

<p><u>SEATS Submission to: South East and Tablelands Regional Transport Plan</u></p> <p>- Original submission in March 2023</p>	<p><u>SEATS Revision to Submission to: South East and Tablelands Regional Transport Plan</u></p> <p>May 2024</p>
<p>SEATS (South East Australia Transport Strategy) provides highly co-ordinated and influential advocacy for the development of transport infrastructure in the South East Australian region that supports sustainable economic development and the prosperity of its constituents.</p> <p>SEATS, formed in the mid 1990s, is an alliance of Local Government and other Government agencies together with industry that is concerned about the state of the freight transport network across south eastern Australia including ACT. The organisation meets quarterly, has a paid secretariat and prioritises projects across all forms of transport that its membership has identified as worthy of Government and operator support.</p> <p>Some projects have commenced either in a planning or construction phase. Some projects extend into Victoria’s Gippsland region as well as the ACT. It is pointed out that much of the freight concerned is not destined for metropolitan markets but from manufacturing node to manufacturing node or to port facilities for export.</p>	<p>NO CHANGE</p>
<p><u>Context</u></p> <p>The SEATS region consists of several regional production areas. The Illawarra-Shoalhaven is industrialised with steel manufacture, production of chemicals and nutraceuticals, food products, building products, the southern tablelands has strong agricultural production, quarry supplies and timber processing. Out of Victoria’s Gippsland comes horticultural produce requiring key freight and transport connections into Sydney.</p> <p>The region has significant quantities of inbound and outbound freight, with freight travelling through Port Kembla and Port Eden</p>	<p>NO CHANGE</p> <p>Quarry materials represent in excess of 6 million t/yr just from one operator alone. These movements are from the Southern Highlands into Sydney and Wollongong/Pt Kembla and from localities like Bredbo to Narooma utilising the various crossings of the Illawarra Escarpment.</p> <p>The rail/road corridor between Yass via Moss Vale/Pt Kembla/Bomaderry carries around 7 million tonnes/yr for a single enterprise with 60% of final production being exported through Pt Botany.</p>

<p>dominating movement in the region. The movement of freight to and from the region relies on existing road and rail networks. Key freight corridors that enable the movement of freight include the M1 Princes Motorway (Mount Ousley Road), Picton Road, the Princes Highway as well as the South Coast rail line and the Moss Vale to Unanderra rail line. The Monaro Highway is an important corridor between metropolitan Sydney and Illawarra Shoalhaven and the Gippsland areas within Victoria.</p>	
<p><u>Introduction</u> Figure 2 depicts the regional context and describes graphically the SE&T Region for this Transport Plan. It is felt that there is justification to regard Bega/Merimbula/Eden as a strategic cluster. In saying this the Port of Eden has an extended area of influence well into Victoria’s Gippsland timbered areas, Merimbula has direct services by air to Melbourne and Bega has possibly the largest manufacturing hub in the region. Transport connectivity is critical to the growth of this strategic cluster.</p> <p>It becomes obvious that the Illawarra-Shoalhaven is enveloped by the SE&T region and more specifically the Shoalhaven. This should be regarded as an opportunity for the SE&T especially with the synergies of Defence activities and postings, the inter-connectedness surrounding education and health services.</p> <p>Of immense interest to SEATS is the crossing of the escarpment. Each crossing between Monaro Hwy out of Cann River to Bulli Pass in the northern Illawarra are all important to their immediate communities. BUT the importance of each pass should be correlated to the freight task existing, or that can potentially exist, rather than the shortest distance for a light vehicle commute.</p>	<p>Agree</p> <p>Agree</p> <p>Strongly agree</p> <p>Still a major of interest. The susceptibility of each of the mountain passes has been exacerbated by the incidences of major storm events, mostly East Coast Lows, caused by climate change.</p> <p>Major freight nodes on the coastal strip are at:</p> <ul style="list-style-type: none"> - Eden/Bega – timber waste products, forestry, dairy milk and processed products - Nowra/Bomaderry – foodstuff ingredients, stockfeeds, ethanol, chemicals - Wollongong/Pt Kembla – steel, coal, cars, manufactured goods

