

MAIN POINTS MADE IN SUBMISSIONS TO THE NSW DRAFT FREIGHT & PORTS DOCUMENT

<p>Greater Sydney Commission</p>	<p>By taking a leadership role, we can make sure that public resources and expertise are brought together to create a more productive, liveable, resilient and sustainable Greater Sydney.</p> <p>Freight and logistics activities are an economic facilitator in any city. This statement is true for every class of freight — from air to rail and container freight, to the local delivery of parcels in vans. Our land use planning must therefore recognise, support and mitigate impacts of freight delivery. Maintaining the productivity of the District’s freight network is an important consideration in this draft District Plan.</p> <p>(The Cargo Movement Coordination Centre) is increasing the efficiency of the rail network in support of new and planned intermodal terminals at Enfield and Moorebank. These facilities are seen as integral to enabling growth of trade through the ports. They will act as extensions of the port to the inland by enabling large volumes of containerised freight to be rapidly transferred by rail closer to the catchments of delivery and/or distribution</p> <p>The Sydney Motorway Corporation is currently working with Sydney Airport and other strategic landholders to develop a detailed proposal for the connection from the St Peters Interchange to the north side of the Airport</p> <p>Port Botany Rail Line duplication: A partnership between Transport for NSW and the Australian Rail Track Corporation will increase capacity between Marrickville and Port Botany through duplication of the existing rail line. The planned duplication will provide capacity for the forecast increase in Port Botany trains, with new flows from the Enfield Intermodal Logistics Centre (opened 2016) and Moorebank Intermodal Terminal, which is currently under construction.</p> <p>447</p> <p>Foreshore Road Capacity Upgrade: Adding a dedicated freight only heavy vehicle lane to Foreshore Road could optimise Port landside movements and help improve the NSW economy. Foreshore Road is the primary route of entry and egress for heavy vehicles visiting stevedore terminals, container depots, fuel terminals and other freight generators in the Port Botany precinct.</p> <p>Sydney Airport East Precinct: Roads and Maritime Services is removing the General Holmes Drive rail level crossing This project and upgraded adjacent roads will improve the movement of rail freight to and from Port Botany, and improve traffic flow to the Airport and Port Botany.</p> <p>WestConnex was designed to improve regional freight movements and reduce traffic along some sections of Parramatta Road. It also aims to return local streets to local communities and enable urban renewal and improved transport services.</p>	<p>GSC cannot take a leadership role, it is subservient to Fed and State Government silo-thinking and induced and direct lobbyists’ processes</p> <p>“Important consideration” is a matter of words – not one action is proposed, even on buffer zone protection through land use planning instruments.</p> <p>False statement: 1.4 m TEU does not “enable growth of trade” as they barely service existing levels and create extra truck movements.</p> <p>“Detailed proposal” is contra to poor pre-planning.</p> <p>False statement: “provide capacity” when the shortfall in train paths against mode split guidelines are 5 p.d. from 2025 rising to 20 p.d. from 2030 (minima) at high wagon utilisation, more if 2.5 m TEU p.a. cannot be reached.</p> <p>Foreshore Road is also a truck parking area and is usually uncluttered by passenger vehicles</p> <p>Improve is an appropriately modest label</p> <p>WestConnex is also limited in regional flows (SGS) and hits hotspots such as Anzac Bridge</p>
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Empty lines have been deleted but it can be assumed the City Councils, ARTC and the like had little to say:

