

21 June 2019

Customer Feedback
Sydney Gateway
Roads and Maritime Services
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NORTH SYDNEY NSW 2059

via email: sydneygateway@rms.nsw.gov.au

RE: Sydney Gateway Concept Design

The Australian Logistics Council (**ALC**) is pleased to make this submission regarding the concept design for the Sydney Gateway.

ALC is the peak national body representing the freight logistics industry with a focus on national supply chain efficiency and safety.

The efficient delivery of freight relies on adequate transport infrastructure, and the Port Botany/Sydney Airport precinct is one of the most significant in the national freight transport network.

ALC acknowledges the importance and value of the Sydney Gateway in reducing road congestion in the Sydney metropolitan area and improving travel times for commuters.

We also acknowledge the potential contribution the project could make to improving the efficiency of freight movement around Sydney, particularly to and from the international trade gateway of Port Botany.

However, ALC remains concerned that there are flaws in the concept design that could mean the project will not deliver on its intended outcomes in relation to freight movement.

In particular, the failure to incorporate direct, dedicated connections for heavy vehicles travelling to and from the Cooks River Intermodal Terminal (CRIT) and adjacent freight depots will jeopardise the overall ability of Sydney Gateway to achieve its objectives in terms of reducing traffic congestion in and around the Port Botany/Sydney Airport precinct.

ALC strongly supports the Sydney Gateway project. However, we believe its design could be vastly improved by reinstating dedicated heavy vehicle access ramps at St Peters for trucks wishing to access the CRIT and Port Botany, as per the original planning design.

This submission sets out why such connections are so critical for industry and for local communities in the precinct.

Freight and the NSW Economy

The freight logistics sector makes a significant contribution to the strength of the NSW economy. In 2017, freight represented around \$66 billion to NSW Gross State Product¹, and this contribution is set to grow significantly in coming years, with freight volumes in NSW forecast to increase by 28 per cent by 2036 – with a 50 per cent increase anticipated for Greater Sydney alone.

In relation to Port Botany, NSW Ports estimates that containers could more than triple from 2.3 million to 8.4 million TEU per annum in the next 30 years.

At present, around 80 per cent of the containers travelling to Port Botany are carried by road – and thus the anticipated increase in volumes will place significant pressure on the road network, even with ongoing efforts to achieve modal shift from road to rail.

Similarly, there is significant growth forecast in relation to air freight at Sydney Airport, with an increase of 58 per cent expected by 2039. Again, all freight travelling to and from Sydney Airport is transported via road.

This growth in freight volumes will place enormous pressure on road infrastructure in and around the Port Botany/Sydney Airport precinct.

Given that one of the core reasons for undertaking the Sydney Gateway project is to alleviate these congestive pressures and improve the efficiency of freight movement, it is vital that the needs of freight logistics operators remain a core consideration in the design.

Regrettably, removing the dedicated heavy vehicle access ramps that were part of the original design sends a message that the needs of freight operators are being lowered in the hierarchy of priorities, at the very time when projected growth in the sector means they should be elevated.

Cooks River Intermodal Terminal (CRIT)

The Cooks River Intermodal Terminal (CRIT) is Australia's largest empty container park, and significantly touches some 30 per cent of all containers that move through Port Botany each year. The facility is heavily relied upon by shipping lines and freight logistics companies who use Port Botany within their operations especially as for every two full containers that are imported, one is re-exported empty thereby requiring the use of such empty park facilities for the staging of containers. This trend is expected to increase with the future tripling in trade and further decline in the local manufacturing base.

CRIT is also situated in the heart of the area where Sydney Gateway will be constructed, and sees hundreds of empty containers travelling to and from the facility each day via road transport.

It is a feature of supply chain operations that empty containers always travel by road. This is true of empty containers being returned to the facility from the port, and also when shipping lines call for containers to be delivered to the port for repositioning.

¹ Transport for NSW (TfNSW) Transport Performance and Analytics 2016 (as reported in NSW Freight and Ports Plan 2018-2023, p. 18)

These calls invariably come at short notice, and empty containers are carried on trucks to the port via a continuous “stack run”. Because of the tight timeframes and other operational imperatives involved, transporting these containers via any means other than road is impractical.

