



14<sup>th</sup> July 2011

NSW Department of Planning & Infrastructure  
Major Projects- Infrastructure

Attention:  
Karen Rae, Environmental Planning Officer  
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**Re Port Kembla Grain Handling Terminal DA 0844/672 MOD 1**

Healthy Cities Illawarra (HCI) is dedicated to improving the health, physical environment and quality of life of people of the Illawarra. People's physical, mental and spiritual health depends on a healthy environment, including sufficient open space, clean water, clean air and sustainable natural ecosystems. Noise pollution has also been recognised as having a major impact on people's health through an increase in stress-related illnesses.

Healthy Cities Illawarra has made many representations in the past about the road haulage of freight to Port Kembla and its environmental and health impacts. We object to this latest proposal to abolish the long standing curfew on truck movements to the terminal and to remove the tonnage limit on road haulage of grain to the Port Kembla Grain Terminal. The reasons for our objection are the public health and environmental impacts, including noise pollution, air pollution, road accidents, greenhouse gas emissions, traffic congestion, and cost-shifting from industry to the public.

Wollongong has unique transport problems, the most notable of which is the level of freight trucking on public roads.

This application to expand road freight transport through the Illawarra follows a similar expansion in coal truck movements two years ago. There is also an application for a new cement grinding mill being considered at present, which would increase truck movements by 744 per day. The impacts of road freight movements through Wollongong are cumulative, and should be considered in conjunction with all the other permitted road freight transport movements through the city.

**1. Noise pollution**

Because of the seriousness of noise as a public health and environmental issue, HCI supports the retention of a curfew on coal trucking movements. It is necessary for people to have periods of quiet for sleep and relaxation to be able to maintain their health and well-being.

The HCI-commissioned Traffic Noise Study 1992 and 1993<sup>1</sup> measured road traffic noise and rail noise at 12 locations, and observed that (page 7) "*the upper end of road traffic noise levels measured represents a significant noise impact upon residents adjacent to the road.*" In general, the noise from coal trucks was found to exceed NSW Government road-side noise guidelines and was appreciably more than the noise from coal trains. Recommendations were made to reduce the impacts of noise caused by road haulage.

<sup>1</sup> Wilkinson Murray, 1992 and 1993, Traffic Noise Study. Healthy Cities Illawarra and NSW Environment Protection Authority.



## 2. Air pollution

The health impacts of emissions from motor vehicle emissions are also expressed through another report we commissioned in the 1990s, 'Illawarra Environment 1992 - Air Quality and Transport Options'<sup>2</sup>. The report found that coal haulage had exceeded agreed limits around Wollongong, and quoted a number of reports from government, non-government and industry sources which identified the wide range of problems caused by road haulage. Wollongong City Council had also expressed concerns about the impacts of road haulage of coal, as well as the financial losses imposed by cost-shifting road-use externalities from the industry to the State.

Young and Laird (1992) note that:

*".. major air pollutants emitted from road vehicles are recognised by authorities including the OECD (1988) and the NHMRC (1992), as Carbon Monoxide (CO), Nitrous Oxides (NO), Hydrocarbons (HC), Lead (Pb) and Particulates. Although Carbon Dioxide (CO<sub>2</sub>) is not universally recognised as a pollutant, motor vehicles are a major source of CO<sub>2</sub> and the NHMRC (1992, p62) notes that combustion of a single tank of gasoline produces 130-180 kilograms of CO<sub>2</sub>, and CO<sub>2</sub> emissions from vehicles contribute significantly to global warming (the greenhouse effect). These authorities also note that in some cases, each of these pollutants is capable of producing adverse health impacts. In addition, the effect of several air pollutants can combine to produce more severe health impacts, along with indirect effects such as ozone production. The NHMRC (1992, p61) notes that ozone may cause health problems and that ozone levels in some Australian cities have exceeded the current air quality standards."*

Also, the Bureau of Transport and Regional Economics (2005)<sup>3</sup> gave a mid-range estimate of the annual health-related costs from air pollution from motor vehicles in Australia's capital cities of \$2.33 billion for the year 2000. This comprises \$1,596 million from the estimated cost of mortality (premature death as a result of air pollution), and \$735 million for morbidity (quality of life and/or productive capacity of victims impaired or reduced as a result of air pollution).

