

**Neighbourhood
Forum 5**

**Wollongong's
Heartland**



**Coniston, Figtree,
Gwynneville, Keiraville,
Mangerton, Mount
Keira, Mount St
Thomas, North
Wollongong, West
Wollongong,
Wollongong City.**

***Submission to the Department of Infrastructure and Regional Development
National Freight and Supply Chain Strategy***

Neighbourhood Forum 5 operates under the auspices of Wollongong City Council. At its meeting of 5 April, Neighbourhood Forum 5 agreed to make representations to the Hon Sharon Bird MP for Cunningham regarding the Maldon-Dombarton rail line.

As a result, the Hon Darren Chester, MP Minister for Infrastructure and Transport advised in part. "In its assessment report Infrastructure Australia raised concerns about some areas of the business case and suggested that the NSW Government would need to address those in order for the project to be considered further.....The National Freight and Supply Chain Inquiry will examine how the nation can remain competitive and meet the demands of markets into 21st Century. I would encourage representative community groups such as the Neighbourhood Forum 5 to make a submission to the Inquiry."

This submission responds to this invitation, in two parts; Wollongong having too many trucks hauling bulk commodities and car imports whilst road upgrades are being denied, and the need to complete the Maldon Dombarton rail link.

A. Too many trucks

The official website that gives access to traffic counts on the Mt Ousley road shows <http://www.rms.nsw.gov.au/about/corporate-publications/statistics/traffic-volumes>, 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?

The 2006 - 07 draft Sydney Wollongong Corridor Strategy released by the federal Department of Transport and Regional Services with the support of the NSW Government as part of the former AusLink programme identified many issues relating to present and projected demands in moving people and freight between Sydney and Wollongong. The strategy noted that the demands on the existing road and rail network will be compounded by the further development of Port Kembla and an expected growth in the number of people commuting between Wollongong and Sydney as well as between Wollongong and Campbelltown/Western Sydney. The projected "rapid growth in corridor freight" was also noted as imposing additional challenges.

The final Sydney Wollongong Corridor Strategy noted (p13) that the Mount Ousley Road is already at capacity in the morning peak (AADT 34 500 in 2003 including about 5500 heavy vehicles). In the intervening ten years to 2017, traffic on the Mt Ousley Road has increased, and, it is congested for more hours of each week day than it was in 2007. Three road closures on Mt Ousley in a six month period from November 2016 to April 2017 from road crashes involving heavy trucks suggest that this road is now operating at capacity as well, and more bulk freight to and from Port Kembla should be going by rail.

A major road haulage task on Mt Ousley is moving coal by giant trucks (up to 11 axles) to the Port Kembla Coal Terminal. In 2009, approval was given by the NSW Department of Planning under Major Project MP 2008/9 to allow up to 7.5 million tonnes per annum (mtpa) of coal on public roads, with the potential to go to 10 mtpa.

The original Council consent provided for a limit of two mtpa of road haulage of coal to the Port Kembla Coal Terminal with a long standing curfew. Wollongong people have been remarkably tolerant in accepting levels of about 5 mtpa of road haulage. Port Kembla is the only coal export terminal in Australia that receives coal by road as all coal for export from Queensland and Port Waratah at Newcastle arrives at the respective ports by rail.

Incredibly, the limit was raised in 2015 from to 7.5 mtpa to 10 mtpa, and, with no public consultation.

Issues of concern raised in 2009 by Neighbourhood Forum 5 included in the assessment process included:

- a. noise emissions,
- b traffic impacts (to be properly modelled differentiating between light and heavy vehicles),
- c dust emissions,
- d use of water,
- e. air pollution,
- f. cumulative impacts (including car carriers and extra coal trucks)
- g. monitoring.
- h. external costs,
- i. the holding of public hearings to assist the assessment process, and,
- j. the desirability of completing the Maldon Dombarton rail link.

Neighbourhood Forum 5 notes that in regards to external costs, the 1990 Report of the Wollongong City Council Coal Transportation Task Force noted, inter alia, that the NSW Roads and Traffic Authority had then suggested that an average external cost of pavement wear and tear due to bulk haulage is 3 cents per net tonne kilometre; also a 1995 report (re St Marys Maldon-Dombarton rail link) commissioned by Wollongong City Council made recommendations including "...establishment of an effective road use charging system whereby road coal freight vehicles pay for the full external costs" such as pavement damage, congestion, noise and environmental costs.

The additional coal was on top of car imports through Port Kembla that had started in 2008. There was a condition that 20 per cent were supposed to be moved by rail by 2011. However, the next train to leave Port Kembla carrying cars will be the first one.

Not content with Wollongong's main roads to Port Kembla having no shortage of heavy trucks on public roads with over five mpta of coal, with the prospect of 10 mpta, plus car imports, there was cargo from expansion of the Port Kembla outer harbour. Here, in June 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 a limit of 200,000 tonnes per annum of road haulage to the Port Kembla Grain Terminal (PKGTT). Data in the PKGTT environmental assessment, including one truck unloading 32 tonnes of grain every 8 minutes, shows that if the PKGTT received grain by road 24 hours a week, seven days a week, 52 weeks a year, there would be over TW0 (2) million tonnes a year of grain being moved by road.

