

WOLLONGONG TRANSPORT COALITION

Submission

Maldon to Dombarton Rail Link Feasibility Study

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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.

WTC has also responded to proposals for further expansion of Port Kembla and suggests that no further expansion of this Port should proceed until the NSW government has given a commitment to support the completion of the Maldon Dombarton link.

The Wollongong Transport Coalition strongly supports a December 2010 Wollongong City Council Neighbourhood Forum 5 resolution supporting construction of the Maldon to Dombarton Rail Link because:

- a it would substantially reduce truck numbers on the roads;
- b enhance road capacity;
- c enhance rail capacity;
- d open up new sources of export through Port Kembla; and,
- e its potential to allow for passenger train movements.

In addition, Wollongong Transport Coalition (WTC) supports a Neighbourhood Forum 5 resolution seeking a representative from the University of Wollongong being placed on the project reference group.

WTC notes that the main campus of the University of Wollongong is located at the foot of the Mt Ousley road, and the excessive numbers of heavy trucks on this road compromises the safety of students and staff accessing this campus, also, significant numbers of students and staff use train services on the existing Sydney Wollongong railway, and would benefit from more (and better) passenger train services. Building the Maldon Dombarton rail link to take freight trains off the existing Sydney Wollongong line would facilitate this. In addition, there is a current bus service between the University of Wollongong and Campbelltown, and this could well be upgraded to a rail service that would

also benefit many Wollongong residents who commute to Western Sydney for work.

The Mt Ousley road has excessive numbers of heavy trucks. Including a massive 5 million tonnes of coal on road. No other city in Australia is subject to this imposition. And if this was not bad enough, a long standing curfew has been lifted and permission given for the tonnages to be increased. In other words, more road crash risk, noise and air pollution, plus congestion. To add insult to injury, the operations of the heavier trucks are arguably subsidised by low fuel taxation (only about 22 cents per litre for diesel used by big trucks after rebates as against the 38 cents a litre paid by motorists) and for the road damage they do, low annual registration charges. As noted by the Henry Tax review, mass distance charges are long overdue. The least that the present feasibility study can do is to properly estimate what it is costing the community to have so much coal on road.

To add to the 5 or more million tonnes of coal on road, cars are now imported through Port Kembla and then trucked to Sydney. Promises of 20 per cent of this car movement to go by rail by December 2010 have been just promises. The present feasibility study should note this commitment (strangely enough, it was absent from the issues paper) and also calculate the community costs of this traffic. This includes road wear and tear, plus road crash risk, and the other external costs noted in the issues paper.

The coal moving to Port Kembla and cars from Port Kembla by big trucks is one imposition. It is now proposed to further expand Port Kembla. Our objections to this expansion without a Maldon Dombarton link appear as Appendix B.

The Maldon Dombarton project is one third completed already and will free up capacity on the congested Sydney Wollongong railway for more passenger trains.

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, the NSW Roads and Traffic Authority, in the official June 2010 submissions report, state that even Stage 1 Port Kembla outer harbour traffic volumes (bulk, general and limited containers) would likely to have "... ***unacceptable impacts to road safety and traffic efficiency as well as environmental issues such as amenity, noise and air quality.***" if the predicted rail mode share could not be achieved.

Many stories have been published in the Illawarra Mercury showing problems with existing rail and road links. By way of example, ***Double truck crash closes Picton Rd*** (Tuesday 30 November 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.

There is also the question of what upgrading of the existing railway will be required if the Maldon Dombarton link is deferred for much longer. The recent upgrading of the Sutherland Cronulla line with nearby signals cost over \$400 million. The building of the Waterfall-Thirroul tunnel promised in 1998 was estimated in 2003 to cost well over \$1 billion with less expensive options noted at about \$700 million. Again, Maldon Dombarton at some \$550 million is a much less costly option, and one has to wonder why the NSW Government has not done more to promote its completion.

WTC notes that the NSW Government is seeking a major M5 East upgrade at a cost of (at least) \$4.5 billion to help allow Port Botany to expand. Given the growth of Western Sydney and the relative proximity of Port Kembla to South Western Sydney, it would make much more sense to complete the Maldon Dombarton link and expand Port Kembla. Consequently, WTC asks as a matter of urgency that the present feasibility study be extended to provide reliable estimates for the cost of completing the Maldon Dombarton link and expanding Port Kembla as opposed to expanding Port Botany and building the M5 East. We are confident that this would reveal a large cost saving to the Federal and/or NSW governments.

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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 mt pa 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

APPENDIX B Edited Submission – Port Kembla Outer Harbour Development

Construction and Operation of Terminals and Berths, Dredging and Reclamation Application Number: MP 08-0249 May 2010

WTC was reactivated in the light of the 2008 formal Port Kembla Coal Terminal (PKCT) proposal for more coal trucks with night operations before the NSW Department of Planning at a time that Wollongong City Council was under Administration and car carriers were starting to arrive at Port Kembla, thus putting additional numbers of heavy trucks on local roads.

