

# WOLLONGONG TRANSPORT COALITION

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## **Submission – to the NSW Department of Planning and Infrastructure Re Port Kembla Grain Handling Terminal DA 0844/672 MOD 1     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 is seeking approval for a long standing consent (over 25 years) so as to lift 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 (PKGT).

The Wollongong Transport Coalition strongly objects to both proposals. 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 running on the corridor.

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
- by low annual registration charges for big trucks which travel large distances each year and contribute to exponential road damage. 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 in the official June 2010 submissions report, regarding Stage 1 Port Kembla

outer harbour traffic volumes (bulk, general and limited containers); 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 that the Environmental Assessment (EA) and its appendices quotes from the Illawarra Regional Strategy of the Department of Planning in terms of Port Kembla and general economic growth.

However, the EA apparently neglects to note mention of 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."*

In addition, the Port Kembla Port Corporation in its Special Feature "Your Port" in The Advertiser for Wednesday 29 June 2011 states in an article RAIL PLANNING ON TRACK studies underway to assist its vision including "...to **encourage modal shift where practical from road to rail.**"

Clearly, the proposals of the Grain Corp work against getting more freight onto rail.

The Grain Corp proposals are also at variance with the results of a June 2011 poll Community attitudes to transportation conducted by Auspoll for the following groups:

Australasian Railways Association  
 Australian Conservation Foundation  
 Australian Local Government Association  
 Bus Industry Confederation  
 Cycling Promotion Fund  
 Heart Foundation  
 International Public Transport Association

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, Neighbourhood Forum 5 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.

The Wollongong Transport Coalition further supports extension of the current exhibition period (14 days mostly in school holidays is far too short) and requests that the Department and or Minister consider referring the present application to the Planning and Assessment Commission with the option of Public Hearings.

In addition, Wollongong Transport Coalition seeks positive measures to get more coal on rail (including completion of the Maldon to Dombarton Rail Link) and to keep grain on rail. This includes rehabilitation of grain lines, reopening of ones such as Harden to Cowra, and full user pays for heavy trucks with a contribution to the social and environmental costs that their operations impose on the wider community.

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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.