

SEATS Submission to:

South East & Tablelands

Strategic Regional Integrated Transport Plan

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.

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.

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.

Previous Submissions

SEATS submitted two previous submissions towards the South East & Tablelands Strategic Regional Integrated Transport Plan in:

- March 2023
- May 2024

The content of both of these submissions still stands and is now complimented by this version of the submission that references matter contained in the DRAFT report.

Context

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.

The region has significant quantities of inbound and outbound freight, with freight travelling through Port Kembla and Port Eden 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.

Additional important contextual comments with regard for freight.

- 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.
- The rail/road corridor between Yass via Moss Vale/Pt Kembla/Bomaderry carries around 7 million tonnes/yr for another single enterprise with 60% of final production being exported through Pt Botany.
- However most freight journeys neither have their origin nor destination at a port or airport. Freight however mainly has its origin/destination at industry/processing hubs and warehouse distribution centres. (Page 10 Para 4)
- Most of the current escarpment crossings were constructed in the mid 1800s for horse and cart. These mountain passes are NOT suitable for frequent freight vehicles configured for modern use. SEATS has repeatedly advocated for those escarpment crossings near freight generation hubs that ARE suited to be designated and maintained for the task.
 - Includes Monaro Hwy out of Cann River; Imlay Rd; MR92 (Nerriga to Goulburn); Mt Ousley Rd/Picton Rd.
 - The Moss Vale to Unanderra Rail line also fits this criteria.

Challenges (P11)

- Bus services by Murrays (Syd – Canb) and Vline (Melb – Canb) operate daily
- A train service operates between Syd and Canb
- RPT Air services operate between Canb and most capital cities.
- Crossing the escarpment for freight is critical to the Far South Coast economic growth. Imlay Rd needs to be recognised as a significant access link for freight between the Tablelands and the FSC including to Port Eden (Edrom)
- The inability to utilise HML vehicles on the Princes Highway north of Snowy Mountains Highway also necessitates the use of ImlayRd/Monaro Hwy from FSC into Sydney distribution centres. Much freight comes into the FSC from Victoria’s Gippsland Region via the Princes Highway corridor. This section of Hwy has a much higher proportion of HML vehicles than most other roads in the SE&T region.
- SEATS would question the feasibility of improving the Snowy Mountains Hwy over Brown Mountain for HML vehicles. Imlay Rd, even 164kn longer into Sydney from Bega does offer freight advantages from Bega/Port Edrom.
- Key links exist between the Freight corridors through the Southern highlands (Hume Hwy and Main Southern Rail Line) and the coastal networks of Princes Hwy/South Coast Rail Line via Picton Rd/Mt Ousley Rd and the Moss Vale to Unanderra Rail Line. These Escarpment crossings need to be prioritised for maintaining and expanding their existing use.
- The Snowy Mountains Highway should be upgraded/maintained as suitable for traffic of certain max weight limits or whatever restriction is appropriate.

Key Directions (P12)

Point 1c – add South Coast (medical, business services, education) and Melb (Vline services daily from Canb & Narooma). A Canberra/Nowra bus service should be supported based on ADF weekly commutes and Education needs

Point 3b – Alternatively build capacity to utilise Imlay Rd to connect Princes and Monaro corridors for HML vehicles. Also build capacity to utilise MR92 to connect Princes and Hume corridors for HML.

The above should be prioritised based on existing and future tonnages.

Point 6c - SEATS strongly supports this. Having only 3 HML Crossings of the Escarpment, 2 in the FSC at Imlay Rd and Monaro Hwy out of Cann River, and with only 1 in the north (Mt Ousley Rd/Picton Rd) a monumental freight disruption will be created should Mt Ousley fail.

The Moss Vale to Unanderra rail line would have similar consequences should it fail for any sustained period.

Definitions (P13-15)

Employment lands – add land for education, health and medical, defence bases and Port Eden (Edrom)

Intermodal terminal (IMT) – add these facilities need HML connectivity to the networks. Is there a listing of these anywhere in the report? Tarago; Fyshwick; Canberra, Moruya, Merimbula airports; Port Eden (Edrom) for timber munitions; Port Eden (Edrom)/Edrom RD/Imlay Rd for specialised OSOM cargos

PBS – also define HML, HPHV and OSOM. Also need a definition for “Community in Transit”

Regional Roads – also comment needed about Imlay RD and Edrom Rd being Forest NSW assets which carry high proportions of HML vehicles

Map (P20 and others places)

Yass being the crossroads of several major roads deserves being highlighted as the same as Goulburn and Young. Yass has major Livestock exchange and major centre for HV breaks for fuel Y food. – Hume, Barton, Lachlan Valley Way, Burley Griffin Way

Maritime (P50)

Care should be made here to differentiate the two maritime functions at Snug Cove and Edrom.

Freight (P51)

The Princes Hwy does NOT have a north-south corridor for freight. Wagonga Inlet bridge and Brogo River bridge (and pass) preclude HVs above General Access class from travelling north-south.

Similarly the Escarpment crossings have the same restrictions – highlighted in earlier points.

Please clarify the comment about “only 19m and 23m B-double vehicles” as this does not apply to all escarpment crossings.

Freight rail is restricted within the SE&T region. Only Tarago and Fyshwick offer freight options at locations off the Main Southern Line.

Driver Fatigue (P69)

The road haulage industry takes the WHS driver fatigue issue seriously. Technology to assist management in this regard has been developed to be installed in HV driver cabins but these systems require regular connectivity to data reception for its use/monitoring. SEATS

has resolved in 2022 to strongly request the Australian government to ensure that 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.

In late 2024 the Australian Govt announced funding for a rollout of the Regional Roads Australia Mobile Program (RRAMP) to improve multi-carrier mobile coverage on highways and major roads in regional and remote Australia:

- 6/11/24 – Fed Minister announced \$8m for regional Victoria
- 15/11/24 – Fed Minister announced \$48m for regional NSW

SEATS believes that the state highways between Bairnsdale in Vic and Ulladulla on the Princes Highway and Queanbeyan on the Monaro Highway fall within this remote category with the number of Heavy Transport Vehicles representing a significant “community in transit” work environment.

Striving to achieve Freight Productivity gains (P79)

Road alignments based on freight routes for bullock drays in the mid-1800s does not meet the needs of a modern day high performance freight vehicle of today. Yet we continue to work to maintain these mountain passes knowing that another failure which will restrict these modern freight vehicles is not far away.

SEATS believes that a limited number of key improvements to the Highway network is required to provide resilience and reassurance to industry that depend on a freight task between the coastal part of the region and the tablelands.

Realistically, freight quantities are continuously generated in the following centres:

- Bega/Two-fold Bay
- Timber harvest areas in BVS, SMS & East Gippsland and in Tumut/Tumbarumba
- Industrial areas within ACT industrial catchment
- Quarries adjacent to Sydney Metro area.
- Nowra/Bomaderry
- Port Kembla/Wollongong

Seamless borders (P84 & elsewhere)

Is Cooma airport operational or likely to be so into the future?

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