

# Wollongong Transport Coalition

## Submission to the NSW Dept of Planning etc. August 2020 re Proposed Manildra facility at Port Kembla and the use of extra large trucks on public roads as opposed to using an upgraded rail line.

The Wollongong Transport Coalition (WTC) was formed in 1993 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 the light of a 2008 PKCT proposal for more coal trucks on public roads with night time operations - approved by the then NSW Minister of Planning. WTC maintains an active website <http://wollongongtransportcoalition.blogspot.com> and a companion <https://www.facebook.com/maldon.dombarton.appeal> website.

This website notes that the official 2006-2031 Illawarra Regional Strategy of the NSW Department of Planning to (p4) "*maximise the efficiency of freight transport [and] "increase the proportion of freight transported by rail"*

Ongoing proposals for further expansion of Port Kembla, require that all relevant issues, including transport, are properly examined. This includes the 2021 Manildra Proposal for an ethanol export facility that was then withdrawn, and now the 2022 proposal.

The 2021 proposal drew a firm response from Wollongong City Council at its meeting of 1 November 2021 that adopted, unanimously, a motion based on a Lord Mayoral Minute presented that in part resolved to:

1. Write to Minister for Planning and Public Spaces expressing concern that further intensification and concentration of the production, storage and transport of highly volatile products at Port Kembla, approved under the State Environmental Planning Policy (Three Ports), could have potential negative impacts on
  - a) The community with cumulative noise and pollution levels on adjoining access roads;
  - b) Council assets and local amenity especially trucking noise; and
  - c) The Port through increased risk of a chain reaction with cumulative hazardous operations.

Despite this and other feedback, it is hard to understand why Manildra want to use large trucks on public roads when only in July 2022, TfNSW noted in a media release they had just spent \$40 million to upgrade the Kiama Bomaderry line. A spokesman for Manildra said, in the TfNSW media release, that will benefit from the rail line upgrade, as follows.

*"The track upgrade to 25-tonne axle loading between Berry to Bomaderry and the tunnels between Kiama and Berry allows our company to operate heavier and longer rail services through the network."*

*"This ultimately means we can meet both our current and future growth targets for both inbound raw materials to our Bomaderry facility and for our export freight to the Port of Botany to meet the export market, which benefits both regional employment and the NSW trade and economy."*

WTC also notes the concerns of Council's Neighbourhood Forum 5, and supports their request for Manildra to give further consideration of using rail, as opposed to their dubious claim in the EIS and in a two page glossy brochure that the rail system does not have the capacity to move the ethanol from Bomaderry to Port Kembla.

It is of note that for decades, a milk train using tankers moved milk from the South Coast to Sydney. Rail continues to be used for moving milk in New Zealand. To quote,

<https://teara.govt.nz/en/photograph/21401/milk-trains> “The dairy company Fonterra Co-operative Group is a major rail customer in the early 21st century. Milk trains run every day through the milking season – about seven months of the year – from the Manawatū and Taranaki districts to Fonterra’s factory at Whareroa, near Hāwera in Taranaki.”

If Fonterra can move milk in rail tankers, and Manildra can move grain by rail to Bomaderry, then why cannot Manildra move ethanol by rail from Bomaderry to Port Kembla?

If however, the company insists on using road tankers, there should be a cap of say 50,000 litres per annum and they should only operate during daylight hours, excluding Sundays and Public Holidays, and operate over designated routes that would exclude haulage through the residential areas of Berkeley, Lake Heights, Warrawong and Windang i.e. the use of King Street and Northcliffe Drive are prohibited.

In addition, Manildra should be required to pay Council a fee for any use of Council roads, and to RMS an additional fee that will cover all additional road maintenance costs. This is addressed below.

The use of giant 33 metre long A- Double road tankers on the Pacific Highway between Bomaderry and the turn off to the Five Islands Road, and along the Five Islands Road is questioned. This section of the Pacific Highway is used by many Wollongong and Sydney motorists when travelling south of Wollongong, and includes the dangerous and winding Kiama Bends.

