



NATIONAL ROAD TRANSPORT ASSOCIATION

**Submission to GHD Advisory on behalf of the Department of Infrastructure,
Regional Development and Cities**

The Princes Highway Corridor Strategy Issues Paper

12 April 2019

Introduction

1. The National Road Transport Association (NatRoad) is pleased to make comments on the Issues Paper entitled *Princes Highway Corridor Strategy*¹ developed by GHD Advisory (GHD) for the Department of Infrastructure, Regional Development and Cities (DIRDC).
2. NatRoad is Australia's largest national representative road freight transport operators' association. NatRoad represents road freight operators, from owner-drivers to large fleet operators, general freight, road trains, livestock, tippers, car carriers, as well as tankers and refrigerated freight operators.

The Context: Broad Policy Considerations

3. The Australian Government is working with the New South Wales (NSW), Victorian (VIC) and South Australian (SA) governments to deliver a Princes Highway Corridor Strategy (Strategy).
4. The objectives of the Strategy are:
 - Promoting better access and connectivity to and along the corridor
 - Improving safety and providing efficient driving conditions along the length of the corridor
 - Activating the corridor as a means to drive better regional development and industry performance
 - Promoting more efficient and environmentally sustainable use of the corridor
 - Supporting corridor investments which are value adding, well-informed and linked together as part of an overarching vision for the corridor.²
5. As identified by the National Transport Commission (NTC)³, the main interstate road freight networks are the
 - Hume Highway (between Sydney and Melbourne)
 - Pacific Highway (Sydney–Brisbane)
 - Newell Highway (Melbourne–Brisbane).
6. We are aware that a corridor strategy is in the course of preparation for the Newell Highway.
7. The Princes Highway is noted by the NTC to be a key urban and regional freight route for NSW.⁴ The NSW government has committed to provide funding for key regional highways thus:

The NSW Government will also continue to provide funding under the Regional Road Freight Corridor Fund to upgrade key regional highways, ensuring that investment targets freight productivity upgrades on key east-west routes linking the National Land Transport Network

¹ https://infrastructure.gov.au/roads/princes-highway/files/Princes_Highway_Corridor_Strategy-Issues_Paper_rev02.pdf

² Id at page6

³ [https://www.ntc.gov.au/Media/Reports/\(D62E6EFC-36C7-48B1-66A7-DDEF3B04CCA\).pdf](https://www.ntc.gov.au/Media/Reports/(D62E6EFC-36C7-48B1-66A7-DDEF3B04CCA).pdf) at p59

⁴ Id at page 129

*via a top-down strategic approach, supported by completed corridor strategies and business cases.*⁵

8. NatRoad supports greater levels of research and data gathering about a large number of the issues the road transport industry faces. Good policy development depends on evidence-based decision making. A large amount of information is already collected by various government agencies and by industry. But it is fragmented and inconsistent which makes it difficult to provide a complete picture of supply chain performance and to compare the performance over a time series. This difficulty transfers to data and analysis of a particular road corridor, as in the current instance. The integration of corridor strategies and the way that issues identified in a particular corridor should be explored against a holistic approach to the industry's priorities is vital.
9. There is an urgent need to ensure better quality information is available to underpin government and industry decision-making for the freight sector, as identified in the federal Government's *Inquiry into the National Freight and Supply Chain Priorities* (the Priorities Report):⁶

*Supply chain activity and performance must be measured to monitor domestic and global competitiveness over time and identify areas where action is required to maintain and improve productivity. A national approach to data consistency across jurisdictions is essential. Performance data should inform the need for capital expenditure and maintenance, regulatory and governance reform, and measuring progress, including implementation of the National Strategy.*⁷

10. We are unsure why the Government has chosen the Princes Highway for the development of a specific strategy when there is no overall integrated freight related strategy for essential road corridors, a matter we believe could be part of the Action Plan arising from the Priorities Report.
11. An Action Plan arising from Priorities Report should see the freight task given the highest possible priority across Australia's road networks. Similarly, the efficient and safe movement of freight should be given the highest possible priority in the current context. As DIRDC itself notes:

*The freight and logistics industry is an essential component of the national economy, where the sector accounts for approximately 8.6 per cent of GDP. An efficient, sustainable and cost-effective freight and logistics industry enabled through partnerships with all levels of government supports Australia's growing economy and quality of life aspirations.*⁸

12. The Priorities Report is useful in indicating that the current corridor strategy confronts competing values, a matter that arises from looking at varying stakeholder ideas in the way adopted in the Issues Paper:

⁵ NSW Freight and Ports Plan 2018-2023

<https://future.transport.nsw.gov.au/sites/default/files/media/documents/2018/TNSW%20Freight%20and%20Ports%20Plan%202018-2023.pdf> page 57

⁶ All Cttee documents including the Report are available at this website

<https://infrastructure.gov.au/transport/freight/freight-supply-chain-priorities/index.aspx>

⁷ Report https://infrastructure.gov.au/transport/freight/freight-supply-chain-priorities/files/Inquiry_Report.pdf at p7

