

DRAFT SUBMISSION

Freight Policy Reform

June 2024





Local Government NSW (LGNSW) is the peak body for local government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

OVERVIEW OF THE LOCAL GOVERNMENT SECTOR



Local government in NSW employs **55,000 people**



Local government in NSW is responsible for about **90% of the state's roads and bridges**



Local government in NSW looks after more than **\$177 billion** of community assets



NSW councils manage an estimated **4 million tonnes of waste** each year



Local government in NSW spends more than **\$2.2 billion** each year on caring for the environment



NSW councils own and manage more than **600 museums, galleries, theatres and art centres**



NSW has more than **350 council-run libraries** that attract tens of millions of visits each year



NSW has more than **400 public swimming and ocean pools**

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Introduction

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing all 128 NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

LGNSW is pleased to engage in the review process of the [consultation paper](#) and provide a submission in response to the [NSW Freight Policy Reform program](#). LGNSW commends Transport for NSW for the extensive engagement with the local government sector on freight matters.

This submission is in draft form until it is considered by the LGNSW Board. Any revisions made by the Board will be forwarded in due course.

Background

On January 25, 2024, the NSW Minister for Transport, the Hon. Jo Haylen MP announced the NSW Freight Policy Reform Program, aimed at optimising freight transport in NSW. This initiative seeks to develop a comprehensive strategic reform agenda and action plan to address various aspects of the freight system. This reform program will entail policy reviews concerning critical components of the freight network, including road and rail. Additionally, it will examine facilities such as intermodals and industrial lands, recognising their vital role in facilitating the movement of goods across the freight network.

Local government in NSW is responsible for over 165,000km of roads, including local and regional roads. As such, councils have a direct stake and accountability for ensuring the efficient utilisation of this network for freight transportation.

LGNSW acknowledges the significance of freight transport in driving productivity and economic growth at national, regional, and local levels. Given the projected significant growth in freight volumes amid a growing population in NSW, local government support

becomes pivotal in meeting the escalating demands placed on road networks. This support is especially crucial for addressing challenges such as traffic congestion and road safety concerns.

In preparing this submission, LGNSW consulted with various stakeholders, including councils and the NSW Roads & Transport Directorate (RTD). The RTD is a long-standing partnership between Institute of Public Works Engineering Australasia (IPWEA) NSW/ACT and LGNSW, focused on addressing roads and transport-related matters.

LGNSW Response

As outlined in the consultation paper, the NSW Freight Policy Reform Program focuses on six key areas including:

1. The role of the NSW Government, Australian Government and industry in making a step change in freight transport.
2. The major ports in NSW.
3. The road and rail network.
4. The supporting metropolitan and regional intermodal terminals (IMTs) and other enabling transport infrastructure.
5. Consideration of freight in the identification and use of industrial land.
6. Embedding freight considerations into transport planning, prioritisation and investment decisions.

LGNSW has structured our responses to several of the discussion questions outlined in the consultation paper, addressing those that align with our policy focus and expertise.

Policy and guiding principles

Discussion question one (policy and business operations):

What actions would have the greatest impact in achieving a productive, sustainable, and resilient freight system?

Several initiatives would contribute to a productive, sustainable, and resilient freight system including: (please note some of these points will be further elaborated throughout this submission).

- 1) Integrated strategic land use planning with freight considerations such as the preservation and retention of industrial land dedicated for freight related activities.
- 2) A significant boost in infrastructure investment via road and rail funding programs to enhance the freight network.
- 3) Government policy direction including fostering collaborative partnerships between local government, state and federal governments to develop comprehensive freight programs. For example, the Heavy Vehicle Access Policy sets out the NSW Government's approach to road access, aiming to enhance safety, sustainability, and productivity for high productivity vehicles (HPV).
- 4) Adopt innovative technologies such as AI transport systems, data analytics and automation to improve freight efficiency. New truck technology can increase productivity on road corridors with HPV able to increase payload capacity to improve freight efficiency.

When working effectively, what role would each level of government play in the freight system? Consider the development of intermodals, distribution centres and depots, refueling sites, empty container parks, truck delivery schedules and connecting freight corridors?

Australian Government:

- Develops and maintains national rail and road networks including interstate connectivity.

