

# Correct Planning and Consultation for Mayfield

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## Submission re Port Botany Landside Improvement Strategy

July 2022

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Firstly may we apologies for our submission being a little late as we have only just realized from the media of your important task.

We trust you will find the Correct Planning and Consultation (CPCFM) submission of value to warrant inclusion.

Access to our oceans has always been of great importance for trade and the movement of product from the state by sea to other locations. Hamlets like Bawley Point on the South Coast had a wharf to deliver people and goods and to export logs and timber.

Now our ocean connections have shrunk to five major ports that include Newcastle, Sydney, Botany, Kembla and Eden as we now rely on land transport to move the freight to and from the State to selected ports that may or may not be close to the origin or destination of the cargo. Washing machines and household supplies are clearly best handled by Port Botany as most are unstuffed within 70kms of the port. Bulk grain and coal are handled by Newcastle and Port Kembla due to their proximity to producers via major rail corridors. This allocation of freight to Ports is largely political decisions steered by funding allocations for road and rail infrastructure.

In the Hunter the rail corridor infrastructure has been driven by the proximity of the Port of Newcastle to the Hunter Coal fields generally to the east of Muswellbrook. The coal rail corridor is generous and of high capacity; however west of Muswellbrook the infrastructure drastically declines to a substandard single track with minimal passing loops. To traverse the Liverpool range between Murrurundi and Willow Tree a poor grade 1876 built Heritage Listed tunnel is part of the corridor. Consists now require as many as 7 locos to drag a small coal train through the 483 metre tunnel using maximum tractive effort at speeds as low as 18kph.

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If the Ardglan Tunnel is not bad enough, the single track deteriorates to a very poor low axle loading 35 km section from Turrawan (near the White Haven mine) to Narrabri. The Inland Port of Narrabri is to be a Hub on the Inland Rail line.

The importance and benefits of the Inland railway can be found at [New South Wales | Inland Rail](#)

With the Inland Rail providing double stacked 1800m long consists capable of speeds up to 115kmph, CPCFM is sure the inquiry will realise that the Ports of Melbourne and Brisbane will be handling considerable quantities of NSW freight.

CPCFM has already seen evidence of containers travelling by rail from WA to Brisbane and for containers to be transported from Port Adelaide to Newcastle.

Whilst making recommendations about “Landside activity” at Port Botany CCFM believes that the “big picture” cannot be ignored.

If the Newcastle / Narrabri rail corridor were modified to deliver a high axle load double stacked capable rail line that allows 1800m trains to travel at 115kmh (same specification as the Inland Rail Line) from the Port of Newcastle to the Inland Port of Narrabri the line would connect Newcastle to Perth, Darwin, Adelaide, Melbourne and Brisbane. Clearly major game changer for rail freight and passenger movement for NSW and Australia. Such a rail line will not only slash journey time but also reduce freights costs by as much as 75%.

## **Recommendation 1**

Connect the Port of Newcastle to the Inland Port of Narrabri with a high axle load double stacked capable rail line that allows 1800m trains to travel at 115kmh

Much has been said about the role of the Port of Newcastle as a full scale container terminal and unfortunately NSW Ports (the operator of Botany and Kembla) consider Newcastle as a threat to their viability.

CPCFM believes that the establishment of a Container Terminal in Newcastle should be seen by NSW Ports as a real bonus to their activity. A 2m teu Newcastle Container Terminal would allow Port Botany to concentrate on improving the movement of container freight into and out of the Sydney basin. This would enhance their viability, growth rates and significantly eliminate many of their problems. It should reduce costs to the consignors and consignees.

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There is ample freight within the Hunter Region and those LGA's related to the Port of Newcastle to rapidly drive the PoN to its maximum capacity of 2m teu in a very short time frame without competing with Port Botany.

Whilst there will be some container freight movement between Botany and Newcastle this will wind back to the movement of "unstuffed" goods by Aldi, Coles, Woolworths etc who distribute supplies to their store from major distribution centers in areas like western Sydney.

A fully fledged container terminal in Newcastle "doing its own thing" will be a major blessing (and offer major savings) to the NSW State Government, as well as to Sydney basin residents and commuters. The removal of container freight from the Newcastle / Sydney rail corridor and the Motorway will be a great benefit for all.

To suppress the establishment of a Container Terminal in the Port of Newcastle, there was a deed of agreement that potentially forces Newcastle to pay a fee to Port Botany on each container handled. The variable fee is basically \$100 per teu.

It is CPCFM's view that a fully-fledged container terminal can be established and operated in the Port Of Newcastle without paying the penalty fee or "cap".

The Deed sets the base trade level, and a range of clauses that provide for escalations, and operational mechanism. The base cap is 30,000 teu and the 2022 level about 60,000 teu.

The Deed gives Port Botany the option to withdraw from the Deed and CPCFM firmly believes that to annul the Deed would be in the best interest of the efficiency, productivity, viability and freight rates of Port Botany.

### **Recommendation 2**

**That the PBLIS strongly recommends to Port Botany that they withdraw from the Deed without delay.**

Recently the freight movements were very seriously impacted by the severe long term and far reaching drought. Impacts of the drought we evident with very low (or non-existent) yields, the use of grain imports for feeding livestock, and the inability to irrigate etc.

This 10 year disruption seriously impacted on freight movement statistic. This unusual data shift has seriously disrupted infrastructure planning as the "supporting evidence" is frequently not available.

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The drought breaking was very uniform, widespread and timely across NSW and in most parts record crops “hit the market”.

The good seasons are continuing and in many areas crops are not capable of reaching the seaboard.

