

**CPCFM Correct Planning and Consultation for Mayfield  
Freight Transport Review Feedback on Interim Report 21 10 2024**

Correct Planning and Consultation for Mayfield

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**Freight Transport Review feedback on Interim Report.**

**Introduction,**

When the Minister for Transport, Jo Haylan, announced the review into freight transport in NSW we were delighted that at long last the community was to be given an independent voice into the operation and planning of transport in NSW.

We were joyous at the prospect of the needs of freight in NSW were to be actively considered and that the regional areas of the State were to be given the opportunity to state their needs and to have their problems addressed.

We note that freight includes everything from a letter or match box to a grossly oversize over mass object like a wind farm or a power station transformer.

WE note that transport covers all modes of freight movement from bikes to multi locomotive powered trains.

We were optimistic that Liberal National decision making process was to be overturned and that the Transport for NSW project officers and staff would have to follow the direction of the new Labor Government complete with its adopted resolutions from this review committee.

How wrong we were. The Interim report was woeful and had largely rejected the content of the approximately 120 submissions. Errors, mis information and a sheer lack of understanding of the coal face of the industry were rife.

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May we please raise the following issues: -

1. Why were the number of submission so small?  
Given the size of the freight industry in NSW and the number of people directly employed in the freight industry and the fact that every household consumes about 2.5 tonnes of freight in groceries and household goods per year it is a serious reflection on the quality of the submissions process. Clearly the set questions were a total failure.
2. The communication by the committee was very poor and lacked skill.  
The web site was hard to find and follow and often contained no information or incorrect information.  
There was no direct person or email to contact.  
Even the publication of the Interim Report was botched with a Draft version placed on display.

There was controversy about the format of the submissions and length of the submissions. Some believed that only the questions could be commented on whilst others thought there was a 10 page limit. From reading all the submissions the writers were committed to the material being presented by them and surely it was reasonable that the committee would be suitably resourced.

From the published submissions, there was unreasonable hiding of identities of submission presenters. (especially those that were corporations or public bodies). It also seems that the committee has considered some input that was not via submissions.

There were no open to the public briefing sessions, workshops consultations held by the Committee of its representatives.  
There were some closed focus group meetings held behind closed doors. This did not give others the opportunity to comment or debunk the undisclosed information. The webinar was poorly presented. We have requested a text copy of the transcript but as yet has not been supplied.

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3. There is extreme bias in the Interim report and that bias is based on information that cannot and was not supported.

There is simply no way anyone could consider Port Botany to be an efficient operation. Small vessels, very few with realistic loads, huge numbers of empty boxes, massive double handling and slow turnarounds are the norm. Suggestions by the committee that Port Botany could reach 7mteu was fanciful and it will be highly unlikely to reach 3 mtu ever. There is no development application or consent and the Sydney Roadways simply would not cope with 14 million container truck movements plus the distribution movements once the boxes are unstuffed.

By contrast the Port of Newcastle could immediately commence handling boxes and rapidly expand to 3mteu with adequate planning and support infrastructure. Surely it was within the scope of the Freight Review to spell out what was needed to bring the Port of Newcastle container terminal on line? ( the CPCFM submission spelt out the rail only terminal with remote distribution and freight handling. The CPCFM submission even covered barge and feeder vessel handling of freight.

It was also very disappointing that the Freight Review Interim Report did not present the Container Handling agreement correctly.

The following table compares the very efficient Port of Newcastle with Port Botany

Facts	Port of Newcastle	Port Botany
Vessel Movements	2073	1620
Tonnage Handled	152,971,980	
Container TEU	prohibited	2.8million
Berths	20	12
Fuel berths	3	2
Alumina / Al ingots	2m tonnes	0

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Wind farms	About 1600 omd big trucks per farm	Zero
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Summary of the Port of Melbourne's trade performance in 2023-24

Cargo type	Throughput 2023-24	% change on 2022-23
Total trade	112.0 million revenue tonnes	+2.8%
Containers (TEU)	3.26 million TEU	+2.4%
New motor vehicles	6.4 million revenue tonnes (412,243 units)	+9.9%
Liquid bulk	5.9 million revenue tonnes	+1.8%
Dry bulk	5.7 million revenue tonnes	+3.0%
Breakbulk	10.1 million revenue tonnes	-1.8%

The Port of Melbourne is unquestionably very much larger and more efficient than Port Botany.

The suggestion from the Review Pannel that freight from Southern NSW should be exported vis Port Melbourne is alarming and shows a lack of loyalty to NSW. The strategy should have been an action plan to counter their encroachment.

4. There is an extreme lack of factual information to support some of the suggestions made in the report and in the webinar held after the Interim report was released.

