

1 May 2020

Department of Planning and Logistics
Level 5 Energy House
18-20 Cavenagh Street
Darwin NT 0801

Attention: Draft Territory-Wide Logistics Master Plan

The Australian Logistics Council (ALC) is pleased to make this submission on the *Draft Territory-Wide Logistics Master Plan* (the Plan).

ALC is the peak national body representing major companies participating in the freight logistics industry. ALC's policy focus is on delivering enhanced supply chain efficiency and safety.

ALC welcomes the development of a Territory-Wide Plan specifically related to logistics in the Northern Territory and appreciates the opportunity for involvement in providing input on the initial discussion paper released in 2018.

ALC's comments on the Draft Plan will cover;

- The importance of corridor protection and planning measures;
- Prioritisation of infrastructure investments; and
- The importance of consistency amongst jurisdictions in regard to the Heavy Vehicle National Law (HVNL);

Summary of Recommendations

1. ALC recommends that NT Government commits to preparing a specific corridor protection plan as part of the NT Wide Logistics Master Plan.
2. ALC recommends that the NT Wide Logistics Master Plan should include an action item for the Northern Territory Government to work with the freight and logistics industry to ensure practical planning policies are put in place to protect current and future freight precincts and corridors.
3. ALC recommends that the list of 51 identified infrastructure projects be included as an addendum to the NT Wide Logistics Master Plan, in order of priority. This list should also include identified funding sources and be updated annually.
4. ALC recommends that the Northern Territory Government actively participate in the current review of the HVNL, with a view to adopting the HVNL to provide national consistency for the freight logistics industry.

Corridor Protection and Planning Measures

ALC is pleased that the Draft Territory-Wide Logistics Master Plan notes that land-use planning activities are critical to protecting existing freight corridors, as well as identifying future land requirements to ensure the timely delivery of freight infrastructure.¹ It is also positive that work has been undertaken to develop a corridor study for a rail link between Mt Isa and Tennant Creek. However, there remains a lack of clarity as to how the Northern Territory Government will undertake corridor protection activities.

ALC has been a long-time advocate for the development of corridor protection strategies, as identifying future transport corridors and protecting them against residential and commercial encroachment is the most effective way to manage growing freight traffic without adding to overall traffic congestion for other road users.

Although Darwin does not yet face the congestion issues present in other major Australian cities, corridor protection must still be undertaken at the earliest possible opportunity to avoid the emergence of these issues in the future.

A clear and consistent approach to corridor protection also provides certainty for both public and private investment plans and prevents complexities in delivering vital infrastructure by avoiding issues such as encroachment and the imposition of curfews.

In particular, ALC would encourage the NT Government to ensure that Darwin Port and Darwin Airport receive particular attention in any corridor protection plan. It is vital that both these facilities maintain full operational flexibility and are not inhibited by the imposition of curfews.

Both these facilities will be critical to promoting the growth of international trade opportunities for producers in Northern Australia, particularly in supporting the growth of resource and agricultural sector exports to growing Asian markets.

Accordingly, ALC recommends that NT Government commits to preparing a specific corridor protection plan as part of the NT Wide Logistics Master Plan. This plan should include, but not be limited to;

- **The clear identification of strategies that the NT Government will undertake to protect future transport corridors;**
- **Details of how each corridor will be protected, with reference to the Northern Territory planning regime;**
- **Particular focus be given to ensuring key corridors are protected that will permit Darwin Port and Darwin Airport to continue facilitating growth in Australian exports; and**
- **For each transport corridor identified, outline the proposed infrastructure to be built in that corridor, including a construction time frame.**

¹ Page 26

Planning

In its initial submission on the NT Wide Logistics Master Plan, ALC noted that future transport corridors and current freight precincts are not adequately protected by the good-will and intentions of state and territory logistics plans alone.

ALC believes that any jurisdictional planning instrument or Commonwealth Government infrastructure funding agreement should contain the high-level principals outlined in the *ALC Planning Principles* (included as Attachment A).

ALC recommends that the NT Wide Logistics Master Plan should include an action item for the Northern Territory Government to work with the freight and logistics industry to ensure practical planning policies are put in place to protect current and future freight precincts and corridors.

