

25 October 2019

Director Transport Assessments
Planning and Services Division
Department of Planning, Industry and Environment
Application number – SSI 7666
GPO Box 39
Sydney NSW 2001

GEA RESPONSE TO THE COFFS HARBOUR BYPASS ENVIRONMENTAL IMPACT STATEMENT

Dear Director

Gas Energy Australia (GEA) welcomes the opportunity to provide comments in response to the Roads and Maritime Services Environmental Impact Statement (EIS) for the proposed Coffs Harbour bypass.

By way of background, GEA is the national peak body which represents the bulk of the downstream gas fuels industry which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the gaseous fuels supply chain: refiners, fuel marketers, equipment manufacturers, LPG vehicle converters, consultants and other providers of services to the industry.

New South Wales (NSW) plays a significant role in Australia's gas fuels industry. It is home to the headquarters of a number of major national suppliers - Elgas, which is Australia's largest marketer of LPG and operates the biggest LPG storage facility in the Southern Hemisphere at Port Botany, Origin Energy, which started out as and remains a major LPG supplier, BOC, which supplies LNG, and Supagas Australia. In addition, DJ Batchen, Ebsray Pumps, Elaflex Pacific and Gameco, which design, manufacture and supply advanced gas equipment, are also located in Sydney.

GEA members support in-principle the building of a Pacific Highway bypass of Coffs Harbour to significantly reduce road crashes and injuries, reduce travel times and reduce freight transport costs. As stated in the EIS in relation to the current route through Coffs Harbour, "Road users, including through and local traffic, pedestrians, cyclists and heavy vehicles, need to navigate 12 kilometres of low speed arterial road with 12 sets of traffic signals, a major roundabout and 26 other intersections." This interaction between pedestrian, passenger and freight traffic through the Coffs Harbour urban centre using the existing highway has resulted in a high crash rate and in the absence of a bypass, will continue to be a substantial safety issue as traffic volumes continue to increase with population growth.

In particular, GEA members strongly supported the bypass design released by NSW planning authorities in October 2018 which had no tunnels and no restrictions on dangerous goods (DG) transport access. In contrast and following the March 2019 NSW election when the bypass was a significant local issue, the most recent design of the bypass put forward in the EIS incorporates three

tunnels. Given current DG transport regulations, GEA is concerned this design would not allow for the transport of DGs on the bypass. And as explained below but not acknowledged in the EIS, this would reduce the expected benefits of the bypass while significantly increasing its capital and operating costs, which the EIS does acknowledge.

With respect to the transport of DGs, GEA is concerned that the EIS is fundamentally flawed for three reasons.

First, it appears to implicitly assume that most DG transport travelling along the Pacific Highway would continue to enter built-up areas of Coffs Harbour even if the new bypass accommodated DG transport and that local DG traffic would not use the bypass. These two assumptions do not come close to holding for the gas fuels industry.

Second, and possibly because it has largely assumed away the problem, there is no evidence the EIS has attempted to rigorously assess the relative risk to people and property of DG transport travelling through populated built-up areas compared to travelling through tunnels of varying specification located in sparsely populated areas. And this is despite such a study having been conducted on Coffs Harbour bypass options in 2004.

Third, the EIS offers false hope there might be a regulatory fix that might allow DG transport access to the planned bypass tunnels for what it assumes to be the small minority of DG transport travelling along the Pacific Highway that does not enter built-up areas of Coffs Harbour. Such a fix would require agreement between Commonwealth, State and Territory Governments. Consequently, it is highly problematic and even if achieved, would most likely come after the planned bypass tunnels have been constructed.

Gas fuels transport

Gas fuels transported in tanks are a significant source of energy in Australia and more specifically NSW, providing energy for more than 650,000 homes and businesses in the State as well as fuel to power vehicles. GEA members also employ more than 800 people and have over \$1.6 billion worth of infrastructure investment in NSW.

This energy can travel long distances across national freight infrastructure, especially in the case of LPG, going from production facilities to supply terminals, then regional depots and finally to consumers, many of who live in regional and remote regions. While some gas is transported via rail and sea, the vast majority is delivered by road transport. This figure does not include CNG and LNG fuel volumes which are point to point delivery systems (ie from a compressor station/liquefaction plant to the end user) and are a growing source of energy for remote mining operations.

The gas fuels industry is one of many users of the existing Pacific Highway at Coffs Harbour which is part of a major interstate route between Sydney and Brisbane, a key freight, bus and tourist route for the region, and a local route for Coffs Harbour residents.

Inclusion of tunnels in the design of the Coffs Harbour bypass

The EIS's review of different bypass design options suggests Option 3, which does not include tunnels, manages the environmental risks associated with crossing Roberts Hill and Gatelys Road

ridges, generally performs better from a traffic and functional perspective, allowing all vehicles to use the bypass, and offers overall better value for money.

GEA notes that the EIS tends to dismiss the noted impracticalities with respect to function and cost associated with including tunnels at three location in the bypass. GEA also notes that the operational and maintenance costs of the new concept design which includes the three tunnels would be \$6 million per year higher than they would be for the 2018 concept design which did not include the use of tunnels.

