

30th July 2024

To

- **Hon Jo Haylen, Minister for Transport**
- **Hon Ryan Park MP, Minister for Illawarra and South Coast**
- **Hon Paul Scully, Member for Wollongong**

SEATS Submission to the Illawarra Rail Resilience Plan announced by NSW Minister for Transport in June 2024

Background

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.

The current SEATS Priority Project Strategic Statement – 2024 is attached at the conclusion of this submission (P8 onwards). It embraces transport network issues across the SEATS region. This Strategic Statement is reviewed annually and represents those projects or issues that the SEATS committee feels will enhance the freight task and increase freight productivity.

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 including stockfeeds, 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.

Introduction

This submission is seeking to achieve two actions by Transport for NSW:

1. Recognise SEATS as a stakeholder in the development of the Illawarra Rail Resilience Plan, and
2. To have the scope of the Illawarra Rail Resilience Plan include the existing significant freight movements along the Moss Vale to Unanderra rail line, as these form an important interaction with the passenger services operated on the Sydney Trains network

The NSW Rail network within the SEATS region servicing the Illawarra Shoalhaven Region consists of two main rail lines.

- The South Coast Line running from Sydney through Wollongong and terminates at Bomaderry on the northern side of the Shoalhaven River.
 - Two loops service Port Kembla between Coniston Junction and Unanderra
 - This South Coast Line also provides rail access directly to Port Botany
- The Moss Vale – Unanderra Line links the Main Southern line at Moss Vale down the Illawarra Escarpment to Unanderra and provides access to/from the Port Kembla loops.
 - Freight trains travelling to Bomaderry are required to use either of the Port Kembla loops to change direction as they also do for the reverse journey.

A proposal to Sydney Trains & T4NSW has been put by the Manildra Group to provide a siding for train turnarounds between Unanderra and Coniston Junction, thus eliminating the delays in having to use the Pt Kembla loop for each train journey (twice/day)

Over 7m tonnes per annum of grain moves between west of Yass to Bomaderry via rail (via Moss Vale, Unanderra, Pt Kembla loop to Bomaderry) or road (via Wilton/Picton Rd/Mt Ousley Rd to Bomaderry). Road transport is used when rail possessions are in place or for track maintenance after an incidence or to manage peak requirements.

The Current Freight Task in Illawarra Shoalhaven

SEATS acknowledges that much of the Freight within the SEATS region is intrastate movements with some large quantities being moved regularly, for example:

- 6m tonnes per annum of quarry products by Boral, including by rail from Port Kembla to Marulan via Moss Vale line
- 7m tonnes per year of wheat grain between western NSW and Bomaderry, via Moss Vale line, by the Manildra Group (at least 1 train/day)

- 60% of production from Manildra Group’s facility is exported overseas in containers from Bomaderry by rail through Port Botany (at least 1 train/day)

Containerisation of export freight is basically locked in as the only way to move processed product by ship. Two of the largest exporters of containerised freight for export are the Manildra Group at Bomaderry and Visy at Tumut. Both of these activities carry the containers to the port by rail but with Pt Botany being the only container port, trains manoeuvre through the rail network and bypass Pt Kembla which according to NSW Ports will not be ready for some time with Newcastle being supported as the next container port for NSW.

Sydney Trains, that administer the Sydney rail network (which includes the south coast line to Bomaderry), would appear to have an understandable preference for passenger trains to the exclusion of freight services. However this should not be the case. Several proposals by the Manildra Group and supported by SEATS and Shoalhaven City Council to improve the performance of the Sydney Trains network for the betterment of both freight and passenger services fail to gain traction when put to T4NSW. They remain active proposals in the SEATS Priority Projects Strategic Statement – 2024.

SEATS Focus on upgrading the South Coast Rail Line

Over several decades now, SEATS has been advocating for various Projects to improve the freight network in its northern Illawarra Shoalhaven sub-region. These project have included:

SEATS Rail Priority Projects:

- 2012 Berry to Bomaderry Rail Track Upgrade – completed except for Bomaderry Yard
- 2012 Turnout required between Unanderra and Coniston Junction for train turnaround for trains >600m
- 2012 increased passing capacity on Moss Vale to Unanderra Line – completed
- 2012 Dunmore Siding – Crossover is required and be available to enable freight trains to have more efficient paths for an expanding freight task
- 2012 Toolijooa Passing Loop – to progress the implementation of this project to create more efficient paths for freight (and passenger) trains on this single line route between Dapto and Bomaderry
- 2019 Bomaderry Station Yard Extension – extension of northern boundary & signally system is undertaken and available to enable freight trains more efficient access to the Bomaderry rail/road intermodal for the expanding freight task
- 2019 Ensure rail access between the Main Southern Line at Moss Vale and the South Coast Line at Unanderra is maintained and available to freight trains for an expanding freight task

