

6 December 2018

Christina Heffner  
Executive Director  
Governance, Freight and Partnerships  
Transport and Main Roads

Dear Ms Heffner

## QUEENSLAND FREIGHT STRATEGY

Thank you for the opportunity to provide feedback on the draft Queensland Freight Strategy. The ARA welcomes the Queensland Government's commitment to work collaboratively with industry to inform the development of the Strategy, and acknowledges the draft Strategy provided to members of the Queensland Ministerial Freight Council serves as a high-level overview of the Strategy for industry consultation, prior to its finalisation.

The ARA notes two-year rolling *Queensland Freight Action Plans* will provide more information about the activities that support a number of delivery statements which are outlined in the document. The ARA and its members would welcome the opportunity to provide feedback on the Action Plans to help ensure the needs of the freight rail sector are reflected in the Plan, and more broadly, in the state's planning, investment and policy decisions. Notwithstanding this, the ARA wishes to provide Transport and Main Roads with the following comments.

### 1. Aligning State and Federal Plans

The ARA strongly supports an integrated national approach to the movement of freight, particularly in regards to inter-state rail freight movements. Adopting a national approach on a number of key issues, particularly in the areas of planning, investment, reform and regulatory and operational alignment, is critical to achieving much needed productivity and efficiency improvements in the freight rail sector which will benefit Queensland.

The ARA recognises that Queensland has its own unique set of challenges and opportunities in relation to the movement of freight across the state. It is fundamental however that there is strong alignment between the Queensland Freight Strategy and the National Freight and Supply Chain Strategy, and the ARA is concerned the draft Strategy contains no reference to the Commonwealth Strategy currently under development. Failure to have a national approach means higher costs of living for Queenslanders and reduced competitiveness of Queensland exports in the global marketplace. Furthermore, productivity improvements can be attained by adapting and repurposing existing freight infrastructure through a national approach of coordinated investment and reforms. Similarly, aligning regulatory and operational requirements across states will further improve the efficient and safe operation of freight rail activities.

#### The ARA encourages the Queensland Freight Strategy to:

- **commit to align and connect with the National Freight and Supply Chain Strategy**
- **work with the Federal Government to address nationally significant freight issues**
- **align across jurisdictions on key priority action areas.**

## 2. Embedding Freight in Planning Decisions

Further to the point above, the ARA encourages jurisdictions, including Queensland, to place a greater focus on integrated land use planning at the jurisdictional level to achieve better planning outcomes for freight.

There needs to be strong integration between the different arms of government in regards to future land use and transport planning to ensure consistency between transport planning and urban planning. The Government must ensure planning is holistic and consistent, thereby providing greater business certainty, and including transport connections in the planning and construction phase, not post-construction. To this end, land preservation and planning for transport corridors and precincts should be integrated into planning processes and state planning departments.

In particular, planning of residential developments should take into account existing and planned transport corridors and precincts and recognise that residential development should not encroach on transport corridors and precincts which operate for 24 hours a day.

Thus, ARA is of the view that urban development plans, particularly for greenfield sites, need to take into account of freight plans at both the state and federal levels. Development Application processes must be cognisant of relevant freight plans, and preferably, planners should be obligated to reflect freight planning objectives (as enshrined in federal and state plans) in their planning decisions.

The ARA notes that the Queensland Freight Strategy supports and aligns with the *Transport Coordination Plan 2017-2027*; TMR's *Main Roads' Strategic Plan 23016-2020*, *Regional Transport Plans* and the *Queensland Transport and Roads Investment Plan*. ARA welcomes this alignment, but believes the final strategy must also detail how the Freight Strategy will ensure freight is embedded in planning decisions to ensure the right decisions are taken by all areas of government (particularly planning departments) including in relation to the protection of key freight corridors.

