



2 January 2020

Mr Paul Lindwall
National Transport Regulatory Reform
Productivity Commission
LB2, Collins Street East
MELBOURNE VIC 8003

Dear Mr Lindwall

National Transport Regulatory Reform

Thank you for the opportunity to provide comment on the Productivity Commission's *National Transport Regulatory Reform* draft report (the Draft Report).

As the representative body of Queensland's 77 councils, the Local Government Association of Queensland (LGAQ) has worked closely with our members to identify actions that would improve the safety, efficiency and productivity of the heavy vehicle transport sector and we believe that these insights are important in shaping the priorities of the National Transport Regulatory Reform agenda.

Further to our earlier submission and subsequent meeting with yourself and other commission staff, the LGAQ make the following comments in relation to the Draft Report. The LGAQ largely supports the analysis contained within the Draft Report. We believe it articulates transport regulatory issues well and our response focuses on two issues that are of critical importance to the local government sector:

- The capability and capacity needs of local government
- Transport technology and data

The Draft Report

Capability and capacity of local government

The LGAQ strongly supports Recommendation 10.1, which calls for the '*Council of Australian Governments to provide greater support to ensure local government has the financial and technical capacity to deliver its role as asset manager for local roads*'. Greater levels of financial and technical support for the assessment of key freight routes and infrastructure would enable an increase in the number of gazettals and pre-approvals. Once again and further to our previous submission, this is demonstrated by the LGAQ's direct work with Queensland councils.

The LGAQ supports Recommendation 6.1 regarding the value of sharing engineering expertise across local government. However, we note that state jurisdiction road managers have valuable experience in heavy vehicle access and asset management, and we suggest that sharing expertise between all road managers would provide even greater benefits.

The LGAQ supports Recommendation 6.4 regarding the expansion of Performance Based Standards (PBS) As-of-Right Networks; however, including local government land use/traffic



planners in the consultation process to consider future freight movements would improve the ability of the network to cater for future freight needs.

Transport technology and data

For many local government road managers, permits are the preferred mechanism of access. Road owners have greater visibility over heavy vehicle movements on local roads and this visibility provides assurance to local government on the types of movements that occur on local roads and assists council to prioritise road maintenance works. While such levels visibility are understandable from asset preservation and road safety perspectives, managing access via individual permits runs counter to increased productivity benefits that can be realised through As-of-Right and/or pre-approved levels of access.

Telematics can provide greater visibility and assurance to local government road managers and remove the need for individual permits. While this technology and data has existed for some time, it has been inaccessible to local government road managers. The LGAQ supports Recommendation 8.2 regarding the development of a National Freight Data Hub; however, we emphasise that local government should also have access to this data as custodians of local roads.

Thank you for the opportunity to provide comments on the *National Transport Regulatory Reform* draft report. If there is a need for further information or clarification of LGAQ's submission, please feel free to contact Mr Robert Chow, Lead – Transport and Logistics via telephone on 1300 542 700.

Yours sincerely

Sarah Buckler PSM
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