



29 March 2017

Mr Paul Retter
Chief Executive Officer
National Transport Commission
Level 15/628 Bourke Street
Melbourne VIC 3000
Via NTC portal

WHO MOVES WHAT WHERE BETTER INFORMING TRANSPORT PLANNING FOR AUSTRALIANS - JANUARY 2017

Dear Paul

Gas Energy Australia (GEA) appreciates the opportunity to respond to the National Transport Commission (NTC) "who moves what where" – Better Informing Transport Planning for Australians – January 2017 discussion paper.

GEA supports the key principle that sound data and information should inform transport planning in Australia. Further, GEA considers planning decisions should take into account the impact on all of the different load types including dangerous goods. In the absence of such information, transport planning can deliver unintended consequences that increase costs for industry and produce inferior safety and health outcomes for local communities.

As an example, GEA offers the following Tugun Tunnel case study into the impacts felt by one carrier and a local community with respect to a tunnel's access restrictions and the resulting dangerous goods alternative route used for the carriage of a class 2 dangerous good.

Tugun Tunnel – Case Study

The Tugun Tunnel in Queensland is a 334m tunnel which forms part of the Tugun Bypass project. The Tugun Bypass takes traffic to the west of the Gold Coast Airport, connecting to Stewart Road interchange at Currumbin and the Tweed Heads Bypass north of Kennedy Drive at Tweed Heads West. When designed, the Tugun Bypass was expected to take 55% of traffic off the existing Gold Coast Highway by 2017 and reduce the average travel time between Currumbin and Tweed Heads West to 5 minutes. The project opened to traffic on 3 June 2008.

The Tugun Tunnel precludes the carriage of:

- dangerous goods class 1
- dangerous goods class 2.1; and
- dangerous goods: mixed class.

This requires tankers transporting Liquefied Petroleum Gas (LPG) to take an alternate route using the Gold Coast Highway. The alternate route passes through commercial areas, entrances to the John Flynn hospital, Southern Cross University and the Gold Coast Airport. LPG tankers must navigate 5 traffic lights and 5 intersections.

While the alternate route is only 1km longer, the transit time increases to between 15 and 30 minutes depending on the time of day, compared to the transit time on the Tugun Bypass of 5 minutes. The Tugun Tunnel's access restrictions require one carrier's LPG tankers to transit the Gold Coast Highway 14 times per day and more during the winter period. Over 5,000 movements per year could have been avoided by one carrier alone with careful assessment of the public risk and appropriate design of the tunnel infrastructure.

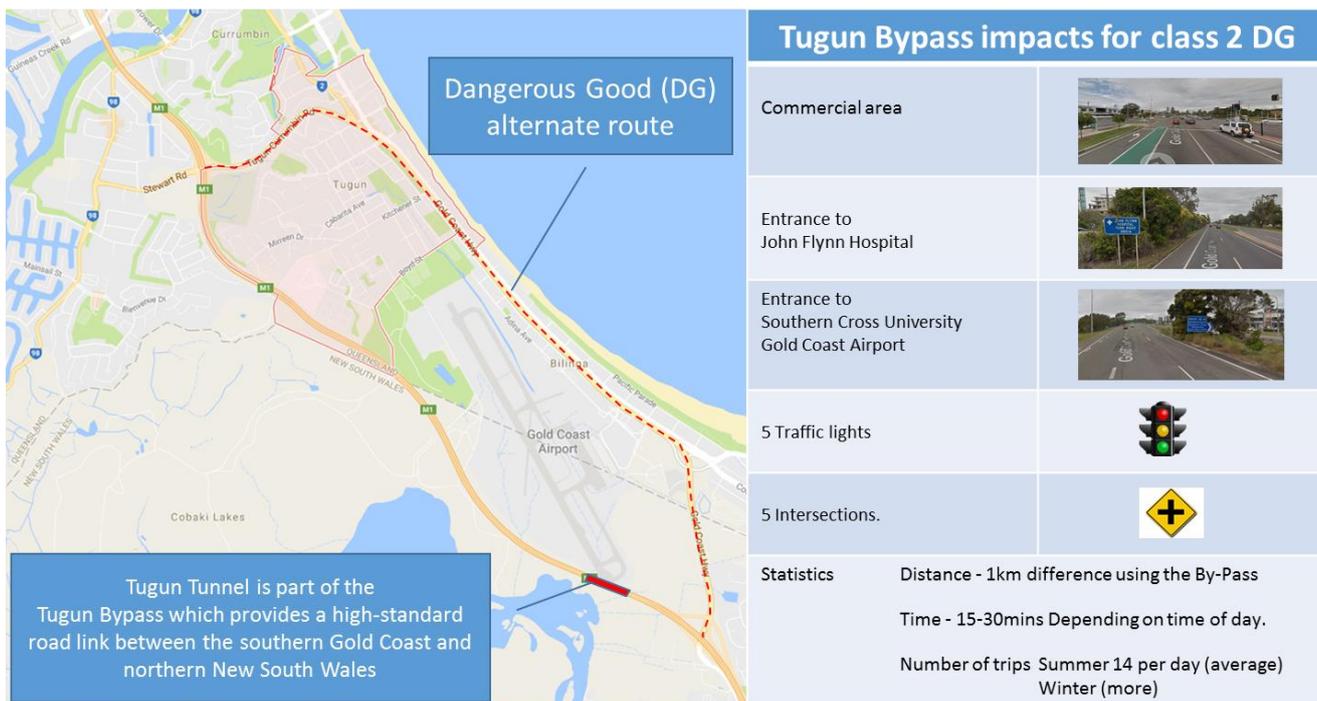


Diagram of Tugun Bypass and dangerous goods alternative route

Gas Energy Australia supports the NTC proposed recommendations in “who moves what where” – Better Informing Transport Planning for Australians – January 2017 discussion paper but as outlined in the case study above, dangerous goods must be considered in data capture to allow future planning decisions to fully consider all the relevant issues, including consequent impacts.

To this end, Gas Energy Australia recommends that jurisdictional lead agencies for vehicle registrations and dangerous goods have open data policies as these are valuable sources of information on vehicle type, tanker volume and route data which can better inform transport planning decisions.

Further, Gas Energy Australia suggests that local government impacts should be included in future data capture.

In closing, GEA supports open and reliable data informing sound planning decisions so that in the future, restrictions in one area do not create unintended negative impacts elsewhere, for example in our case study, 334m of tunnel exposing a community to over 5,000 additional heavy vehicle movements a year.

Yours sincerely

John Griffiths
 Chief Executive Officer
 Gas Energy Australia