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Dear Simon,

**Draft Port Development Strategy Ministerial Guidelines**

As a municipality that has a direct interface with the Port of Melbourne and is home to some of the key players in freight and logistics, Hobsons Bay City Council welcomes the opportunity to provide feedback on the draft Ministerial Guidelines.

It is understood the draft Ministerial Guidelines provides for a common framework for port authorities to prepare “well considered” port development strategies to respond to individual and evolving circumstances. And the scope of the guidelines extend beyond the port boundaries into neighbouring land use interfaces, transport beyond the port gate and environmental issues and social considerations. Council has provided feedback to those sections of the draft Ministerial Guidelines where it believes it adds value.

Council looks forward to working with port authorities when developing future Port Development Strategies.

If you would like to discuss this submission further please contact Kathleen McClusky, Director Strategic Development on 9932 1004 or email [kmccclusky@hobsonsbay.vic.gov.au](mailto:kmccclusky@hobsonsbay.vic.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Eddy', written over a horizontal line.

Chris Eddy  
**Chief Executive Officer**



## **DRAFT PORT DEVELOPMENT STRATEGY MINISTERIAL GUIDELINES**

Hobsons Bay is situated on Port Phillip Bay, approximately seven to 20 kilometres south west of Melbourne's Central Business District (CBD).

As a coastal municipality we have strong links with the ports and the freight pathways. These can provide both positive and negative impacts for our community, including businesses.

Hobsons Bay City Council has made submissions to a number of port related consultation activities over the years more recently to Infrastructure Victoria's advice on the second container port for Victoria earlier this year and the Future Port Capacity Discussion Paper in September 2016. Historically Council has contributed to the development of the Port Development Plan 2009 – 2035 through input into a consultation draft process in 2006, to Freight Futures in 2008 and in 2010 to Shaping Melbourne's Freight Futures and the Port and Environ Advisory Committee.

The following is feedback on the content of the Port Development Strategy (PDS) (part 1) and strategy preparation and consultation process (part 2).

It is considered that port development strategies are expected to consider freight transport network beyond the gate, including localised port related transport issues. Port development strategies will also have to address existing and emerging issues around port land use interfaces with neighbouring communities and environmental and social considerations.

### **Integrated approach to port transport planning**

Section 1.3 (integrated approach to port transport planning) highlights the need for an integrated approach to port transport planning beyond the port gate. Port planning needs to be considered in the context of ports being an integral part of the wider transport network and not planned in isolation. Furthermore an analysis of projected usage of the same infrastructure by other road or rail users is required to determine 'real' capacity.

Section 2.1 i) c) of the draft Ministerial Guidelines suggests that a review of a port development strategy "may" include "current and emerging issues regarding the adequacy of road and rail infrastructure connecting to the port and wider transport network connections". It is suggested that this wording be altered to "must include".

### **Road network**

Of particular concern is the road network capacity of the Princes Highway and West Gate Freeway to carry additional freight traffic given the projected population growth in the western suburbs. The West Gate Tunnel Project has an estimated life of seven years so the capacity of this combined road network is critical in any future port planning. Easy access between the ports and industrial manufacturing located in the west is also imperative. As mentioned in Council's submission to Infrastructure Victoria's Second Container Port Advice – Evidence Base Discussion Paper (Discussion Paper), it is anticipated that much of the increase in road freight traffic with



an origin or destination to the port will use existing arterial and local roads through residential areas, including Hobsons Bay to access the terminals, warehouses and container parks in the western metropolitan region. Council is particularly concerned about the displacement of Port of Melbourne road freight traffic into Hobsons Bay due to the proposed introduction of truck tolls on the West Gate Freeway or West Gate Tunnel and the imposition of truck bans on existing freight routes in the inner west as part of the West Gate Tunnel Project. In addition, if the Port of Melbourne is developed to the extent suggested in the Discussion Paper and rail capacity is not provided to handle a significant proportion of containers, the increased road freight traffic on the motorways and distributor will congest these roads to the extent that more and more motorists will choose to take alternative routes and 'rat run' through residential areas. Port development strategies therefore must consider and have approaches to avoid, mitigate or manage these issues.

