

Cowra Council Submission on Transport for NSW (TfNSW) 'Freight Policy Reforms Interim Directions' (September 2024)

Thank you for the opportunity to provide feedback on the TfNSW 'Freight Policy Reforms Interim Directions' (September 2024) (hereafter referred to as 'The Directions').

Road

2.3.1.6. Council supports TfNSW finalising the automated National Service Levels Standards for NSW road categorisation, including the categorisation of local roads.

Noting that Council expects the service level standards for:

- 'Primary Road Category' 'Significant Places' will result in recognition that town centres such as Cowra will need to be included in TfNSW strategic planning for bypass by freight traffic;
- 'Primary Road Category' 'Connector Roads' will indicate Local Government owned connector roads have geometric restrictions and structurally deficient pavements that are unsuitable for the types of PBS heavy vehicles proposed in the NSW Heavy Vehicle Access Policy; without a significant external capital upgrade funding investment (also refer 10.4.1 below).

2.3.3.4. Council supports the use of telemetry data to support planning investment and management; with a focus on demonstrating the volume and type of heavy vehicles on Council's regional and local road network. This data has benefits in assigning the correct 'Primary Road Category' and will assist with the 'Interim Directions' stated intention of reviewing local Government road funding providing a more reliable and regular funding stream (refer 7.7.2.2.)

7.7.7.2 Council supports the proposed direction *'NSW Government should review local government funding programs as a package to identify opportunities to support ongoing maintenance activities with a more reliable and regular funding source than project-based grant funding. Grant funding should also be identified as an opportunity for delivery of freight outcomes including improved safety, sustainability and productivity.'*

10.4.1. Appendix B of the NSW Heavy Vehicle Access Policy proposes increasing maximum length of PBS vehicles from 30m to a maximum of 60m including on the local road network. Section 10.2 of The Directions recognises the need for 'infrastructure upgrades, including improved bridges, level crossings, rest areas, decoupling zones and overtaking lanes.' These upgrades on local roads cannot be funded by local government and require a significant external funding investment.

Rail

3.8.1.5. Council supports the immediate action to *'Complete the economic and choice analysis component of the joint study with Queensland and Victoria that focuses at a strategic east coast level on the export grain haulage task. If this is not proceeding expeditiously, complete the analysis for NSW with industry consultation so that grain can be moved efficiently using whatever mode leads to this outcome.'*

Noting that section '6.1 Key areas of vulnerability' states *'The Main West Line was rated 'high risk' in terms of resilience and of highest concern – related largely to the lack of alternative freight routes if unavailable (particularly for mining commodities which cannot easily be redirected to road).'*

Council's submission toward the immediate actioned 'economic and choice' analysis would request a review of the NSW Government 'Cowra Lines Feasibility Study'. This study completed a Benefit Cost

Analysis of 'Option 2 Re-instate Blayney to Demondrille at 25 TAL, 80kph' without recognition of the economic benefits of the use of this line to provide rail network resilience in the event of unavailability of the Main West Line.

Should you require any clarifications or further information please contact Council's Director Infrastructure and Operations Dirk Wymer.

Dirk Wymer
Director - Infrastructure and Operations

[REDACTED]
[REDACTED]
[REDACTED]