SEATS Road Priority Projects

- 1995 North Kiama Bypass – completed
- 2003 PH Oak Flats to Dunmore – completed
- 2005 PH Gerringong to Bomaderry – completed
- 2005 PH Additional Bridge across the Shoalhaven River at Nowra - completed

- 2012 PH Albion Park Rail Bypass – completed
- 2012 Upgrade Picton Rd/Mt Ousley Rd – under planning/construction
- 2019 Mt Ousley Rd interchange – under construction

Freight volumes will grow as populations grow! However there are certain freight tasks that will grow in accordance with increased CapEx by industry together with the specialisation of certain processing activities in established localities.

- Port Kembla will continue to grow as a vehicle import centre. This activity is ideally suited to the major centre of Sydney and draws advantage from plentiful areas of semi-serviced industrial land in and around Wollongong.
- The Manildra Group is currently building capacity at Bomaderry to quadruple production. This will generate a need for significantly more grain to be freighted in (preferably by rail); more export containers needing to go to Pt Botany by rail; more road freight of ethanol to fuel distribution centres; Manildra have also made it aware that the IMD that is being built as part of the project will be available to other Shoalhaven based manufacturers to utilise to transit containerised export freight including chemicals, nutraceuticals, building components etc.
- Carbon reduction proposals around green steel, hydrogen fuel generation and offshore renewable energy proposals off Illawarra and Gippsland are all capable of generating freight growth not only on road and rail but also on the waterways along the coast.

Climate Change

The coastal aspects of the Great Dividing Range on the east coast of Australia are playing a part in the affects of Climate Change. This is particularly evident on the South Coast of NSW and the interplay with the East Coast Low weather patterns. As shown in the T4NSW Freight Policy Reform paper, the incidence of road closures is increasing due to flooding (and land slips). On the south coast the intensity and frequency of rain storm events is becoming quite noticeable on the road and rail assets.

The South Coast Rail line and the Moss Vale to Unanderra Rail Line Have been significantly affected and were unavailable to freight trains for extended periods post the East Coast Low events since 2020.

Supply chain effects were experienced by industry within the region as well as for customers/suppliers outside the region, including meeting shipping timetables.

This scenario is not only a recent event. In the 1980s a large section of the South Coast Rail Line was washed away in a storm in the northern suburbs of Wollongong. The repairs took months having a major disruption to freight and commuter services.

SEATS shares with industry, the concern that the reliability and sustainment of the key east-west escarpment freight linkages, both rail and road, need to be prioritised by Governments in maintenance and upgrade programs. The business and reputation of regional processors can be influenced by prolonged supply chain disruptions.

The Illawarra Escarpment and the Freight Task

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 the coastal plain to the Southern Tablelands 600-800m above.

The 2 rail lines that cross the Illawarra Escarpment are susceptible to climatically caused disruption to services

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

In February 2023, SEATS resolved to:

- a) Strongly support the upgrading of the Mt Ousley/Picton Rd corridor, including the works near the University of Wollongong
- b) Request 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.**

Strategic Issues

This submission has concentrated on freight movement around major freight generators that are seeking to utilise the most productive and efficient modes of transport to move raw, semi-processed and finished goods around the state, nation and globe.

The freight supply chain has a different dynamic from distribution warehouses to the point of sale. The logistics for this part of the supply chain are more pragmatic in meeting delivery schedules over shorter haulage distances. The vehicles used are more suited to the delivery or receipt dockages and local road conditions.

The movement of freight within the northern SEATS sub region

SEATS specifically discussed these questions at its meeting held in Goulburn on Friday 17th May, 2024. The matters raised are given in point format for ease of explanation.

Metropolitan rail freight

- There needs to be a greater acceptance by Sydney Trains that freight trains need to share parts of the metropolitan rail network
- The metropolitan rail priority for passenger trains works against freight rail –
 - More freight slots are required through the Sydney network
 - Longer trains using non peak slots could be part of a solution
 - A siding between Unanderra and Coniston Junction is required for freight train turnaround

- Where rail freight into ports exists, strong support needs to come from Government for its continuance and expansion to satisfy
 - Export TEUs direct to Pt Botany
 - Grain freight direct to Pt Kembla and processing facility at Bomaderry

Ports and Containerised freight

- Currently containerised freight bypasses Port Kembla to Pt Botany by rail (& road) due to lack of facilities at PK.
- T4NSW (backed by policy statement from the NSW Government) needs to maintain rail access to Pt Botany for containerised freight on (whole) trains (and just not from Meadowbank)

SEATS Priority Projects that will assist Rail Freight productivity:

