SEATS Submission to the Australian Government Productivity Commission on Impacts of Heavy Vehicle Reform in December 2025

Background

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 ACT. The organisation meets quarterly, has a paid secretariat and prioritises projects across all forms of transport that its membership has identified as worthy of Government and operator support.

Some projects have commenced either in a planning or construction phase. Some projects extend into Victoria's Gippsland region 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.

The current SEATS Priority Project Strategic Statement – 2025 is attached at the conclusion of this submission (P14 onwards). It embraces transport network issues across the SEATS region. This Strategic Statement is reviewed annually and represents those projects or issues that the SEATS committee feels will enhance the freight task and increase freight productivity.

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 including stockfeeds, food ingredients and building products. The southern tablelands has strong agricultural production, quarry supplies and timber processing. Out of Victoria's Gippsland comes horticultural produce requiring key freight and transport connections into Sydney as well as quarry materials for the Melbourne market.

The region has significant quantities of inbound and outbound freight, with freight travelling through Port Kembla, Port of Eden and Port Hastings dominating overseas export movement from 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 include the M1 Princes Motorway (Mount Ousley Road), Picton Road, the Princes Highway between Sydney and Melbourne as well as the South Coast rail line and the Moss Vale to Unanderra rail line. The Monaro Highway is an important corridor between metropolitan Sydney and the Gippsland areas within Victoria.

Introduction

This submission will address areas of freight productivity growth within the SEATS region that can be achieved with improvements to the network, especially with bridge upgrades to allow higher productivity freight vehicles to utilise the State Highway corridors. Significant improvements have been and are still being achieved by the combined efforts of the Australian government, the governments of the Australian Government Territory, New South Wales and Victoria through various capital funding programs like the Princes Highway Upgrade Program which remains at foot today.

SEATS has been able to maintain its focus on improving freight productivity within its region which basically runs from Wollongong to Dandenong and east of the Hume Highway Corridor hinterland.

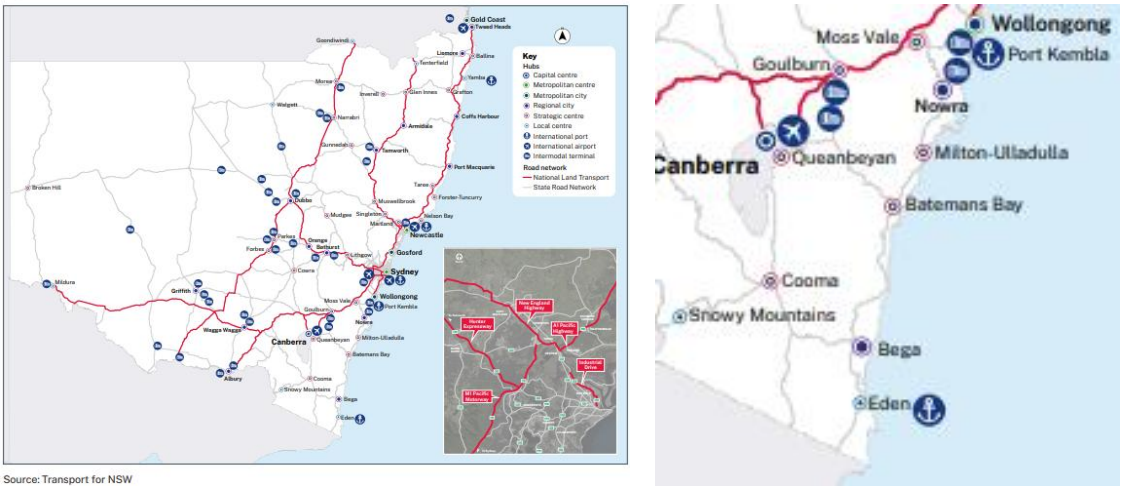
Key focus points include

- The current freight task in NSW/Victoria
  - Exports & imports; Interstate freight; Intrastate freight; Government policy & regulations
- The changing freight task
  - A growing & changing population; Climate change; Emerging technology
- Strategic Issues
  - The entire freight chain;
  - Role of government;
  - Challenge of integration
- The discussion questions raised will be specifically addressed.

SEATS acknowledges the existing national land transport network and the NSW South Coast Line and Main Southern Line and Victoria's Gippsland Line rail networks. Rail is poorly represented within the SEATS area of NSW. A similar poor representation of both road and rail services exist in Gippsland. This was a prime purpose in the establishment of SEATS to improve network linkages.

The Road Network is shown in a Transport for NSW document to be:

Figure 2.4 National Land Transport Network and NSW state road network



Source: Transport for NSW

Within the SEATS area the road network is primarily the Princes Highway and the Federal/Monaro Hwy each running north-south and connecting Sydney with Melbourne via Victoria's Gippsland region. The Hume Highway radiates from Sydney

in a south westerly direction towards Yass and Albury towards Melbourne and other places.

Within NSW a network of east-west crossings provide interconnectivity between the Princes Highway corridor on the coastal plain with the Hume/Federal/Monaro Highway corridor. Each of these crossings of the Illawarra Escarpment climbs the 6-800m from the coast over mountain passes built in the 1800s.