- Provides infrastructure funding and setting policy directions.
- Facilitates national freight legislation, operations and policies to ensure efficient interstate freight movement.
- Provide funding to state and local government for freight supporting infrastructure,
- Determines national freight strategy in consultation with industry, state and local government.

NSW Government:

- Manages state rail and road networks, including key freight corridors.
- Facilitates the development of intermodals, distribution centres refueling sites through strategic planning and investment.
- Coordinating with local governments to integrate state, regional and local freight networks. Provides funding and support to local government.
- Planning of State Significant Development freight related developments e.g. intermodal terminals.

Local Government:

- Manages local road networks and traffic flow, directly impacting truck delivery schedules.
- Strategic land use planning, determining the location and development of intermodals, distribution centres, and other freight infrastructure.
- Engages with state and federal governments to identify and maintain key freight corridors within their jurisdictions.
- Collaborates and engages with other levels of government in strategic planning, investment, and infrastructure programs to support defined and integrated state and regional freight networks.
- Seeks guidance from state and federal governments for strategic transport planning to inform local asset management and infrastructure investment priorities.
- Facilitates community consultations as frontline facilitators to ensure that the voices and concerns of local communities are heard and integrated into

decision-making processes. This involvement helps to align freight infrastructure development with community needs and priorities.

LGNSW on behalf of councils in NSW, plays a key role in identifying and advocating for the provision of infrastructure funding including roads to meet their communities' needs. LGNSW's [2024 Policy Platform](#) details our positions that are highly relevant to this submission:

- **3.4 - Increased infrastructure funding to local government through Commonwealth and State Government revenue sharing and grant programs.**
- **3.18 - Improved freight connectivity to freight hubs including international airports.**

Is urban encroachment and the rezoning of industrial land for other purposes impacting the freight task - how? What are the long-term implications? How could various levels of government assist with better land use planning?

The freight task is growing more quickly than the population growth in Sydney, with a forecast growth rate of 152 per cent increase in freight demand compared to a 54 per cent population growth between 2016 and 2056¹. As a result, this will create significant pressure and increased competition for land impacting the freight task. Managing and protecting employment lands, key freight and logistics lands as well as competition for access to affordable land for these key urban land use activities, are a key underlying challenge in Greater Sydney.

Such impacts of urban encroachment and rezoning of industrial land on the freight task include:

- Loss of suitable freight lands due to the rezoning of industrial land for residential and commercial development projects. This diminishes the availability of suitable land for freight operations.

¹ Transport for NSW, Travel Zone Projections 2019 (TZP19) - NSW Government population and dwelling projections

- Increased traffic congestion due to the conversion of industrial land to other uses can displace freight related activities to more remote areas, resulting in longer transportation distances, increased transport costs and delivery times.
- Longer term implications of urban encroachment and industrial land rezoning on the freight task could include negative impacts on economic productivity, reduced resilience in the freight transport network as well as increased pressure on such existing freight corridors and infrastructure such as local roads managed by councils.

From a local government perspective, councils could assist with better land use planning by:

- **Continued Advocacy:** Working with other spheres of government to advocate for the long-term protection and retention of existing industrial land from rezoning through comprehensive land use policies embedded in the strategic region and district plans.

This ensures there is sufficient land available for freight-related purposes, such as intermodal terminals. As NSW faces significant population growth and growing housing demand, these lands need some level of protection from speculative activity and other development pressures to prioritise medium and high-density residential uses. Once lost to residential redevelopment, such industrial and urban services land cannot be recovered. Without the protection of these lands, the impact of continued urban encroachment will be felt.

- **Balancing Priorities:** Local government needs to balance the need for industrial land with council and community priorities. This includes ensuring that any rezoning decisions, often driven by the state government, consider local priorities and the optimal use of land to support sustainable development.

- **Infrastructure investment:** Advocating for infrastructure investment and prioritising projects that enhances freight connectivity. LGNSW advocacy has long emphasised the need for better integration of land use and transport planning, closely aligned with committed and funded infrastructure delivery program.

What role do you see for both the NSW and Australian Governments in transport planning and investment? What principles should apply to the planning process and in prioritising investments?