<p><u>Public Transport (Section 3)</u> The report does not mention the public transport (bus) service that runs out of Sydney down the Princes Highway through Nowra to Eden. And the Vline service that operates between Melbourne and Canberra via Bombala on 6 days each week and between Melbourne & Narooma via Eden There is also a desire to operate a bus service from Nowra/Bomaderry to Canberra once the route through Nerriga and Tarago is compliant for vehicles over 15t. Users would be ADF workers, students at ACT facilities and people using medical and legal services.</p>	<p>Still applies Service frequencies may have changed</p>
<p><u>The zero-emissions future (section 3.5)</u> A major encumbrance in achieving a zero emission future is the fact that the South-East region has two geographic hinterlands – the coast and the tablelands. The Illawarra Escarpment divides the coastal areas by approximately 600m vertically from the tablelands. The sheer challenge of ascending/descending the limited number of mountain pass crossings is a reality that will test the zero-emission goal.</p>	<p>No change</p>
<p><u>An Evolving Freight Task (section 3.6)</u> The Monaro/Federal/Hume highway corridor carries much of the through freight between Gippsland and metropolitan Sydney (horticultural produce, processed food).The preferred back haul routes for these HVs are either the Hume (HML) or Princes (GA Vehicles). It should be noted that HML vehicles from Bega Cheese use this route despite the disadvantages of Browns Mt on the Snowy Mountains Highway when travelling to Sydney. The use of the higher productivity vehicles is limited for east-west freight task by the alignment, both horizontal and vertical, of the mountain passes. Many regional industries are disadvantaged by not being able to use higher productivity vehicles. Routes such as Snowy Mountains Highway, Kings Highway, MR73 through Kangaroo Valley and Illawarra Highway are all HML restricted. Mt Ousley Rd/Picton Rd performs the greatest share of moving freight from the</p>	<p>Still applies</p> <p>However following the opening of the new Shoalhaven River Bridge at Nowra, larger HV configurations are travelling south on the PH. (Restrictions still apply on the crossing of Wagonga Inlet by larger HV configurations.)</p> <p>A major restriction!</p> <ul style="list-style-type: none"> • The future development of the Port of Eden must be allowed for in transport considerations <ul style="list-style-type: none"> ○ Imlay Rd and Edrom Rd need to be transferred from Forestry NSW to Transport for NSW with planning to

<p>Princes Hwy corridor to the Hume Hwy corridor. This is really only practical from Nowra and the lack of an all weather east-west freight route south of the Shoalhaven River would open up additional economic development on the south coast. Two candidates are MR92 which has an acceptable escarpment pass but requires a link from Nerriga to the Hume Highway at Goulburn and the Imlay Rd which would provide greater opportunities for the timber industry at Bombala and through the port of Eden.</p> <p>The map on page 18 is soon (by April 2023) to be incorrect in that the crossing of the Shoalhaven River at Nowra will not be a barrier to allow HML/PBS vehicles moving south along the Princes Highway. There are other structures that may influence permits being granted at Falls Creek, Wagonga Inlet and Brogo River. <u>This map on P18 needs to be modified.</u></p> <p>HV Rest areas are an essential safety feature for long and medium haul routes. SEATS strongly agrees with the statement on page 19 that the kings, Monaro and Princes Highways are inadequate in this regard. Further, HV Rest Areas need to be considered available for HVs travelling in either direction with safe ingress and egress points.</p> <p>The issues of first/last mile access is more than suiting the environment and planning guidelines. Buffers which allow expansion of the access corridor to allow the movement of higher productivity HVs, queuing lanes at intersections etc need to be allowed when these corridors are planned and built. A 20m wide easement will not cut it for an industrial intersection!</p> <p><u>The Illawarra Escarpment and the Freight Task</u></p> <p>Whilst not unique to the South Coast of NSW, the existence of the Illawarra escarpment is a real barrier to the movement of freight. There are only a few of the mountain passes that are suited to HVs that connect to the South East Region and these are:</p> <ul style="list-style-type: none"> • Bulli Pass (Princes Highway at Bulli to Appin/Campbelltown) 	<p>classify as PBS, A-double compliant freight routes</p> <ul style="list-style-type: none"> • Recognition that quarry materials are being road/rail freighted from the outer rim of Sydney (Marulan, Albion Park, Bombo) and requiring local councils to maintain the first/last mile issues for the greater good of metropolitan projects like Western Sydney Airport and the urban expansion. • The IMT at Tarago needs to be recognised as a major asset in the Sydney waste supply chain. • Is there an opportunity to establish a dedicated Air Freight Airport to move those operations out of SYD and WSI. Potential for Goulburn. <p>Has Team made contact with the Freight Pinchpoint program being headed by Tamworth City Council.</p> <p>HV Rest areas – are there enough for the task being delivered</p> <p>A network for HV Charging facilities (electric and hydrogen) needs to be investigated along PH & MH</p> <p>Very important</p> <ul style="list-style-type: none"> • In the north of the region the preference by hauliers to use PBS/A-double vehicles to cross the escarpment at Mt Ousley Rd/Picton Rd for long haul intrastate and interstate freight movements via Hume & Monaro Hwys is being
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- Mount Ousley Rd (Princes Highway between Hume Hwy at Wilton and Wollongong))
- Macquarie Pass (Illawarra Highway between Hume Hwy at/near Moss Vale and Shellharbour)
- Route B73, Moss Vale Rd through Kangaroo Valley (between Hume Hwy at Moss Vale and Princes Hwy at Nowra)
- Main Road 92 (between Nerriga and Princes Hwy at Nowra) This route is restricted westward beyond Nerriga by a
- Kings Highway (between Canberra/Queanbeyan and Batemans Bay)
- Snowy Mountains Highway (between the Monaro Hwy near Bombala to Princes Hwy near Bega)
- Imlay Rd, a Forestry Commission road between Monaro Hwy and Princes Hwy near Eden
- Monaro Highway (Princes Hwy at Cann River to Bombala, ACT and Hume Hwy through to Sydney)