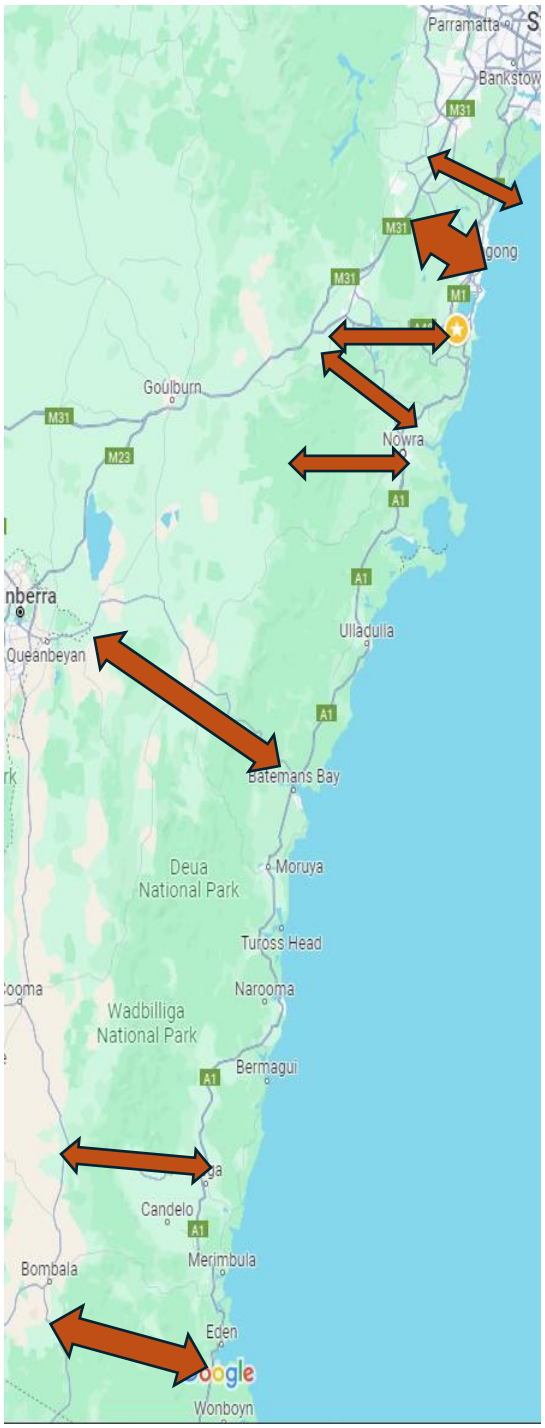
To understand the movement of freight, an understanding of some of the major industrial activities needs to be understood. The following list is not exhaustive but represents the scattered nature of these manufacturing nodes and the types of freight being carried.

Locality (industry)	Freight out (road/rail)	Freight In (road/rail)
Wollongong/Pt Kembla	Steel, Cars, Manufactured goods, waste materials	Coal, Grain, Quarry materials
Nowra/Bomaderry	Processed food ingredients, Stockfeeds, Ethanol, Chemicals	Grain, quarry materials
Bega/Eden	Dairy Products, timber, (wood waste by sea)	Milk, Wood waste, Quarry materials
Goulburn/Marulan	Quarry products,	Steelworks slag
Tumut	Wood products, wood/paper waste	Timber, Timber/paper waste
Tarago		Putrescible waste from Sydney
Bombala	Processed timber, forest logs	Forest logs
East Gippsland	Horticulture, timber waste, milk, rare earth minerals	Stockfeed, dairy products
Central Gippsland	Horticulture, agriculture, sand & quarry products	Construction materials,

The freight is diversified and includes over 6m tonnes/annum of quarry materials moving from the NSW Southern Tablelands to the coast and Sydney by Boral using several of the coastal escarpment passes.

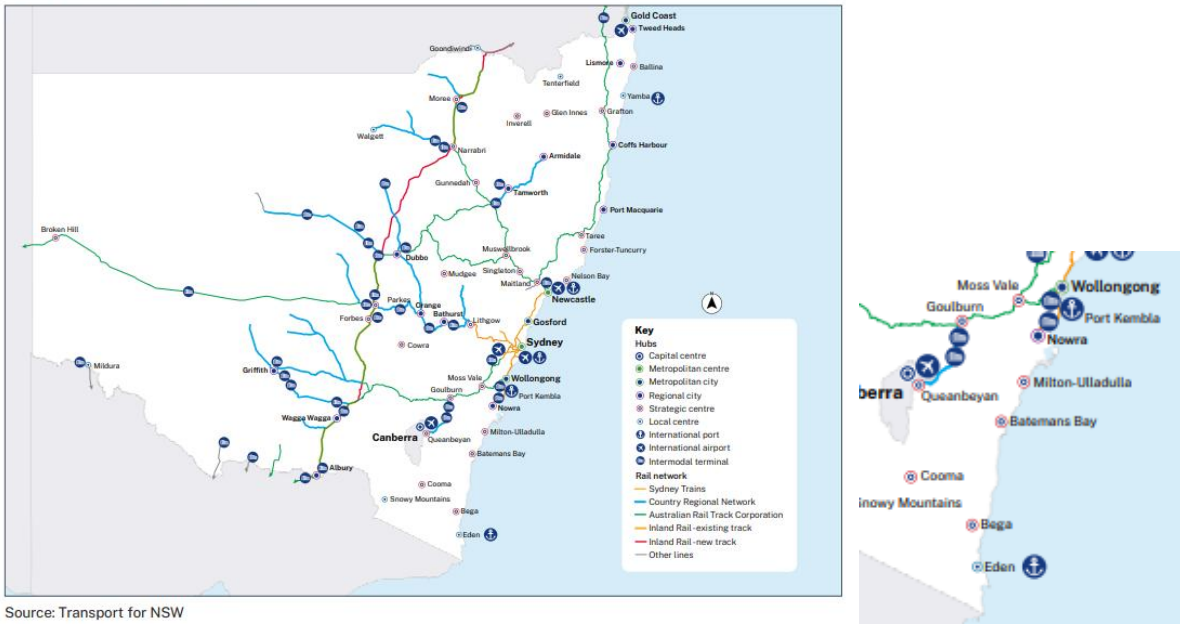
The current status of the escarpment road crossings is shown below.
Further comments will be made in the section related to Climate Change.