When developing port development strategies, consideration should also be given to existing and future improved pedestrian and cycling routes. The potential increase in road freight presents hazards for cyclist safety and this requires consideration and the establishment of off-road cyclist networks.

### **Rail network**

Another concern is limited capacity to retrofit rail lines servicing the Port of Melbourne precincts. The consequences are that the bulk of the transport network will be heavily reliant upon road freight which will place pressure on the West Gate Freeway which residents and businesses in Hobsons Bay are reliant upon given a lack of alternatives and an infrequent and unreliable public transport network.

Consideration of Victorian Government policies encouraging urban consolidation should also be given when developing port development strategies. This includes consideration of freight movement through existing and expected residential areas.

### **Port land use planning**

Section 1.4 (port land use planning) acknowledges that ports experience encroachment on adjoining urban uses. The PDS should include an overview of land issues and opportunities faced by the port and identify land required for future port activity to provide a transparent signal of port expansion. Identifying areas of port related activity outside the boundary of a port and interface issues is also important. The draft Ministerial Guidelines state that a port development strategy should demonstrate consideration of the impact of port operations on adjoining land uses. Rather than "where practicable" port planning "must" seek to avoid, minimise or mitigate the impact from ports.

### **Environmental and social considerations**

Section 1.5 (environmental and social considerations) highlights that where ports propose significant expansion adjacent to urban areas a range of measure to reduce the impacts relating to noise, traffic management, air quality and lighting must be considered. This is also relevant for existing port operations and existing residential areas and therefore a port development strategy should acknowledge and respond to these issues. Section 2.1 i) d) of the draft Ministerial Guidelines suggests that a review



of a port development strategy “may” include “current and emerging port interface, port environs or environmental or social considerations”. It is suggested that this wording be altered to “must include”.

There is an extensive network of open space along Hobsons Bay foreshore from Yarraville to Williamstown which offers significant amenity and tourism values that are important to the community. There is no mention in the draft Ministerial Guidelines about consideration in port development strategies regarding visual amenity particularly to residents. Light spillage, noise and height of stacked containers are issues that require consideration in port development strategies.

Section 1.5 (and section 2.1 i) could also benefit from inclusion in a port development strategy an acknowledgement of the number of local and Victorian jobs the port creates or may create into the future. Although Hobsons Bay’s economy is supported by a variety of industry sectors, the majority of economic output has traditionally been generated by high yield manufacturing, particularly from the ship building and motor vehicle industries. A national move away from traditional manufacturing, attracting new and diverse investment to the municipality is essential for the western region of Melbourne. Much of this growth is occurring in the advanced manufacturing sector, transport and logistics, construction and retail sector. The transport, postal and warehousing sectors saw some of the largest gains in terms of pure employment numbers. The link between port facilities and the transport, postal and warehousing sector is already strong, any change to this nexus will have significant consequences for the strong industrial base in Melbourne’s west. Port development strategies therefore must include consideration of local and Victorian jobs.

Section 1.5 highlights the need for port authorities to include climate change risks and transport resilience in their port development strategies and Council supports these considerations to be included in the Guidelines.

Section 2.1 iii) suggests that “a range of issues such as port interface concerns may include qualitative considerations and need to be explored through appropriate approaches”. It is considered that port authorities have a social responsibility to ensure that they outline in their port development strategies their plans to avoid, minimise or mitigate the impact from ports on neighbouring land uses particularly residential and transport networks outside the port boundaries.

### **Consultation and engagement**

Section 2.1 i) highlights that a port development strategy review summary be provided to the Victorian Government for comment. Local government should also be consulted at this time to ensure localised issues are appropriately represented before drafting a strategy.

Section 2.2 highlights the expectations of port authorities to design a stakeholder consultation process. Council would welcome input into this design to ensure local stakeholder engagement but to also understand the expectations of the timing of these consultation activities to effectively resource a timely response during drafting the strategy.



The draft Ministerial Guidelines highlights the requirement for port authorities to prepare a port development strategy in the order of 25 to 30 years and at five year intervals to ensure that they remain responsive to changing circumstances. These timeframes are supported including consulting at these five year intervals.