Currently, trucks undertaking such a task utilise Kent St, Coward St and Bourke Rd in Mascot.

The continued growth in container volumes discussed earlier means that heavy vehicle traffic volumes servicing CRIT and Port Botany will continue to grow steadily in the years ahead. This scenario will be exacerbated in the short term by the closure of the Tyne St Peters empty container park as a result of Sydney Gateway construction, which will undoubtedly place further pressure on CRIT as the largest and closest empty park facility to Port Botany.

It is also worth noting that in the event there are rail closures at Port Botany, then freight trains terminate at CRIT. In that event, it is not merely empty containers moving to the port from CRIT, but all export freight being carried on rail.

This highlights CRIT’s critical role in the NSW supply chain – and demonstrates why ensuring heavy vehicles can continue to access the facility in the most efficient manner possible is an imperative for Sydney Gateway.

Residential Growth

Over recent years, the suburb of Mascot has witnessed burgeoning residential growth, with a significant number of large-scale apartment buildings being constructed in an area that, until recently, was largely industrial and commercial use land.

The changing character of the area is also placing pressure on the road network, particularly on Kent St, Coward St and Bourke Rd, which are now key routes for passenger vehicles driven by local residents, in addition to freight vehicles and commuter traffic travelling to and from Sydney Airport.

In practical terms, this slows road freight movements to and from the port, as freight vehicles have to contend with traffic congestion, parked cars along key routes and complications created by diversions put in place to accommodate construction work on new residential apartment buildings.

Sydney Gateway is intended to alleviate some of these pressures. However, without the provision of dedicated ramp access for heavy vehicles accessing CRIT and Port Botany, trucks will be forced to continue using the current route along local streets in Mascot to travel between the two facilities.

This will undermine the core goal of Sydney Gateway to reduce road congestion and improve the efficiency of freight movement.

It will also have a deleterious impact on community amenity in these new residential communities, as residents become increasingly vocal about the movement of heavy vehicles through their local area.

As history has shown, complaints from residents about heavy vehicle noise and movements on local streets generally results in the imposition of curfews or outright bans on heavy vehicle movements in particular areas. This further undermines the efficiency of freight movement.

Sydney Gateway represents an opportunity to stop that problem before it starts by ensuring the needs of freight operators are properly considered and incorporated into the design.

Improved rail access to and from Port Botany

While the vast majority of empty containers travel to and from the port by road, CRIT is also looking to enhance its rail connectivity with Port Botany for shuttle trains either travelling directly to and from CRIT to the Port, or for regional trains calling ex Port for the loading of empties to deliver up country.

As part of this strategy, Qube Logistics as lessees of CRIT have proposed the development of a direct rail turn out to and from the Port which would cross directly underneath the proposed concept design of Sydney Gateway, close to where the roadway crosses the main line at elevation.

It is critical that the Sydney Gateway concept design allows for this future rail access / corridor, as it would be prohibitively expensive to retrofit if the current design did not accommodate a future rail solution with a direct turn out to and from the port.

The Solution

Sydney Gateway has been described as the 'missing link' in the Sydney road network, and ALC agrees with this characterisation.

However, there is little point in constructing the 'missing link' if it does not actually provide adequate connections to and from the key freight facilities in the region, namely the Port Botany/Sydney Airport precinct (including CRIT).

Dedicated ramps for heavy vehicles accessing these critical facilities, as present in the original designs, are essential for improving efficiency and combatting road congestion.

Likewise, without a direct rail turn out to and from the Port, trains will be forced to propel in on the main line, reducing total rail supply chain capacity and jeopardising the NSW Government's overall mode share target.

ALC submits there is compelling reason for a strategic business case to be developed that will include direct, dedicated connections for heavy vehicles to and from Sydney Gateway that will facilitate access to, in particular, CRIT, but also Port Botany and Sydney Airport.

The logical way to achieve this would be to construct ramps at Canal Road that can accommodate heavy vehicles accessing CRIT and other freight facilities as well as preserving access for a direct rail port turn out from CRIT to the port.

