ACN 002 749 260
ABN 85 002 749 260

10 Julius Avenue
North Ryde NSW 2113

Tel: (02) 8094 3200
Fax: (02) 9018 0146
www.elgas.com.au

NSW Draft Freight and Ports Plan
Future Transport 2056
Sydney NSW 2000

23 March 2018

Re: Elgas submission on NSW Draft Freight and Ports Plan

To Whom It May Concern:

Elgas welcomes the opportunity to make a submission to the Draft Freight and Ports Plan which we believe can play a significant role in ensuring liquefied petroleum gas (LPG) is delivered efficiently and safely throughout NSW.

Elgas is largest distributor and marketer of LPG in NSW and Australia with significant freight operations out of Port Botany and across the state. We believe designated corridors and tunnel access is required for Class 2,3,C1 vehicles carrying liquid fuels, chemicals and packaged gas products. Fatigue management rest areas also need to be addressed. We recommend the Government establish special taskforces with all relevant parties, including Elgas, to guide future approaches across these key areas.

The Elgas 65,000 tonne LPG underground cavern storage facility in Port Botany is a pivotal storage and strategic distribution hub for NSW & the East Coast of Australia providing supply security for consumers and other LPG marketers. The Cavern has also maintained supply security since Shell and Caltex closed its Sydney refineries.

Figure 1: Sydney LPG Underground Gas Cavern Facility – Port Botany

Access and egress to Port Botany is vital to ensure reliable, safe and cost effective supply of LPG to the market. Elgas generates over 7,700 trips per annum from the Cavern. B Double and Tri Axle tankers service NSW and beyond, direct to customers and to our Blacktown and regional facilities situated throughout NSW.

Elgas has appreciated the opportunity to engage and assist in providing information and concerns on the four key areas below to various consultation forums, NSW Ports, NSW Transport, Greater Sydney Commission and now the Draft Freight and Port Plan.

(a) Designated freight corridors for vehicles carrying Class 2,3,C1 goods

Elgas recommendation: Establish a workshop for all parties involved in the movement of Class 2,3,C1 goods to assist in guiding a suitable approach.

In NSW and nationally, there is currently no designated corridor for the movement of liquid fuels, chemicals and packaged gas products which is especially important for meeting high demand and transporting strategic supplies to key regional areas and interstate. This is forcing this segment to use available city metropolitan networks often running through very urban congested areas. This is demonstrated in Figure 2 and Figure 3.

If we consider the implication of including the collective number of all Class 2,3,C1 goods delivered daily, it adds to the urgent need for this segment to be given serious consideration in the development of a fully integrated freight plan.

Figure 2: Current freight corridors for LPG road tankers around Port Botany vicinity