In the main submission writers supported their points with numbers, tonnages and distances. These are the measures to determine the freight task and capability to deliver. In the Freight Reviews final report facts, figures, timelines, route maps and real freight terms must back up every point made and especially for all recommendations. The claim presented by the Pannel that 80% of contains from Botany end up in Western Sydney is not supported by Port Botany. They state that of 80% of imported containers stay within 40kms of Port Botany. That is very different and only refers to containers. The questions that the Freight Review should be addressing are: -

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- Why are containers being transported through the largest city in Australia from the extreme East to the distant West?
  - Why are about 50% of the containers handled empty?
  - Why is the majority of the unstuffed freight transported by truck from the West of Sydney to the East or out of Sydney to locations like Newcastle and northern NSW?
  - Why is agricultural produce like grains, wool, cotton, meat, and logs transported past other seaports like Newcastle for export at great expense?
  - Why do 700,000 b doubles per year have to travel from Melbourne to Sydney?
5. CPCFM is certainly not in support of a freight Commissioner for Western Sydney as it will not act in the interest of NSW freight but simply manifest the gross inefficiencies of the evolving system.
6. CPCFM does not support the establishment of IMT's in Western Sydney. Newcastle however would offer a remote container terminal west of the Port.
7. Freight is not confined to cartons, boxes and containers etc as freight movement is not the only activity catered for by the support infrastructure, Roads, rail networks and even waterways and airspace cater for a wide range of needs. Freight trains must share the network with passenger and heritage rail. Roadways must also share the infrastructure with business and private users. Business use can include trucks, buses, taxis, delivery vans. Truck style and capability also is very variable from light rigid to heavy multi trailer combinations and loads vary from internet home delivery packages to bulk grain and from bales of cotton to fuel or coal or even relocating an excavator between construction site.
8. Without doubt the most efficient freight movement in NSW is Coal. It moves about 2million tonnes per annum relatively quickly in a very efficient manner and at a low financial and environmental cost. Coal movement is based on 1800metre trains in loads of about 9,600

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tonnes largely on a single track. Loops at loading points and on the move loading and unloading supported by high quality management by the Hunter Valley Coal Chain Coordinator and quality above rail operators. The Panel should visit the HVCCC and see first hand the operation. Truck very rarely carry coal.

9. Orbital rail and dedicated freight lines are the wrong solution for the freight problem in Sydney. The real solution is to remove all freight from Sydney that is not absolutely necessary. The report has not itemised the rogue freight. Here are some examples:-
- Grain trains from the north of NSW are taken through Newcastle, the Central Coast and Sydney to Manildra's plant at Nowra.
  - Logs are containerised at Werris Creek and taken to Port Botany via Newcastle, the Central Coast and Sydney.
  - Stationery and office furniture for Sydney CBD offices is unloaded at Port Botany taken to Western Sydney where it is unstuffed and put in trucks to be taken back to the CBD.
  - Food and groceries are transported by rail or truck in quantities to be unloaded sorted and reassembled into supermarket delivery loads to be delivered across Sydney and to regional locations like Newcastle, Tamworth and Armidale.
  - Why are about 700,000 B-double return truck trips are now made between Sydney and Melbourne each year. Between Melbourne and Sydney, just 2% of freight is taken by rail.

IMT's, dedicated freight line and orbital rail should be banned in the Sydney Basin.

10. The needs of communities is also a complex matrix that freight must take into account. Cities like Sydney need Metro trains to exist. In the New England Region the community simply needs a Train. Not only do they want a passenger train service but the State of NSW needs a rail line to connect Tamworth to SEQ and especially Brisbane Toowoomba (and Wellcamp international freight airport). As a case studies, The Freight Review committee may like to examine: -

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1. how Baiada is the get their 3,000,000 chooks to Sydney and Brisbane efficiently, viably and safely after beading them, feeding them 450,000 tpa of feed and processing them?

Or 2. How Winterbourne Wind farm from Walcha will freight 1592 windmill components most oversize from the Port of Newcastle to Walcha via the New England Highway?

Or 3. How Tomago Aluminium Smelter can efficiently and viably get their ingots loaded on to vessels for export?

11. The approximately 120 submission writers and approximately 130 interim report webinar participants very clearly and in well documented factual formats pointed out to the committee that the freight system in NSW was a grossly inefficient mechanism that flourished on exploiting the inefficiencies for their own financial gain at great expense to the freight forwarders / receivers, the consumers and to the taxpayers of NSW.

For example just how could the interim report condone the transport of grain from Northern NSW be transported to the Port of Newcastle to be containerised and loaded on to trains or more trucks to be carted to Port Botany for export.

OR how could the committee support the cartage of freight to Victoria for export via the Port of Melbourne. Surely in both cases the committee should have highly criticised the activities and provided a workable option to address the issues and instil freight efficiency and economic benefit to NSW and it's people.