There are 2 rail lines that cross the escarpment:

- South Coast Rail Line (from Sutherland to Bomaderry shared by freight and passenger trains)
- Moss Vale Line (an exclusively freight line from Main Southern Line at Moss Vale to South Coast Line at Unanderra, Port Kembla and Bomaderry)

The importance of Picton Rd/Mt Ousley Rd cannot be understated in the movement of freight between and through the South East Region and the Illawarra Shoalhaven.

The upgrade of Picton Road and Mount Ousley interchange will contribute to the integrated approach that governments are taking across the transport network to better link ports with key freight precincts as well as key domestic distribution centres. The goal is to help create sustainable communities by

observed in Wollongong/Pt Kembla and Nowra/Bomaderry

- The Moss Vale Rd and Macquarie Pass, via Bowral/Moss Vale, were decreasingly being used by hauliers and represented local freight over shorter distances
- In the south of the region, with the long term remedial repairs on the Snowy Mountains Highway at Brown Mt, there has been increased use by hauliers in utilising Imlay Rd with A-double configured vehicles.
 - The Snowy Mountains Highway is, and will continue to be, the preferred route for local light traffic accessing ACT health & education facilities. This route is also an important tourist route for southern NSW
 - The resilience issues regarding access to and out of the lower south coast will remain dependent on an effective Snowy Mountains Highway
- The coastal restrictions on HV along the Princes Highway still need to be addressed.
 - The Wagonga Inlet bridge northern alignment will continually need to be addressed to be progressively stabilised and upgraded
 - The Brogo River pass, including the replacement and realignment of the bridge, will also need to be addressed to resolve HV access issues to local industries.
- There will remain a need for an efficient HV alternate crossing of the escarpment between the two A-double routes that are currently preferred by hauliers. An investigation into which of the alternatives routes should be upgraded to provide an alternative route between the Princes Hwy and the Hume Hwy, should the Mt Ousley Rd/Picton Rd option fail through climatic conditions or a crash incident, is strongly supported by SEATS.