⁸ <https://infrastructure.gov.au/transport/freight/index.aspx>

Planners in Australia are challenged by the need to find a balance between creating opportunities for people to live in areas with good access to services and jobs, and the job creation and national wealth aspects of freight terminals and the facilities and corridors that support them. This balance between community amenity and employment and commercial uses is difficult to achieve to everyone's satisfaction.⁹

13. The Expert Panel that oversaw the Priorities Report preparation, in summary recommended the following, all relevant to the development of a corridor strategy and all directed at making the freight task safer and more efficient:

- the streamlining and review of permit approvals, with the aim of reducing the approval period on key freight routes to 24 hours;
- improving road access and targeting investment to key freight routes and last mile access;
- the expansion of infrastructure investment programs to improve road access for high productivity and oversize/overmass vehicles;
- the reinvestment of road charges revenue to road infrastructure investments;
- better consideration of freight in urban and land use planning; and
- improving infrastructure for regional supply chains, including sealing roads and providing mobile phone coverage and broadband.

14. These aims are at the centre of NatRoad's reform agenda and shape the perspective that we bring to bear in addressing the Issues Paper. We acknowledge the importance of community engagement to assist in shaping the Highway strategy. But the member feedback we have received is that the length and differing standards of road quality along the length of the Highway will make it difficult to apply a strategy that integrates the diverse needs of all stakeholders.

Safety

15. In the Issues Paper key issues have been considered against the five project objectives and have been identified as safety, access and connectivity, efficiency and sustainability, investment and vision, and corridor activation.

16. Each of these areas is then listed with a number of issues in a tabular form presented with related comments. We do not find this approach helpful. None of the issues is set against objective data that could indicate whether the stakeholder material gathered and reflected in the tables is reflected in objective analysis that reinforces or detracts from the comments set out. In turn, none of the points made is referenced to the literature that has been reviewed which the Issues Paper states has been examined¹⁰ but has not been referenced.

17. By way of example, the following issue with a related comment is made:

“Frequent run off road crashes in rural areas • Analysis of crash data suggests run off crashes are the most common crash type along the Princes Highway, particularly in rural areas.”¹¹

18. This statement and comment raise many issues that need to be explored. What crash data was analysed over what period? How was it sourced and isolated to the various sections of the Princes Highway? What variability was there between urban and rural sections of the Highway? What was it about the data that “suggested” run off crashes are “the most

⁹ Note 7 at pages 38-39

¹⁰ Above note 1 at page 3

¹¹ Above note 1 Issue 5 at page 10

common?” How was the test of “the most common” determined? If the “crashes” were run-off does that assume they were single vehicle incident run-offs or did the analysis take into account run-offs to avoid collisions? Western Australia has a Regional Run-Off Crashes program.¹² The program identifies regional roads with an above average single vehicle run-off road crash risk and prioritises these roads for safety treatments. It would be instructive therefore to determine if the rates along certain parts of the Highway are equivalent and to have data which could measure the extent of the issue as worthy of a similar investment approach. Only with that type of analysis can strategy be properly advanced.

19. Following the points made in the Issues Paper set out in paragraph 17 of this submission, there are two further dot points that in effect articulate the treatments that assist to ameliorate run-off crashes:

- The increased use of Audio Tactile Edge Line should be considered in sections with a high incidence of fatigue and run off road type crashes (including where roadside hazards exist).
- Median treatment and roadside barriers may also be considered along specific sections of road, where appropriate.

20. We are not sure that this is helpful without being made far more specific. We submit that a great deal of further work needs to be done so that the individual issues presented under each heading are given priority and data that substantiates a particular position or otherwise is cited.

21. The perspective set out in the last paragraph is reinforced when Issue 2 relating to bridges is considered. The following is said:

“Bridge condition, alignment and width causing safety issues • Bridge geometry leading to safety issues (e.g. Lane width) • Any bridge upgrades, renewal and replacement should align with long term planning.”¹³

22. We draw your attention to the Bridges Renewal Program. The aim of the federal Bridges Renewal Program is to upgrade and repair bridges to facilitate higher productivity vehicle access on freight corridors and enhance access for local communities. This aim is supported by NatRoad because bridges are the linchpins of the road system; they are crucial infrastructure. Limitations on access in local government areas is a major issue, with bridges being cited as the major impediment to heavy vehicles being permitted to move in those areas. Under the Program, the Australian Government will provide \$275 million from 2015-16 to 2018-19, \$85million in 2019-20 and \$60 million per year from 2020-21 onwards.¹⁴ The allocation of monies into the future should be based on a comprehensive assessment of the state of bridge repair throughout the country.

23. Given the importance of this issue, surely it is necessary when isolating issues for a corridor strategy to assess the number of bridges along the corridor, with a related assessment of their age and condition? That will also assist to, for example, enable local governments along the corridor to assess whether they are eligible to obtain funding under the Bridges Renewal Program.