These health costs are an indication of the levels of human suffering directly attributable to the dominance of road transport over other transport alternatives.

## 3. Road accidents

HCI believes that more freight trucks on the road will have implications for the safety of other road users.

Road commuters between Wollongong and Picton, Cambelltown, Sutherland or Sydney will face an increased risk of accident on their daily trip to and from work. The increased truck movements will also affect holiday traffic moving between Sydney and the South Coast, as well as those who live at Kiama and Nowra and drive on the Mount Ousley road. The Australasian Railway Association Inc (ARA) (2007)<sup>4</sup> notes that train transport is 20 times safer than road for the movement of freight.

## 4. Greenhouse gas emissions

The ARA also finds that rail transport uses only one third of the amount of energy of trucks to move the same weight of freight. Australia's greenhouse gas emissions must be considered in any transport planning; therefore we believe that NSW should be supporting moves towards rail alternatives rather than road transport for freight transport to and from Port Kembla.

## 5. Road pricing and hidden subsidies

The Wollongong City Council Coal Transportation Task Force report (1990) found that more attention needed to be given by all levels of Government to the externalised costs of truck operations. These include road infrastructure and maintenance costs, congestion costs, road accidents, tourism opportunity costs, air and noise pollution and climate change.

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<sup>2</sup> Young A and Laird P, 1992, 'Illawarra Environment 1992 - Air Quality and Transport Options', Healthy Cities Illawarra and the University of Wollongong

<sup>3</sup> Bureau of Transport and Regional Economics' 2005 working paper 'Health Impacts of Transport Emissions in Australia: Economic costs' (WP63)

<sup>4</sup> Rail – Safer, Cleaner, Greener', March 2007, Australasian Railway Association Inc (ARA)

One loaded B-Double truck causes the same road wear as 20,000 cars. The Henry Tax review (2010) noted that mass distance location charges are long overdue to better cover the road maintenance costs of large trucks, and their relatively low annual registration charges.

Fuel taxation rebates also militate against the use of alternatives to road freight transport. Fuel taxation is around 23.1 cents per litre for diesel used by big trucks after rebates, compared to 38.2 cents paid by motorists.

These impacts of road use highlight the need for appropriate road pricing for heavy trucks as well as enforced regulations to control safety, noise and exhaust emissions. Using the Road and Traffic Authority's former guide of 3 cents per net tonne km for recovery of road system costs from heavy trucks implies that for a 40km haul of coal from Appin to the PKCT, there is a hidden subsidy of about \$1.20 per tonne.

## **6. Conclusions**

More attention should be given by all levels of Government to the external costs of heavy truck operations. As described above, the public is subsidising road freight haulage to a very large extent - financially, socially and environmentally. Rail transport provides a superior alternative in all aspects, and it would be preferable to invest in rail infrastructure rather than updating Picton and Mt Ousley Roads.

Much of the problems of freight access to Port Kembla could be solved by the completion of the Maldon-Dombarton rail link, and its use for freight transport. This will reduce the amount of truck movements necessary to shift the increasing volumes of freight coming into and out of the harbour. This rail link will also remove coal trains from inner western Sydney and free up pathways for metropolitan passenger trains.

The freight transport problems in the Illawarra, as described above, should not be exacerbated by granting consent for any increase in volume or allowable times from the already high level of haulage experienced on our roads. Because of the impacts of road haulage described, a curfew should remain in place to protect the citizens of Wollongong from suffering even further with 24-hour per day noise and air pollution.

HCI requests that this application be referred to the Planning and Assessment Commission. The Port Kembla Coal Terminal's 1992 proposal to expand throughput was subject to a Commission of Inquiry, demonstrating the importance of the issue to the Illawarra region. HCI therefore supports a call for a Commission of Inquiry for this major proposal, and all other proposals which will increase road freight transport through Wollongong, with broad terms of reference.

Yours sincerely

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## **References**

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