

## **Submission to Victoria Freight Plan Update**

### **Introduction**

SEATS (South East Australia Transport Strategy) provides highly co-ordinated and influential advocacy for the development of transport infrastructure in the South East Australian region that supports sustainable economic development and the prosperity of its constituents.

SEATS formed in the mid 1990s, is an alliance of Local Government and other Government agencies together with industry that is concerned about the state of the freight transport network across south eastern Australia, including Victoria, ACT and New South Wales. The organisation meets quarterly, has a paid secretariat and evaluates projects across all forms of transport that its membership has prioritised as worthy of Government and operator support.

Some projects have commenced either in a planning or construction phase. Some projects extend into New South Wales as well as the ACT. It is pointed out that much of the freight concerned is not destined for metropolitan markets but from manufacturing node to manufacturing node or to port facilities for export.

### **Preamble**

SEATS has been active for almost three decades now, but it would be fair to say that during the period when the Victorian Transport Plan was developed, SEATS did not engage as well as it should have but rather left its advocacy in the hands of the individual membership Councils.

Now realising that this was an inappropriate focus, especially on the higher order issues, SEATS now wishes to become engaged as a more active stakeholder in the 2024 review.

### **Context**

The SEATS region consists of several regional production areas. The Illawarra-Shoalhaven is industrialised with steel manufacture, production of chemicals and nutraceuticals, food products, building products, the NSW southern tablelands has strong agricultural production, quarry supplies and timber processing. Out of Victoria's Gippsland comes a range of agricultural produce, predominantly horticulture, requiring key freight and transport connections into both Sydney and Melbourne.

The region has significant quantities of inbound and outbound freight, with freight travelling through Port Melbourne, Port Eden and Port Kembla dominating national export movement out of the region. The movement of freight to and from the region relies on existing road and rail networks. Key freight corridors that enable the movement of freight into and out of Gippsland include the Princes Highway and Monaro Highway corridors and the Bass Highway/South Gippsland Highway corridor as well as the Gippsland rail line.

The continuous improvement of the Princes Highway corridor in recent years is of vital interest to SEATS as it contributes to the integrated approach that governments are taking across the transport network to better link ports with key freight precincts as well as key domestic distribution centres. The goal is to help create sustainable communities by providing a reliable and safe road network to access high value employment and social amenity.

## **The Proposal**

SEATS recognises that Victoria's new freight plan is a state-wide plan for what needs to be done to support industries involved in the movement of goods. It builds on the government's work of the last decade in a way that enhances Victoria's economic prosperity and liveability.

The Plan sets out short, medium and long-term priorities and actions to support the State's freight and logistics system through this period of unprecedented growth and rapid change in the broader environment, while allowing government and industry to embrace new opportunities in the future.

It is understood that the Victorian Freight Plan, released in 2018/2019 is currently seeking input on the updating of the Victorian Freight Plan. Freight Victoria

Freight Victoria has been engaging with industry to better understand key issues, identify priorities for action, and discuss how it should measure success.

Updating the Plan will position the freight sector to meet Victoria's future challenges and provide the state with a clear and productive roadmap for Victoria's freight system.

SEATS is wishing to make input into the review and feels that its position across south eastern Australia places it with this helicopter view of the freight logistic chains.

SEATS also wishes to be an engaged stakeholder in this process moving forward.

## **SEATS Contribution**

SEATS applauds the fact that Freight Victoria is focusing on five key priorities, and that all actions relate to delivering outcomes which are consistent with:

1. **Planning and protecting current and future freight corridors and places;**
2. **Reducing the impact of congestion on supply chain costs and urban communities;**
3. **Using our rail freight assets better;**
4. **Planning for Victoria's future port capacity; and**
5. Staying ahead of the technology curve.

Note: the following network improvements have tried to be linked by colour coding, where possible, with the above priorities.

SEATS has developed a [SEATS Priority Project Strategic Statement - 2024](#) for its region and advocates these freight network advancements to Governments, MPs, Councils and Industry.

For Victoria these priorities relate to:

#### AIR

- Access for regional airlines to Sydney Airport.
  - The Australian Government is currently review the policies

#### RAIL

- Undertake the necessary works to deliver the outcomes of Victoria's Regional Network Development Plan to enable:
  - Passenger rail services between Traralgon and Melbourne of 20 min in peak times and 40 min off peak with additional trains beyond Traralgon to Bairnsdale
  - Freight services to utilise the Gippsland rail line efficiently between Bairnsdale and Melbourne by ensuring sufficient passing loops exist to provide schedules/pathways