- **Dunmore Siding** – A crossover is required on an already constructed passing loop to make better use of the asset and enable freight trains to have more efficient paths for the expanding freight task on this single track South Coast Line
- **Bomaderry Station Yard Extension** – extension of northern boundary & signal system is required to be undertaken to enable the longer freight trains to be wholly within the section and to allow more efficient access to the Bomaderry rail/road IMD being developed for the expanding freight task
- **Toolijooa Passing Loop** – to progress the implementation of this project to create more efficient paths for freight (and passenger) trains on this single line route between Dapto and Bomaderry
- Ensure **rail access between Bomaderry and Port Botany** is maintained and adequate paths are available for freight trains of up to 1200m.
- Ensure rail access between the **Main Southern Line at Moss Vale and the South Coast Line at Unanderra** is maintained and available to freight trains for an expanding freight task
- Note: In coming years there will be significant increases in freight in/out of Bomaderry and Port Kembla

Additional comments

1. Electrification of rail line between Kiama and Bomaderry

This is not a major issue relating to freight as locomotives for the freight task traverse rail networks that are electrified but mainly they are not electrified.

The tunnels between Kiama and Gerringong would be expensive to electrify.

SEATS comment: The hybrid passenger trains that can operate both on diesel (or battery packs) and an electrified network, need to be seriously investigated to operate between Bomaderry and other parts of the Sydney Trains network.

2. Single line between Dapto and Bomaderry

This can be overcome by ensuring adequate passing loops. However these passing loops need to be able to cater for freight trains with suggested locations being Dunmore, Toolijooa and Bomaderry Yard.

3. Maldon – Dombarton rail line alternatives

The existing Moss Vale – Unanderra rail line exclusively carries freight and additional capacity exists on this corridor. Freight activity to/from Pt Kembla and Bomaderry mainly comes from beyond Yass on the Main Southern Line.

The quantity of freight from western Sydney needs to be evaluated carefully and the cause to bypass Moorebank needs to be also considered before incurring major CapEx on this “new” line.

4. Train turnaround facility between Unanderra and Coniston Junction

This facility is required now and will be increasingly required as the Manildra Group’s operation at Bomaderry reaches its planned expansion over the decades to come. Should the Maldon – Dombarton link ever eventuate, this train turnaround will be required to service industrial needs in the Kembla Grange/West Dapto area.

In conclusion, SEATS seeks:

1. To be recognised as a stakeholder in the development of the Illawarra Rail Resilience Plan, and
2. To have the scope of the Illawarra Rail Resilience Plan include the existing significant freight movements along the Moss Vale to Unanderra rail line, as these form an important interaction with the passenger services operated on the Sydney Trains network

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SEATS Priority Project Strategic Statement – 2024

This Priority Project Statement has been evolved by SEATS (South Eastern Australia Transport Strategy) over many iterations since 1995. This current list of projects represents both physical works required or government policy initiatives that will generate regional economic development through an improved freight network leading to increased productivity and carbon emission reduction.

Set out initially by mode of transport, a state by state statement is also shown below.

AIR	
<p>Access for regional airlines to Sydney Airport</p> <ul style="list-style-type: none"> - have the Australian Government reform regional access at Sydney Airport, including: 	<ul style="list-style-type: none"> ✓ release trapped slots so regional airlines can build consistent daily schedules, and to make the regional ring fence more usable ✓ smooth, or average, preserved regional slots to ensure the same number of regional slots are available every day in the morning and evening peaks ✓ provide the ability to retime regional slots by up to one hour to help with slot fragmentation
RAIL	
<p>South Coast Rail Line - (Freight div T4NSW)</p>	<ul style="list-style-type: none"> ✓ Turnout required <u>between Unanderra and Coniston Junction</u> for train turnaround for trains >600m ✓ <u>Dunmore Siding – Crossover</u> (as per Fixing Country Rail application RNSW1385) is undertaken and available to enable freight trains to have more efficient paths for an expanding freight task ✓ <u>Bomaderry Station Yard Extension</u> – extension of northern boundary & signally system (as per Fixing Country Rail application RNSW1392) is undertaken and available to enable freight trains to more efficient access the Bomaderry rail/road intermodal for the expanding freight task ✓ <u>Toolijooa Passing Loop</u> – to progress the implementation of this project to create more efficient paths for freight (and passenger) trains on this single line route between Dapto and Bomaderry
<p>Moss Vale to Unanderra Rail Line – (Freight div T4NSW)</p>	<ul style="list-style-type: none"> ✓ Ensure rail access <u>between the Main Southern Line at Moss Vale and the South Coast Line at Unanderra</u> is maintained and available to freight trains for an expanding freight task
<p>Southern Line (Goulburn to Canberra) – (Freight div T4NSW)</p>	<ul style="list-style-type: none"> ✓ Ensure rail access <u>between the Main Southern Line at Goulburn and the rail/road intermodal at Tarago</u> is maintained and available to freight trains for an expanding freight task