Covid has also disrupted freight movements and hindered “normal trade”. The impact of Covid not only impacted on NSW trade but also World trade. In many cases this has disrupted the operation of Port Botany, cruelled efficiency measures and forced charges up.

The use of “normalized” statistics will greatly improve the accurate planning of transport infrastructure.

## Recommendation 3

**That the PBLIS strongly recommends that the statistics used to monitor freight movement in NSW be modified to provide an allowance for the drought, record agricultural production and Covid.**

CPCFM will be interested to discover how a Container Terminal in the Port of Newcastle could seriously outperform Port Botany, Port Melbourne and Port Brisbane.

Whilst there is considerable data available on public display most is published in isolation and never correlated to generate the “real picture”.

In an attempt to overcome this problem CPCFM decided to carry out some long term data collection and embark on some in depth studies. These studies have involved examining the containers shipping and container movements at the ports of Botany, Brisbane and Melbourne. Currently Newcastle container movements are very low in the absence of a dedicated container terminal.

The CPCFM study of Port Botany has now been underway for almost twelve months. The core of the study involve collecting data about each and every vessel visit to the three Port Botany container terminals.

Periodic and regular reports are being produced and access to the data base can be made available on request.

It must be remembered that only a small proportion of containers that are loaded or off loaded are “full”. Of the 2,750,000 containers handled this year there were about 1,400,000 inbound, (1,375,000 full and 25,000 empty) and 1,350,000 outbound (770,000 full and 580,000 empty).

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As an indicator the table below displays the Months Data Summary for the Month of June 2022.

Summary		Jun-22
Number of Vessels	90	number
Year Built Average	2008	year
Longest vessel length	336	metres
Average vessel Length	250	metres
Shortest vessel Length	147	metres
Total max capacity of all vessels	40,7141	teu
Average max capacity of vessel	4,524	teu
Average below deck	1,293	teu
Average deck Count	1,452	teu
Total Months Load carried on port entry of all vessels	248,384	teu
Average total load	2,744	teu
Average % loaded	62%	percent
Average time in port	47	hours
Largest vessel	9572	teu
Smallest vessel	960	teu
Total Berth occupation of all vessels	4227	hours
Longest stay at berth	170	hours
Shortest stay at berth	14	hours

## Recommendation 4

**That the PBLIS strongly recommends that greater emphasis is placed on statistically quantifying “weaknesses” in the handling of containers on vessels, in the container terminals, at the port and whilst using land transport.**

The discussion documents raised a number of landside issues on or close to the Port Botany site whilst these are important the issues raised above are of critical importance and fundamental to the increase in in efficiency and expansion of the port facility.

CPCFM would like to comment on some key issues:-

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## D19 Booking Fee Structure

CPCFM opposes fees on freight especially where they incur additional expenses that simply prop up an inefficient and costly activity. The PBLIS should recommend fee reduction for efficiency and productivity. Rail is clearly the best way to transport the majority of freight to and from Port Botany

### Recommendation 5

**That the PBLIS strongly recommends that greater emphasis is placed on rewarding efficiency and productivity AND actively works to greatly increase the share of freight movements by rail.**

## D20 Transport data

**It is critical that rail is the primary mode of transport for container and bulk freight. Road transport should only be used for the last mile component of the journey. Rail should be able to provide direct connection with the Container Terminals. Trucks should only be necessary for that portion of the journey distant from the port.**

**Official transport statistics are currently poor, commonly outdated and unreliable. Transport for NSW is the obvious choice for the collection and storage of data. The data should have a very high level of public access. Freight rail timetable should be available to the public.**

### Recommendation 6

**That the PBLIS strongly recommends that Transport for NSW actively collect and promulgate freight transport statistics. The data should be quality, current and cover all modes of transport that are relevant to the State of NSW.**

## D21 and D22 Transport Efficiency

**Changes by the Environment Protection Agency (EPA) to the Environment Protection Licences (EPL) have greatly impacted on the operation of trains in NSW. The EPA now require track operators and rolling stock (including locomotives) to be separately licenced and regulated.**

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**Freight rail tracks in NSW are operated by several players including Sydney Trains, ARTC and John Holland Rail. A freight train journey may traverse the tracks of more than one licenced track operator AND one or more rolling stock operator.**

Rail freight may also compete with other rail freight and with passenger services. In the Hunter Valley the coal services certainly dominate the provision and use of the rail lines. Their dominance is largely attributed to the highly efficient Hunter Valley Coal Chain Coordinator. (HVCCC). HVCCC is an independent body overseeing activity along the world's largest and most complex coal chain.

The container freight movement seriously needs a body such as the HVCCC to plan and coordinate the movement of containers within and through NSW.

### **Recommendation 7**

**That the PBLIS strongly recommends that a “container movement coordination body” be established in conjunction with Transport for NSW to actively plan , develop and conduct a quality efficient and productive container movement organization for NSW.**

D23 Western Sydney and Port Botany.

Whilst Port Botany is currently the major container freight handling port within NSW it is clearly not the sole port providing containers to NSW. Melbourne, Brisbane and Newcastle are all players and their share of container freight is likely to rise significantly with the establishment of a Container Terminal in Newcastle and with the opening up of the Inland Rail Line.

Whilst this discussion relates directly to Port Botany it would be wrong for the Landside Improvement Strategy to disadvantage other options that container users may wish to use.

### **Recommendation 8**

**That the PBLIS strongly recommends that consideration is given to the choices container services users may wish to choose. To use the PBLIS as a means of protecting Port Botany would simply be wrong.**

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CPCFM trusts that our independent review submission will be considered.

We will be more than happy to expand on the points we have raised.

Rick Banyard

Research Officer CPCFM

For and on behalf of John L Hayes Convenor CPCFM