Exclusion of DG vehicles

GEA is concerned that the EIS has also not adequately assessed the volume and travel patterns of DG transport or considered the risks to those using and living near local roads and the impact on local traffic volumes of excluding DG transport from the bypass. The EIS states "It should be noted that Coffs Harbour itself is a destination for dangerous goods deliveries such as Class 2.1 (flammable gases) and Class 3 (flammable liquids). Therefore, during operation of the project, a significant number of dangerous goods vehicles would continue to use the existing Pacific Highway in order to service customers in the Coffs Harbour CBD."

GEA is extremely concerned that this statement is misleading and inconsistent with information and advice provided to NSW transport authorities by GEA members which show that 95% of the roughly 4,400 LPG tanker movements along the Pacific Highway each year do not make deliveries into Coffs Harbour. GEA members also move LNG along with liquified carbon dioxide and other air separation unit (ASU) gases up and down the Highway, and hardly any of these make deliveries into Coffs Harbour.

Moreover, drivers of large tankers carrying gaseous fuels along the Pacific Highway do not take rest stops in the Coffs Harbor area because there is a lack of adequate rest facilities for large DG vehicles in the town. Instead, they stop at Clybucca, which is an hour south of Coffs Harbour, to comply with required fatigue management breaks.

Yet even for those GEA members making daily LPG deliveries in the Coffs Harbour area using local (bulk and cylinder) delivery vehicles, being unable to depart and return to their terminals via the bypass would maintain the volume of DG traffic in the urban centre and built-up areas, including interaction with pedestrians, cyclists and other local road users.

A core element of a safe system of transport is to separate vulnerable road users from long distance transport or to significantly reduce speeds to minimise the consequence of a predictable human error. Requiring DG heavy vehicles to continue using the existing highway instead of using the new bypass, would maintain interaction with vulnerable road users as well as the dangers associated with longer journey times and the environmental impact from higher fuel consumption.

A study of the risks of different Coffs Harbour bypass options conducted by Connell Wagner in 2004, concluded that transporting DGs through built-up densely populated areas such as the Coffs Harbour urban centre, represents a greater risk to people and property than transporting DGs through bypass

tunnels significantly removed from heavily populated areas. In particular, it stated “The smaller the built-up area in proximity to the route, the less severe the consequences of an incident”¹.

In accordance with GEA’s strategic transport action plan, our policy is that DGs should be transported along the safest route. The EIS fails to make the case that preventing DG transport from using bypass tunnels and making them continue to drive through populated areas of Coffs Harbour is the safest option.

For example, excluding DGs from the bypass would require tankers transporting LPG to continue to take the existing route of the Pacific Highway. As noted above, this route is 12 kilometres of low speed arterial road with 12 sets of traffic signals and passes through commercial areas, with entrances to a number of holiday parks, motels and hotels and main shopping precincts.

GEA’s position is that the bypass design should accommodate the carriage of all goods. And if the preferred route requires tunnel options, the tunnels should be designed to accommodate the carriage of DGs and not exclude them.

GEA acknowledges community support for the inclusion of tunnels in the bypass design with respect to current and future farming operations, biodiversity, visual, noise and Aboriginal heritage impacts. With this in mind, GEA considers that the design of bypass tunnels should accommodate DG transport which would deliver significantly improved safety, economic and environmental outcomes through the reduction in DG transport through the existing highway and reduce freight travel times.

Internationally there are numerous examples of tunnels which have been built to accommodate the carriage of DGs, especially in the United States and Europe where DGs are allowed through main route tunnels with restrictions. For example, the Big Walker Mountain Tunnel in Virginia, United States, at a length of 1289 meters. In Australia, DG transport is allowed to access the Cudgen Road Tunnel in NSW where there is no alternate route.

Conclusion

In conclusion, GEA is very concerned that the EIS has not adequately assessed the impacts associated with excluding DG vehicles from the proposed bypass, the volume and travel patterns of DG transport or considered the risks to those using and living near local roads and the impact on local traffic volumes. In accordance with GEA’s strategic transport action plan, our policy is that DGs should be transported along the safest route. GEA considers that the EIS fails to make the case that forcing DG transport to continue passing through populated areas of Coffs Harbour is the safest option.

GEA’s position is that the bypass design should accommodate the carriage of all goods. And if the preferred route requires tunnel options, the tunnels should be designed to accommodate the carriage of DG and not exclude them.

GEA notes the ongoing consultation stated in the EIS with the NSW Environment Protection Agency, SafeWork NSW and Fire and Rescue NSW to confirm if the project would be able to accept any classes of dangerous goods during operation. GEA is keen to work with the NSW Government to

¹ Connell Wagner Pty Ltd, *Coffs Harbour Highway Planning Coffs Harbour section – Dangerous Goods Transport Comparative Risk Assessment Working Paper No. 8*, Neutral Bay, 2004, p. 26.

investigate the use of tunnels by DG vehicles and how tunnels can be designed to accommodate their passage.

Should you have any questions relating to this submission please do not hesitate to contact Melissa Dimovski at mdimovski@gasenergyaustralia.asn.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Griffiths", with a horizontal line drawn through the bottom of the signature.

John Griffiths
Chief Executive Officer
Gas Energy Australia