The NSW and Australian Governments are responsible for allocating the necessary funding for transport and road infrastructure projects based on the national and state level strategic priorities and identified needs. This includes investing in major road and rail upgrades, public transport, freight infrastructure and interstate connectivity. Further, they are also responsible for developing strategic transport plans such as identifying key transport corridors, assessing future demand, and setting strategic priorities for investment.

Principles should prioritise sustainable transport solutions that reduce the environmental impact, improve the efficiency of the transport network by reducing congestion, enhancing connectivity as well as support the long-term economic viability. Further transport planning should ensure it addresses the needs of all users to ensure transport are equitable and accessible to all.

For instance, [Muswellbrook Shire Council](#) has urged the NSW Government to strategically enhance transport routes, enabling the smooth transportation of renewable energy project components to Renewable Energy Zones (REZ). The current highways prove insufficient for the influx of oversized vehicles, demanding substantial infrastructure upgrades to accommodate trucks transporting sizable wind turbine blades. The utilisation of local roads for such large freight can create major change to traffic patterns in operation and road damage. Further, it may also pose safety risks due to vehicle maneuverability issues. As such, LGNSW asks the NSW Government to

address road infrastructure constraints hindering the transportation of renewable energy project infrastructure to REZ.

Another key project is the Lower Hunter Freight Corridor, a vital transport corridor that will provide crucial freight rail connections to support the growing communities, businesses, and industries in the Hunter Region. This NSW Government initiative aims to create a dedicated freight rail line between Fassifern and Hexham, bypassing Newcastle's urban area. By separating freight and passenger rail operations, the project seeks to improve reliability and capacity for both networks. The Lower Hunter Freight Corridor will significantly reduce rail freight traffic through Newcastle's urban area, decrease the number of heavy vehicles on the roads, and alleviate network congestion, ultimately enhancing freight and passenger travel times and stimulating economic growth across the Lower Hunter. LGNSW understands that planning is underway to identify land for this project following extensive stakeholder and community consultation and is committed to supporting the NSW Government and City of Newcastle in delivering this state priority project.

The NSW Roads & Transport Directorate (RTD), a joint initiative between LGNSW and IPWEA NSW and ACT, has called on the NSW and Australian Governments to work together with local governments in NSW to:

- Develop and implement integrated network plans for the local road network incorporating, critical infrastructure and resilience plans, local transport network plans, asset and risk management plans, community strategic plans, delivery programs and operational plans, road safety plans, and freight strategic plans.
- Provide a more sustainable long-term funding model for local government with a higher level of base funding support and reduced reliance on individual competitive grants.
- Provide a long-term commitment to a funding program designed to improve freight outcomes by addressing first and last-mile challenges on the local and regional road network.

- Providing additional funding to councils to increase the access of High Productivity Vehicles (HPV) and Performance Based Standards (PBS) vehicles to the local road network and promote the uptake of such vehicles by the transport industry more widely, resulting in improved road safety outcomes.

Specific matters for NSW freight policy

Discussion question two (rail freight policy):

How do you see Inland Rail impacting or changing your operations? What should the NSW Government do to harness the benefits Inland Rail will deliver?

Freight intensive industries such as mining and agriculture are predominately located in regional NSW areas like the Hunter, Riverina and Central West. These areas generate significant freight movements on council roads yet have some of the largest road deficits and maintenance shortfalls. Road carries the greatest share of interstate freight, estimated at around 80 per cent compared with rail².

Rail should be prioritised as the most appropriate form of transport for many mass or bulk products, and as an alternative to heavy road transport where practical in both metropolitan and regional areas of NSW. Councils in metropolitan areas are facing increasing levels of heavy vehicle traffic on already congested local roads, for example in areas located near or affected by access to Port Botany in Sydney. Local government welcomes initiatives to greatly increase the share of this traffic via the Inland Rail project. There are benefits to councils in NSW through the completion of the Inland Rail Project such as reduced road congestion and emissions, avoided road crashes, reduced road maintenance costs and improved connectivity to other domestic markets in Victoria and Queensland.

Freight rail projects, like the Western Sydney Freight Line, which will link Western Parkland City to Port Botany, are particularly beneficial for local governments as they

² Transport for NSW, Strategic Freight Model 2021

will help reduce road congestion. Regional communities are supportive of Inland Rail for the opportunities it provides to local communities, including job creation. The construction and operation of Inland Rail may necessitate upgrades to local road networks, rail infrastructure, and other supporting facilities, presenting both challenges and opportunities for local government involvement and investment.