Infrastructure Investment

ALC notes that the draft plan includes two priority infrastructure projects and supports the inclusion of the Darwin Ship Lift. ALC supported the prioritisation of this much-needed infrastructure project in its 2019 publication *Help Us Deliver*², and it is positive that construction will begin in mid-2021. ALC hopes that this project will remain on-time for completion in late 2023.

ALC would also encourage the NT Government to support necessary upgrades to key water, sewerage, electrical and communications infrastructure to address current service capacity issues. This would facilitate the future development of surrounding landholdings for use by freight operators, including warehousing and logistics support facilities that would be consistent with the objective of developing this area of Darwin into a key maritime and logistics precinct.

The first discussion paper prior to the release of the draft plan included a list of 51 important infrastructure projects in the NT. ALC believes that the identification and prioritisation of these projects are critical in ensuring that industry can make informed investment and planning decisions over the long term.

ALC recommends that the list of 51 identified infrastructure projects be included as an addendum to the NT Wide Logistics Master Plan, in order of priority. This list should also include identified funding sources and be updated annually.

The Heavy Vehicle National Law

ALC notes that the Northern Territory is not a participating jurisdiction in the Heavy Vehicle National Law (HVNL).

² <http://www.austlogistics.com.au/wp-content/uploads/2019/10/22102019-Help-Us-Deliver.pdf>

ALC's consistent position is that there should be a single national law encompassing heavy vehicle regulation. As such ALC believes that to achieve this outcome, the Northern Territory Government must adopt the HVNL in its current form.

Australia's supply chains do not stop at state and territory borders. Not only must jurisdictions adopt the highest standards of heavy vehicle maintenance, safety and fatigue management principals, but they must ensure that there are minimal inconsistencies in this regulation amongst states and territories.

The effect of the Northern Territory's reluctance to adopt the HVNL continue to be felt nationally. The lack of a truly national law leads to additional administrative and cost burdens for national freight companies.

The HVNL is currently being reviewed by the National Transport Commission (NTC), and this review process affords an opportunity to address aspects of the HVNL (including the approach to fatigue management) which have previously been identified as issues for non-participating jurisdictions.

For example, in its submissions to the HVNL review, ALC has recommended that the HVNL should be redesigned to adopt the fatigue management approach used by Western Australia – another non-participating jurisdiction.

By actively participating in the review process, the Northern Territory has an opportunity to shape a national law that can deal with the concerns of local operators, but still promote greater national consistency.

ALC recommends that the Northern Territory Government actively participate in the current review of the HVNL, with a view to adopting the HVNL to provide national consistency for the freight logistics industry.

Again, ALC is pleased to be given the opportunity to provide a submission to the draft NT Wide Logistics Master Plan. We are encouraged by the work that has been undertaken to date and look forward to continuing to engage with the NT Government in its implementation of this Plan when finalised, as well as the National Freight and Supply Chain Strategy.

Should you wish to discuss this submission further, I can be contacted at Kirk.Coningham@austlogistics.com.au.

Yours sincerely,



Kirk Coningham OAM
Chief Executive Officer

ALC NATIONAL PLANNING PRINCIPLES

- 1** All planning instruments must recognise that planning for transport and logistics (including ensuring the continued efficient operation of existing ports and other freight and logistics infrastructure) is an urban priority. This means that caps, curfews and other restrictions on how infrastructure (particularly ports and airports) are operated and used must be avoided.
- 2** Compromised planning outcomes between industrial and residential uses fail both industry and residents. Planning instruments must incorporate sustainable land use planning solution that allows industry to operate and expand in order to increase economic activity and jobs near where people live. Planning instruments should therefore contain land use compatibility features including:
 - a) land separation between residential and freight and logistics lands; and
 - b) retention and protection of lands that are suitable in size for freight and logistics purposes.
- 3** Planning instruments must ensure that industrial lands and transport corridors are capable of operation 24 hours a day, seven days a week. State and territory governments must ensure planning instruments provide for mitigation measures when sensitive use developments (e.g. residential) are located close to freight infrastructure.
- 4** Planning instruments must identify a clear linkage of road and/or rail infrastructure between employment lands and other clearly identifiable freight generation points, as well as other significant transport infrastructure such as ports, airports and intermodals.
- 5** Governments must establish effective corridor protection mechanisms to ensure timely preservation of surface, subterranean and air corridors and strategic sites for future infrastructure priorities.