Despite numerous objections (over 100), and at least 10 calls for a new Commission of Inquiry to be held to examine the PKCT proposals, the Minister for Planning lifted the long standing curfew and gave conditional approval for road haulage of coal to the PKCT to be lifted from about 5 million tonnes per annum (mtpa) to 7.5 mtpa and then to as much as a 10 mtpa.

In 2010, Port Kembla Port Corporation (PKPC) has formally proposed additional portside and landside facilities to attract new trades, as well as increasing the volume of existing cargoes. To this end, PKPC has prepared Environmental Assessment (EA) and is seeking concurrent Concept Plan Approval and Major Project Approval from the Minister for Planning for the development. This is to be in three stages.

Given the present constraints on Wollongong-Sydney rail and road connections that have had to cope with additional numbers of trucks resulting from the expansion in 2008 of the Inner Harbour to take car carriers and that result from double the numbers of coal trucks, in the absence of plans to upgrade the existing railway or complete the Maldon Dombarton railway, WTC has no option but to object to the present proposals to further expand Port Kembla.

The rail and road connections between Wollongong and Sydney are already congested at peak hours.

At the Port Kembla Port Corporation (PKPC) Community Forum held 20 April 2010 at Port Kembla, consultant for the applicant (PKPC) stated that there were no further train paths available for freight trains on the existing Sydney-Wollongong railway, and it was proposed to use the Moss Vale Unanderra line.

Page 19.4 of Appendix I of the voluminous Environmental Assessment (EA) notes the limitations of rail capacity on the existing main line to Sydney, and suggests rerouting freight trains from Sydney via Moss Vale.

This would impose severe penalties on the economic provision of rail freight services; firstly by an excessive extra distance when compared with the existing line, and secondly the difficult nature of the Robertson-Unanderra track with its short crossing loops and its steep grades. Although it did not appear to be mentioned in the EA, safe working requires a maximum speed of 40km/h for most sections, with some sections further constrained to 20km/h operations.

These constraints in turn would lead to a choice of using road freight rather than rail freight; quite possibly in excess of claims of 50 per cent rail for bulk cargo, or even 65 per cent as noted in Table 19.2 page 19.6, Appendix 1.

WTC would reiterate the points made at earlier Forums, including on August 2008, identifying critical infrastructure needs (including Maldon-Dombarton and the Picton Road and the Princes Highway, upgrading existing railway to Sydney plus the Princes Highway) and in August 2009 hosted by PKPC. This 2009 forum noted the increasing potential for Port Kembla to service Western Sydney. This potential however requires much better rail and roads to avoid severe road congestion and increased numbers of road crashes. On the other hand, completion of the Maldon-Dombarton link would do much to enhance the potential for the growth of Port Kembla.

The EA totally fails to note the repeatedly expressed expressions of community concern about the state of the Picton Road, and the number of fatalities from road crashes. By way of example, the Illawarra Mercury has frequently drawn attention to the fact that since the year 2000, no fewer than 21 lives have been lost in road crashes on the Picton. This was noted in a front page and page 2 article on the Illawarra Mercury for 28 April 2010.

In addition, the EA fails to adequately address cumulative impacts resulting from not only the trucks car carriers and extra coal trucks (there does not seem to be any modelling for either 7.5 million tonnes per annum (mtpa) or 10 mtpa of coal on road as conditional approved in 2009), or the ongoing population increase of Wollongong and Shellharbour (including a new large Calderwood subdivision) with more and more people commuting to Sydney.

A further point of concern is that the EA suggests that barge and rail may be used to move much of the material required for the proposed reclamation. However, the EA does not spell out the means that will ensure that using barge and rail will actually occur, as opposed to over-reliance on trucks operating over public roads.

The 2007 Sydney-Wollongong AusLink corridor strategy recognized severe constraints on rail and road links. This strategy looks out to 2030, but somehow, by design or accident, the EA fails to notice this important federally funded strategy.

The EA also tends to treat truck impacts as if one truck was just one vehicle. However, it is well known that trucks occupy more road space (a semitrailer has a factor of at least three and a B-Double at least four), are over-represented in fatal road crashes, and a heavy semitrailer causes at least 10,000 times the road wear and tear that a family car does.

In addition, the EA is very light on external costs. It stands as a failure of the assessment process that applicants have not, to date, been required to address in detail such issues.

The possibility of completion of the Maldon-Dombarton rail link is noted in the EA along with the 2009 prefeasibility study and the current feasibility study now underway. However, this feasibility study is not due until mid 2011.

WTC submits that in the absence of any commitment to complete the Maldon-Dombarton link, and given the severe constraints on the existing rail and road networks, that both the Concept and the Stage I application should, if not withdrawn by the proponent, be refused by the Department of Planning.

At the very least, assessment of the current proposals should be put on hold for 12 to 18 months, until the Maldon-Dombarton feasibility study results are released, and the EA revised to incorporate the results of the feasibility study, and the comments made in the various submissions to the EA.

In addition, proposals for further expansion of Port Kembla require that all relevant issues are properly examined and that a Commission of Inquiry with public hearings is held as opposed to the somewhat opaque process adopted by the Department of Planning in 2009 in not holding public hearings.

WTC is supportive of the concept of seaports serving their hinterland when supported by good rail and road infrastructure. However, this does not hold in the present place.