



Action for Public Transport (N.S.W.) Inc.

Freight Branch team,
Transport for New South Wales,
Parramatta.

Submitted via website: <https://www.haveyoursay.nsw.gov.au/freight-policy-reform-program>

Dear team,

Freight Policy Reform Program

Submission on September 2024 directions paper

Introduction

Action for Public Transport (NSW) Inc. is a transport advocacy group which has been active in Sydney since 1974. We promote the interests of beneficiaries of public transport - passengers and the wider community alike. The community also benefits from carrying freight on trains where appropriate.

This submission relates to the Freight Policy Reform Interim Directions paper available at https://www.transport.nsw.gov.au/system/files/media/documents/2024/freight-policy-reform-interim-directions-sept-2024_0.pdf.

Discussion

The Interim Directions Report acknowledges that freight is expected to grow. The road freight task has seen appreciable growth, with this in part due to improvements on roads and concessions made to allow larger trucks carrying heavier loads.

We can see little evidence of an intention to put rail freight on an equal footing with trucks on roads. Indeed, a new set of support pillars of road freight issued a few days ago - see [NSW Heavy Vehicle Access Policy: Safe, sustainable and productive road freight](#) dated September 2024.

No comparable policy for rail freight has been released recently. Rather, many quite affordable actions to make rail freight more efficient have remained not done for decades, such as connecting the Minto intermodal facility directly with the freight track that passes within 25 metres of the facility's boundary.

Just outside Sydney, construction of the Hexham road bypass powers ahead while work on the Hunter Valley rail freight bypass is yet to really start. Further north, the Coffs Harbour road bypass, including a road tunnel, is progressing well.

To the south, the rail track between Menangle and Mittagong has never received the straightening that would help rail freight compete with road between Sydney and Melbourne. The Maldon Dombarton rail link, which was raised in many submissions last autumn to the Review Panel, does not even rate a mention in the Interim

Directions Report.

The need for this rail link to be completed has grown in recent years, as shown by problems with the existing South Coast line being closed following severe rain events in 2022 and 2024 and underlined by the impending opening of the new Western Sydney International Airport.

In Sydney, getting more containers that move to and from Port Botany onto rail is mentioned in the Directions report. However, there is no mention of the former target of 28 per cent of such containers onto rail. Some submissions last autumn to the Panel raised the desirability of a payment to get more containers on rail, similar to that which applies at the Port of Fremantle in Western Australia, or the Mode Shift Incentive Scheme that works well in Victoria. Yet there is no mention of this in the Interim Directions report.

The thinking that road freight is good whilst rail freight is something else seems to have captured the authors of the latest Directions report. Figure 10.1 reproduces a diagram highlighting benefits resulting from using PBS (performance-based standards). There is no hint of the **greater** benefits that would be realised by removing freight from some road vehicles and putting it on rail.

These benefits are extensive and include

- improved road safety
- lower road maintenance costs and reduced pressure for road upgrades
- lower road congestion
- less air pollution
- appreciably less emissions (as rail freight is generally three times more energy efficient than road freight).

The Interim Directions Report does recognise external costs but unfortunately does not estimate such costs for road and rail freight nor does it distinguish between externalities in urban versus non-urban areas.

Recommendations

1. That the Panel provide a draft policy "Safe, Sustainable and Productive Rail Freight" for implementation by the NSW Government.

This should be supported by tabulation and quantification of the benefits of removing freight from some heavy trucks and putting it on rail.

2. That the final report should at the very least acknowledge a case for a Mode Shift Incentive Scheme to lift rail's share of containers moving to and from Port Botany.
3. That the final report should at the very least acknowledge a case for completion of the Maldon Dombarton rail link
4. That a new section should be added to the final report estimating and comparing external costs of rail and road freight in urban and rural areas.
5. That the final report canvass creation of a specialised body to promote the development of rail freight. The body's duties would include seeking opportunities to re-align major rail corridors and seeking opportunities to promote rail freight development at multiple rural centres.