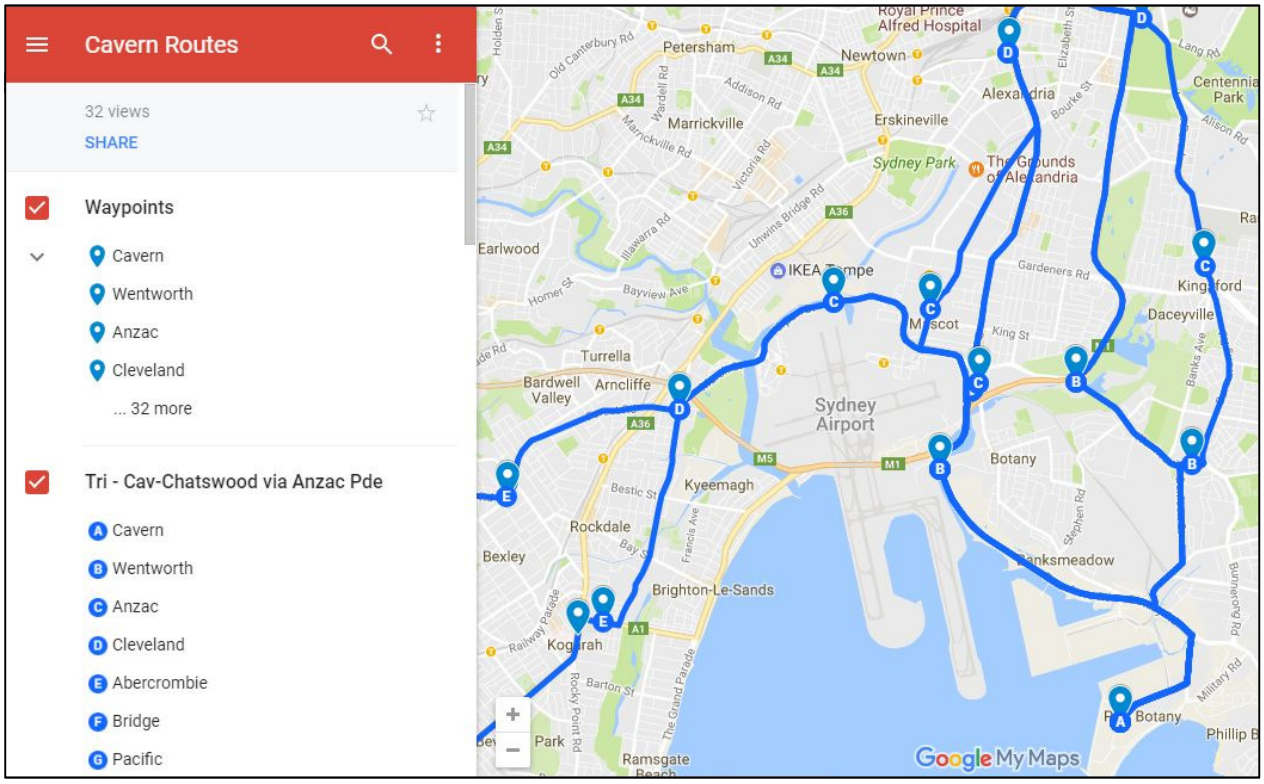


Figure 3: Direct deliveries from Elgas Cavern to storage facilities, depots and customers

(b) Tunnel access for vehicles carrying Class 2,3,C1 goods

Elgas Recommendation: Establish a taskforce to deal with designated freight corridors and tunnel access for Class 2 Goods, as they are linked together.

Freight transport is being driven underground by urban growth pressures particularly around Port Botany which is flanked by the Sydney Airport and urban intensification.

While the development of tunnels is a preferred solution to addressing the impact of urban intensification and subsequent congestion, it severely threatens Elgas' operation and use of current corridors. As vehicles carrying liquid fuels, chemicals and packaged gas products cannot at present access tunnels, these vehicles are limited to existing urban rat runs that are less than adequate and raise a concern of safety by other road users and residents.

The Sydney WestConnex project will be largely comprised of underground tunnels which will exclude all trucks carrying Class 2,3,C1 goods including LPG. At the same time, claims about heavy vehicle traffic being reduced by corridor projects such as WestConnex, are encouraging Sydney Councils such as those in the Inner West to create more public spaces and reduce heavy vehicles on Parramatta Road and its side roads. The missing link to the Port

and how it will work is yet to be finalised and how it will interact with the existing corridors in relation to the movement of Class 2,3,C1 goods.

In analysing an example of how tunnels can impact this important segment, we have provided details on the Tugun Tunnel, on the Gold Coast as follows:

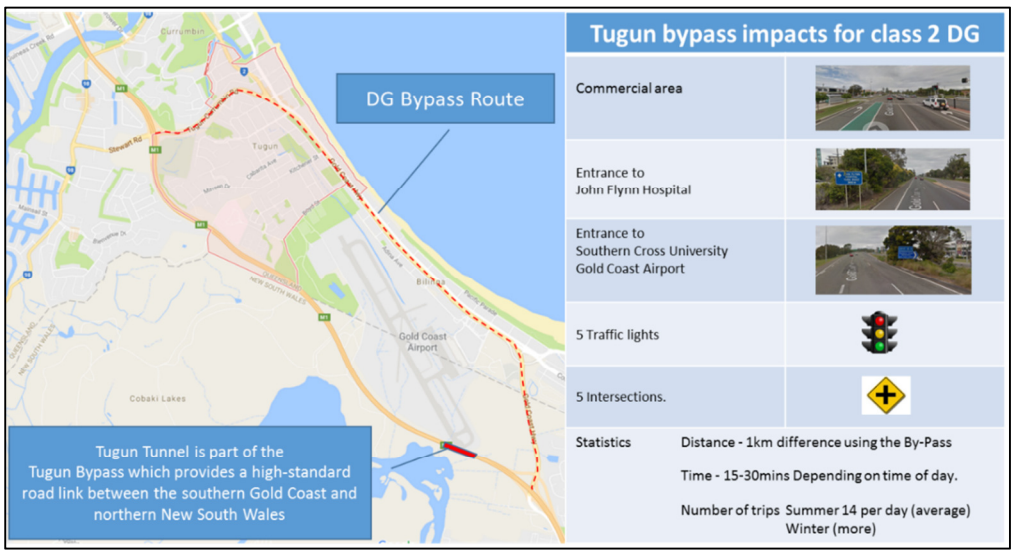
Opened on 3 June 2008, the Tugun Tunnel is 334m long and forms part of the Tugun Bypass project. The bypass takes traffic to the west of the Gold Coast Airport, connecting to Stewart Road interchange at Currumbin and the Tweed Heads Bypass north of Kennedy Drive at Tweed Heads West. The Bypass was expected to take 55% of traffic off the Gold Coast Highway by 2017 and reduce travel time between Currumbin and Tweed Heads West to 5 minutes.