PORTS & LOGISTICS PLANNING & ADMINISTRATION

<p>Ports Australia</p>	<p>Ports Australia agrees with the NSW Government... that freight and port networks are fundamental to our economy ... and future growth and prosperity ... the intent of this view is neither included in the key actions for creating a future transport system (pg. 5), nor fully comprehended in the rest of the document.</p>
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	<p>(Section 5) outlines limited actions that correlate with the Priority Action Areas. As a result, the document lacks clarity and is likely to raise ambiguity among the community and uncertainty for businesses looking to invest</p> <p>... there is almost no consideration about protecting corridors to the ports, securing buffer zones around the ports, or securing land for future port development over the coming 20 year horizon or the long term horizon. Clearly the rhetoric preceding section 5 is based on logical and considered planning concepts, but this does not translate to meaningful actions for the future of this State and its ports network</p> <p>Ports Australia considers that the draft NSW Freight and Ports Plan is limited in its consideration of the future planning and management of ports. Ports Australia is aware of the recent restructure within Transport NSW. This appears to have led to a diminished focus on the NSW ports network given the lack of considered planning and investment outlined in the draft NSW Freight and Ports Plan. Given the importance of ports to the freight network and the future of this State, Ports Australia hopes to see increased resources within the government allocated towards this industry and for improved consideration in the final NSW Freight and Ports Plan... Inclusion of relevant freight infrastructure on the Nation Building Network; for example extending the national road network from the Pacific Highway through the port of Newcastle</p>
NSW Ports / TfNSW	<p>TfNSW under “Productivity & Regulatory only has “The NSW Cargo Movement Coordination Centre (CMCC) ... is working to reduce cargo movement costs and increase productivity at key supply chain interfaces, including via the Port Botany Landside Improvement Strategy, and the Port Botany Rail Optimisation Group. Freight solutions for cities include:</p> <ul style="list-style-type: none"> • Facilitating 24 hour operations • Separating freight from passenger tasks during peak times/directions • Designing places for freight in cities; precincts, streets and major buildings • Enabling the use of higher productivity vehicles where they are required.
Shipping Australia	<p>It is particularly impressive that strategic action areas are identified which should focus much needed attention on priority areas and the set timelines for the completion of these actions should be strictly adhered to if the State is going to have any chance of coping with the projected demand for freight services in the not too distant future.</p> <p>In many ways, as far as a land transport strategy is concerned, this draft strategy could be used as an exemplary model by other States/Northern Territory.</p> <ul style="list-style-type: none"> • (Strong case to eliminate “dirty diesel” trucks from port precincts and ship idling.)
Australian Logistics Council	<p>The NSW Government revise its Freight and Ports Plan once the National Freight and Supply Chain Strategy is finalised</p> <p>Preparation of a comprehensive timetable setting out when freight will be separated from passengers on identified lines by end of 2020 [as if]</p> <p>one clear outcome of (the March '18) Forum was the need for plans to have key performance indicators that set timeframes within which actions are to be undertaken. This is to ensure that progress can be properly measured. It is insufficient to merely set timeframes for which initiatives may be ‘investigated’.</p> <p>Identify opportunities to use new and existing data sources to better establish:... the point of origin and final destination of freight</p>
NSW Business Chamber & regionals	<p>RDA Sydney</p> <p>While the document is comprehensive, it is very difficult to read what the priorities are and what is possible to implement (based on funding constraints). It would be beneficial to indicate priorities in order of importance or to indicate whether they are part of a package</p> <p>... definitely need long term 30-40 year vision using economic scenario planning to identify land use plans for future growth centres and transport plans, to protect freight corridors. Need better underlying statistics and good scenario modelling to make an informed comment.</p>

	<p>Need to predetermine future locations of intermodal terminals. Need to know where intermodals are/connectivity to Newcastle/Port Kembla/Port Botany and acceptable travel times. More corridors to link Port Kembla, Newcastle, Port Botany.</p> <p>Need to plan and get other parts e.g. employment lands/housing etc right to know where corridors should go. By planning the implementation of timely infrastructure, alongside preserved corridors, things can happen logically with more sustainable outcomes. Bad planning decisions lead to local curfews which immediately affect supply chain efficiency and latent capacity. Infrastructure first will drive the right growth at the right place and allow dedicated growth areas for freight.</p> <p>Learn from other states - Victoria has reserved corridors.</p>
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THREE PORTS