Route Name	Capability	Current Status
Bulli Pass	GA Vehicles	Land slip issues, currently undergoing repairs
Mt Ousley/ Picton Rd	3+2/3 lanes for PBS/ A-double	
Illawarra Hwy (Macquarie Pass)	GA Vehicles	Land slip repairs, currently undergoing repairs
Moss Vale Rd (Kang Valley)	GA Vehicles < 23t	Land slip issues , currently undergoing repairs
	Hampden Bridge load limitation of 23t introduced in mid 2025	
Main Road 92	B-doubles to Nerriga	No HV access beyond Nerriga
Kings Hwy	GA Vehicles	
Snowy Mountains Hwy	GA Vehicles	Land slip issues , currently undergoing repairs from 2022
Imlay Rd	A-double	(currently Forestry NSW road)
Monaro Hwy From PH at Cann River	A-double	Main crossing between NSW & Vic



The NSW rail network

Figure 2.5 NSW rail network



Source: Transport for NSW

The NSW Rail network within the SEATS region consists of four main rail lines.

- The South Coast Line running from Sydney through Wollongong and terminates at Bomaderry on the northern side of the Shoalhaven River.
    - Two loops service Port Kembla between Coniston Junction and Unanderra
    - This South Coast Line also provides rail access directly to Port Botany
- The Main Southern Line running from Sydney through Picton, Goulburn, Yass to Wagga and Melbourne
    - This Main South Line branches south of Goulburn into the South Line to Canberra
    - The Tarago Inter Modal Terminal serves as the transfer point for putrescible waste from Sydney (Rhodes) to the Woodlawn BioReactor.
- The Moss Vale – Unanderra Line links the Main Southern line at Moss Vale down the Illawarra Escarpment to Unanderra and provides access to the Port Kembla loops.
    - Freight trains travelling to Bomaderry are required to use either of the Port Kembla loops to change direction as they also do for the reverse journey.

A proposal to Sydney Trains & T4NSW has been put by the Manildra Group to provide a siding for train turnarounds between Unanderra and Coniston Junction, thus eliminating the delays in having to use the Pt Kembla loop for each train journey (twice/day) representing a productivity loss on a daily basis.

Over 7m tonnes per annum of grain moves between west of Yass to Bomaderry via rail (via Moss Vale, Unanderra, Pt Kembla loop to Bomaderry) or road (via Wilton/Picton Rd/Mt Ousley Rd to Bomaderry). Road transport is used when rail possessions are in place or for track maintenance after an incidence or to manage peak requirements.

The Current Freight Task in South Eastern NSW

Much of the Freight within the SEATS region is intrastate movements with some large quantities being moved regularly, for example:

- 6m tonnes per annum of quarry products by Boral, including by rail from Port Kembla to Marulan via Moss Vale line
- 7m tonnes per year of wheat grain between western NSW and Bomaderry by the Manildra Group (at least 1 train/day)
- 60% of production from Manildra Group's facility is exported in containers from Bomaderry by rail through Port Botany (several trains/week)
- Agricultural produce out of Gippsland being freighted to Eden/Bega (timber & dairy) and to Sydney (horticulture and finished food)

Containerisation of export freight is basically locked in as the only way to move processed product by ship. Two of the largest exporters of containerised freight in NSW for export are the Manildra Group at Bomaderry and Visy at Tumut. Both of these carry the containers to the port by rail but with Pt Botany being the only container port, trains manoeuvre through the rail network and bypass Pt Kembla (and Moorebank) which according to NSW Ports will not be ready for some time with Newcastle being supported as the next container port for NSW.

Port Kembla is one of the major entry points for vehicles into Australia. This activity supports a lot of activity in Wollongong/Pt Kembla and has utilised much of the previously semi-developed industrial land in the Wollongong region.

In recent years the dynamic of the current road freight task is seeing more A-double movements into/out of Nowra/Bomaderry via Mt Ousley Rd/Picton Rd to Hume Hwy because of improvements to the M1 Princes Motorway to Nowra/Bomaderry. Hauliers are being observed utilising these larger HV configurations and ignoring the escarpment mountain passes that are restricted to GA vehicles and have been plagued by land slippages and prolonged road maintenance activities, even with the disadvantage of increasing distances by between 10-30%..

A similar circumstance is also becoming evident on the far south coast with hauliers increasingly using the A-double configurations via Imlay Rd to join the Monaro Hwy near Bombala rather than the delays through roadworks due to land slips on the Snowy Mountains Highway for GA vehicles.

Three Govt Policy areas are needing to be addressed here:

1. Imlay Rd (and Edrom Rd to Eden Port) are both owned and controlled by Forests NSW. SEATS believes that it is time to seriously investigate the transfer of both of these predominantly freight roads to Transport for NSW and bring them within the classification system of other State freight links.
2. The bridge limitations on the Princes Highway at Narooma and Brogo needs to be up graded to allow HML vehicles to enable greater productivity.
3. Sydney Trains, that administer the Sydney rail network (which includes the south coast line to Bomaderry), would appear to have an understandable preference for passenger trains to the exclusion of freight services. However this should not be the case. Several proposals by the Manildra Group and supported by SEATS and Shoalhaven City Council to improve the performance of the Sydney Trains network for the betterment of both freight

and passenger services fail to gain traction when put to T4NSW. They remain active proposals in the SEATS Priority Projects Strategic Statement – 2025.

The Changing Freight Task

Freight volumes will grow as populations grow! However there are certain freight tasks that will grow in accordance with increased CapEx by industry together with the specialisation of certain processing activities in established localities.

- Port Kembla will continue to grow as a vehicle import centre. This activity is ideally suited to the major centre of Sydney and draws advantage from plentiful areas of semi-serviced industrial land in and around Wollongong.
- At Bluescope at Port Kembla major CapEx is currently being undertaken to diversify the output types and increase quantities as required by the domestic and export markets.
- Tarago on the Southern Rail Line will grow because of the need for Sydney to dispose of its putrescible waste and provisions by the Woodlawn Waste BioReactor to expand its operation will require expansion of the Tarago IMD.
- The Manildra Group has built a new packaging facility to enable production capacity at Bomaderry to quadruple over time. This will generate a need for significantly more grain to be freighted in (preferably by rail); more export containers needing to go to Pt Botany by rail; more road freight of ethanol to fuel distribution centres; ……. Manildra have also made it aware that the IMD that has been built as part of the project will be available to other Shoalhaven based manufacturers to utilise to transit containerised export freight including chemicals, nutraceuticals, building components etc.
- The inter-relationship of the forested areas in the SE part of the NSW and eastern Victoria with timber processors on the Far South Coast, areas around Bombala and Tumut and in the ACT will also drive freight growth
- Proposals around green steel, hydrogen fuel generation and offshore renewable energy proposals off Gippsland are all capable of generating freight growth not only on road but also on the waterways along the coast.