The environmental assessment stated most grains arrives between January and July, and 20 per cent the rest of the year. On this basis, over 1.5 million tonnes a year of grain could be moved by road. The proposed increase in trucking, and the cumulative impacts, are of concern. Although most grain arrives by rail at Port Kembla, in recent years, the condition of many grain lines in Western and South Western NSW have been allowed to run down, thus increasing an incentive to use more trucks. More incentives to rail are needed to increase freight on rail.

Neighbourhood Forum 5 recommended that

- a. A nominated maximum tonnage of grain by road (no more than 50 per cent increase over the present limit of 200,000 tonnes per annum).
- b. An estimate of all the external costs of additional grain haulage on road.
- c. A code of conduct for grain truck drivers (as per coal truck drivers).
- d. An outline of measures to encourage more grain onto rail. These should include a surcharge on road deliveries to cover the external costs.

Instead, approval was given to up to 500,000 tonnes per annum, with no external costs (including under-recovery of road system costs) being requested from those putting more loads on roads. Next were two approvals to increase quarry products on Mt Ousley and other Wollongong roads. 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 (mpta) to 4 mpta 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_

Neighbourhood Forum 5 (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 and the upgrading of noise walls along the F6 and the Mt Ousley Road. 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 withdrawal of the ship, the Claudia I, was reported by the Sun Herald on 10 July 2011 (p19) in an article "Ship out, congestion in". In summary, More than 200 extra trucks are now on inner -city roads after a ship which used to carry more than 9000 tonnes of gravel into Sydney Harbour each week was withdrawn from service by Hanson Concrete of Glebe. The ship Claudia 1 which made three return trips a week from the company's quarry at Bass Port to Glebe, carried 3100 tonnes per trip. The company was reported as looking for a replacement vessel. However, it was also noted that this could take some time.

The second quarry allowed to put more trucks on our roads was Boral. Neighbourhood Forum 5 resolved in 2013 to make a submission objecting to increasing road haulage of quarry products by 500,000 tonnes per annum without further examination of rail haulage. Here, the Environmental Assessment (EA) 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 (see correspondence from Pacific National in Appendix A).

Again, an approval was given, with no compensatory levies. This is despite the need for road upgrades such as the Appin Highway and grade separation of a busy and dangerous intersection at the foot of Mt Ousley. Or the upgrading of noise walls on Mt Ousley, with better monitoring of noise.

Road Crash Risk

The Illawarra Mercury has ongoing reports of crashes on major roads involving heavy trucks. Yet these are too often overlooked in proponents Environmental Assessment report when seeking approval for more trucking, and, by government.

In this regard, the draft National Freight and Supply Chain Strategy does not appear to mention road safety. This needs remedying in the final report, where acknowledgement should be given to the fact the shifting road freight to rail freight is an investment in road safety.

Road congestion

There is growing peak hour congestion on the Mt Ousley Road and the freeway to Sutherland. These busy roads have had to deal with expansion of the population of Wollongong and Shellharbour with more people than ever commuting to Sydney for work. Plus the start up of car-carriers in 2008 following expansion of the Inner Harbour, and the approval to conditional double road haulage coal from a hefty 5 million tonnes per annum (mtpa) to a massive 10 mtpa, plus more grain trucks, and more quarry trucks

In assessment of truck impacts, Neighbourhood Forum 5 suggests that the use of mere vehicle numbers, as opposed to measures such as Passenger Car Equivalent kilometres or Weighted Vehicle tonne kilometres, understates the real impact of the extra heavy truck movements.

Noise

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.

The RTA notes (<http://www.rta.nsw.gov.au/heavyvehicles/reducingnoise.html>) noted, "Noise from heavy vehicle engine compression brakes is a significant and on-going cause of complaint for many NSW residents."

This website notes that a pilot fixed noise camera site was constructed at Mt Ousley and has been operational since November 2007. Yet, truck noise has not abated since then. Nor have additional noise cameras being installed.

Air pollution

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

Rail adequacy questions

When the NSW Government granted approval, c2004, for the expansion of Port Kembla to accommodate car carriers, Wollongong people were assured that the existing road and rail infrastructure would be adequate. However, the NSW Parliamentary State Development Committee after conducting an Inquiry into Port Infrastructure in New South Wales in a report released 17 June 2005 made two important recommendations:

Recommendation 12. *That following the anticipated transfer of general cargo stevedoring to Port Kembla in 2006, the NSW Government re-examine the freight task out of Port Kembla to ensure that the anticipated increase in freight traffic is supported by the necessary improvements in road and rail infrastructure.*

Recommendation 13. *That the NSW Government consider the feasibility of expanding rail infrastructure into Port Kembla, including consideration of the Maldon to Dombarton line, in conjunction with the AusLink program.*

Note the date of the recommendations – 2004. Note also the 2007 federal parliamentary committee report called "The Great Freight Task - Is Australia's transport network up to the challenge." and the Committee Chairman Mr Paul Neville MP, comment that despite some progress, ***"it is now even more obvious that bold measures will be necessary to see a more serious movement of freight from road to rail."***

Encouraging rail and external costs

Keeping heavy haulage of bulk commodities by road through cities at reasonable levels requires more effort by both the Australian and state governments.