The Tugun Tunnel precludes the carriage of dangerous goods class 1, dangerous goods class 2.1, and dangerous goods: mixed class. This requires tankers transporting LPG to take an alternate route using the Gold Coast Highway. The alternate route passes through commercial areas, and entrances to John Flynn Hospital, Southern Cross University and the Gold Coast Airport. LPG tankers must navigate 5 traffic lights and 5 intersections (see Figure 4).

While the alternate route is only 1km longer, the transit time increases to 15-30 minutes depending on the time of day, compared to the 5 minute transit time on the bypass. One carrier's LPG tankers will transit the Gold Coast Highway 14 times per day and more during the winter period.

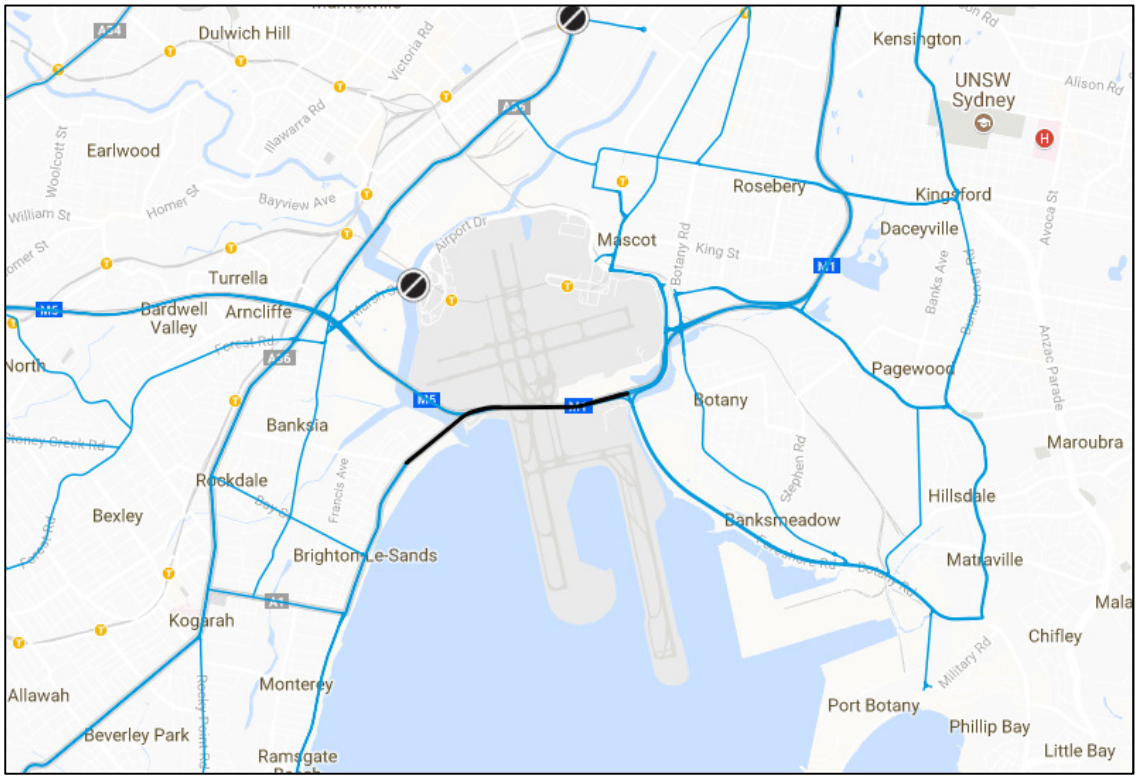
If there had been careful assessment of the public risk and appropriate design of the tunnel infrastructure, one carrier alone could avoid over 5,000 movements on the alternate route per year. In productivity terms, this means drivers and tankers carrying the precluded goods are on the road for **1,274 hours** more than they would without the tunnel exclusion.

Figure 4: Tugun Tunnel impacts for Class 2 Vehicles



A current issue for Sydney, is the inability to access the very short Qantas Tunnel forces B-Double HML designated loads to be forced to travel through a highly congested area around O'Riordan Street, Bourke Road and Canal Road St Peters onto the Princess Highway.