SEATS wants to re-emphasise that the growth in freight volumes will not be in direct proportion to population at all centres. Certain locational advantages by industry, whether these be good or bad, but significant investments have been made and these are not readily about to be abandoned. The planning implications alone will need for a major play by government if this is about to change.

Striving for improvements to Freight Productivity

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 the 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

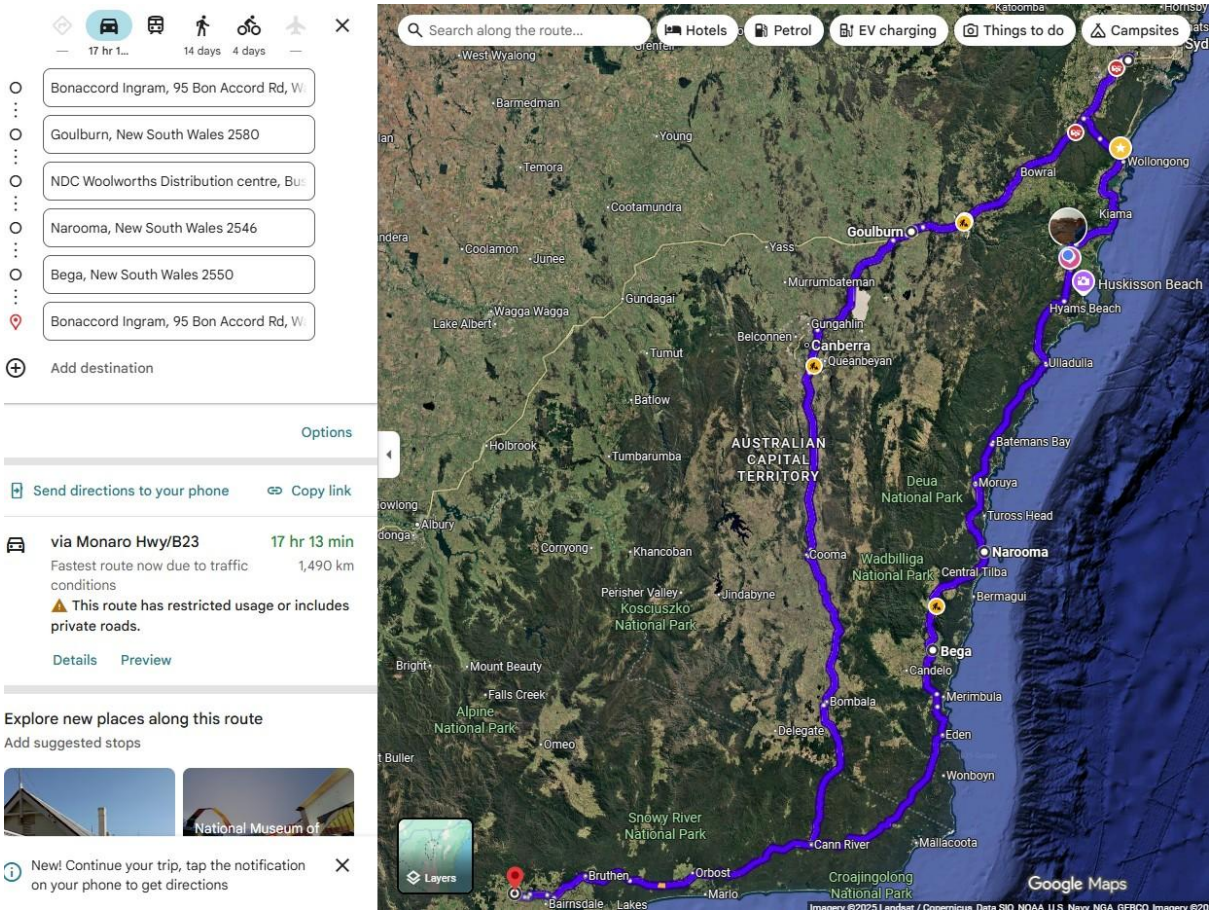
weather events are creating circumstances that cannot satisfy today's demanding freight tasks.

The two escarpment crossings not built on mountain passes in the 1800s are:

- Main Road 92 between Nowra and Nerriga is a crossing built between 1997 and 2010 has a gentle incline and has been built (and approved) for PBS 2 vehicles BUT it does not extend westward beyond Nerriga towards Tarago (for connection to Monaro Hwy) and Goulburn (for connection to the Hume Hwy).
- Imlay Rd is also a gentle incline from the Princes Hwy at Womboyn, south of Eden, to its intersection with the Monaro Hwy at Rockton.
  As said elsewhere in this submission Imlay Rd is under the management of Forests NSW. SEATS supports the transfer of this built asset to T4NSW.

AN EXAMPLE TO DEMONSTRATE the inefficiency of the current network is a agribusiness company near Bairnsdale in Vic that has its own fleet of trucks. They use these trucks in semi-trailer configuration to deliver up the Princes/Monaro/Hume Hwy into the grocery distribution centres at/near Moorebank. They backhaul from those same distribution centres down the Princes Hwy delivering groceries to supermarkets south of Batemans Bay all the way back to Bairnsdale.
Why use semi-trailers? There are 2 bridge crossings that are not approved for higher category HVs and these are at Wagonga Inlet at Narooma and Brogo River within Bega Valley Shire.

