

22 March 2018

Transport for NSW
PO Box K659
HAYMARKET NSW 1240

Dear Sir / Madam,

Draft NSW Freight and Ports Plan

AlburyCity welcomes the opportunity to provide a submission to Transport for NSW in relation to the Draft NSW Freight and Ports Plan.

As a major regional NSW city located at the southern extremity of the state, Albury is a vibrant community situated on the Hume Freeway some 550km from Sydney and 310km from Melbourne. With a population of 52,000 people, Albury is an essential regional capital city providing infrastructure, health and professional services, business, employment, education, culture, sports and recreation to a broader regional catchment of approximately 180,000 people.

The city's liveability and strategic location is evidenced by the presence of many national and multi-national businesses from a variety of sectors; some of which have established head offices in the city. Identified strategic priorities for the region include the development of the Transport and Logistics sector as a result of Albury's geographic location on the main freight and passenger corridor between Melbourne and Sydney.

Infrastructure assets including the NEXUS Industrial Precinct, the Ettamogah Rail Hub (ERH) and the proposed Inland Rail Project provide a number of opportunities for future growth. Additionally, Albury has a successful and highly varied manufacturing sector with major employers including Norske Skog, Milspec and Asahi Beverages contributing significant value-add end employment to the region and the State of NSW more broadly.

AlburyCity's consideration of the Draft NSW Freight and Ports Plan provides specific reference to the plan numbering and title format outlined in the Plan:

1.9 Outcomes delivered by the 2013 NSW Freight and Ports Strategy

AlburyCity recognises the positive impact of the full duplication of the Hume Freeway from Sydney to Albury including the improved safety and travel times.

2.3 Regional NSW Freight Overview

It is important to note that the economies, freight volumes and types across Regional NSW vary significantly. While statistically coal, grains and livestock will are identified as the three largest growth commodities throughout Regional NSW, this is not the case for the wider Albury Wodonga Functional Economic Region.

2.4 Key Trends

While the Inland Rail project is further explored in 2.9 of the draft Plan, it is important that it also be identified in this section as a key driver influencing freight demand. The Inland Rail Project provides a much larger opportunity for the state of NSW than is articulated in the draft Plan. The focus for NSW should not be restricted to optimisation of movement of freight in regional NSW to the Ports of Botany, Newcastle and Kembla. Rather, the NSW Government should look to capitalise on the opportunities presented by the opening up of markets in Victoria and Queensland. The supply chain benefits will be considerable across the entire eastern seaboard.

2.5 Ports in NSW

While it is appreciated that the Draft Freight and Ports Plan is a NSW planning document, the failure of the document to mention Port of Melbourne is disappointing. There is a need to recognise the requirement for connectivity to other major ports (eg. Melbourne and Brisbane) which for many regional cities and businesses, are integral to their ability to reach markets and continue to contribute to and drive the NSW economy. Linkages provided to these ports are just as important to the linkages provided to Ports in Botany and Kembla.

Importantly the NSW Government must recognise that for many southern NSW businesses and producers, infrastructure demand for movement of freight to ports may be to Melbourne rather than Sydney. There has previously been a resistance to invest in road and rail infrastructure which supports or facilitates the movement of goods to the south due to the Government's desire to drive freight into Sydney Port. Infrastructure investment should be based on the needs of business and industry and what is required to ensure their sustained and progressive growth and development and contribution to the regional economy.

2.6 *Intermodal Terminals*

Given the significance of intermodal terminals to containerised freight movement through regional NSW, it is pertinent to include a Regional Freight Network Map in the document in addition to the Metropolitan Freight Network Map.

2.7 *Transport Regulation and Reform*

Transport NSW's intention to pursue opportunities to provide dedicated rail networks for passengers and freight to reduce sharing of busy rail corridors is supported and encouraged. The provision of heavy vehicle road infrastructure to not only cater for increased vehicle movement demand, but to drive economic growth, is a key consideration for Albury.

2.9 *Inland Rail*

See commentary from 2.4 in relation to Inland Rail.

3.1 *Mode Share Split by Commodity (Manufacturing)*

Albury has an operational first-class intermodal hub in the city currently handling more than 20,000 TEU per annum, with present-day capacity to increase rail share of manufactured goods freight. A wording change is suggested to identify that these opportunities exist now, they are not only 'in the future' and should not be limited to 'future city hubs'. Rather there should be reference to growing regional city transport hubs.

3.2 *Opportunities and Challenges by Commodity (Manufacturing and Construction Materials)*

There is no discussion around the opportunities and challenges for the manufacturing and construction sectors outside of Sydney. The challenges identified have little bearing on the landscape in regional NSW.

It is important to note that proximity to Sydney is not a gauge by which regional NSW freight priorities should be established. Albury, located on the NSW – Victorian border, provides a key freight and logistics hub for the state, and a gateway to Victoria, supporting and driving the growth and development of regional NSW and surrounding towns and villages.