<p>Undertake the necessary works to deliver the outcomes of Victoria's Regional Network Development Plan to enable:</p>	<ul style="list-style-type: none"> ✓ Passenger rail services between Traralgon and Melbourne of 20 min in peak times and 40 min off peak with additional trains <u>beyond Traralgon to Bairnsdale</u> ✓ Freight services to utilise the Gippsland rail line efficiently between Bairnsdale and Melbourne by ensuring sufficient passing loops exist to provide schedules/pathways
<p>ROAD</p>	
<p>Barton Highway (T4NSW)</p>	<ul style="list-style-type: none"> ✓ Completion of section <u>between Yass and ACT Border</u> ✓ Establishment of HML route <u>between Cooma and Yass (through ACT)</u> for access to Tumut via Hume Highway and Gocup Rd
<p>Crossing the Illawarra Escarpment (T4NSW)</p>	<ul style="list-style-type: none"> ✓ <u>Mt Ousley Rd/Picton Rd</u> – continuous improvements with regard to safety & resilience ✓ <u>MR 92 Beyond Nerriga</u> – providing a HV/HML route between Nerriga and the Hume Hwy at Goulburn ✓ <u>Kings Hwy improvements</u> to enable HML access ✓ <u>Snowy Mountains Highway upgrade</u> to address resilience issues caused by mountain pass instability to ensure HV access and over time HML access
<p>Princes Highway (NSW & Vic)</p>	<ul style="list-style-type: none"> ✓ <u>Mt Ousley Rd interchange at UoW</u> ✓ <u>Nowra Bomaderry Transport Strategy</u> – progress of studies ✓ <u>PH Upgrade Project:</u> <ul style="list-style-type: none"> ○ Jervis Bay Rd intersection ○ JB Rd to Hawkens Rd upgrade ○ Milton Ulladulla Bypass ○ Moruya Bypass ✓ Improvement of section <u>between Batemans Bay and Snowy Mountains Hwy to enable compliance for HML/PBS vehicles</u> (especially crossings at Wagonga Inlet & Brogo River). ✓ Completion of the <u>duplication of the Princes Highway from Traralgon to Sale</u> by the scheduled completion date of mid 2024 ✓ Continue the delivery of the Princes Highway upgrade program through the Gippsland region, including the <u>Sale Alternate Truck route moving to construction asap</u>

<p>Emerging transport freight issues needing to be addressed in Victoria</p>	<ul style="list-style-type: none"> ✓ To enable <u>resolution of the Traralgon bypass alignment</u>, this very important project for Gippsland, requires every effort to be made across all Victorian Government Departments involved to determine a way forward as soon as possible. ✓ <u>Transport infrastructure planning within Baw Baw Shire</u> is important to this peri-urban area under the Victorian Government’s Metropolitan Planning Strategy “Plan Melbourne 2017-2050”. SEATS asks that the planning and development funding to ensure future options are not built out with incremental development. ✓ Early planning and design for the PH <u>through Bairnsdale including across the Mitchell River to the eastern and northern town limits</u>, incorporating improved traffic management practices at the PH/Great Alpine Rd intersection, are required to set the agenda for the future duplication of the Princes Highway from Sale to and through Bairnsdale
<p>Continuous improvements to the following corridors in liaison with Local Government to identify local projects to enhance safety and improve productivity for delivering the freight task</p>	<ul style="list-style-type: none"> ✓ <u>Bass & South Gippsland Highways</u> – including access to the Gippsland Coast Offshore Wind Energy Zone support facilities ✓ Realignment of sections of the <u>Monaro Hwy from Cann River to NSW border</u> ✓ Realignment of sections of the <u>Princes Hwy from Cann River to NSW border</u> ✓ A new statement around Vic North South Access is required here
<p>SEA</p>	
<p>Seaport Access (NSW)</p>	<ul style="list-style-type: none"> ✓ <u>Ensure PBS compliant road access into Pt Kembla</u> from National Hwy grid is available and that adequate height clearances under bridges are monitored and maintained between Picton Rd and Pt Kembla in both directions. ✓ <u>Ensure rail access between Bomaderry and Port Botany</u> is maintained and adequate paths are available to freight trains of up to 1200m.
<p>Seaport Access (Vic)</p>	<ul style="list-style-type: none"> ✓ <u>Ensure PBS compliant road access into Port Hastings and Port Melbourne</u> from National Hwy grid is available ✓ <u>Ensure freight rail access to export sea ports</u>

Priority Project Strategic Statement for NSW

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