LGNSW acknowledges current funding arrangements for rail infrastructure projects, such as the \$400 million Fixing Country Rail program funded by the Restart NSW Fund, which includes projects like the Junee to Griffith connection. Rail services using the Inland Rail will intersect with numerous national, state, and local roads, offering increased rail productivity and freight efficiency, and reducing freight costs by decreasing road movements. The NSW Government should continue to invest in and support these initiatives to harness the full benefits of Inland Rail for all regions of the state.

Discussion question three (ports):

As port operations relating to container trade and coal exports remains outside of LGNSW's focus and policy scope, we will not be providing any specific comments on this section.

Discussion question four (road freight):

What are the most important safety, sustainability and productivity considerations for road corridors?

Safety:

- **Local traffic management:** Implementing appropriate and clear signage, and systems to control speed and reduce congestion to enhance safety for all road users.

- **Road network maintenance and infrastructure upgrades:** Regular maintenance and repair of roads to ensure road surfaces are safe for drivers to travel on. One key freight route is the Newell Highway, which supports end to end access for road trains, but the road is subject to flooding. As such, flood mitigation strategies must be deployed to ensure continued freight movement.
- LGNSW has advocated on behalf of councils to the NSW Government seeking further improvements on road safety issues, specifically truck safety. Our recommendations include:
 - Mandate facial technology in heavy vehicles traveling over 400km in one direction to monitor driver fatigue.
 - Implement rigorous and regularly reassessed truck driving competency assessments, like CASA pilot requirements.

Sustainability:

- **Sustainable Materials:** Incorporate recycled materials into road construction and maintenance using a circular economy approach to minimise environmental impact and enhance sustainability.
- **Improve Fuel Efficiency/Reduce Emissions:** Continue to reduce emissions through improved diesel fuel efficiency and higher efficiency standards accompanied by a planned move to the use of renewable energy through EV trucks and or hydrogen fueled trucks.

Productivity:

- **Road funding:** Increased funding for road construction, maintenance, repair, and restoration are one of LGNSW's primary priorities, especially in the face of natural disasters such as the 2022 floods which caused an estimated repair bill of more than \$2billion in damages to local roads. Sustainable funding is an ongoing challenge especially for local government. Increased road usage, compounded with extreme weather events, has contributed to escalating road maintenance requirements on councils with significant funding shortfalls.
- **Enhancing the efficiency in the movement of freight** through extensive road corridor designs.

How can road funding be made more sustainable? Do you have specific comment on road charges and funding?

As outlined in the consultation paper, revenue from heavy vehicle road charges is largely collected by the Australian and State governments through fuel excise and vehicle registration and is not directly linked to road maintenance funding. Productivity gains are accrued to the freight industry through increased profitability which in turn provides increased tax revenue to the Australian Government. Local government does not receive any direct financial benefit. This disparity highlights the need for a more equitable distribution of funding. LGNSW advocates for a sustainable funding model that ensures councils receive adequate resources to maintain and develop road infrastructure, reflecting their critical role in managing most of the road network.

Road investments are independently funded based on budget and program allocations. Funding is distributed through grant programs and is subject to application. LGNSW views the current funding model as insufficient to meet the needs of local communities, placing unprecedented pressure on the resources of councils in NSW. The inequitable and uncertain government funding arrangements create significant challenges in infrastructure planning over the medium term. Regional and local roads increasingly need to accommodate longer, heavier, and higher freight transport. Despite record infrastructure funding at both federal and state levels, local and regional roads are not receiving meaningful increases in recurrent road funding. Freight movements are expected to increase by 213 million tonnes to 469 million tonnes in 2036.³ Given that heavy vehicles impose greater damage on the road network than light vehicles, this is likely to cause significant issues for the local road network managed by councils.