<p>NSW Ports/TfNSW</p>	<p>TfNSW in Sydney, where the port and airport are co-located in an area which is experiencing rapid residential growth. The potential impacts of not reserving sufficient light industrial land to support the secondary logistics activities generated by the port and airport include increasing the freight tonne kilometres generated by these logistics tasks and disproportionately increasing the congestion impact of freight vehicles on the transport network as a whole.</p> <p>The effect of residential land use encroachment is particularly pronounced for air freight and international port movements. Although the gross volume of air freight is relatively modest, its growth forecast is as substantial as port freight.</p> <p>... in Sydney, where the port and airport are co-located in an area which is experiencing rapid residential growth. The potential impacts of not reserving sufficient light industrial land to support the secondary logistics activities generated by the port and airport include increasing the freight tonne kilometres generated by these logistics tasks and disproportionately increasing the congestion impact of freight vehicles on the transport network as a whole.</p> <p>TfNSW also need to gain a good understanding of freight movements. The problem will be how to get the data, particularly legislative data, but need to educate stakeholders as to the benefits so as to gain the necessary information needed from stakeholders</p> <p>Suggest that the KPI's are developed by government and industry together to create an industry standard. There is no one source to say what KPI's are efficient - every organisation thinks they are efficient. So this standard will give us a baseline. It must have an end to end supply chain approach. Right through the entire chain. If you get one stage working really efficiently and the rest not, it will affect the entire supply chain. We need to understand the entire supply chain process from landed freight to the final consumer</p> <p>Engagement-The strategy should also include clearer detail of the community engagement process, particularly around issues such as introducing off-peak freight</p> <ul style="list-style-type: none"> • Problem is how to align all the different stakeholders in the area of off-peak freight movements. • Communication with the community is vital – freight is everyone’s business. • Precincts should be planned well in advance and communicated so that people are aware. • There have been a number of mechanisms introduced to reduce noise on the freight network. • Dilemma of how to balance the demand for increased freight, on the one hand, with community concerns, on the other. • Major concerns from the community, particularly in village-style areas, about noise from off-peak freight movements. • It is important that there is a solution-based approach to off-peak freight rather than a confrontational approach. • Impact of off-peak freight movements on employment conditions for freight workers and those receiving deliveries. So the issue is not just about noise in neighbourhoods but also the working conditions of the people receiving the deliveries.
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<p>Australian Logistics Council</p>	<p>The Transport and Infrastructure Council (TIC) published a summary of proposed rail activities as part of what was called a National Rail Work Program contained in a document called National Rail Vision and Work Program.</p> <p>Regrettably, despite widespread industry support, the push for a national rail freight agenda seems to have stalled in recent times. Movement of container freight by rail, rather than road, is a key strategy for alleviating congestion around ports. Most states have policies to increase the share of rail, with the current NSW Freight and Ports Strategy aiming for a rail share of 28%.</p>
<p>NSW Business Chamber & regionals</p>	<p>Port Kembla is a key asset for the Illawarra. The port is a vital source of employment for the people of the Illawarra supporting some 5,200 jobs and making a \$760 million annual contribution to the Gross State Product of NSW. The continuation of the Illawarra's economic transition and expansion is dependent on maximising the value of strategic assets like Port Kembla.</p> <p>As the development of Sydney continues, and in particular Western Sydney, many industry sectors and businesses will see direct and indirect benefits of relocating to regions like the Illawarra. These benefits will be particularly relevant for manufacturing and logistics operations. Congestion on the South Coast Line and Sydney Trains Network and the limitation of train paths on the Sydney Trains Network available to coal services is an ongoing concern to this industry in NSW.</p> <p>(Significant discussion about road and rail problems and pinch-points.)</p> <p>The SWIRL involves completing the 35 km Maldon-Dombarton rail line (originally proposed only as a freight line) and making the line a dual passenger and freight track with electrification.</p> <p>RDA Sydney</p> <p>Long term 40-60 year visions and port plans for Newcastle, Port Botany and Port Kembla should be coordinated and inter-related, and built around an overall NSW population and economic growth forecast and plan, and as part of a more detailed integrated Greater Sydney economic, land-use and transport plan and model capable of handling various growth scenarios. Current and future inter-related air, road and rail capacity constraints need to be considered. It is imperative that wherever possible this planning aligns with Australian government port and airport plans</p> <p>To develop more realistic freight demand models for improved long term plans we must have a much more detailed knowledge and better understanding currently of what we have and how it works</p> <p>In implementation, the concept for prioritisation of projects and use of a strategic freight model is supported but the infrastructure program needs more clarity in terms of prioritization and funding.</p> <ul style="list-style-type: none"> • Relationship with the new NSW State Infrastructure Strategy? • What are the Key Drivers with respect to prioritisation? • How interdepartmental and interagency collaboration will be achieved along with the necessary strong leadership and political will? • How “De-bottlenecking” of existing infrastructure and retro-fitting <i>Catch-up</i> infrastructure will be achieved? <p>As in many cases this strategy is having to plan, design and retrofit new freight infrastructure, land-use and transport solutions to a city with major congestion and access problems, we recommend that the NSW government studies what other global cities like Hong Kong have done in overcoming restricted land use and transport corridors</p> <p>2013 Forum - Concluded by many that it's not capacity that's the issue, it's the efficiency. There is a lot of capacity and a lot of space; it's about making the current network working more efficient that's important.</p> <p>If you have plenty of trains running but no one wants to use them, you have wasted your time- this comes back to getting more knowledge of the whole supply chain components for freight movement. Many don't know what happens to freight once it leaves their stage/port etc. This is a clear place for government to come in.</p> <ul style="list-style-type: none"> • Optimise network usage