ALC and other stakeholders have worked together to produce a concept design of how these ramps could be incorporated into the design for Sydney Gateway and the location of a

proposed port turn out. An example of the ramps design is included at **Appendix A** and the rail turn out at **Appendix B**

It is important to note that the incorporation of such dedicated access ramps into the Sydney Gateway design will be a crucial aspect of 'future proofing' the project, in the sense that such ramps would be able to accommodate Higher Productivity Vehicles (HPVs) that will play an increasingly important role in meeting our future freight task through their additional safe carrying capacity.

Moreover, such ramps may also help in the more efficient transport of passengers to and from Sydney Airport's terminals by providing access for public transport busses and private coaches.

To fully realise the potential benefits of the project, it will also be important to further enhance connectivity to Port Botany by dealing with current capacity constraints on General Holmes Drive, as well as connectivity from Foreshore Rd to the M5 East.

Consistency with the NSW Freight and Ports Plan 2018-2023

The construction of dedicated heavy vehicle access ramps for Sydney Gateway and preservation of a rail corridor for a direct port turn out from CRIT would be entirely consistent with undertakings provided in the *NSW Freight and Ports Plan 2018-2023*, published in September 2018.

The Plan calls on the NSW Government to pursue the "*investigation of truck-only lanes in the port precinct*" within the next decade and the achievement of a significant growth in the port rail mode share.²

Given that the Sydney Gateway is likely to be the most significant investment in road infrastructure within the Port Botany/Sydney Airport precinct within that period, the project represents an ideal opportunity to deliver on the Plan's commitment by incorporating dedicated heavy vehicle access ramps into the Sydney Gateway design and allowing for future direct port rail access underneath the elevated roadway at CRIT.

Conclusion

Sydney Gateway is a significant project that has the potential to dramatically enhance the efficiency and safety of freight movement in Australia's largest city, as well as contribute significantly to a reduction in road congestion and enhanced amenity for local communities in new residential developments around Mascot and Botany.

However, these potential benefits will only be fully realised if we ensure the project design is fully optimised to meet the operational needs of the freight logistics industry.

Ensuring that heavy vehicles are provided with dedicated access ramps to and from CRIT and the project design allows for a future direct port turn out from CRIT will be critical in this respect.

² [NSW Freight and Ports Plan 2018-2023](#), p. 65

CRIT plays a central role in the resilience of the national supply chain – particularly on those occasions when rail services at Port Botany are temporarily unavailable. Incorporating dedicated heavy vehicle access ramps at Canal Rd to and from CRIT into the design of Sydney Gateway – as was originally envisaged – will further strengthen the project, and help ensure its undoubted value is shared even more widely across the entire community.

ALC is grateful for this opportunity to comment on the Sydney Gateway concept design.

Please contact me on 0403 477 131 or via email to simon.morgan@austlogistics.com.au should you wish to discuss this submission in further detail.

