / sites through land use planning measures will be required to minimise the intrusion of residential development that may compromise future freight related activity in the last mile.
- The use of drones to transport freight from localised hubs situated in the last mile has the potential to cause significant nuisance to residents from noise and loss of amenity.

### Recommendation

Creating a formal means to coordinate and apply a consistent planning approach between Local Government and TfNSW to address last mile issues is recommended,

Matters for consideration should include:

- Restricting delivery times to outside of peak periods
- Review and guidance on the type of transport best suited to deliver goods during off peak periods – particularly where noise and amenity impacts in and around town centres can be minimised.
- Better utilisation of empty commuter car parks during off peak periods to maximise the use of limited space and unused infrastructure and to consolidate freight handling and delivery activity in or around town centres
- Develop environmental performance standards for last mile delivery and distribution of freight, includes noise, air quality, lighting, water quality etc.
- Developing best practice guidelines for dock design and waste management facilities that are consistent for residential, commercial and industrial land uses and satisfy freight industry best practice.
- Review and develop new technical guidelines for wayfinding and parking restriction signage to minimise visual clutter and simplify information to all users.
- Review the use of drones to transport freight in urban areas and develop guidelines for their use taking into account potential significant noise, safety and amenity issues on the community.

## **Noise and Air Quality Impacts Associated with freight movement**

The transport of freight relies primarily on it being moved by road, rail, air or water. Where an interface exists between transported freight, residential and sensitive land uses (such as aged care facilities, hospitals, schools, childcare centres, gyms) significant health, safety and amenity issues can arise from air and noise pollution, lighting overspill and removal of vegetation.

Sensitive land uses ideally should not be permitted under or adjacent to major freight transport corridors where air and noise pollution can cause adverse health impacts. Changes in transport technology is unlikely to significantly help mitigate major sources of fine particulates PM2.5 derived from brake dusts, tyres and pavements etc., or sources of noise such as from rail / wheel squeal and wagons rattling etc.

Community expectations and tolerance of noise and air pollution is likely to change as more development and people live adjacent to major roads, rail lines or under flight paths. The future need for more out of peak deliveries to town centres and the cumulative transport impact associated with the 24hr economy could generate increased community concern about noise and air quality which could result in freight movement restrictions and limitations applied to freight performance .

### Recommendation

To best manage issues arising from noise and air pollution that could limit or adversely affect freight transport and operations and help inform the community, freight / transport operators and assist State and Local Government in developing appropriate land use planning strategies, it is recommended that noise contours along all rail and major arterial road corridors in urban areas be developed by TfNSW.

The air quality contours developed should include current and forecast levels of air pollutants Particulates PM2.5 and PM10, Carbon Monoxide, Sulphur Dioxide and Nitrous Oxides.

The noise quality contours should include current and forecast noise levels – dBA Leq (for day and evening), N70 and N40 for the number of peak noise events above 70dBA and 40dBA during (day and evening).

It is suggested that the noise contour maps could be made available to the community under s.10.7 (previous s 149 certificates) under the EP&A Act 1979 (similar to what exists for Aircraft Noise) so that they can be informed of the potential noise and air pollution levels affecting a property at time of purchase.

### **Greater inclusion of Local Government**

Local Government needs to have a much greater role in freight planning. The Draft Plan is generally silent and lacks detail on the role of Local Government. It is not evident what the expectations and contribution of Local Government is in the Draft Plan.

The movement and distribution of freight is rapidly changing in response to technology and network congestion. These changes will require major infrastructure development and investment that will require a much more coordinated and whole of government approach.

Accommodating new corridors and developing freight priority routes for example will have significant impacts on land use planning strategies for local government and communities – these include not only the environmental and economic impacts associated with noise and air pollution, safety, amenity, changes to property values etc. but also accommodating and appropriately integrating changes to freight distribution at the local level. Local government needs to be a part of the planning at the earliest stages to ensure the transition to future freight is seamless.

### **Summary**

In recent years, the growth of residential land use development, light industry and freight distribution centres / hubs in Sydney's western and south western areas has placed greater pressure on the road network within and around the Sutherland Shire resulting in increased traffic congestion and potential for conflict between heavy vehicles and passenger / light vehicles.

The movement of freight will continue to be a major challenge for all levels of Government in response to the rapid growth of Sydney and its 3 key cities. Both the creation of new corridors and protection of existing ones will be important as will be the need to separate freight on dedicated roads and rail. To address this challenge a holistic all of government approach is vital and the role of the Freight and Ports Plan, has a major role in facilitating this outcome.

Yours sincerely

Ingo Koernicke  
Senior Environmental Scientist  
(Air Quality and Sustainable Transport)