12. All forms of freight should compete with each other on prices / cost of operation. This includes freight and passengers. The interim report should have included a table to enable comparison of rail, road, air and sea services. The cost should include all discounts (eg pension) subsidies (eg fuel rebate for trucks) and infra cost (eg cost of building and maintaining freeways etc.)
13. Unfortunately the committee failed to consider that freight was not the only consideration when accessing the needs of our rail line, roadways, airspace and watercourses.

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For example when addressing the 3139 kms of unused rail corridors in NSW the committee simply said it they are not needed for grain then close them. Whereas in the New England and the Hunter and other locations there were strong needs expressed for the use of the corridors for passenger services and heritage train based tourism. It is a disgrace that only 2386 Kms of line are operational.

As a second example the committee seemed to support the increase of rail freight with the Newcastle Freight Rail corridor proposal and the provision of a dedicated freight line between Sydney and Newcastle. Both projects are championed by TfNSW but strongly questioned in the submissions with sound options presented.

A Maitland Morisset route would have future proofed a very important passenger rail network loop to match the expanding residential areas of Greater Newcastle. If the Port of Newcastle was encouraged to handle containers and further expand other service the need for the Freight Rail Bypass would probably diminish.

The Committee also questioned the freight volumes between Sydney and Newcastle saying that 80 per cent of the Port Botany freight went to Western Sydney however this was not supported by trade volumes or trade statistics or path numbers.

Huge quantities for freight in heavy vehicles travels on the M1 from Sydney to meet the States need north of the Hunter River. The Interim report did not document or comment on the size of this freight task and how its efficiency could be improved. The report did not identify the value of the fuel pipeline from Sydney to Newcastle or the approximately 200 truck loads of fuel distributed daily from Newcastle fuel terminals.

The report also did not document the impact of freight movements by the High Speed Rail proposal or the Inland Rail development.

14. A key strategy for rail freight to lower freight costs, improve efficiency and be competitive with tucks is use double stacking. The committee should have made a number of recommendations to track design and these include:-



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- # All rail lines in NSW be standard Gauge
- # All Rail tracks capable of handling freight trains in NSW be capable of supporting double stacking
- # All Rail tracks capable of handling freight trains in NSW be capable of handling 1800 metre trains.
- # When upgrading or building new infrastructure that crosses a rail line the works must permit double stacking.

15. The committee recognised the significance of coal on rail freight but provided almost no data about coal movements, coal volumes, cost per tonne per km or rail freight revenue / profitability.

The Report noted that there is a world wide change in coal use as renewables took hold. There was no assessment of this change on the NSW coal exports from the ports of Kembla and Newcastle. Detailed studies and evaluation by CPCFM indicate that export tonnage from Newcastle in 2024 is likely to be about 7m tonnes above last year and that the export volume will continue at record or near record levels until at least 2050.

16. **The** growing needs on the Hunter Valley to Narrabri via Werris Creek (Port of Newcastle to Walgett) corridor clearly needs major work and one would have expected the committee would have recommended an urgent upgrade to at least dual track / double stack with a new at grade Ardglen Tunnel. This track would save the coal, grain, cotton and other freight considerable expenditure, reduce freight time and greatly reduce the risk of total network failure (in the event of an Ardglen Tunnel shut down).

17. It would seem that the report has not fully considered the pollution, environmental issues and Decarbonation. For example there is no fuel volumes for fuel used for freight tasks. There is no record of the fuel transported by road and how this task can be undertaken more efficiently by rail, pipeline, barge or ship. As a second example why are electric locomotives not used for freight trains in most of Greater Sydney?

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18. Most freight in Australia and especially NSW comes in contact with the coast line, however the freight review offers no suggestions how water could assist with freight movement. There should be more coastal ports or freight terminals, rivers should be utilised and barges and feeder vessels should be part of our freight mix. Why is Tasmania and New Zealand (New Plymouth to Newcastle) not connected by ROPAX vessels similar to the Spirit of Tasmania services. There are six vessels operating from Tasmania to the Mainland with much of that transport by road from Melbourne / Geelong to Sydney and Newcastle and beyond.

The rail network should **NOT** be expected to pay its way and recover all costs or make a profit. Why penalise rail when road and highways are not expected to provide any level of fiscal return?

Rail like roads frequently value their benefits in non-financial terms including long-term benefits, acting as a catalyst, being a defense measure and pure social terms. Going for a drive to the beach is rarely financially viable. There are lots of unused roads and bike trails that are unused however the freight Review panel did not say close them.

CPCFM believes that the Panel should be making recommendations to engage the 3139 kms of nonoperational rail as a strategy to improve the operation of the freight task. For example, can NSW continue to keep the rail corridor from Tamworth to SEQ freight free? We suggested the NSW government open the railway line from Tamworth to SEQueensland as a matter of urgency.