Further, it is concerning that fuel excise revenues are in structural decline. Local government has long been advocating for a sustainable road funding model that recognises its significant oversight of the road network. Despite their critical role,

³ [Funding local roads – recommendations to clear the infrastructure backlog](#) (2017)

councils have the lowest revenue base, raising just 2.89 per cent of total taxation revenues in 2022-23⁴ and are unable to levy any road taxes directly to address the \$1.9 billion road infrastructure backlog according to the NRMA. This situation underscores the urgent need for a more equitable and sustainable funding model to ensure councils can adequately maintain and develop road infrastructure.

As aforementioned, local governments rely on grants and federal and state funding, in addition to council rates revenue, to maintain and improve the road network. While federal and state funding for roads has increased recently through road programs such as through the Road to Recovery and Fixing Local Roads program. A significant shortfall still exists. The need to adequately fund upgrades and construct new road infrastructure to cater to future growth in both passenger and freight traffic has not been addressed. More importantly, there must be a way to ensure that road funding is more available, steady, and predictable to help councils with their long-term financial planning.

Unpredictable grant funding arrangements also drive higher rates of contract, casual and temporary labour as well as labour hire as councils are not in the position to offer as many ongoing employment opportunities. Instead, these uncertain funding arrangements encourage councils to offer shorter period of employment based on the duration of available funding. This poses challenges for councils in terms of attracting, retaining and upskilling their workforce to meet the growing freight task.

Additionally, unprecedented wet weather events over the past three years have further strained road conditions, highlighting the urgent need for a sustainable funding solution to support long-term maintenance and safety.

Funding is crucial for councils to respond to the increasing freight task and its impact on local road networks. The economic benefits of increased freight movements to the freight and logistics industries and their customers do not automatically flow through

⁴ [Taxation Revenue, Australia, 2022-23 financial year | Australian Bureau of Statistics \(abs.gov.au\)](https://www.abs.gov.au/taxation-revenue-australia-2022-23-financial-year)

to councils. There is little extra revenue to address the impact of growth on council-managed roads, especially in NSW's rate-pegged environment.

Councils need a mechanism to share in the financial benefits that productivity improvements bring to the heavy vehicle and freight industries through higher-productivity vehicles and other transport efficiency gains. This would provide councils with the means to address road maintenance and upgrades necessary for these vehicles to use local roads and help redress the substantial infrastructure funding backlog facing councils in NSW and nationally.

As part of LGNSW's ongoing advocacy for increased road funding, key asks in LGNSW's 2024-25 [NSW Pre-Budget Submission](#) includes:

- Provide \$400 million in grant funding to councils to support infrastructure betterment to withstand future natural disasters while delivering benefits associated with improved resilience and productivity, economic and social outcomes.
- Increased funding for the \$1.1 billion Fixing Local Roads Program and Fixing Country Bridges program to help address the estimated \$1.9 billion road maintenance and infrastructure backlog faced by councils in rural and regional NSW.
- Maintain Regional Emergency Road Repair Fund (RERRF).
- Increase Road Block Grant funding in line with current CPI rate.
- Increase funding for the Regional and Local Roads Repair Program (RLRRP).

Discussion question five (changing technology):

How can freight networks be improved to handle the growing freight task while utilising changing technology and lowering emissions?

Improvement of freight networks to handle the growing freight task should focus on leveraging innovative technologies and fostering collaboration and engagement

between different levels of government. Population growth is expected to significantly increase freight demand. This will drive demand in container traffic, particularly in Greater Sydney, where the population increases are concentrated. This will require more efficient operation of existing freight logistics chains, including greater productivity in the use of the infrastructure already in place. The prioritisation of rail for the transport of bulk products over long distances and the integration of automated and connected vehicle technologies would be helpful in alleviating congestion and reduce the environmental impact. Transport initiatives such as the automated heavy vehicle access program, which local governments are already involved in, demonstrate the potential for reducing processing times and more importantly the administrative burdens, leading to more efficient freight movement.

Heavy vehicle technology is evolving rapidly. There is a significant opportunity to accelerate the uptake of high productivity through increased payload capacity, low and zero emission vehicles to reduce the carbon footprint of freight transport and efficiently move freight across NSW. These modern vehicles will improve safety and support better decision-making about the NSW road network. To further enhance the freight network, governments should consider the adoption of AI digital technology solutions such as Intelligent Transport Systems (ITS) including real-time analytics and telematics, as a means of improving the efficiency of road freight operations.

