








14 October 2024

Submission re the New South Wales Freight Interim Directions Report



 For many years freight transport issues have occupied much of  time and resources. This includes numerous letters and submissions (including this year to the 2024 discussion paper). A meeting of the  held 7 October requested a further submission.

In May 2024, we contended that the discussion paper was in need of major revision. Although we appreciate the opportunity for further consultation, we have serious concerns about the Interim Directions Report.

Maldon Dombarton

The completion of the 35 km rail link is now due. However, it is not even mentioned in the Interim Directions Report. Nor was it shown on any maps – including that of the Western Sydney Freight line corridor.

This issue was raised in several submissions apart from our own. These include Wollongong City Council, an official submission from the University of Wollongong Government Relations, the Western Sydney Leadership Dialogue and Fastrack.

The Rail Futures Institute submission noted in part “Completion of the 35 km Maldon to Dombarton rail link would allow removal of most freight trains from the increasingly congested Tempe to Wollongong line including the Waterfall – Thirroul section that has had relatively frequent closures due to extreme weather events. “

The Australasian Railway Association in its submission states, inter alia, re advancing Maldon to Dombarton: “There is strong support for this next step from local MPs, local Councils (Wollongong, Wollondilly, Campbelltown, Shellharbour, Shoalhaven), Business Illawarra, Business Western Sydney, the University of Wollongong, and RDA Illawarra/Shoalhaven, along with freight customers including Cement Australia, Bluescope and GrainCorp.”

In addition, the 2021 Illawarra-Shoalhaven Regional Transport Plan notes on page 51 that “The transport of freight via the shared rail network is constrained by the needs of passenger transport, particularly during morning and afternoon passenger peaks. Transport freight services are often held for up to 11 hours as passenger services are given priority.

“To address the growing need for additional rail capacity to and from the Port of Port Kembla, Transport for NSW will investigate the completion of Maldon to Dombarton Line to facilitate additional freight movement between the Illawarra-Shoalhaven and Western Sydney.”

The Maldon Dombarton rail link would greatly improve the reliability and serviceability of the existing rail lines serving the Illawarra. These are the Illawarra line between Waterfall and Wombarra and the Unanderra Moss Vale Line. The operation of both lines is highly marginal in times of adverse weather. Furthermore the stability of the latter line up the face of the escarpment at West Dapto attracts high risk.

Clearly, a way forward to complete the Maldon Dombarton link needs to be addressed in the final report. [REDACTED] like others, wishes to see the new link having a capacity to move passengers as well as freight. We also seek meaningful policies that will result in rail increasing its modal share of freight and passenger traffic to and from western Sydney including the new airport.

Too many trucks on Illawarra and other roads – including Mt Ousley

Page 4 of the 2006-2031 Illawarra Regional Strategy of the Department of Planning as follows: *"It is important that the Region's transport networks support economic growth and maximise the efficiency of freight transport. In particular, what is required are strategic transport corridors to support development of the port of Port Kembla, **increase the proportion of freight transported by rail**, efficiently link regional centres and towns, and support public transport."*

The final freight strategy should reflect this goal for the Illawarra. Moreover, increasing the proportion of freight transported by rail or sea or conveyors or pipelines and reducing the proportion of freight transported by road should be a statewide goal.

This should include a fuel pipeline to the new Western Sydney International Airport.

Earlier traffic volumes on the Mt Ousley road that show in 2017, the average daily traffic count on this road is 53,018, and of this, 13 % are trucks.

That is nearly 6900 truck movements a day on this road. What other city in Australia has to put up with this imposition?

Not content with Wollongong's main roads to Port Kembla having no shortage of heavy trucks on public roads with for road haulage on coal gaining approvals for 10 mtpa, plus car imports, there is cargo from expansion of the Port Kembla outer harbour.

As far back as 2010, the Submissions Report for the Port Kembla Outer Harbour Expansion released by the Department of Planning included comment by the NSW Roads and Traffic Authority that after consideration of the impact of Stage 1 Port Kembla outer harbour traffic volumes stated if the predicted rail mode share could not be achieved, there would be likely *"... unacceptable impacts to road safety and traffic efficiency as well as environmental issues such as amenity, noise and air quality."*

However, the NSW authorities then were asked to approve an increase of road haulage to the Port Kembla Grain Terminal (PKGTT). Approval was given to up to 500,000 tonnes per annum, with external costs (including the important under-recovery of road system costs) all but ignored.

Then two approvals to increase quarry products on Mt Ousley and other Wollongong roads were given. In 2011, Hanson Construction Materials Pty Ltd (Hanson) wanted to expand the rate of production at its Bass Point Quarry from a present level of about 1.5 million tonnes per annum (mtpa) to 4 mtpa over time, using both road and ship transport; and, to cease the use of sea transport (thus throwing more trucks onto busy roads in Wollongong and Sydney

██████████ (in submissions to the NSW Department of Planning) called, inter alia, for a levy of \$5 per tonne to be applied to additional road haulage of quarry products from Bass Point to Sydney, with the proceeds being applied to road improvements. The amount of \$5 per tonne was based on

estimates of external costs of road and rail freight as noted by the 2012 report of the Independent Pricing and Regulatory Tribunal of New South Wales *Review of Access Pricing for the NSW Grain Line Network*.