Yours sincerely

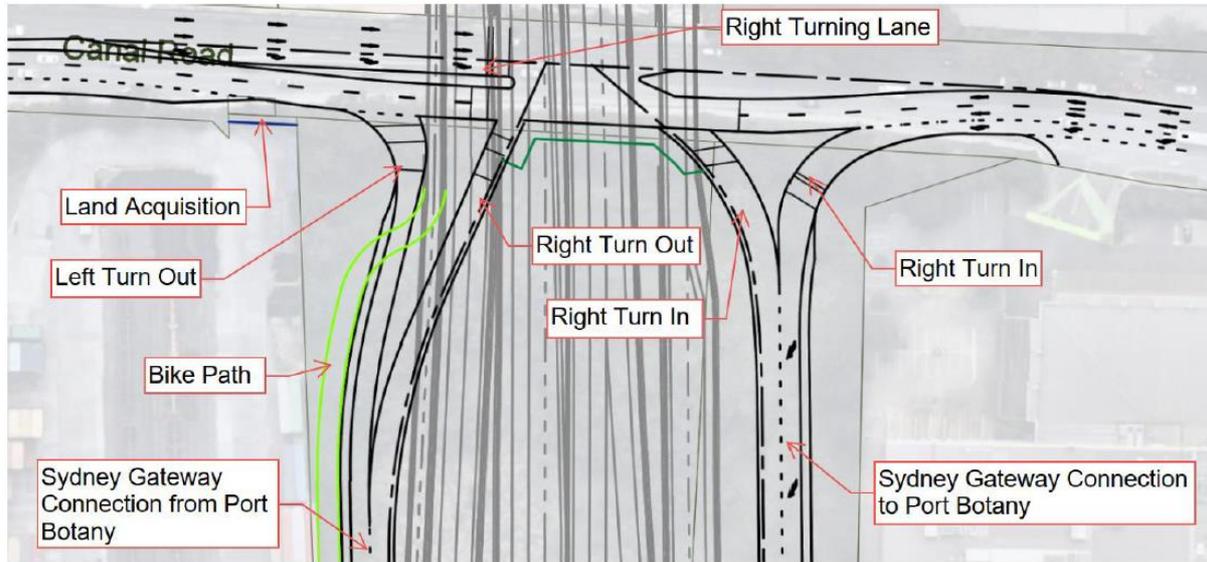


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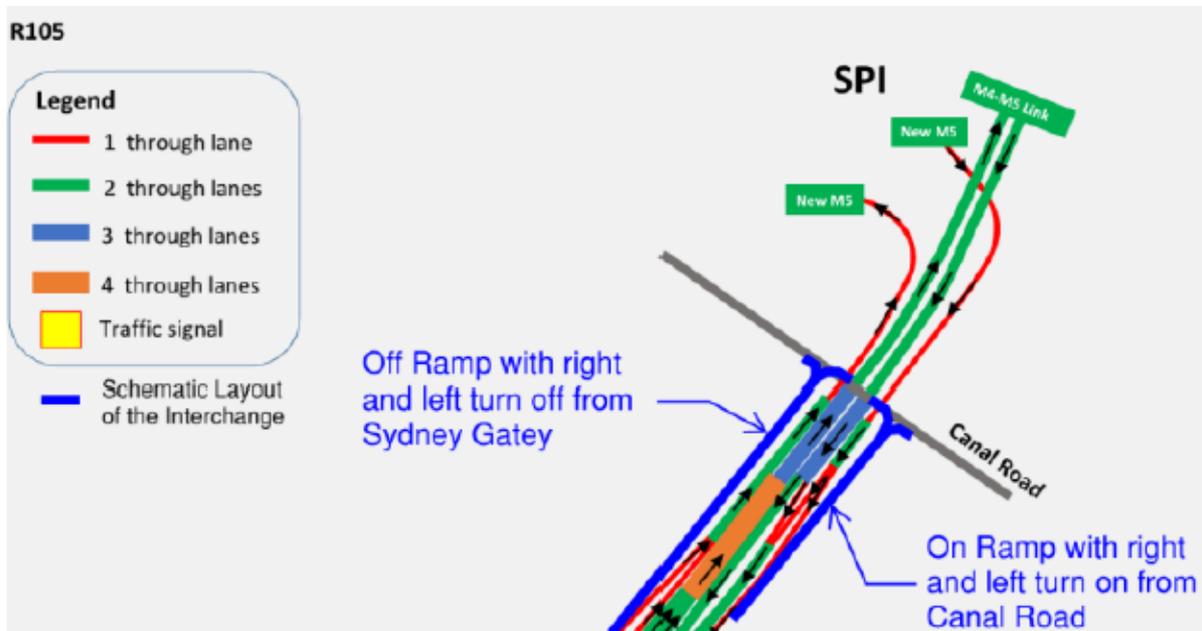
Appendix A: Potential Design of Sydney Gateway/Canal Road Heavy Vehicle Access Ramps