	<ul style="list-style-type: none"> • Develop infrastructure for single consolidation points – both physical and communications • Develop better understanding of capacity versus demand <p>Data - The group agrees with the need for improved freight mapping and analysis, but rather than producing more broad data on the freight task the focus should be on granular data that can be meaningfully utilised at the local/precinct level. We do not need to know, for instance, how many containers there are moving around Port Botany but would be better to know where containers are going to and what they contain.</p> <p>Strategy needs to better articulate, and incorporate effect of consolidation points/modes used and these needs to be identified for capacity measurement and mapping. The theory of freight needs to be understood and provide proactive planning to drive usage of existing and planned future infrastructure. Better understanding of the existing capacity of the rail and road network needed (eg quoted Illawarra region). The long term urban redevelopment and <i>Greenfields</i> planning within Sydney is not integrating current and future freight strategies as it should. We need to understand the implications for the future. Pushing the problem and the corridors further out will not necessarily combat the longer term problem.</p> <p>Look at what's expanding in South Sydney & Inner Sydney and where there is no road expansion (e.g. Green Square). Should we be introducing "people" and growing areas into traditional freight forwarding industrial precincts?</p>
City Council/s	<p>WCC</p> <p>Whilst the NSW Draft Freight and Ports Plan addresses relevant issues across NSW, Council's submission is focused on local Illawarra issues. Three key issues are not specifically mentioned at all in the NSW Draft Freight and Ports Plan. These critical issues are:</p> <ol style="list-style-type: none"> Rail freight access to and from Port Kembla. Road freight access to and from the Illawarra. Port Kembla cruise ship facilities. <p>Numerous other freight and general transport issues have been previously identified, however it is contended that the above first two issues are of utmost importance to the Illawarra and NSW State economy, particularly given growth in South West Sydney which has again been highlighted in the "360 Illawarra Shoalhaven Economic Outlook" report (released 1 March 2018). These two projects must be addressed through detailed project planning and development in the short term with implementation in the medium term (10 to 15 year timeframe).</p> <p>The early completion of the South Western Illawarra Rail Link (SWIRL) is considered by many expert authorities to unlock the Illawarra, not just for freight access but potential as a dual function freight/passenger line to connect the Illawarra to South West Sydney and the proposed Badgery's Creek "Aerotropolis". The greater economic benefits achieved by the dual function SWIRL have been found to justify its implementation in the short to medium term.</p> <p>The completion of SWIRL would also enable the earlier development of a container terminal at Port Kembla thus providing an alternative to Port Botany. A major benefit of this strategy is a significant reduction in road and rail congestion impacts in the Sydney suburbs adjacent to and approaching Port Botany.</p> <p>In addition, significant upgrades to the South Coast Rail Line between Waterfall and Thirroul, whilst previously acknowledged by the Australian Government as a "Key Strategic Corridor" does not feature in the current Freight and Ports Plan other than a notation to investigate additional capacity within a 10 year timeframe. An upgrade of the South Coast Line would also provide additional capacity for both freight and commuter demands between the Illawarra and Sydney.</p>