Clearly, more investment is needed into rail infrastructure. In addition, road freight subsidies through failure to ensure user pays pricing with mass distance pricing for the heavier long distance trucks (including coal trucks) and failure to charge for external costs needs to change.

The draft National Freight and Supply Chain Strategy does not appear to mention external costs including emissions. This needs remedying in the final report, where acknowledgement should be given to the fact that some road freight is in receipt of hidden subsidies and that rail freight is more energy efficient than road freight.

B. Maldon Dombarton

Work on this 35 km rail link started in 1983, and by the time the project was stopped in 1988, it was about one third complete. It has been much studied ever since.

In February 2017, the Illawarra Mercury noted that “The Maldon-Dombarton rail line has received a big setback, after Infrastructure Australia recommended it not receive federal funding.” This was despite Infrastructure Australia in earlier publications noting the potential of completing the 35 km Maldon-Dombarton rail link to improve access to Port Kembla.

In its most recent evaluation, Infrastructure Australia (IA) was quoted as finding that the line “would not justify its costs”. It appears to Forum members that Infrastructure Australia, in its evaluation, has understated the congestion on the existing Sydney to Wollongong railway line, and totally ignored the increasing road congestion on the Mt Ousley highway.

The 2007 Sydney Wollongong Corridor Strategy (p 11) notes that the Illawarra rail line faces an effective restriction on freight train operations during peak periods (600 to 900 and 1500 to 1900hrs) and that the Maldon Dombarton line may be able to play a future role and could "remove bulk freight from the Illawarra rail line and some other parts of the Sydney passenger rail network...."

It is a fact that in 2014, the NSW Department of Planning gave approval to Boral to increase road haulage of quarry products from its Dunmore quarry, and stated that *"Boral is unable to increase the amount of product supplied by rail ...as it is unable to gain access to additional rail paths or utilise longer trains;...* The existing South Coast line is now operating at near full capacity during the day and for some of the night. The Moss Vale Unanderra line has severe speed-weight restrictions and extra distance for freight moving between Port Kembla and Western Sydney.

In 1983, it was proposed to construct the new railway in three years, and, that the new railway is one third completed already, that it should be able to be completed within three years. The February 2017 Infrastructure Australia report says five years, this, along with the indicated cost of completion of some \$800 million, should be questioned.

In addition, as more people live in Wollongong and work in Sydney (for housing affordability) attention is needed to the need to improve the passenger train service between Wollongong and Sydney, with more trains and faster trains. Much local sentiment is reflected in the Illawarra Mercury Editorial for Saturday 15 July 15, 2017'

Our readers have made it loud and clear through the columns of these pages as part of our Cut the Commute campaign. The people of the Illawarra want a better service from our region to Sydney on both road and rail.

The NSW Government has been working on a proposal for the F6, but has been standing idly on the tracks in terms of a better rail prospect for this region. And commuters and travellers have rightly had enough. Now it seems the answer is staring them in the face and as much as the NSW Government doesn't want to hear it the numbers stack up.

The answer is plain to see. The stalled Maldon-Dombarton rail link must be completed. Documents revealed by Fairfax Media have revealed the true potential open to the people of the Illawarra. A cabinet-in-confidence document entitled Rail Corridor Strategy: Sydney to Wollongong produced in 2014 has rated a rail link upgrade for Wollongong to Sydney in its benefit-cost analysis as "exceptional".

In response to the findings, local politicians have called for action. "If you untangle freight and passenger movements you get a much better outcome," Cunningham MP Sharon Bird told the Illawarra Mercury, adding South Coast Line delays often related to freight movements. "To see this put in a document ... just leaves me with the question about why they [the NSW government] are so completely wedded to new toll roads."

This has the potential to be a complete game changer for this region and we need government representatives of every level in the Illawarra to be pushing in unison for this to be prioritised.

We must demand action and we must demand a better result for the people of the Illawarra who travel each day on our train lines.

We can no longer continue to accept inaction or being put in the "too hard" basket. In this modern world we can put man on the moon, send spacecraft to Mars, replace people's failing body parts and even cure diseases once thought incurable.

We can do things that were once thought impossible. Surely, we can invest in this region, do the impossible and finally, once and for all, Cut the Commute.

Conclusions

Whilst public exhibition of the draft National Freight and Supply Chain Strategy is appreciated, the final version really needs to articulate policies that will reduce over-reliance of heavy truck using public roads to move bulk commodities and to result in fewer loads on roads. Some acknowledgement in the final strategy of the situation facing Wollongong, with its 6900 trucks a day on Mt Ousley is requested.

The final strategy also needs to address safety issues along with improving road cost recovery from heavy truck, improving energy efficiency and reducing emissions.