Discussion question six (strategic land use planning and industrial land):

How can strategic land use planning better accommodate and plan for urban freight?

With increases in population, living standards and freight volumes in NSW, industrial lands and freight networks should be included as part of the strategic land use and development planning process. Sound planning and long-term thinking is needed to protect industrial and urban services land and assure its continued supply in the future. LGNSW advocacy has long emphasised the need for much better integration of land use and transport planning, closely aligned with a committed and funded infrastructure delivery program. Decisions relating to strategic planning outcomes, population

growth, housing targets and individual development approvals that may affect freight access are made within the overarching planning framework that includes a hierarchy of region plans, district plans and local plans.

Ideally, the preferred approach is where the State and councils identify areas where land use change is required, based on economic and land use research and subsequent amendments are made through the applicable local environmental plan, consistent with the long-term vision for the area and the District Plan initiatives for productivity and economic growth.

In Greater Sydney, it has been estimated that only 8 per cent of land across Greater Sydney is zoned for non-residential uses such as industrial and urban services⁵. There was strong support from councils for the former Greater Cities Commission's 'Retain and Manage' policy adopted in 2018. This policy was regarded as highly effective, providing certainty to all stakeholders about expectations on future zoning and giving clear direction on how underutilised sites are to be redeveloped. The policy is a vital strategic land use planning tool allowing business in industrial lands to invest with certainty and councils to effectively and efficiently refuse inappropriate planning proposals that do not have strategic merit. LGNSW also notes that other peak bodies including the Planning Institute of Australia and Australian Logistics Council (ALC) have advocated its importance. For example, the ALC suggests that 'Australia's national freight task is estimated to increase by 25% by 2040...and the protection and preservation of industrial land is fundamental to the future operating capabilities of the supply chains.'⁶ LGNSW understands the Department of Planning, Housing and Infrastructure is currently updating the policy as part of the update of the Greater Sydney Region Plan.

⁵ Greater Sydney Commission: [A Metropolis that Works](#), 2018

⁶ Australian Logistics Council media release: Long term thinking needed to protect industrial land and freight corridors, 2021.

Discussion question seven (freight matters):

Is stakeholder feedback incorporated into government policy direction?

Yes, stakeholder feedback is incorporated into government policy direction, in the context of freight policy reform such as Heavy Vehicle Access Policy. LGNSW notes that NSW Government has increasingly collaborated with local governments to enhance freight outcomes, including more efficient freight connectivity and access that is necessary to support economic growth. The automated heavy vehicle access pilot program, which involves the collaboration with six councils including Blacktown, Penrith, Dubbo, Parkes, Forbes and Liverpool Plains, is a clear example of how local government is being increasingly engaged with NSW Government as part of the stakeholder consultation process.

LGNSW is supportive of councils forging stronger partnerships with NSW Government to improve public understanding of the safety, economic and environmental benefits of high productivity vehicles.

Do you have access to contacts within Transport for NSW in relation to freight matters?

Yes, the Freight team led by Scott Greenow, A/Executive Director Freight have been LGNSW's and councils' main contacts within Transport for NSW for freight matters.

What do you consider government should do to improve your access to decision makers and enable you to influence reforms being considered?

Local government must be recognised and engaged as an equal partner in the development and delivery of solutions to the growing freight task in NSW. Regular consultation forums that include local government and council representatives with other stakeholders would improve access to decision-makers and enable local

government to influence reforms. Further, collaborative partnerships such as pilot programs involving local government would also greatly assist.

Conclusion

LGNSW values the opportunity to contribute to the NSW Freight Policy Reform consultation process. We recognise the critical importance of enhancing freight transport efficiency to bolster productivity and foster economic growth across national, state, regional, and local landscapes.

Local government in NSW is responsible for over 165,000 km of roads, including local and regional roads, placing a substantial load on councils to maintain and develop this extensive network. Adequate funding must be invested in local roads to ensure they can support growing freight demands and provide safe and reliable infrastructure for all users.

The need for collaboration among all spheres of government is paramount. By working together, we can develop and implement strategic transport solutions that address current challenges and future needs. LGNSW looks forward to continued collaboration with the NSW Government and other stakeholders to advance freight policy reform and achieve sustainable, efficient, and equitable transport outcomes for communities across NSW.

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