INTERMODAL TERMINALS

NSW Ports	<p>Accommodating growth in passenger and freight transport on existing networks is a significant challenge in Metropolitan Areas. This is a particular issue on the rail network... The Western Sydney Freight Line and new intermodal terminals in Western Sydney will be critical. The effective commencement of Moorebank intermodal freight terminal will also be vital for increasing the share of rail freight transported in the metropolitan area... It will be critical for the NSW to work closely with NSW Ports to</p>	<p>Fatuous</p> <p>24 hour air freight is not</p>
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	<p>maximise the efficiency of landslide transport networks which support the movement of import and export freight which plays a vital role in the NSW and national economy.</p> <p>... the distance of the last mile is stretched from available land on the outskirts of cities to the end-consumer in the urban centre. In a city such as Sydney, this can easily be a distance of 50 kilometres or more. The result is to increase the number of smaller last mile delivery vehicles, increase the freight kilometres travelled and increase the social and economic costs associated with this task.</p> <p>As well providing space for freight, consideration needs to be given to how this space should be used. The greatest economic benefits are likely to be secured from freight facilities that are intensive, multi-tenant and potentially multi-level developments, with the possibility of competing logistics operators being located in the same facility</p> <p>Effective planning for Western Sydney Airport (WSA) is vital, encompassing road and pipeline infrastructure to support the construction of the airport and surrounding development. WSA presents an opportunity to introduce modern, quiet air freighters that can operate over 24 hours.</p>	<p>new, do they know nothing?</p>
Shipping Australia	<p>The major ports at Botany, Newcastle and Port Kembla are of significant importance to the economy of the State. The adjacent lands and the transport corridors of each of these ports are critical for the ongoing operation of the port. In this context, legislation to protect these corridors from urban encroachment is essential and confirmation of these boundaries will provide certainty that is required by the whole community. We commend the Government for identifying and preserving land for an intermodal terminal in the vicinity of Eastern Creek, along with road and rail freight corridors such as the proposed western Sydney freight line.</p>	

MALDON-DOBARTON

Shipping Australia	<p>We are pleased that the government has lifted the cap on the number of TEU that can be handled at Port Botany, prior to the tender being released for the long-term lease of the facilities to the private sector, which will enable Port Botany to operate for quite some period ahead. We question whether the State Government’s intention to list Port Kembla as the state’s next major container terminal, once Port Botany reaches capacity will be adhered to by the incumbent lessee of the Port Botany and Port Kembla facilities? If container facilities at Port Kembla eventuate, then significant land freight network improvements will have to be made to enable the movement of cargo to/from the port. There is already significant use of rail for movement of cargo (mainly coal) to and from Port Kembla and this is expected to double by 2031. Funding infrastructure for the transport of containers could be an issue, given that once ports are leased, the revenue stream for the Government from port charges would naturally cease. Investigations have already commenced for the Maldon to Dombarton Rail Line in partnership with the Australian Government. We believe the construction of this line should be expedited.</p> <p>It is noted that the strategy addresses the outer harbour expansion project at Port Kembla. The concept plan proposes the development of two separate container facilities, each serviced by two berths. The two terminals are expected to be constructed between 2014-2025 and 2026-2037 respectively, depending on demand. Each berth would have capacity of 300,000 TEU per annum, providing a total capacity of 1.2 million TEU per annum upon completion in 2037 (AECOM Australia; 2010)</p> <p>In our view, too little, too late. On page 170 of the draft strategy, it says that in 2011, Sydney Ports Corporation forecast an increase in the container trade from 2 million TEU in 2010-2011 to 10.98 million TEU in 2036.</p> <p>Even with the full utilisation of intermodal terminals at Enfield and Moorebank, the capacity at Port Botany is expected to peak around 8 million TEU’s. Clearly, we need a two to three million TEU container terminal at Port Kembla by 2036 with capacity to grow considerably after that time.</p>
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INLAND RAIL & SYDNEY BYPASS

Ports Australia	iA 2012 Consider dedicated interoperable rail freight access from new freight generating areas to the port of Brisbane Identify relatively short road links from existing main highways to ports such as Newcastle and Port Kembla
NSW Ports?TfNSW	TfNSW Freight planning also needs to ensure community expectations on transport noise and emissions are addressed, with mitigation requiring both policy measures and infrastructure responses
Australian Logistics Council	To emphasise the potential budget savings, Infrastructure Australia noted in its 2017 report, Corridor Protection: Planning and investing for the long term, that close to \$11 billion (in 2016 dollars) could be saved on land purchases and construction costs on seven corridors identified as national priorities on the Infrastructure Priority List. This included NSW related projects such as the Lower Hunter rail freight alignment (with a potential saving of \$33 million), the Outer Sydney Orbital road and rail link (\$3,665 million), the Western Sydney Airport rail connection (\$1,104 million) and the Western Sydney freight line and intermodal terminal access (\$1,605 million). While there is likely to be Australian Government funding involved in all these projects, the savings for the NSW Government should not be understated.