So for a round trip of 1500km the freight operator cannot improve the productivity of the freight task because of 2 sub-standard bridges on a major state highway.



The necessity to improve bridges on freight routes is essential to achieve productivity gains.
There are areas within the Gippsland agribusiness precincts where bridges need to be strengthened but insufficient priority is given both by the applicants and assessors to bridges as more pavement can be improved for the same $s as a bridge upgrade. The funding programs for bridge upgrading need to revert to a “bridges only” capex item.

Another issue to reduce the incidence of HV minor crashes revolves around the need for HVs to utilise more of the road, including both lanes, when turning. SEATS supports a regular education program to alert ALL drivers that HVs will use BOTH lanes when turning

The Productivity Commission needs to remind rail track operators of the implication of “track possessions” on the frequency of road freight movements to undertake the freight task. Whilst it may be optimal to “possess” the track for the operators, consultation with industry that will need to divert freight to road should be a mandatory obligation to assess impact on road corridor level of service.

During times of “natural disasters” a more expeditious approval mechanism needs to be itemised to allow essential services to operate using non approved routes to satisfy the task.

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 Kings, Monaro and Princes Highways in this regard. Further, HV Rest Areas need to be considered available for HVs travelling in either direction with safe ingress and egress points.

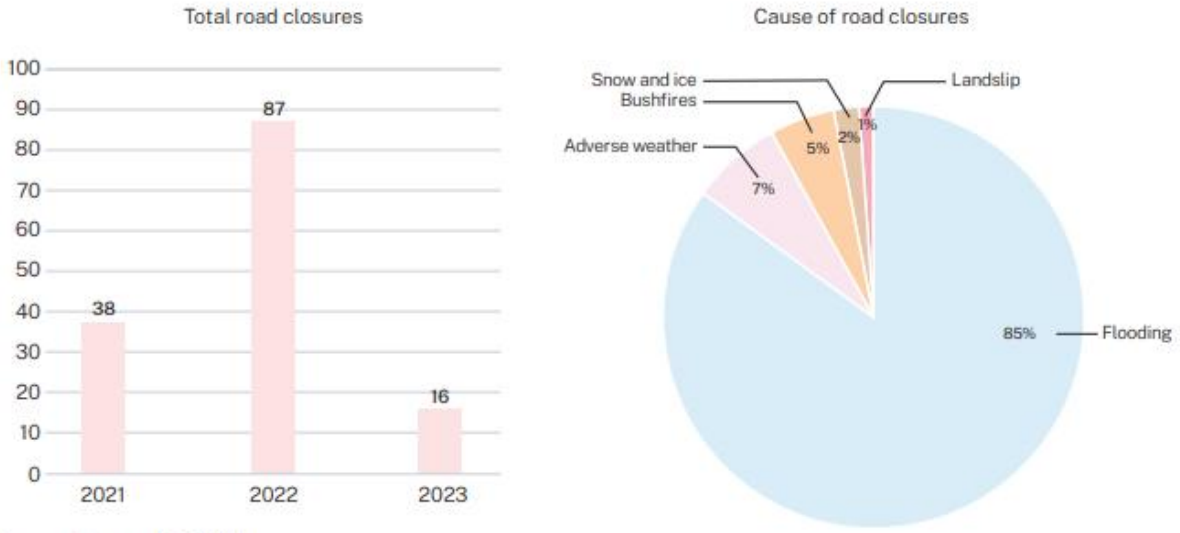
The issues of first/last mile access is more than suiting the environment and planning guidelines. Buffers which allow expansion of the access corridor to allow the movement of higher productivity HVs, queuing lanes at intersections etc need to be allowed when these corridors are planned and built. A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

Climate Change

The coastal aspects of the Great Dividing Range on the east coast of Australia are playing a part in the affects of Climate Change. This is particularly evident on the South Coast of NSW and east Gippsland and the interplay with the East Coast Low weather patterns. As shown in the NSW Freight Policy Reform paper, the incidence of road closures is increasing due to flooding (and land slips). On the coastal rim of south east Australia, the intensity and frequency of rain storm events is becoming quite noticeable on the road and rail assets.

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

Figure 3.5 Road closures on key freight routes 2021-2023



Source: Transport for NSW

minor, roads that crossed the Illawarra Escarpment is still being repaired in 2025/6

with several years yet to resolve the current land slippages. All mountain passes, with the exception of two, fall into this category and repeat incidences are most likely.

These recent weather events have caused land slippages and rock falls on the key mountain passes that cross the Illawarra Escarpment between the coast and the tablelands causing several of these routes to be closed for prolonged periods for major reconstruction works. 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.

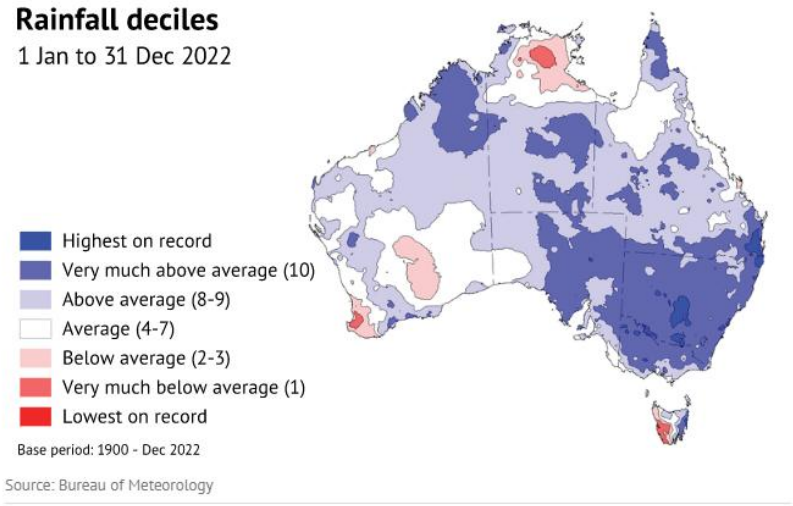
These ECLs have brought about a new dimension to the escarpment issue. At some points during 2022 closures and restrictions on the various mountain passes placed imposts on hauliers and industry, including tradesmen, travelling between Illawarra, Shoalhaven and the Tablelands. Thankfully Mt Ousley Rd held up although subject to lane restrictions. SEATS believes a second east-west freight route is required south of the Shoalhaven River and Main Road 92 forms the basis for this alternate all weather route for heavy vehicles.

