

WOLLONGONG TRANSPORT COALITION

Submission – to the NSW Department of Planning and Infrastructure Re Bass Point Quarry Project 08-0143 July 2011

In 1993, the Wollongong Transport Coalition (WTC) was formed by local people with the aim of responding to a Commission of Inquiry that examined the impact of the expansion of the Port Kembla Coal Terminal (PKCT). WTC was reactivated in 2008 in the light of a PKCT proposal for more coal trucks with night operations before the NSW Department of Planning in 2008-09 at a time that our City Council was under Administration. Our 2008 Submission appears as Appendix A.

The applicant Hanson Construction Materials Pty Ltd (Hanson) is seeking approval to expand the rate of production of 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.

The Wollongong Transport Coalition is most concerned that the ship that for some years has been moving quarry products from Bass Point to Sydney has stopped, (Sun Herald July 10, 2011) thus putting 200 trucks a week on the Mt Ousley road with the potential for even more quarry products on this and other main roads.

Our main roads to Port Kembla have no shortage of coal trucks on public roads, now over five million tonnes per annum (mtpa) to the Coal Terminal and with the prospect of 10 mtpa, plus a further 2 mtpa or so of coal to the steel works. Plus car carrying trucks since 2008 and now approval in 2011 to expand Port Kembla Outer Harbour with more big trucks.

No other city in Australia is subject to this imposition with its increased road crash risk, noise and air pollution, plus road congestion. To add insult to injury, the operations of the heavier trucks are arguably subsidised by low fuel taxation (only about 23.1 cents per litre for diesel used by big trucks after rebates as against the 38.183 cents a litre paid by motorists) and for the road damage big trucks that travel large distances each year, low annual registration charges. As noted by the Henry Tax review, mass distance location charges are long overdue.

Port Kembla expansion to date has already put more pressure on the Mt Ousley, Picton and other roads. Plans for further expansion of the Outer Harbour

envisage most extra freight on rail, however, as seen by the NSW Roads and Traffic Authority regarding Stage 1 Port Kembla outer harbour traffic volumes (bulk, general and limited containers) in the official June 2010 submissions report; 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."*

There are many Illawarra Mercury stories showing problems with existing rail and road links. By way of example, ***Double truck crash closes Picton Rd*** for Tuesday 30 Nov, 2010 notes, inter alia

The westbound lane of Picton Rd at Cataract is closed following a collision between two trucks.

Nobody is believed to have been seriously injured in the incident.

Motorists are advised to use either Illawarra Hwy or Appin Rd as alternative routes.

The Picton Road now has serious road safety issues, and to upgrade it to dual carriageway standard, at even an average of \$30 million per km is likely to cost about \$1 billion. WTC suggests that the money would be far better invested in more modest road safety upgrades of the Picton Road and completing the Maldon Dombarton rail link.

To upgrade the Mt Ousley road would also be difficult and very costly.

The Wollongong Transport Coalition notes the statements on 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."*

This means a decrease in the proportion of freight transported by road. On top of more coal trucks, car carrying trucks, more trucks with the Outer Harbour expansion, possibly more trucks with recent Grain Corp proposals, now comes an extra 200 quarry trucks a week with the potential for more quarry trucks on Mt Ousley and other roads.

More heavy trucks on roads are also at variance with the results of a June 2011 poll "Community attitudes to transportation" conducted by Auspoll. The research showed that, in part, after polling 1510 "nationally representative" persons on various transport

questions that "most people want changes in the way that trucks use the roads. In this regard:

- ▶ 68% support the introduction of truck-only lanes on major arterial roads;
- ▶ 61% support restricting truck movements in cities to non-peak periods;
- ▶ 53% support banning the use of very large trucks in cities; while
- ▶ 33% support making trucks pay more for the use of roads in daylight hours (34% oppose this).

The Wollongong Transport Coalition notes that Neighbourhood Forum 5, which operates under the auspices of Wollongong City Council, at its meeting of 6 July 2011, resolved to make a submission objecting to both the proposed lifting of a curfew on grain truck movements to the terminal and removing the current limit of 200,000 tonnes per annum on road haulage of grain to the Port Kembla Grain Terminal. In addition, Neighbourhood Forum 5, **noted and recommended that:**

The present planned variation of the existing consent for Port Kembla Grain Terminal operations is completely unjustified and should be withdrawn, revised and resubmitted later. The new version should include detailed consideration of all cumulative impacts, together with consideration given to:

- 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 of 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.

The Wollongong Transport Coalition supports these recommendations as they would apply to quarry trucks. This includes more quarry products by ship.

The Wollongong Transport Coalition requests that the Department and or Minister consider referring the present application to the Planning and Assessment Commission with the option of Public Hearings.

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**APPENDIX A Submission – Port Kembla Coal Terminal Project (MP 08_0009)
To NSW Department of Planning October 2010**

The Wollongong Transport Coalition (WTC) was formed by local people fifteen years ago with the aim of responding to the then Commission of Inquiry to examine the impact of the expansion of the Port Kembla Coal Terminal (PKCT) on the region. WTC has now been reactivated in the light of the current proposal.

We are apprehensive about the length of time that the proposal was on exhibition. One month, of which half was during school holidays, is not sufficient for a community to respond to a proposal that will have such a major impact on the region. Requests for an extension of the closing date through the Member for Keira, the Hon David Campbell, had not been granted to date.

Only in Wollongong would it be considered to double the coal trucks on the road, to abolish an existing curfew and to have coal trucks running twenty four hours a day, seven days a week. Although it is not immediately clear in the impressive and large proposal of PKCT, it is apparent that the aim is to increase road haulage of coal from 5 tonnes to a maximum of 10 million tonnes per annum (mtpa). This would mean a doubling of the coal trucks on the road.