PORT BOTANY

Shipping Australia	The Port Botany container chain has been confronted with these issues for some time. They have been examined in detail in prior reports; notably by Brereton in 2005 and IPART in 2008, which resulted in a number of new initiatives and investments by Sydney Ports Corporation (SPC). There is no doubt that significant improvements in the container supply chain have been made through initiatives such as the Port Botany Landside Improvement Strategy (PBLIS) supported by the Ports and Maritime administration regulation. We look forward to the Port Botany Rail Team achieving similar efficiencies with respect to rail.
Australian Logistics Council	Urban Freight Consolidation Centres By 2040, Port Botany is estimated to have a container throughput of 7 million TEU – almost three times the container throughput achieved in 2016. ¹³ ALC has long held the view that the duplication of a 2.84km section of single track between Port Botany and Enfield is a vital infrastructure project for NSW. The project is currently listed as a ‘High Priority Initiative’ by Infrastructure Australia. Transport for NSW currently lists the project as being in the planning phase. ALC recommends that that final Freight and Ports Plan provide a time when the line should be completed. ALC Forum 2018 participants also raised the need for urban freight consolidation centres to be developed to improve the efficiency of freight delivery. In these centres, freight is consolidated, meaning that fewer trucks can take more efficient routes when delivering freight in CBD and inner-urban environments. The point was particularly made that as areas such as Waterloo and Alexandria become increasingly gentrified, the ability for freight chain participants to conveniently consolidate freight for delivery in increasingly busy CBD areas is becoming more challenging. The NSW Government, in collaboration with industry, can play a role in trialling the use of urban freight consolidation centres by ensuring adequate planning protections are put in place after a trial site has been designated. Industry remains concerned that in many circumstances the quality of the protection provided to industrial lands and transport corridors is only as good as the contents of the lowest level instrument within the planning hierarchy. During ALC Forum 2018, a participant drew attention to Queensland’s Sustainable Ports Act 2015 which requires ports adjacent to the Great Barrier Reef to prepare master plans

Well, good morning

In the State where not one infrastructure decision can be made in accordance with due diligence protocols or even commonsense, the freight and ports industry is chuffing along on the same path that produced governmental stupidity – no vision, no concerted “safety in numbers” alliance, no sharp economic nous.

The attached shows the submissions I could find. Its quotes are included in my critique – remember the intent is to force a pause and then express the vision? Without cooperation, it will be a loud screech.

I would be happy for additions, corrections, deletions or whatever, I for one want to have a strong and unified voice.

Please see if you agree:

- RDA Sydney’s is “the best” in some respects, please make your own judgement. But the complete lack of attention to rail realities in all is a grievous failing.
- Errors are indicative of ideology and favouritism beating logic and economics.
- Ports Australia SAL and NLC quite strong in various directions, SAL sadly delusional
- No cohesion and no “vision setting” so that advocacy has a real direction.
- RDA and other calls to preserve corridors ignores the lack of any professional system to do so. The corridor reserved for the extension of Maldon-Dombarton through the South West and to Eastern Creek and beyond has been smashed by an innocent-looking “City Deal” driven by Metro, not freight, vested interests. DUH!
- No mention of scale economies, port charges, the futility of duplicating the Port Botany rail link and of building M-D as planned, of the real needs and ways to link with Inland Rail; (it seems Rob Lee and I are the only ones doing that)
- PON, SAL and PA will fail the whole industry as well as their shareholders if they maintain their negativity to non-revision and non-cooperation, in my view (errors in submissions have led me to believe they can be readily dismissed).

So please see this as a serious contribution and my efforts as being professionally based. I was responsible for all logistics matters in NSW from 1977 to 1984 and noticed industry isolationism when Dewar brought me back in 2003. 15 years later the industry is squeaking but not shouting, mumbling but not breaking through people who neither understand nor care about trade, jobs and commerce.