4.2 *Increase access for freight across the road and rail network*

The Ettamogah Rail Hub (ERH) currently has a funding submission before the Fixing Country Rail Fund to further develop its intermodal facility. If successful, ERH will deliver a 3.5km master siding and

further 2km extension to the rail siding. These siding expansions will allow trains to fully clear the Inland Rail mainline in order to load and unload without blocking the corridor. It is anticipated that loading on the mainline will become much more difficult upon completion of the Inland Rail Corridor.

At present, ERH is timetable constrained and will have difficulty servicing current customers into the future due to the requirement to stop trains on the mainline. The ERH project provides a solution to more efficient rail freight services and diversion of freight away from our road network, thereby relieving road congestion and improving safety. The ERH proposal to construct a master siding off the Melbourne – Sydney mainline will also deliver rail safety benefits and allow ERH and its customers to maximise the opportunities presented by its location on the Inland Rail Corridor.

4.3 Protect existing freight precincts and ensure sufficient future land use

The NEXUS Industrial Precinct (Nexus), located 10km north of Albury's CBD, is a 450ha site zoned to support 24/7 large or heavy industrial development, with a further 700+ha available for future expansion. Spanning the Hume Freeway and the main Melbourne – Sydney rail corridor, Nexus is ideally placed to enable new and existing large scale industrial business operations to access capital city markets and their respective ports.

In order to meet the transport and energy requirements of existing Nexus tenants and drive future private investment and jobs, a range of infrastructure works have been identified as being critical including:

- augmentation of the city's water and sewer network to service the long term needs of tenants (underway);
- upgrades to electricity supply capacity (complete);
- installation of roundabouts at key intersections (partly completed);
- extension of the rail siding servicing the intermodal hub;
- provision of NBN back haul into the precinct (underway);
- reticulation of natural gas supply throughout the precinct;
- creation of southern ramps at the Davey Road interchange on the Hume Freeway;
- Stage 1 subdivision works to ensure fully serviced land parcels are investment ready and available to the market (almost complete).

NSW Government funding is currently being sought under the 'Growing Local Economies' program to support the development of common or shared enabling infrastructure at ERH and Nexus. This funding seeks to unlock the full potential of this highly significant regional manufacturing, transport and logistics hub.

4.6 Ensure safe, efficient and sustainable freight access to places

The provision of safe, efficient and sustainable freight access should not be limited to the three locations of Sydney, Parramatta and Western Sydney Airport. Failing to apply this priority to the entire freight network throughout the State limits the ability of this priority to be realised. All identified objectives of safety, environmental and amenity improvements are also priorities for regional NSW.

5.3 Regional NSW Initiatives

- AlburyCity has applied for and been unsuccessful in a number of transport related State funding applications including the Fixing Country Roads funding to assist in the construction of a roundabout at the intersection of Gerogery Road and Wagga Road. It should be noted that the current State policy which discounts the economic benefits of NSW projects in the proximity of a state border due to the possibility that jobs or investment may be derived by interstate residents or business operators must be removed. Fair and equitable investment policy should be applied across all NSW communities without fear or favour, as the current policy severely impacts the potential for state support for viable and revenue positive projects in Albury and elsewhere on the state border.
- The southern connection from the Hume Highway to the Barton Highway and into Canberra is not included as a committed or potential project in the Regional NSW initiatives. This upgrade should be prioritised to ensure provision of safe passenger and heavy vehicle transport movements between Melbourne – Albury/Wodonga – Canberra. Many Albury Wodonga businesses rely on this corridor to transport goods. The existing predominantly single lane connection will not suffice for a further 20 years.
- As part of the Regional Economic Development Strategy (REDS) development process, facilitated by the NSW Department of Premier and Cabinet, AlburyCity has identified planning priorities for the city and the wider Functional Economic Region (FER). The Albury Wodonga REDS sets out an economic vision for the FER and builds on the region's strengths to guide investment over the next four years. This involves leveraging the significant built infrastructure endowments and natural amenity, access to land and water, climate and lifestyle offering. These endowments form the basis for the region's specialisations.

Once finalised, this Strategy and the supporting Action Plan will act as an important tool to inform the NSW Government of the priorities of each FER and the ways in which the actions identified can support the delivery of the broader State planning objectives.

The NSW Government should acknowledge that applying a broad-brush approach to classifying, planning for and contributing to NSW future transport freight projects is counter-productive to the growth and prosperity of the state. The economies, social fabric and environmental influences can be vastly different across regional areas of NSW.

AlburyCity therefore encourages Transport for NSW to consider the existing regional and local government priorities, plans and capabilities, prior to finalising future freight projects.

Supporting regional cities such as Albury through extended transport and freight infrastructure investment, as well as recognition of its unique border location, will provide authentic positive impacts. There remains significant unrealised capacity in Albury's economy for growth, and considerable benefits for NSW can be realised with policy settings that promote regional development.

AlburyCity has recently prepared and lodged submissions to the draft NSW Future Transport 2056 and draft Regional NSW Services and Infrastructure Plans. We encourage consideration be given to ensuring there is alignment between all relevant transport plans and strategies to ensure a holistic and coordinated approach to their implementation.

Yours faithfully,

Frank Zeknich
General Manager