The second quarry allowed to put more trucks on our roads was Boral. [REDACTED] resolved in 2013 to make a submission objecting to increasing road haulage of quarry products by 500,000 tonnes per annum. Here, the Environmental Assessment noted that (3.3.3 Alternatives) "Boral has consulted with Pacific National Rail about the availability of additional rail paths to rail product to the St Peter's terminal. Pacific National indicated that they were unable to identify a suitable additional train path".

[REDACTED] notes that in regard cement rail transport to Sydney from Port Kembla, currently by road, a very efficient loop loading facility could be installed at Port Kembla for powdered cement rakes. This would require a rail unloading facility be identified or established more or less central to the Greater Sydney area.

Efficient rail transport would be considerably lower cost than road transport. The cost of road transport is further increased by the relatively high cost associated with hauling cement up Mt Ousley, along Picton Rd and the M31 to at least Liverpool.

Noise and air pollution

More effort should be made by NSW government authorities to reduce truck noise, including late at night and in the early hours of the morning. In this regard, we appreciate recent moves by the NSW Government to address this issue.

Both diesel trucks and diesel trains are responsible for air pollution and small particle emissions. However, trucks use about three times more diesel than trains to move a tonne of freight. This leads to more air pollution.

Encouraging freight on rail

Keeping heavy haulage of bulk commodities by road through Wollongong at reasonable levels requires much more effort by the NSW government. This includes more investment into rail infrastructure and a round of measures to improve rail freight productivity, similar in scope to the assistance given to the road freight industry with better roads and also approvals for heavier and larger trucks.

The interim report advocates a National Service Level Standards for roads. We would ask: where is the advocacy for National Service Level Standards for Rail ?

These should extend to the Main South line linking Sydney to Albury, parts of which carries steel from Port Kembla, and grain to Port Kembla for export. At present, this line has too many temporary speed restrictions, and too many permanent speed restrictions (winding track over 100 years old).

The interim directions report in Figure 10.1” Benefits of PBS vehicles replacing heavy vehicles (2008 to 2022)” from a 2024 publication of the National Heavy Vehicle Regulator appears to advocate heavier trucks. Our experience is that approval for heavier trucks does not lead to few trucks, but instead to more trucks, as some freight then moves from rail to road.

The Panel is asked to consider requesting inclusion in the final report of a graph of the benefits of some modal shift from road back to rail. These would include less road crashes, reduced road congestion and maintenance costs, less noise and emissions.

We note that the Interim Directions report states that “Even with increasing modal shift to rail as the volume of freight continues to increase, it is **imperative that the road network be improved** to minimise the impact of heavy vehicles on the community, to reduce congestion, minimise tailpipe emissions and reduce the safety risk posed by reducing the number of interactions with heavy vehicles on the road network.”

██████████ suggests that this claim needs to be accompanied by a statement that it is simply impossible for all future growth in the NSW freight task be accommodated by trucks operating on public roads and that it is **“imperative that the rail network be improved”**.

Five pillars for rail freight ?

██████████ also notes that on 15 September, the report: NSW Heavy Vehicle Access Policy, Safe, sustainable and productive road freight (<https://www.transport.nsw.gov.au/system/files/media/documents/2024/Heavy-Vehicle-Access-Policy-September-2024.pdf>) was released. The Executive Summary Recommendations has Five Pillars to advance road freight.

██████████ would like to see the final report support the development of Five Pillars to advance rail freight; and, to supply some further details as to what these pillars may include.

External costs and emissions

The interim report does recognise external costs and emissions. We would appreciate more detail in the final report.

This could usefully include noting the The New South Wales the Independent Pricing and Regulatory Tribunal IPART) in its 2012 *Review of Access Pricing for the NSW Grain Line Network* estimates for external costs for road and rail freight in both urban and non-urban areas.

The potential for more use of rail to lower emissions in NSW freight transport due to rail's superior energy efficiency in moving freight. This is generally acknowledged as a factor of three to one.

Conclusions

Whilst public exhibition of the Interim Directions report is acknowledged with appreciation, the final version really does needs to articulate policies that will reduce over-reliance of heavy truck using public roads.

In short, and following the release in September of the report: NSW Heavy Vehicle Access Policy, Safe, sustainable and productive road freight, we see the present approach as a case of:



The Interim Directions Report needs to be totally revised so as to outline measures that can allow for some modal shift from congested city roads and lightly built country roads to rail. This could include Five Pillars to grow rail freight and in any event will need policy changes and investment in rail infrastructure.

This should include completion of the Maldon Dombarton rail link.

