

# **Submission to the NSW Draft Freight and Ports Plan**

**March 2018**

## **Preamble**

Central Coast Council is an amalgamated Council that combines the legacy Local Government Areas of Gosford City and Wyong Shires. It has a total area of 1681 square kilometres. It is a collection of urban and rural areas which together are home to around 330,000 residents.

Council thanks Transport for NSW, for the opportunity to comment on issues relating to the NSW Draft Freight and Ports Plan 2018 and acknowledges its importance in support for the Transport for NSW's Future Transport 2056 Strategy.

Council recognises the importance of the overall road and rail freight network and that the delivery of an efficient transport system is fundamental to the economic prosperity of the Local Government Area of the Central Coast and the state generally.

The provision of appropriate road and rail connectivity, efficient ports, freight infrastructure and related transport, contributes to the long-term economic sustainability of all of our communities.

The Draft Plan stated aim, "A plan for moving goods in an efficient, safe and environmentally sustainable manner, providing successful outcomes for community and industry", is acknowledged and concurred with.

Central Coast Council therefore welcomes the Plan which is being developed in line with an earlier commitment of the NSW Freight and Ports Strategy 2013 to "reissue the NSW Freight and Ports Strategy in five years' time" and that strategy's achievements. The scale of the community consultation process involved in the development of the Plan, of which this submission is a part, is also acknowledged and appreciated.

## **1 Introductory Comment**

Central Coast Councils' primary interest in freight and ports comes from its responsibilities for its local and regional roads. The maintenance of the local and regional road system forms part of the Councils annual capital works program. The Central Coast Council local and regional road network covers an area of approximately 2,000 km with an annual budget of over \$70 million

Council generally plays no direct role in the provision of other forms of freight infrastructure such as rail, airport and ports.

Nonetheless, Council maintains a keen interest in these broader transport outcomes through its role in local and regional land-use planning or as a general advocate for local and regional economic development and the economic sustainability of the Local Government Area.

The importance of freight transport and ports for productivity and economic development in national, regional and local contexts is acknowledged.

The underlying concept of a well-defined and integrated NSW freight network comprising road, rail and ports, will assist all levels of government in their ongoing strategic planning, investment and infrastructure programs. The Plan also highlights the fact that improving freight efficiency in NSW needs the involvement of both public and private sectors.

## **2 Summary of Key Issues**

The provision of appropriate road connectivity, freight infrastructure and other transport forms, contributes not only to the long-term sustainability of our communities, but also provides vital access to basic goods and services for residents in remote locations or to disadvantaged groups in the Local Government Area.

We therefore reaffirm the following key issues that we feel must be addressed in the final Plan:

- For the foreseeable future, the vast majority of personal, work/business and, especially in the context of this submission, freight related transport in the Central Coast region will continue to be road-based.  
From a Local Government perspective, this largely translates to our responsibility for the maintenance of the local and regional road network.
- In developing policies regarding freight and heavy vehicle access, Councils must balance the economic benefits associated with the increased freight requirements, with the concomitant impacts on the road infrastructure, safety and amenity concerns of their local communities. Economic benefits and efficiencies to the freight and logistics industries and their customers do not automatically flow through to Councils in terms of increased revenue to address the impact of these vehicles on the road networks, without which many of these freight flows would not be possible.
- Further, Councils are involved in a range of regulatory-related administrative processes and mechanisms to determine access rights for freight vehicles, including oversized vehicles, on local and regional road networks. Local Government supports more clearly documented and streamlined assessment processes, particularly in light of changes now in operation in this policy area by the National Heavy Vehicle Regulator. Councils have limited resources, both financial and professional, to perform the often complex technical infrastructure assessment processes necessary for any route assessment task.
- Rail remains the most appropriate form of transport for mass/bulk products between State and Local Government Areas. Central Council recognises there is a need for increased use of rail to transport freight and must be explored as an alternative to road transport where practical.

In regard to passenger rail, improved rail connections between the Central Coast and Sydney CBD, and improved connections to key destinations within the Central Coast Region such as Wyong and Gosford Hospitals have been priorities identified in previous surveys. Also identified was the need for better separation of passenger and freight rail lines.

Road/Rail freight hubs, replacement of road/rail bridges and the upgrading of road/rail crossings must also remain a priority to alleviate congestion.

The Central Coast Local Government Area has a diverse range of industry supply chains. This ranges from horticultural and seasonal, perishable produce to the long distance rail freight travelling between Queensland and Sydney. All users require direct, high quality transport options.

- The location of a second Sydney Airport, in relation to increasing air freight, and its impact on Central Coast residents needs to be considered as well as the access and congestion issues related to the existing Sydney airport and nearby Port Botany freight hubs.
- Local Government has a key role in land use planning processes, ranging from strategic-level Local Environment Plan (LEP) planning processes, to approvals for industrial or retail related developments.
- Central Coast Council recognises and appreciates the specific initiatives listed in the Plan which are aimed at improving freight access and to date have benefitted this Council, including the "Bridges for the Bush" program for Higher Mass Limit constrained bridge infrastructure, the Fixing Country Roads Program and the Fixing Country Rail Program.

However, the Plan still needs to acknowledge that this Council, as with many others, has significant infrastructure funding backlogs and community impact challenges when local and regional road networks are opened up to increased numbers of heavy vehicles.

- Strategic road/transport corridors must be expanded to include key regional and local roads, especially those identified as strategic "first and last mile" connections in an integrated freight network.

