

<p>Neighbourhood Forum 5</p> <p>Wollongong's Heartland</p>		<p>Coniston, Figtree, Gwynneville, Keiraville, Mangerton, Mount Keira, Mount St Thomas, North Wollongong, West Wollongong, Wollongong City.</p>
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Submission by NF5 to the NSW Independent Pricing and Regulatory Tribunal Review of third-party access to Rail infrastructure in NSW

Neighbourhood Forum 5 (NF5) operates under the auspices of Wollongong City Council to advise Council and other levels of government on community concerns and respond to current initiatives. Thankyou for the opportunity to make a submission to the above-mentioned review.

At its meeting of 7 December, Neighbourhood Forum 5 agreed to lodge a submission to IPART about the proposed Manildra - Port Kembla Bulk Liquid Terminal, where the proponent plans to use road transport rather than rail transport, and to use A- Double tankers. These are very large trucks, up to 35 metres in length, that are appreciably longer than B-Doubles at 23 metres (and semitrailers at 19 metres).

The submission is consistent with one lodged in August by the Forum to the NSW Department of Planning and Environment that addressed the concerns expressed by members.

The use of road transport is considered to be in need of review by both the proponent and the NSW Government, and further consideration should be given to the use of rail between Bomaderry and Port Kembla. In a brochure called Clarifications, released in August (or September) 2022 by Manildra, it is stated that

“Rail paths to Bomaderry are allocated to rail operators by Sydney Trains, which is a NSW Government Department. Manildra’s rail operator has been allocated 14 rail paths to Bomaderry, which are fully utilised. The Main Line Network Owner (Sydney Trains) is adamant that no further rail paths are available due to the requirements of the passenger service which operates between Kiama and Bomaderry on a frequent operational schedule.”

This is despite, in July 2022, TfNSW announcing that the NSW Government had just completed \$40 million rail upgrade to 13 kilometres of track on the South Coast Line to a 25-tonne axle loading between Berry to Bomaderry, and the tunnels between Kiama and Berry (see <https://www.transport.nsw.gov.au/news-and-events/media-releases/40-million-rail-upgrade-south-coast-line-complete>).

It is also of concern that the Transport Impact Assessment dated 26 April 2022 does not even consider the use of rail. Nor does it adequately address the cumulative impact of the proposed increase in truck movements, 13 loaded ones and 13 empty ones each day on roads that already have no shortage of heavy trucks.

Neighbourhood Forum 5 requests that further consideration be given to the uses of rail, and for IPART to ensure that Sydney Trains works with Manildra to find extra freight train paths. If this is deemed not to be possible, with reasons for this placed on the public record, then the imposition of consent conditions is requested that would:

- a) Specify the routes that trucks must use, and specifically prohibit routes that would take trucks
 - i) over Downies Bridge on Old Port Road and/or
 - ii) through the residential areas of Berkeley, Lake Heights, Warrawong and Windang
- b) Apply a levy on the proponent for Council and State Road upgrades and repairs.
An amount of 3 cents per net tonne km is considered to be appropriate indicator for road system costs for heavy truck operations that cause significant wear and tear to road pavements

The estimate of 3 cents per net tonne km for under-recovery of road system costs from heavy truck operations was given in a 1990 Report of the Wollongong City Council Coal Transportation Task Force. This report noted, inter alia, that the NSW Roads and Traffic Authority had then suggested that an average cost of pavement wear and tear due to bulk haulage is 3 cents per net tonne kilometre.

- c) Require the applicant to undertake, and transparently publish, the results of traffic surveys at regular intervals, with a view to confirming the traffic projections provided in the application.
- d) Restrict the hours of operation to exclude Sundays, Public Holidays and between 9.00 pm and 7.00 am

Neighbourhood Forum 5 also notes that at its meeting of 1 November 2021 Wollongong City Council meeting unanimously adopted a motion based on a Lord Mayoral Minute presented, that in part resolved to write to Minister for Planning and Public Spaces expressing concern that further intensification and concentration of the product could have potential negative impacts on the community, and road users.

Please do not hesitate to contact me if any clarification and/or further information is required

Yours Faithfully
David Winterbottom
NF5 Secretary