There are several significant concerns that we would like to raise in this regard:

Current situation. The present level of 5 mtpa far exceeds the original limit of 2 mtpa in the consent granted in 1979 by Wollongong City Council. This limit was lifted in 1982 when the State Environmental Planning Policy (SEPP No.7) was introduced. By way of compensation for residents, SEPP 7 limited road haulage of coal to 11 hours per day six days per week (except on Sundays and Public Holidays) and required coal from Tahmoor and Western Mines to be received at PKCT by rail. In the new proposal no mention is made of this.

Constant noise. The coal transport corridor traverses large residential areas. While during the day the noise of trucks is part of overall traffic noise, at night the noise is heard at longer distances thereby preventing many people from having a proper night rest.

Safety. More coal trucks in addition to the soon to be operating car carrying trucks will have implications for the safety of other road users. Road commuters between Wollongong, the Hume Highway (via Picton) and Sydney will face an increased risk of safety on the daily trip to and from work. How will the roads cope in holidays and long weekends? How will an increase in trucks on the road impact on tourism?

Environment: Dust and exhaust fumes will increase, this will have implications on the health of people and increase greenhouse gases. The Federal Government is taking climate change seriously and we would expect the NSW Government to do so as well.

Infrastructure. Large sums of money have been invested in a feasibility study to complete the Maldon-Dombarton rail link. It would seem sensible to finish the rail link and utilize it for transport to and from Port Kembla Harbour. Rail only uses one third of the energy that trucks use and are 20 times safer than road in the movement of freight.

PKCT has had the opportunity to plan the above proposal for a lengthy period of time. It contracted engineers and advisers to collect data and compiled a report with the aim of convincing decision makers of the merit. However the community has had only one month to respond and has had no time to lobby respective government departments for sampling and data collection, let alone inform residents. Wollongong City Council has been placed in administration and citizens are not adequately represented. It is feared that in the rush to create more employment, essential social and long term economic implications are overlooked.

We urge the Minister for Planning to hold a Commission of Inquiry with a broad term of reference to ensure that all relevant issues are properly examined.

WOLLONGONG TRANSPORT COALITION

Supplementary submission – to the NSW Department of Planning and Infrastructure Re Bass Point Quarry Project 08-0143 February 2012

Further to our main submission of July 2011, Wollongong Transport Commission remains concerned at the proposals of the applicant Hanson Construction Materials Pty Ltd (Hanson) in seeking approval to expand the rate of production of 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.

The Wollongong Transport Coalition does not consider that the 2011 Submissions Report adequately addresses the cumulative impacts of extra bulk trucks on Mt Ousley and other roads. These cumulative impacts increased following two determinations by the Planning and Assessment Commission in December 2011. The first, as noted in the Illawarra Mercury of 2 and 3 December 2011 was to approve an application to lift road haulage of grain to Port Kembla from 200,000 to 500,000 tonnes per annum. The second approval was to BHP Billiton to expand production of their Appin Mine Complex to 10.5 mtpa, and using road haulage for the expanded coal production.

As noted in the Illawarra Mercury for 19 January 2012 *Quarry plans to dig deep - Bass Point expansion blueprint with Planning Department* there is concern about increased truck movements, including from the NSW Department of Transport about transport impacts that may be required with an increase of production from 1.5 mtpa to 2.4 and then 4 mtpa. This contrasts with consultants claims that the impact would be 'moderately low'.

A submission from the RTA notes in part that it " ... *does not object in principle to the application as the increase in traffic volumes associated with this project is considered not to have a significant impact on the classified road network.*" This was signed by the then Manager, Road Safety and Traffic Management, Southern (Region) RTA 28 June 2011.

Given the potential to put 2.5 mtpa of extra bulk products on Mt Ousley and other roads, the assessment of this officer of the RTA is questioned. It is suggested that the RTA gave a much better assessment of these and similar track assessments in respect of plans to expand the Outer Harbour of Port Kembla. As noted in the June 2010, the Submissions Report for the Port Kembla Outer Harbour Expansion released by the Department of Planning comment by the NSW Roads and Traffic Authority noted that after consideration of the impact of Stage 1 Port Kembla outer harbour traffic volumes (bulk, general and limited containers and less than 2.5 mtpa on roads proposed) 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.**"

Wollongong Transport Coalition suggests that this will be the case if the Bass Point Quarry Project is approved as per the current application.

Our concern about increased truck numbers is shared by Wollongong City Council at its meeting of 30 January 2012. In part: 1 Wollongong City Council inform Transport for New South Wales of its concern about the increased use of road-based bulk haulage within the Wollongong Local Government Area, focussed on Port Kembla. Wollongong City Council requests a report from Transport for New South Wales on the environmental and social impact on the City of such planned increase.

Neighbourhood Forum 5 operates under the auspices of Wollongong City Council. At its meeting of 1 February 2012, this Forum resolved in part to support the above part resolution of Council, and, inter alia

A. That the assessment process regarding the Bass Point Quarry Project application include the holding of Public Hearings in Wollongong or Shellharbour City.

B. To make a supplementary submission to the NSW Department of Planning, that inter alia, calls 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.

Wollongong Transport Coalition also requests that public hearings be held and a levy be placed on the road haulage of quarry products by road from Bass Point to Sydney in addition to the 1 mtpa that was being hauled before the ship was withdrawn from service. We suggest that from analysis and data on external costs given an October 2011 report by the *Independent Pricing and Regulatory Tribunal of New South Wales Review of Access Pricing for the NSW Grain Line Network* would support a levy.

In addition, consideration should be given to the use of rail to move quarry products from Bass Point to Sydney and Western Sydney.

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