The influence of the ECLs can be seen in the table below when in 2022 the annual rainfall totals were 100% above (double) the annual long term average for each of Sydney, Camden, Albion Park and Nowra airport BOM weather stations.

Annual Rainfall in mm

Airports	Mean Rainfall	Mean Days >1mm	2017	2018	2019	2020	2021	2022
Sydney	1093.4	96.1	871.4	831.4	749.4	1225.4	1198.4	**2274.8**
Camden	823.2	49.7	911.8	528.5	393.6	1026.6	1022.5	**1704.4**
Albion Park	998.1	82.6	971.8	637.2	596.0	1266.6	1138.8	**2585.4**
Moss Vale AWS	958.4	93.0	714.4	612.3	446.8	1247.2	1113.4	1857.8
Goulburn	575.2	69.6	488.0	388.6	350.4	763.0	943.8	1028.4
Nowra	1133.1	65.8	814.0	751.2	577.4	1673.2	1280.0	**2535.4**
Canberra	615.4	72.0	486.0	472.0	358.6	790.0	912.6	892.4
Moruya	852.6	78.5	843.2	724.6	492.4	1253.0	1189.4	1379.2

Cooma	539.5	69.3	563.4	342.8	318.6	572.8	847.4	648.6
Merimbula	783.8	72.7	564.4	491.8	425.0	1019.0	1325.4	1072.8
Bombala AWS	650.9	81.4	592.8	494.6	385.6	655.4	1011.0	1025.4
Mallacoota	939.8	92.4	801.8	758.6	595.2	1002.8	1264.6	1133.0



These events caused medium/long term interruptions on several of the mountain passes, specifically Mt Ousley Rd, Macquarie Pass (Illawarra Hwy), Jamberoo Mt Pass, Moss Vale Road through Kangaroo Valley (Cambewarra Mt & Barrengarry Mt), Kings Hwy (Clyde Mt), Snowy Mountains Hwy (Brown Mt). The South Coast Rail line and the Moss Vale to Unanderra Rail Line were also affected and were unavailable to freight trains for extended periods.

Many of these routes are regular haulage routes for freight moving up or down the escarpment. They are also commuter routes for workers and tradesmen going about their regular work on both the coast and tablelands.

Supply chain effects were experienced by industry within the region as well as for customers/suppliers outside the region, including meeting shipping timetables.

This scenario is not only a recent event. In the 1980s a large section of the South Coast Rail Line was washed away in a storm in the northern suburbs of Wollongong. The repairs took months having a major disruption to freight and commuter services.

SEATS shares with industry, the concern that the reliability and sustainment of the key east-west escarpment freight crossings needs to be prioritised by Governments in the maintenance and upgrade programs. The business and reputation of regional processors can be influenced by prolonged supply chain disruptions.

The Illawarra Escarpment and the Freight Task

Whilst not unique to the South Coast of NSW, the existence of the Illawarra escarpment is a real barrier to the movement of freight. There are only a few of the mountain passes that are suited to HVs that connect the coastal plain to the Southern Tablelands 600-800m above and these are:

- Bulli Pass (Princes Highway at Bulli to Appin/Campbelltown)
- Mount Ousley Rd (Princes Highway between Hume Hwy at Wilton and Wollongong)
- Macquarie Pass (Illawarra Highway between Hume Hwy at/near Moss Vale and Albion Park on the Princes Motorway)

- Route B73, Moss Vale Rd through Kangaroo Valley (between Hume Hwy at Moss Vale and Princes Hwy at Nowra/Bomaderry)
- Main Road 92 (between Nerriga and Princes Hwy at Nowra) This route is a PBS2 link but is restricted westward beyond Nerriga by a section of road weight limited to 15t
- Kings Highway (between Canberra/Queanbeyan and Batemans Bay)
- Snowy Mountains Highway (between the Monaro Hwy near Bombala to Princes Hwy near Bega)
- Imlay Rd, a Forestry Commission road between Monaro Hwy south of Bombala and Princes Hwy near Eden
- Monaro Highway (Princes Hwy at Cann River in Vic to Bombala, ACT and Hume Hwy through to Sydney)

There are 2 rail lines that cross the Illawarra Escarpment:

- South Coast Rail Line (from Sutherland to Bomaderry shared by freight and passenger trains)
- Moss Vale Line (an exclusively freight line from the Main Southern Line at Moss Vale to the South Coast Line at Unanderra, for Port Kembla and Bomaderry)

The importance of Mt Ousley/Picton Rd in fulfilling this freight task cannot be understated in the movement of freight between the coast and the tablelands. Clearly Mt Ousley/Picton Rd is the most important escarpment crossing, BUT what is the fallback position within NSW to accommodate HML/PBS vehicles and share the burden for freight up/down the 6-800m mountain escarpment should Mt Ousley Rd fail.

A second crossing, at least, needs to be identified and readied to perform this task. This selection needs to be cognisant of the type and importance of the freight on the national/state/regional/local need and the detour distances to satisfy the freight tasks involved.

In February 2023, SEATS resolved to:

a) Strongly support the upgrading of the Mt Ousley/Picton Rd corridor, including the works near the University of Wollongong
b) Request that Transport for NSW undertake a "what if" investigation on the provision of road and rail links across the Illawarra Escarpment with the view to identifying and supporting a second east-west road freight route which can satisfy future freight requirements in most natural disasters.