Figure 5: B-Double Routes out of Port Botany including Qantas Tunnel



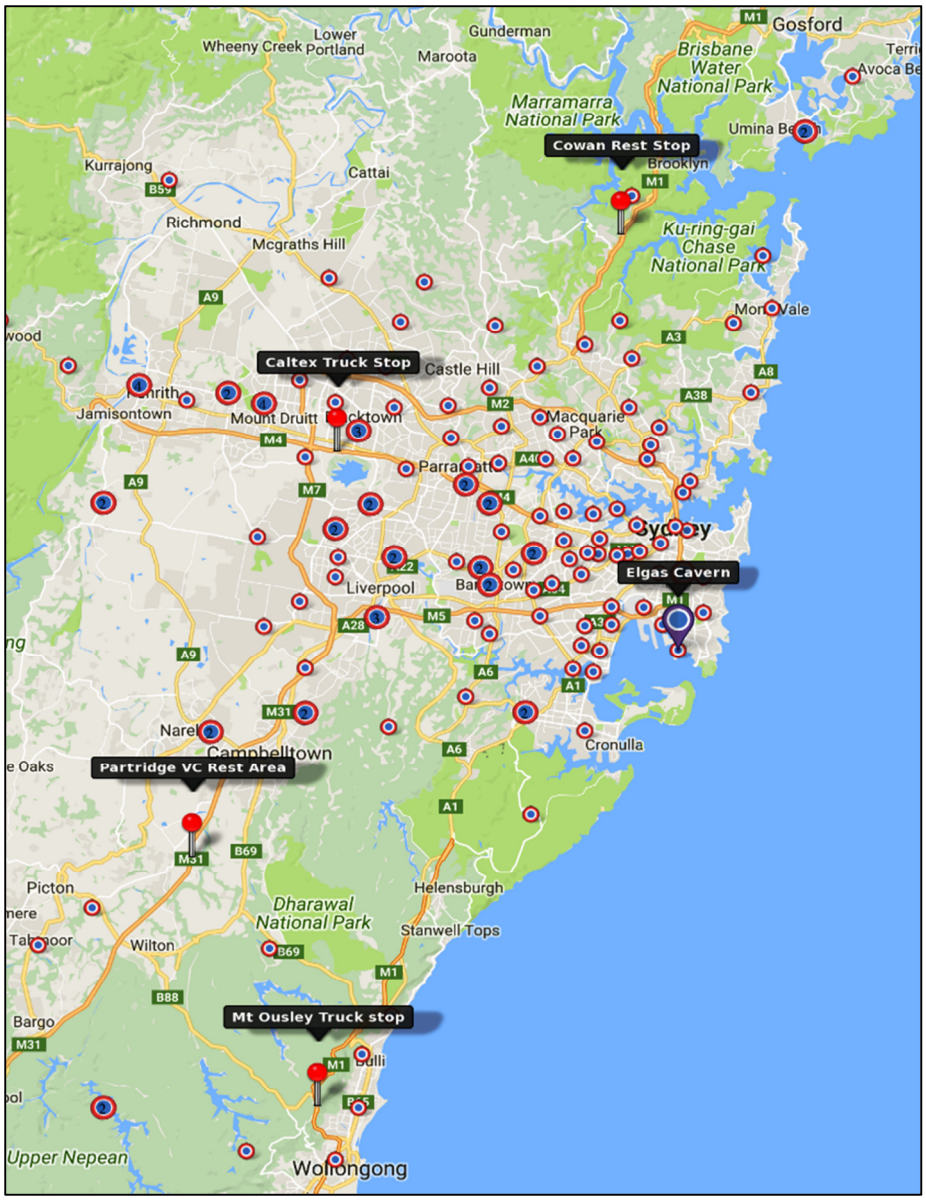
(c) Fatigue Management Rest Areas – Metropolitan Areas

Elgas Recommendation: Establish a taskforce to evaluate fatigue management areas given the shortage of suitable land and space, and encroachment of urban intensification.

Elgas has reviewed our obligations under Chain of Responsibility laws and implemented procedures at the Port Botany Cavern to ensure drivers are not impacted by fatigue.

When new procedures were implemented, consultation with drivers revealed there were no suitable rest stops within the immediate vicinity of the Port Botany Cavern, and at worst, only on the outskirts of Sydney metropolitan areas (see Figure 4). This is a major issue considering a driver can take 3 hours or more to get to the unloading or loading destination which can impact the driver's compliance to National Heavy Vehicle Regulator requirements with respect to work hours.

Figure 6: Rest stops in Sydney and surrounding areas



(d) Load discrepancy – over state borders

Elgas Recommendation: For the NHVR to adopt nationally (including NSW) the Victorian Government's "Road Friendly Suspension" incentive. The long term benefits are greater efficiency savings and reduced truck movements.

> The Victoria Government (VicRoads) provides incentives based on "road friendly suspension" that allows transport operators to increase greater mass weights on front and rear axle giving approximately one and a half tonne payload increase. Roads and Maritime Services in NSW does not currently recognise these Victorian concessions.

Analytics from Elgas' transport contractor determined if vehicles were able to legally carry the same maximum gross weight in NSW as VIC, it would cut approximately 50 loads from running through regional and rural VIC/NSW over a 12 month period.

Should you require further information or explanation on any of these key areas, we would be pleased to respond.

Yours sincerely,

Warring Neilsen
Corporate Affairs Manager
Elgas Limited
A Member of The Linde Group