#### ROAD

- Princes Highway (NSW & Vic)
  - Completion of the duplication of the Princes Highway from Traralgon to Sale by the scheduled completion date of mid 2024
  - Continue the delivery of the Princes Highway upgrade program through the Gippsland region, including the Sale Alternate Truck Route moving to construction asap
- Emerging transport freight issues needing to be addressed in Victoria
  - To enable resolution of the Traralgon bypass alignment, this very important project for Gippsland, requires every effort to be made across all Victorian Government Departments involved to determine a way forward as soon as possible through the Latrobe Valley Mine Rehabilitation Plan.
  - Transport infrastructure planning within Baw Baw Shire is important to this peri-urban area under the Victorian Government's Metropolitan Planning Strategy "Plan Melbourne 2017 2050". SEATS asks that the planning and development funding be allocated to ensure future options are not built out with incremental development.
  - Early planning and design for the PH through Bairnsdale, including across the Mitchell River to the eastern and northern town limits, incorporating improved traffic management practices at the PH/Great Alpine Rd intersection, are required to set the agenda for the future duplication of the Princes Highway from Sale to and through Bairnsdale

- Continuous improvements to the following corridors in liaison with Local Government to identify local projects to enhance safety and improve productivity for delivering the freight task
  - Bass & South Gippsland Highways – including access to the Gippsland Coast Offshore Wind Energy Zone support facilities
  - Realignment of sections of the Monaro Hwy from Cann River to NSW border

## SEA

- Seaport Access (Vic)
  - Ensure PBS compliant road access into Port Hastings and Port Melbourne from National Hwy grid is available
  - Ensure freight rail access to export sea ports

In the 2025 edition of the SEATS Priority Project Strategic Statement the following Victorian related projects will emerge more clearly:

- Latrobe Valley Mine Rehabilitation Plan determination in October 2025
  - Requires 2025/26 Vic budget (\$5-10m) to determine scope, corridor definition and cost estimates for the Traralgon bypass construction over say 6-9 financial years
  - In 2027/28 Vic Govt approach Aust Govt for 50% funding for construction phases
    - This is essential to allow Phase 1 construction to follow asap after 2027/28 for, say, \$50m (Vic & Aust Govts) for early prelim works.
- TRARALGON WEST - Pakenham to Longwarry (includes links into emerging employment precincts that support new residential growth in Baw Baw & Cardinia)
  - Time savings for freight
    - Time sensitive quality fresh food & produce
  - Liveability & Housing considerations
    - Local employment precincts
  - Significant part of Victoria's urban growth
  - Haulage routes using existing roads supporting metro infrastructure construction require offset from metro growth budgets
- TRARALGON EAST
  - Sale Alternate Truck Route – acceleration of components
    - Construct funded components:
      - Bridge strengthening
      - Roundabout(s)
  - Princes Highway upgrade continuation - including paths through Bairnsdale
    - Includes addressing eastern approach to Bairnsdale (existing bridge & roundabout)

- Continue progressive upgrades of linkages to NSW and Port of Eden (Edrom)
  - Rolling program to improve safety & overtaking opportunities:
    - Princes Highway
    - Monaro Highway
- HEAVY VEHICLE SPECIFIC ROUTES
  - Leongatha HV Alternate Route (Stage 2)
  - Bridge strengthening required on highways and major roads
    - Undertake bridge strengthening as a rolling program over, say 10 years
    - HVs are becoming larger (and heavier) configurations
  - Emerging issues with renewables – North/South link addressing needs of Offshore Renewable Infrastructure requirements (roads & transmission)
  - Gippsland linkages to freight assembly point(s) for Melbourne Port (road & rail) – suggested to be at Lynbrook
  - Southern Gippsland – new extractive industries required
    - Needed to allow Melbourne’s urban & employment growth
    - Haulage routes using existing roads requiring maintenance offset from metro growth budgets
- SUPPORTING POPULATION GROWTH & EMPLOYMENT
  - Warragul-Drouin
  - Wonthaggi
  - Traralgon
  - Sale
  - Bairnsdale

### **Additional General Comments for submissions:**

The Princes Highway through eastern Victoria is a nationally significant east-west freight route connecting Metropolitan Melbourne to New South Wales and the Australian Capital Territory. It is part of the Principal Freight Network (PFN) with freight volumes set to double by 2050.

The Princes Highway is the main transport ‘spine’ of Gippsland, supporting key regional industries and the major regional centre of Latrobe Valley as well as Warragul, Sale and Bairnsdale. Efficient freight connections along the corridor are essential for the movement of building materials, fresh and processed food, timber and the movement into Gippsland of manufactured consumer goods, stock feed, and capital equipment and spare parts for the coal and growing renewable energy industry.