A traffic impact assessment on page 15 has **Figure 3.4: NHVR A-Double Approved Route** that includes Five Islands Road. It is further noted that Foreshore Road provides access to an industrial area. This assessment makes the bold assertion that “Therefore, the adjoining roads are designed to accommodate predominantly heavy vehicles and would be able to accommodate development traffic.”

This raises many questions. Which agency gave approval for A Double trucks, which can be up to 35 metres in length. Was there any public consultation before this approval was given, and was there any consultation of the proposal to allow such big trucks? Also, was any approval sought from and given by Wollongong City Council, Shellharbour City Council, Kiama Municipal Council, and Shoalhaven City Council??

### **More on road freight in and around Wollongong**

Wollongong's main roads to Port Kembla have no shortage of coal trucks, with an incredibly high limit of ten million tonnes per annum (mtpa) being able to be transported to the Coal Terminal by heavy trucks on public roads; prior to 2015, when the consented limit was doubled, it was five mtpa. Additional coal is transported to the steel works. Since 2008 car carrying trucks have emerged on the roads, and approval in 2011 to expand Port Kembla Outer Harbour has resulted in more big trucks. The NSW Planning and Assessment Commission in December approved an application in 2011 to lift road haulage of grain to Port Kembla from 200,000 to 500,000 tonnes per annum.

On top of the coal and the grain along with general freight and car imports, there are now extra quarry products on Mt Ousley and other roads (Hanson's Bass Point Quarry and Boral's Dunmore Quarry).

No other city in Australia is subject to this imposition of bulk haulage by road 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 subsidized.

A 1992 Report of a 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 was 3 cents per net tonne kilometre. This estimate is in part supported by the NSW Independent Pricing and Regulatory Tribunal of New South Wales in its 2012 Review of Access Pricing for the NSW Grain Line Network which noted (page 31 and 32) external costs from articulated trucks in urban areas of 3.88 cents per net tonne kilometre.

Road freight is not only more dangerous than rail freight, but uses more energy as well, with more emissions. When accidents occur, road congestion results. By way of example, on Friday 30 March 2012, a grain truck, with dog trailer, overturned on Mt Ousley south of the Mt Pleasant overpass. This blocked Mt Ousley road for more than ten hours, with traffic congestion on Bulli Pass extending as far back as Waterfall (see Illawarra Mercury for 31 March 2012).

Three 2016-17 incidents include:

A. 14 November 2016 M1 Princes Motorway closed after an accident involving two trucks . Both lanes of Mt Ousley road were closed for hours, requiring diversions via Bulli Pass Road.

B. 23 Jan 2017 M1 Princes Motorway closed Southbound after truck rollover New Mount Pleasant Road overpass at about 8.30am. Motorists travelling South were advised to avoid the area and to divert via Bulli Pass whilst heavy vehicles were being diverted via Picton Road, then the Hume Motorway.

C. 3 April 2017 Truck, car crash on M1 at Mount Ousley. This resulted in lane closures.

### **The hidden subsidy for the proposal**

Based on earlier Wollongong City Council findings in 1992 that 3 cents per net tonne kilometre is a reasonable estimate of the shortfall between actual road system costs and then road user charges for heavy trucks, a conservative estimate (based on CPI which is less than the increase in road construction and maintenance costs) is now 6.04 cents per net tonne km.

The documents accompanying the proposal note and the length of haul is 70 kilometres, and that it is estimated that the development would result in the shipping of up to 200ML or 157,860 Tonnes of ethanol per year via the pipeline running to the Berth.

If 6 cents per net tonne km was to be charged, this means that a payment of \$4.20 per tonne of ethanol could be levied. For 157,860 Tonnes pa, this is about \$663,000 – money that could well be used for the repair of flood damaged roads, and expediting the long awaited Mt Ousley interchange.

### **Conclusion**

The Wollongong Transport Coalition views with dismay the proposals to put large B-Double tanker trucks on our main roads, when totally inadequate consideration has been given to the option of using rail to transport the ethanol from Bomaderry to Port Kembla. It is requested that Manildra be required to supply an assessment of the rail option, and in any event, any holding facility at Port Kembla should be constructed so that rail remains a viable option in the future. If road transport is to be used, there should be a charge imposed for the extra costs it imposes on the Council and or state road network, and the wider community.

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