Figure 1: Proposed Connection Layout



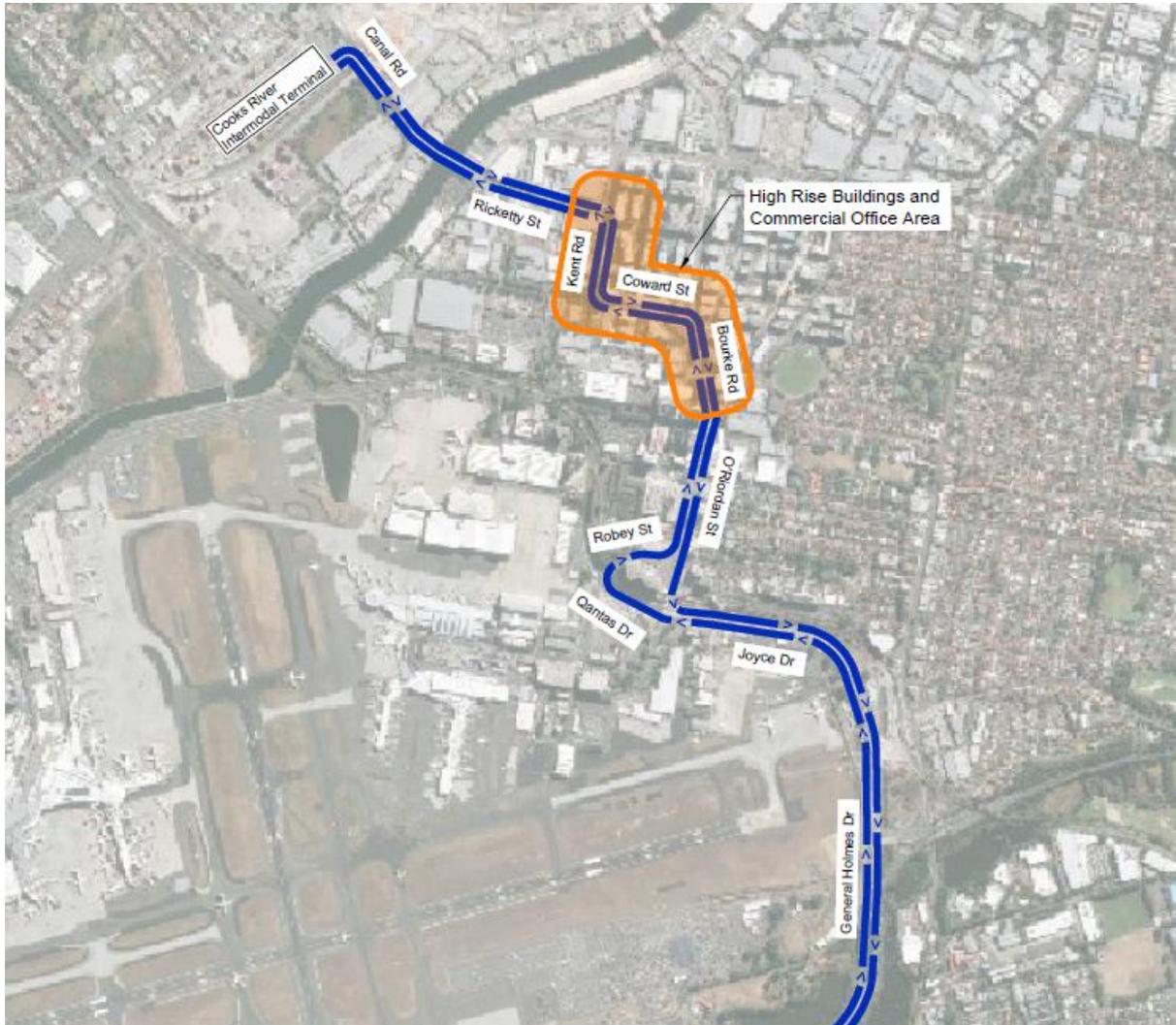
Source: Mott MacDonald and Qube Logistics

Figure 2: Schematic Layout of Proposed Connections



Source: Provided by RMS and adapted by Mott MacDonald

Figure 3: Residential area of B-Double Route used to access Port Botany from CRIT



Source: Mott MacDonald and Qube Logistics

Appendix B: Potential Design for Rail Turn Out From CRIT to Port Botany



Source: Mott MacDonald & Qube Logistics