The section of the existing M1 route between Pakenham Bypass and Longwarry, is not access controlled. This section of highway has experienced higher than average crash rates. With traffic volumes on the Princes Highway increasing due to population growth and intensification of primary industry, the remaining uncontrolled access points may pose an unacceptable safety risk. Princes

Highway Nar Nar Goon to Longwarry 80km zones have been implemented due to treatment required at intersections. Combined issue for Gippsland and Southeast metro region. Problem is related to population growth and is impacting freight productivity. **This impact is significant for freight operators managing times, number of trips and fatigue management.**

The Longwarry to Pakenham section of the Princes Highway is the major gateway to Gippsland and Baw Baw Shire. The peri-urban area, Warragul Drouin is experiencing significant growth in population. In 2021 the combined population of Warragul-Drouin was 35,348. This is set to increase by 68%, or 24,035 people, by 2041. This makes it one of the fastest growing peri-urban areas in regional Victoria. It is the centre of business activity in West Gippsland however, relatively high number of residents live locally and commute to work in metropolitan Melbourne. A high percentage of peri-urban residents who commute to the city use private vehicles **This high urban growth rate is associated with an increase in land use development and transport demand.**

Baw Baw Shire is a major economic contributor to the Victorian livestock, extractive resources, and agricultural produce industries. Construction and manufacturing have the highest economic output. The region supports 20,670 jobs and has an annual economic output of \$6.275 billion.

Warragul and Drouin are two distinct, but closely located, towns in Baw Baw Shire, 100km east of Melbourne. Together, the towns are described as a combined regional centre due to the proximity of the centres and similar rates of population growth. They form the centre of business activity in West Gippsland.

Arterial roads from north or south of Baw Baw currently require all traffic to travel through Warragul and Drouin town centres to access the highway. The resultant traffic congestion on both arterial and local road connections is adversely affecting freight efficiency in and around Warragul-Drouin. It is also impacting local amenity and the vitality of the commercial precincts.

The completion of the Mine Rehabilitation Plan for the Latrobe Valley is critical to the next stages of work on the upgrade of the Princes Highway and other infrastructure that will enhance the PH Corridor around Traralgon and the Latrobe Valley Regional Rehabilitation precinct and make connections for continuation of the Upgrade Program into the eastern outskirts of Melbourne.

It will also set the scenario for integrating the residential and employment precincts within Latrobe City, Baw Baw Shire and Cardinia Shire into this markedly improved transportation network.

SEATS has been concerned for some time on the “missing links” in the Princes Highway corridor and the Gippsland rail line.

SEATS strongly supports that the MLRA works diligently in securing the approvals to arrive at a Latrobe Valley Regional Rehabilitation Strategy and that



within that strategy the buffer areas set aside for rehabilitation and subsidence issues around the minesites are resolved to allow detailed planning for the residential expansion areas, other appropriate zonings and transport/services corridors.

#### Higher Productivity Vehicles and related issues

The use of the higher productivity vehicles is clearly the way of the future to allow industry to improve freight productivity. This agenda is being driven by the Australian Government and the haulage industry.

Herein lies a dilemma! Three considerations are mentioned below.

A major issue is that to design and construct a road fit for purpose for these vehicles, the mountain passes that we have today, would probably not be built in their current form or location. This legacy is now working against the nation, and maintenance agencies, as the knowledge about the continual day to day use and the extreme weather events are creating circumstances that cannot satisfy today's demanding requirements.

Another issue is management of driver fatigue which is driving the provision of HV Rest Areas as an essential safety feature for long and medium haul routes. SEATS strongly agrees that provision of HV Rest Areas is inadequate on the Monaro and Princes Highways in this regard. Further, HV Rest Areas need to be considered and made available for HVs travelling in either direction with safe ingress and egress points.

The issues of first/last mile access is more than just suiting the environment and planning guidelines. Buffers which allow expansion of the access corridor to allow the movement of higher productivity HVs, queuing lanes at intersections etc need to be allowed when these corridors are planned and built. A 20m wide easement will not cut it for an industrial intersection any more!

SEATS requests that the Vic Govt needs to retain a rolling program of bridge upgrades on major freight routes to bring the network up to PBS standards where appropriate. This may not be practical in all circumstances. All new bridges on a known or anticipated freight routes should be designed to suit all HPFV configurations.

SEATS is also concerned that there are some sections of roads across Melbourne that are HML non compliant and this corridor is critical to the economic development of Victoria. SEATS is sure that the Government is aware of this issue, but what strategies are in place to overcome this for freight productivity purposes:

- Missing pieces of the east/west freight corridor across Melbourne are critical for Victoria's economic development but do not meet HPFV standard
- Westgate Tunnel –The Westgate Tunnel isn't on the NHVR mapping tool as yet, however it is understood that its viaduct won't be able to carry HPFV and that there may not be intention to upgrade it.

SEATS would argue that in advocating for roads and bridges in Gippsland to be uplifted to HPFV capacity over time, it is also vital to ensure connective links within and across Melbourne are similarly uplifted.