<p>providing a reliable and safe road network to access high value employment and social amenities.</p> <p><u>Climate Change – Natural Disasters</u> Recent East Coast Lows have brought about a new dimension to the escarpment issue. At some points during 2022 closures and restrictions on the various mountain passes placed imposts on hauliers and industry, including tradesmen, travelling between Illawarra Shoalhaven and the Tablelands. Thankfully Mt Ousley held up although subject to lane restrictions. SEATS believes a second east-west freight route is required south of the Shoalhaven River and Main Road 92 forms the basis for this alternate all weather route.</p>	<ul style="list-style-type: none"> The rail access between Moss Vale and Pt Kembla/Bomaderry is a vital freight route, carrying grain, quarry products, from southern and western NSW <p>An emerging issue with the alignment of the mountain passes built on the sides of mountains in the 1800s. They are subject to slippage during major weather events. The only two crossing that are not mountain passes are Imlay Rd from Eden to Bombala and MR92 from Nowra to Nerriga with connections to Tarago and Goulburn requiring upgrades to HML standards.</p>
<p><u>The Visitor Economy (Section 3.7)</u> The visitor economy is an important economic driver for the South East Region. From a SEATS perspective, where the influence of the visitor economy restricts the “normal” freight task then measures need to be implemented to offset the disadvantage to HVs. These measures may well be different in each case but recognition and monitoring of the situation is necessary.</p>	<p>No changes</p>
<p><u>Question for the Team developing this Plan</u> How much consultation has there been between the Forestry authorities in the South East and Gippsland? This does not come through in the Plan. The movement of timber products has major maintenance implications on the regions roads. Understanding forestry harvesting practices, with local government at the table, could have immense benefit. A working party on that issue may be a good outcome for the Plan. Similarly, a greater understanding of the interests within Twofold Bay/Port of Eden may be another working party outcome with Defence, port interests around shipment of timbers, cruise ships and the fishing fleet could be beneficial. An offshore wind farm</p>	<p>Bombala has become a timber processing hub.</p> <p>A working party on that issue may be a good outcome for the Plan.</p> <p>A working party on that issue may be a good outcome for the Plan.</p>

<p>may emerge off the Gippsland coast that may want to use the Port of Eden as a construction base or operational base.</p>	
<p>Further Comments To realise a region where to “live, work and play” are core objectives then access to realistic transport routes and services between home and work, work and education, home and education must also be addressed, not just the broader community considerations.</p>	<p>No changes</p>
<p><u>Recent resolutions by SEATS that are relevant to a Transport Plan for the SE&T Region</u></p> <ul style="list-style-type: none"> • SEATS strongly supports the upgrading of the Mt Ousley/Picton Rd corridor, including the works near the University of Wollongong • SEATS requests that Transport for NSW undertake a “what if” investigation on the provision of road and rail links across the Illawarra Escarpment with the view to identifying and supporting a second east-west road freight route which can satisfy future freight requirements in most natural disasters • SEATS shares with industry the concern that the reliability and sustainment of the key east-west escarpment freight crossings need to be prioritised by the NSW Government in its maintenance and upgrade programs. • SEATS regards the Barton Highway corridor upgrades to be an essential part of the transport infrastructure network linking the Hume Motorway to the ACT and Monaro Highway. • In the interest of road safety and the “Towards Zero” policy, SEATS believes that adequate Heavy Vehicle Rest Stops need to be provided at driving intervals of 1 hour on all state highways for both directions of travel. • SEATS strongly requests the Australian government ensure that 	<p>Mt Ousley Interchange now funded Wilton Interchange investigations are advancing</p> <ul style="list-style-type: none"> • The future development of the Port of Eden must be allowed for in transport considerations <ul style="list-style-type: none"> ○ Imlay Rd and Edrom Rd need to be transferred from Forestry NSW to Transport for NSW with planning to classify as PBS, A-double compliant freight routes <p>This is very important if Imlay Rd and Mt Ousley Rd are going to be relied upon for future freight crossing the Escarpment This will allow hauliers to make decisions on investment decisions on higher performance HV configurations</p> <p>Barton Hwy is a major link for HVs (Freight & Buses) travelling between central NSW/Queensland to the ACT/Snowfields and Gippsland.</p> <p>Agree</p>

<p>within 5 years all national and state highways achieve a 95% mobile telephony reception coverage and that the rollout commence on the Monaro Highway and the Princes Highway between Sydney and Melbourne.</p>	<p>Extremely important for PBS vehicles and HV driver safety</p>
<p>SEATS (South East Australia Transport Strategy) https://seats.org.au/ or admin@seats.org.au or 0402 571782</p>	<p>Amendment made by Greg Pullen, Executive Officer, SEATS. 27/5/2024</p>