### **3 Specific Comments on Priority Action Areas of the Draft Plan**

#### *Priority Action Area 1 – Strengthen freight industry and government partnerships*

Central Coast Council welcomes opportunities for industry and government to work together to harness opportunities and address challenges in order to improve freight outcomes for all stakeholders. Other areas that could potentially benefit from strengthened industry/government partnerships include road safety and amenity, "first and last mile" issues and curfews.

Relaxation of existing controls however, needs to be subject to the consideration of the impacts on adjacent sensitive residential areas, schools and hospitals, including consultation with affected communities.

#### *Priority Action Area 2 – Increase access for freight across the road and rail network*

This priority action area is supported by Central Coast Council, however any increase in freight must include an appropriate balance between economic outcomes and infrastructure impact and local community safety and amenity factors.

Expanded road/transport corridors including key regional and local roads, especially those identified as strategic "first and last mile" connections will also increase freight access.

While this priority action area may support the overall expansion of freight transport into off peak periods, local government is required to uphold the amenity of its constituency in these considerations. Adequate consultation with the affected communities is essential.

Council supports a greater use of rail transport as an alternative to road transport and better separation of passenger and freight movements on rail to enhance the ability of rail transport to take on a greater share of the freight task thus reducing the impact on its own road networks.

Of particular importance to Central Coast Council is the 0-10 Year Initiative for the Northern Sydney Freight Corridor to separate freight and passenger trains.

Further development of key port infrastructure listed in the Plan, particularly Newcastle, in the absence of adequate connecting road or rail infrastructure, is likely to have an impact on Central Coast Local Government Area, its road networks and the community generally. This must be taken into account.

#### *Priority Action Area 3 – Protect existing freight precincts and ensure sufficient future land use*

The protection of existing freight precincts and the provision of sufficient land use will be a future challenge in light of Council's other commitments to its constituents and other stakeholders.

Outcomes are likely to be intertwined with other objectives of the Plan such as improved partnerships, advances in corridor planning and new technologies. Central Coast Council appreciates the guidance offered from the state in order to make better informed decisions in regard to its own asset management and infrastructure investment priorities, especially given the limited funding currently available for these programs.

It is agreed that there is room for better integration of freight considerations into strategic land use plans and policies. Especially important is the reservation of key freight corridors and sound, balanced planning decisions relating to freight-related development.

The impact of freight activity on other land uses, such as residential areas co-located near shopping centres, requires a more effective interface management /consultation mechanism. This includes management of noise and other amenity impacts related to freight operations.

Recognition of the costs of congestion must not be limited to the freight and logistics sector, but also to other road users and should include local and regional road congestion costs.

#### *Priority Action Area 4 – Facilitate introduction of technologies that reduce freight costs and impacts.*

It is understood that technological change will have a significant impact on freight productivity. This change is encouraged and supported by Central Coast Council as is the role played by State Government in providing the expertise and leading the discussion in this regard.

#### *Priority Action Area 5 – Reduce the regulatory burden on industry.*

The introduction of the National Heavy Vehicle Regulator system is one initiative that has proven to be very effective in reducing the regulatory burden on the freight industry.

However, at the present time the transport efficiency gains and extra productivity of Higher Productivity Vehicles (HPVs) on Council's local and regional road network are not reflected in the funding made available to local government. These benefits accrue to industry as well as the State and Federal governments but have no direct financial benefit to Councils to offset increased local road costs.

*Priority Action Area 6 – Ensure safe, efficient and sustainable freight access to places.*

Outcomes delivered to date under the NSW Freight and Ports Strategy 2013 are acknowledged as having improved safety, efficiency and sustainability of freight access to places in the Central Coast region. Achievements which have benefitted Central Coast Council include the introduction of the NHVR Scheme, the establishment of the National Rail Safety Regulator and introduction of the Fixing Country Road and Rail Programs.

However, it needs to be reiterated that improving freight efficiency, does not always provide the best outcomes for local communities, because of the impact on road infrastructure and road safety/amenity perspectives.

The community impact concerns are also very relevant to the span-of-hours/curfew issue currently being advocated by some stakeholders in the freight industry.

This may also require measures to reduce the impact on community such as use of quieter vehicles, redesigned or repositioned loading docks, and changed driver work practices. Whilst it may be desirable to increase regional and local freight transport, Central Coast Council's primary task is to respect the wishes of the majority of its constituents.

#### **4. Conclusion**

Central Coast Council welcomes the initiatives contained in the NSW Draft Freight and Ports Plan and thanks Transport for NSW for the opportunity to make comment. This submission addresses those priorities identified in the Plan and their impact on the Central Coast Local Government Area.

Council recognises the importance of the overall freight task and that the delivery of an efficient road and rail transport system is fundamental to the economic prosperity of Central Coast Council and the State generally.

The provision of appropriate road and rail connectivity, efficient ports, freight infrastructure and related transport contributes to the long-term economic sustainability of all of our communities.

The efficient movement of general road and rail freight must however, include a balance between economic outcomes, infrastructure impact and local community safety and amenity factors.

A key issue for this Council as with all Councils remains the funding issue. There are presently insufficient funds available to Local Government to adequately maintain its local and regional road network. There currently exists a considerable backlog of outstanding renewal works that is currently being addressed with an annual renewal budget of \$27 million for council's local and regional roads. Increased freight movements without a corresponding mechanism to increase state and federal grants will only exacerbate this situation and could reduce the effectiveness of the Plan.