As pointed out SEATS is aware that some of the Higher Productivity Freight Vehicle (HPFV) routes are incomplete, and certainly Freight Victoria is aware of the limitations across Melbourne. HPFV vehicles all fall under the Performance Based Standards (PBS) method of classification which is the more progressive methodology and the gold standard to which agencies and operators are aspiring to achieve across the nation. It is possible to have a B-double classified under PBS but the vehicle itself is technologically more advanced and will have a higher volume so increased productivity.

In regions like Gippsland, the main freight networks are compliant for HML vehicles, so it becomes frustrating when sections need to be detoured around.

In Gippsland one of the biggest hurdles to full coverage for HPFV is load-limited bridges. The funding secured for the region in the last budget was to upgrade 7 bridges between Traralgon and Drouin to HPFV capacity. A rolling program is required to continue to address this.

### Climate Change

The coastal aspects of the Great Dividing Range on the south east coast of Australia are playing a part in the effects of Climate Change. This is particularly evident on the South Coast of NSW and Victoria's Gippsland and the interplay with the East Coast Low weather patterns. The incidence of road closures is increasing due to flooding (and land slips).

2022 was an exceptional year for intense storms and the consequences. Apart from extinguishing the Black Summer Bush fires that started in 2020 that ravaged north Gippsland and south east NSW, the damage and devastation left on major, and minor, roads that crossed the Great Dividing Range are still being repaired in 2024 with several years yet to resolve the current land slippages. Most mountain passes fall into this category and repeat incidences are most likely, disrupting freight and commercial activities.

East Coast Lows (ECL) are intense "low" pressure systems which occur, on average, several times each year off the eastern coast of Australia, in particular southern Queensland, NSW and eastern Victoria.



These ECLs have brought about a new dimension to the escarpment issue. At some points during 2022 closures and restrictions on the various mountain passes placed imposts on hauliers and industry, including tradesmen.

Strategically, this submission has concentrated on freight movement around major freight generators that are seeking to utilise the most productive and efficient modes of transport to move raw, semi-processed and finished goods around the state, nation and globe.

The freight supply chain has a different dynamic from distribution warehouses to the point of sale. The logistics for this part of the supply chain are more pragmatic in meeting delivery schedules over shorter haulage distances. The vehicles used are more suited to the delivery or receipt dockages and local road conditions.

As distribution forwarders want to move to more productive vehicles, road assets dictate otherwise to find suitable solutions. As mentioned above, the first/last mile is more than suiting the environment and planning guidelines. Buffers which allow expansion of the access corridor to allow the movement of higher productivity HVs, queuing lanes at intersections etc need to be allowed when these corridors are planned and built. A 20m wide road easement will not cut it for an industrial intersection!

#### Telephony & data transfer

With modern steps forward in the integration of technology and monitoring of freight and driver safety in HVs, SEATS believes that data and telemetry services need to be provided by existing Telcos to extend their networks to cover remote areas between Bairnsdale in Vic and Ulladulla on the Princes Hwy and Queanbeyan on the Monaro Hwy.

SEATS previously resolved to *strongly requests the Australian government ensure that within 5 years all national and state highways achieve a 95% mobile telephony reception coverage and that the rollout commence on the Monaro Highway and the Princes Highway between Sydney and Melbourne*

SEATS acknowledges that this is not a State responsibility, but as a workplace safety issue, HVs using these remote links are not contactable, nor can their HVs be monitored as moving for much of these journeys. Employers seek a better OHS answer.

In the last few months, the Australian Government has announced funding allocations to improve telephony and data transfer along major routes as a recognition to the “community in transit” and other safety/resilience issues. Already a mobile tower is being constructed on the Monaro Highway 10km north of Cann River. Well done to whoever enabled this to happen!

#### Freight Data Capture

SEATS has already acknowledged an issue raised under the NSW Freight Reform Program that freight data is generally poor around the nation.

SEATS has suggested to make the process of data collection ancillary to shipment rather than a separate follow up process. Use electronic capture of encrypted datasets from truck/train/boat/plane.

Have a University or technical research agency develop the technology and transfer mechanism and allow use of the data by transport planning agencies like CSIRO, NHVR, State agencies, Local Government.

*If a dairy cow can be administered its daily medicine and feed supplements just by walking up to the dairy, data about the cargo consignment can be captured en route.*

### **Declaration of Interest**

SEATS would like to point out that Baw Baw Shire, Latrobe City, South Gippsland Shire, Wellington Shire and East Gippsland Shire are current members of SEATS and share the interest to improve the connectivity by road and rail to other working areas of Gippsland and beyond to maintain and improve freight logistic corridors.

SEATS (South East Australia Transport Strategy)  
<https://seats.org.au/> or [admin@seats.org.au](mailto:admin@seats.org.au) or 0402 571782

Greg Pullen, Executive Officer, SEATS

December 2024