This is a viable proposition because:

- New England train lines are positioned between coastal and western routes providing alternate routes from Qld to most of NSW.
- New England train corridor is available for reactivation without complex and expensive redevelopment negotiations.
- The creation of rail loops allows more efficient and faster freight routes and can stimulate new ventures.

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- A rail loop from Newcastle to Grafton then Glen Innes and Inverell to Moree then to Narrabri, Werris Creek and back to Newcastle via the Hunter Valley would make a multi day tourist train journey to rival and of the Worlds greatest train journeys.
- Investment costs are lower than many of the other upgrades including the coastal train corridor.
- The Moree Grafton line should concurrently be opened.
- These corridors are resilient against flood, fire and other natural disasters and would be huge boost to Tourism
- The Conversion of rail lines in Northern NSW are grossly inefficient and environmentally wasteful the opening of the corridors would spur lines into a series of loops.
- Rail infrastructure already exists. They require upgrading to meet current and future freight needs and demands.
- Once upgraded, the line can be an important North-South freight (and potentially passenger) link between Queensland and NSW that can assist the NSW and Commonwealth governments to realise decarbonisation efforts by shifting freight from roads to rail.
- It will be of major importance to NSW for the 2032 Olympic games.

CPCFM recommends that the Pannel make a direction to prepare a list of all the non operational rail lines and make recommendations with reasons of which ones should be reopened to freight and passenger services and which ones should be closed.

In completing the task the Pannel should treat passengers as the “freight” of passenger services.

19. The constitution requires that trade between the states should be free however the trade routes between NSW and Queensland are minimal. There is only one rail route and very few road freight routes. Even interstate coach services are almost non existent. The Inland Rail at some time in the longer term will connect North Star with

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Toowoomba. There is urgent need to connect Tamworth and SEQ with a freight rail connection.

20. The Pannel has expressed concern about the holding costs of non-used corridors however has not provided any details on a corridor by corridor basis. It has also failed to make comments about rail tracks that are underutilised. It has also not attempted to provide the cost of operation of rail services and the revenue gained. Most trains in Sydney would not cover the cost of operation and rely on massive subsidies from Government coffers. Are there any rail corridors in NSW that make profit?
21. When considering the optimum method of determining freight movement for grain and other seasonable products the key factor must be adequate statistics that present a true and accurate account of the past OR accurate predictions of the future. The long, severe and wide spread drought basically showed that there was no need for freight transport. Who ever when it rained!!!!!!! Huge quantities grain are now being road transported to the Port of Newcastle at huge expense to the economy and the environment.
22. In Newcastle we currently load about 200 road tankers mostly B Doubles or larger with diesel to be transported by road because the railways has decommissioned the fuel wagons and rail side equipment to decant the wagons. Surely fuel distribution is an essential service that must be provided for in government policy.
23. Rail should handle almost all high volume freight that travels greater than 50kms. Trucks are good for first and last mile transport and for loads that are out of gauge for trains. The Pannel should recommend that all Government planning should act accordingly.
24. Train design needs a lot of work and must be front and centre of the Pannel's recommendations.  
Train fuel must move away from diesel and from 100% electric.  
Power should be via battery electric with only about 50% (or less in the future) of the track having overhead power lines with power

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directed to those sections from REZ's and other power sources(eliminating the need for unsightly and costly power transmission lines and substations etc). Locos used in closed loops and some orbitals could be near 100% electric. The new regional trains are dual fuel.

Trains must become multi purpose and be capable of handling freight and passengers. (Our original submission detailed the 500 tonne train).

All tracks should be government owned like all roads. Revenue for road and rail collected transparently via a distance travelled/tonnage charge. This should ensure that cities pay for the services provided by the regions.

25. CPCFM strongly believes that if the Pannel is reviewing freight movement in NSW it MUST make directions to assist in establishing the Port of Newcastle as a major container port. To do otherwise would be counter productive, environmentally harmful and hugely expensive. The Port of Newcastle is prepared to self fund the container handling infrastructure. Given this major investment it is totally reasonable for the State Government to assist with off port infrastructure including but not limited to:-

- Constructing the portside rail line.

- Adjusting the rail corridor leading to and from the Port.

- Assisting with the establishment of an IMT at Hexham West with connection to the Main rail line and the M1.

- Rebuilding the Ardglen Tunnel as a matter of urgency.

- Establishing double stacking capability from Walgett to Newcastle asap.

- Ensuring that the rail network is capable of handling the container traffic need in a timely manner.

- Establishing a new freight and passenger rail line from Tamworth to SEQueensland and connection to the Qld ail Network.

These items will have a cost however they will attract major savings and significant new revenue streams. The nett cost is likely to be minimal.

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