Strategic Issues

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 receival 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!

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SEATS Priority Project Strategic Statement – 2025

This Priority Project Statement has been evolved by SEATS (South Eastern Australia Transport Strategy) over many iterations since 1995. This current list of projects represents both physical works required or government policy initiatives that will generate regional economic development through an improved freight network leading to increased productivity and carbon emission reduction.

Set out initially by mode of transport, a state by state statement is also shown below.

AIR	
Access for regional airlines to Sydney Airport - have the Australian Government finalise its reform regional access at Sydney Airport, including: -	✓ SEATS seeks that trapped slots be released so regional airlines can build consistent daily schedules, and to make the regional ring fence more usable ✓ SEATS seeks smooth, or average, preserved regional slots to ensure the same number of regional slots are available every day in the morning and evening peaks ✓ SEATS advocates that there needs to the ability to retime regional slots by up to one hour to help with slot fragmentation
Improved regional RPT air services for Far South Coast of NSW	✓ SEATS seeks enablement for a proposal to have RPT airline services hub overnight out of the Far South Coast of NSW (Merimbula/Moruya) ✓ SEATS seeks assistance for airport operators, where RPT services operate, to grow the passenger throughput. ✓ SEATS encourages State Governments to assist local Councils to fulfil their development plans for runway enhancements
RAIL	
South Coast Rail Line - (Freight div T4NSW)	SEATS seeks the following infrastructure improvements on the NSW South Coast Rail Line: ✓ Turnout required between Unanderra and Coniston Junction for train turnaround for trains >600m ✓ Dunmore Siding – Crossover (as per Fixing Country Rail application RNSW1385) is undertaken and available to enable freight trains to have more efficient paths for an expanding freight task

	✓ Bomaderry Station Yard Extension – extension of northern boundary & signally system (as per Fixing Country Rail application RNSW1392) is undertaken and available to enable freight trains more efficient access the Bomaderry rail/road intermodal for the expanding freight task ✓ Toolijooa Passing Loop – to progress the implementation of this project to create more efficient paths for freight (and passenger) trains on this single line route between Dapto and Bomaderry ✓
Illawarra Rail Resilience Plan	SEATS seeks to have resilient and sustainable policies/practices to support freight train paths, as follows: ✓ The IRRP include the significant freight movements along the Moss Vale to Unanderra rail line, and these long standing rail freight movements be recognised as forming an important interaction with the passenger services operated on the Sydney Trains network ✓ The IRRP include the significant freight movements between Bomaderry and Port Botany on the South Coast rail line, and these long standing rail freight movements be recognised as forming an important interaction with the passenger services operated on the Sydney Trains network in moving freight to the export rail/sea intermodals at Port Botany (and Port Kembla) ✓ Transport for NSW identifies specific scheduling time bands where freight trains can have priority pathing, (as occurs within Melbourne under Freight Victoria framework) ✓ Transport for NSW recognises that there may be inadequate road alternatives for freight as a backup to rail
Moss Vale to Unanderra Rail Line – (Freight div T4NSW)	✓ Ensure rail access between the Main Southern Line at Moss Vale and the South Coast Line at Unanderra is maintained and available to freight trains for an expanding freight task
Southern Line (Goulburn to Canberra) – (Freight div T4NSW)	✓ Ensure rail access between the Main Southern Line at Goulburn and the rail/road intermodal at Tarago is maintained and available to freight trains for an expanding freight task
Undertake the necessary works to deliver the outcomes of Victoria's Regional Network Development Plan	SEATS seeks the following rail infrastructure and policy upgrades to allow: ✓ 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

Rail access to Victorian Export Centres for Port of Melbourne	SEATS seeks to ensure that provision for rail to/from Gippsland is made in the development of inland export centres for Port of Melbourne (at Lyndhurst)
ROAD	
Barton Highway (T4NSW)	SEATS advocates for the Barton Highway that ✓ Transport for NSW move to the construction of Stage 2 asap between Yass and ACT Border ✓ Establishment of a HML freight route between Cooma and Yass (through ACT) for access to Tumut via Hume Highway and Gocup Rd. Secure a funding commitment asap to allow completion of all stages of construction
Crossing the Illawarra Escarpment (T4NSW)	✓ Mt Ousley Rd/Picton Rd – continuous improvements with regard to safety & resilience ✓ MR 92 Beyond Nerriga – providing a HV/HML route between Nerriga and the Hume Hwy at Goulburn ✓ Kings Hwy improvements to enable HML access ✓ Snowy Mountains Highway upgrade to address resilience issues caused by mountain pass instability to ensure HV access and over time HML access
Princes Highway (NSW & Vic)	SEATS advocates for Illawarra Escarpment road crossings to be improved as follows: ✓ Mt Ousley Rd/Picton Rd – continuous improvements with regard to safety & resilience including works at Mt Ousley Interchange and Wilton Interchange to M31. ✓ The "Beyond Nerriga" East West Freight Route – provide a HV/HML route between Nerriga and the Hume Hwy at Goulburn via Tarago to create a HML freight route, based on MR92 escarpment crossing between Nowra and Nerriga ✓ Kings Hwy improvements to enable HML access ✓ Snowy Mountains Highway upgrade to address resilience issues caused by mountain pass instability to ensure GA vehicle paths. SEATS advocates for T4NSW to work with Forests NSW to recognise both Imlay Rd and Edrom Rd as significant freight routes currently being used by HML vehicles.
Identifying and Upgrading HML Crossings of the Illawarra Escarpment (T4NSW) to cater	✓ SEATS requests that Transport for NSW **undertake a "what if" investigation** on the provision of road (and rail links) across the Illawarra Escarpment with the view to identifying and supporting a second