¹² <https://www.mainroads.wa.gov.au/OurRoads/RoadSafety/Pages/regional-run-off-program.aspx>

¹³ Above note 1 at page 9

¹⁴ Cth of Australia Inquiry into National Freight and Supply Chain Priorities *Supporting Paper No 5*

24. We refer to the other safety issue that requires research and which is an issue throughout Australia. Issue 10 under safety with the first related dot point says:

“Driver fatigue safety considerations • Distance spacing of rest stops.”¹⁵

25. This issue again requires research and background before it can be properly responded to. How many rest stops are there at what intervals along the highway? What is their condition? Are they suitable for heavy vehicles? Do the towns off the Highway offer rest facilities? If so where are they in relation to other rest stops? What is the fluctuation in their use between seasons and diurnally? How many of the rest stops are suitable for heavy vehicles having regard to, say, the most recent Austroads’ guidelines?¹⁶

26. These three issues under the heading Safety have been chosen to highlight the way that NatRoad believes the corridor strategy should be progressed: much more research and detail about issues is needed before we can give meaningful feedback on the issues of most importance to members. The balance of the submission highlights similar matters in the other subject headings.

Access and Connectivity

27. As is evident from the material set out earlier in this submission, this subject is of great importance in adding to the efficient freight task.

28. Issues 28 and 29 are most pertinent:

“Access constraints for larger freight vehicle combinations such as B doubles • Network continuity between sections of the corridor for larger freight combinations (e.g. B-doubles/triple road trains) • Freight transport cost savings if corridor was B-double accessible along entire length • Vehicles are currently restricted due to bridge capacity constraints • Consideration of 1st and last mile road restrictions

Access constraints for overmass/overdimensional loads • Overmass/overdimensional payloads are restricted due to bridge constraints • Bridge strengthening – sections may not be up to standard for larger combinations • May impact movement of larger farm machinery and wind farm components.”¹⁷

29. The first point relates back to the matters earlier raised about bridges. The Issues highlighted in the prior discussion emphasise the need for some objective assessment of bridges and their capacities. In addition, anecdotally, NatRoad has been informed that a very large number of access permits are sought and obtained for sections of the Princes Highway, permits that allow access otherwise not available because of the nature of the heavy vehicle. It is vital that a corridor strategy verify this feedback objectively, setting out the number of local government areas along the corridor, the extent of permits obtained or not obtained for various sections of the Highway in respect of common heavy vehicle combinations (e.g. B doubles), the time taken to approve or reject permits and the main reason for that rejection.

Efficiency and Sustainability

30. NatRoad notes that in the introductory words to the Issues list in this subject area, it is said “gaps in heavy vehicle approved routes are apparent.” These should be detailed so that where

¹⁵ Above note 1 page 10

¹⁶ <https://austroads.com.au/latest-news/new-guidelines-for-the-provision-of-heavy-vehicle-rest-areas>

¹⁷ Above note 1 at p13

those gaps arise (independently of or inclusive of bridge issues) they are clearly identified. How the conclusion articulated is substantiated is important. How has this become apparent?

31. Issue 31 with related comments is as follows:

“Transport efficiency gains along HPFV/PBS/HML approved routes • Incorporate major freight routes into long term planning • Provision of additional HPFV/PBS/HML approved routes provides transport efficiency opportunities • Targeted bridge/road upgrades on road sections required.”¹⁸

32. Again, these are indeed issues that vitally affect the heavy vehicle industry but a time frame within which the road system could accommodate a change, the required infrastructure upgrade and the potential costs are missing from the Issues Paper. Without such detail, the mere listing of issues is not helpful.

33. Clarification is sought in relation to Issue 38 under this heading. This identifies that freight bottlenecks through key towns and cities exist. One of the dot points against this issue is “conflict with other key freight routes.” We are unsure of the point being made. Does this mean that freight should be transferred to those other routes (which ones?) to stop the bottlenecks? Or does it mean something else such as conflict with potential rail movements? If the latter an assessment will need to be made of the contestability of road versus rail freight i.e. what freight is possible to substitute from road to rail and at what cost?

34. Item 43 is “current and future industry impacts on corridor.” Growth in the freight task is mentioned as an issue. The proper assessment of this issue needs an estimate or a measurement of some kind as a baseline so that growth along the corridor or to particular spots along the corridor can be assessed and its impacts measured using data that is objectively formulated.

Investment and vision

35. The Issues of relevance here also require measurement. The item, for example, of funding of major road infrastructure projects needs to have attached the current funding levels, a plan for the relevant upgrades to meet the vision for a road of “national significance” (one of the other issues identified) and the estimated monies that would need to be spent to achieve this aim.

36. Issue 57 is the “reduction in freight transport related regulatory barriers.” The listing of this issue is considered appropriate but reinforces the comments that we made at the beginning of this submission: many of the issues must be viewed against the context of a national action plan that arises from the Priorities Report and the strategy which is created should reflect the aims set out in the Priorities Report.

Corridor Activation (regional development)

37. The item Issue 62 “Impacts of future road linkages” is correctly identified as an issue. But the fact is that those road linkages will largely follow the other issues that are noted in the comments, that is the development of industries and the associated local employment that will be created. The strategy that follows must identify the potential of those industries for the concomitant identification of additional road and related infrastructure to support the expected growth.

¹⁸ Id at p 14

Conclusion

38. NatRoad looks forward to the development of a draft strategy which we would be happy to comment on.