**The ARA encourages the Queensland Freight Strategy to set out how the Freight Strategy will align with Queensland's overall planning framework.**

## 3. Supporting Inland Rail

As outlined in the draft Queensland Freight Strategy, the State's freight task will grow by more than 20 percent over the next decade. The ARA encourages the Queensland Government to use the Queensland Freight Strategy to reinforce its funding commitment to a number of key rail freight infrastructure projects, most notably, improved rail connections to support the Inland Rail project.

The ARA appreciates the Federal and State Governments are continuing work on a \$1.5 million study looking at feasibility of options for improved rail freight connections to the Port of Brisbane from Acacia Ridge. The ARA looks forward to the Queensland Freight Strategy providing further clarity on how this important infrastructure link to the Port fits within the State's broader infrastructure objectives. In addition to supporting improved rail connections to support Inland Rail, ARA also supports rail infrastructure investment to allow heavier and longer trains to use the Queensland North Coast line and the Mt Isa line.

**The ARA encourages the Queensland Freight Strategy to provide further detail regarding potential planning and delivery options of a Port Brisbane freight rail link.**

#### 4. Action on Heavy Vehicle Pricing

Rail is a critical component to achieving an effective and efficient multi-modal approach to moving freight. The underlying principle of a multi modal approach to freight supply chains is the ability to use the right mode of transport for the job. In other words, the right mode should be utilised for the task at hand taking into consideration the economic, environmental, reliability and safety performance of that mode.

To support the selection of the right mode, the Federal and State Government must ensure that the freight market is established and regulated in such a way that adequately recognises safety, environmental and economic considerations.

In order to achieve an efficient multi-modal freight market, all freight transport modes must be regulated in the same manner to ensure that choice of freight mode is not distorted by inconsistent regulation across freight modes. Under current infrastructure pricing regulations, freight utilisation of roads and rail is priced under two very different pricing frameworks. The pricing of road and rail freights use of infrastructure should be undertaken via a single consistent framework.

ARA recognises that the Heavy Vehicle Road Reform process is underway at the Federal level, but this is an endeavour requiring buy-in from all jurisdictions to support its development and implementation. Queensland support for this process is critical to addressing the long-standing pricing framework inconsistencies between road and rail.

**The Queensland Freight Strategy should reflect the Queensland Government's commitment to progress heavy vehicle road reform measures, including heavy vehicle trials in the state.**

#### 5. Streamlining regulations

Prior to the most recent meeting of the Transport and Infrastructure Council (TIC), the Freight on Rail Group (FORG) challenged Ministers to act on a number of policies to create a level playing field between rail and road. These included affording rail freight efficiency and productivity a higher priority at TIC; harmonising operating procedures and training requirements for freight train drivers and crews across jurisdictions; investigating and quantifying the impacts of mandated train driver hours on the rail freight sector and recognising the rail freight sector's significant contribution to reducing both accident costs and carbon emissions in Australia's transport supply chain.

There is a growing need for action by all governments to address policy imbalances and mis-alignments inherent in the Australian transport industry. These policy imbalances exist within an environment where there are significantly different requirements to entry and operation between road freight and rail freight.

Creating a competitive level playing field for road and rail freight providers is a high priority issue for the rail freight sector. Given the sector's importance to sustaining Queensland's and Australia's productive capacity to maintain international competitiveness, it should also be a primary goal of both levels of government.

In addition, the Queensland Freight Strategy should also seek to align regulatory and operational requirements across states to further improve the efficient and safe operation of freight rail activities

**The Queensland Freight Strategy should reinforce the Queensland Government's commitment to work with other jurisdictions to level the playing field between road and rail transport.**

The ARA appreciates the invitation to provide feedback on the Queensland Freight Strategy and would welcome further opportunities to discuss its contents at future meetings of the Queensland Ministerial Freight Council. If you wish to discuss these matters further, please contact Duncan Sheppard, ARA General Manager, Freight and Contractors, 02 6270 4531 or [dsheppard@ara.net.au](mailto:dsheppard@ara.net.au).

Yours faithfully,



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cc: The Hon Mark Bailey, Queensland Minister for Roads, Road Safety and Ports.