for existing and future road freight	east-west road freight route in the north which can satisfy future freight requirements in most natural disasters ✓ SEATS notes the recommendations of the NSW Freight Reform Plan and the Strategic Regional Integrated Transport Plans for the South East & Tablelands (and Illawarra Shoalhaven) Regions regarding Illawarra Escarpment crossings and should be addressed by Transport for NSW. (Note:SEATS advocates that the Illawarra Rail Resilience Plan should reach the same conclusion.) ✓ SEATS advocates for T4NSW to work with Forests NSW to recognise both Imlay Rd and Edrom Rd as significant freight routes currently being used by HML vehicles. ✓ SEATS supports the increased provision of HV Rest Areas and where possible, and needed, to incorporate connections to allow changing of drivers.
Princes Highway (NSW & Vic)	SEATS advocates for the following Princes Highway improvements to continue as planned: ✓ Mt Ousley Rd interchange at UoW ✓ Nowra Bomaderry Transport Strategy – progress of studies and works ✓ Upgrade bridge capacity at Currambene Creek Nth (under construction) ✓ PH Upgrade Project: o Jervis Bay Rd intersection (under construction) o Jervis Bay Rd to Hawkens Rd upgrade (in planning/design) o Milton Ulladulla Bypass (in planning/design) o Moruya Bypass (in planning/design) ✓ Improvement of section between Batemans Bay and Snowy Mountains Hwy to enable compliance for HML/PBS vehicles (especially crossings at Wagonga Inlet & Brogo River). ✓ 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	SEATS advocates for the Princes Highway corridor through Gippsland to be improved and that funding allocations be made for planning as follows: ✓ 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 o Requires 2025/26 Vic budget allocation ($5-10m) to determine scope, corridor definition and cost estimates for the Traralgon bypass construction over say 6-9 financial years

	○ In 2027/28 the Victorian Govt approach Australian Govt for 50% funding for construction phases ✓ 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 $3m be allocated towards the planning and development tasks to ensure future options are not built out with incremental development. ○ Longwarry to Nar Nar Goon(includes links into emerging employment precincts that support new residential and employment growth in Baw Baw & Cardinia Shires) ○ While delivering time savings, productivity gains & improved supply chains for time sensitive quality fresh food & produce freight tasks ○ While stimulating local employment precincts to address liveability & housing considerations ○ By recognising this significant part of Victoria's urban growth ✓ 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
Haulage routes on local roads for metropolitan infrastructure growth.	SEATS seeks for those areas in close proximity to metropolitan Melbourne and Sydney that for haulage routes utilising local roads to support metropolitan infrastructure construction be compensated maintenance offsets from metro growth budgets (or grants) ✓ In the need to allow Melbourne's urban & employment growth, Southern Gippsland Shire is experiencing new extractive industries opening up or expanding ✓ Adjacent to Sydney, Goulburn Mulwaree Council is experiencing establishment and expansion of extractive industries ✓
Heavy Vehicle Specific Routes	SEATS sees the following road initiatives as delivering freight productivity gains and safety improvements by adequately addressing the needs of Heavy Vehicle movements specifically: ✓ Sale Alternate Truck Route ✓ Leongatha HV Alternate Route (Stage 2) ✓ The Hyland Highway in Gippsland to address the needs of Offshore Renewable Infrastructure requirements (roads & transmission)

	✓ Gippsland linkages to freight assembly point(s) for Port of Melbourne (road & rail) suggested to be at Lyndhurst/South Dandenong ✓ Bridge strengthening programs in both Victoria and NSW on highways and major roads: o Undertake bridge strengthening as a rolling program over, say 10 years o Recognising that HVs are becoming larger (and heavier) configurations
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 ✓ Realignment of sections of the Princes Hwy from Cann River to NSW border
ROAD & RAIL ACCESS SUSTAINMENT	
Climate Change & impact on transport infrastructure	SEATS seeks that all levels of Government be aware that recent weather patterns of the East Coast Lows and the bushfire event of 2019/20 have brought about a new dimension to the Great Dividing Range escarpment issue. At some points during 2022 closures and restrictions on the all mountain passes placed imposts on hauliers and industry, including tradesmen. ✓ Fires cause immediate disruption when key roads are blocked or utility services are severed and may take days/weeks to repair. ✓ Torrential rains can cause erosion/slippages above or below the road structure which may take months/years to repair ✓ Funding streams need to be made available for recovery works after these natural disasters. o Funding should allow for betterment to build more resilient infrastructure. ✓ Key strategies need to be developed within disaster management plans to address: o Short term issues: Utility disruption (water, sewer, electricity, telecommunications) o Medium term issues: Road/rail disruption to supply chains o Longer term issues: Repairs to mountain passes for road/rail o A longer term strategic solution needs to be determined to move HML Freight Vehicles in and around the region, including across the escarpment

SEA	
Seaport Access (NSW)	To enable effective use of the regions ports, SEATS seeks to: ✓ Ensure PBS compliant road access into Pt Kembla from National Hwy grid is available and that adequate height clearances under bridges are monitored and maintained between Picton Rd and Pt Kembla in both directions. ✓ Ensure rail access between Bomaderry and Port Botany is maintained and adequate paths are available to freight trains of up to 1200m. ✓ Ensure HML/PBS compliant road access into Port Eden (Edrom) via Imlay Rd and Edrom Rd (both Forests NSW assets) and Princes Highway, both north and south
Seaport Access (Vic)	To enable effective use of the regions ports, SEATS seeks to: ✓ 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 ✓ Ensure HML/PBS compliant road access on Princes Highway, both north and south, to access Port Eden (Edrom) via Edrom Rd (Forests NSW assets).
TELECOMMUNICATIONS	
Telephony & Data Transfer in remote areas (Bairnsdale to Ulladulla on Princes Hwy and Queanbeyan on Monaro Hwy)	SEATS has 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* ✓ The Victorian and NSW Governments should continue with the rollout of a Federally Funded program delivering outcomes in this regard. ○ 6/11/24 – Fed Minister announced $8m for regional Victoria ○ 15/11/24 – Fed Minister announced $48m for regional NSW