

Victoria's 30-Year Infrastructure Strategy (2025–2055)

Monday, 28th April 2025

Table of Contents

ntroduction	2
Embedding Freight in Victoria's Infrastructure Future	2
Response to Key Recommendations and Future Options	3
1.Urban Growth, Land Use and Freight Interactions (Recommendations 1–34)	3
Residential Intensification and Planning (Recommendations 1, 7–8)	3
Public and Active Transport Infrastructure (Recommendations 9–13, 14–16)	3
Schools, TAFEs, Community and Health Infrastructure (Recommendations 3–5, 17–20)	4
Energy Infrastructure and Urban Freight (Recommendations 29–34)	4
Workforce and Operational Readiness	4
2.Strategic Infrastructure Planning and Governance (Recs 35–43)	5
Recommendation 35: Prepare and publish infrastructure sector plans to shape Victoria's cities	5
Recommendation 36: Reform infrastructure contributions.	5
Recommendation 37: Improve asset management of all government infrastructure.	5
Recommendation 38: Prepare for more recycling and waste infrastructure.	5
Recommendation 39: Use digital technologies to better design, build, operate and maintain government infrastructure.	5
Recommendation 40: Use modern traffic control technology for efficient and safe journeys.	5
Recommendation 41: Rail Freight	5
Recommendation 42 and Future Option: Off-Peak and Urban Freight:	6
Recommendation 43	7
3.Road Reform, Pricing and Future Freight Planning (Future Options A–G)	7
Road Pricing Reform (Future Option – "Charge people fairly to use roads")	7
Urban Freight Precincts and Mode Shift (Future Option – "Plan for more efficient and sustainable urban freight")	7
City Loop Reconfiguration and Freight Rail Integration	8
4.Missed Opportunities and Strategic Gaps	8
Freight Decarbonisation Strategy	8
Maritime Emissions and Shore Power	8
Support for Low-Emissions Fuels	8
Enabling Innovation Through Regulation	8
Local Government Capability and Coordination	8
Lack of Integration with Inland Rail and National Freight Initiatives	8
Conclusion	9
Summary of Key Recommendations	9

Introduction

The Australian Logistics Council (ALC) appreciates the opportunity to provide this submission in response to Infrastructure Victoria's Draft 30-Year Infrastructure Strategy (The Strategy). As the peak national body for the end-to-end freight logistics supply chain, ALC represents companies across road, rail, ports, air, warehousing, intermodal transport, and supporting infrastructure and technology.

Freight is a cornerstone of Victoria's economic performance and national supply chain resilience. While the draft Strategy includes several important freight-related recommendations, it still treats freight as peripheral rather than essential. To build a future-ready infrastructure system, freight must be embedded as a core stream—alongside transport, energy, digital, and water infrastructure—in all stages of planning, design, and investment.

Embedding Freight in Victoria's Infrastructure Future

Freight must be recognised and embedded as a foundational and interconnected element of Australia's infrastructure strategy. It is the mechanism through which goods move across vast distances—linking ports, terminals, warehouses, and end markets. It connects producers to consumers, underpins industrial activity, and ensures communities can access essential services.

The national freight system is inherently interconnected, relying on the seamless functioning of multiple transport modes—road, rail, air, and coastal shipping—as well as integration with energy networks, digital systems, and land use planning. However, current planning frameworks often treat freight in isolation, leading to fragmented investment, modal inefficiencies, and regulatory misalignment across jurisdictions.

These shortcomings are evident in nationally significant projects such as Inland Rail. While the rail corridor itself is a key freight spine, its full value depends on intermodal terminals, efficient last-mile road access, and industrial precinct connectivity. Without coordinated planning across these assets, the benefits of such investments are diminished. Similarly, inconsistent approaches to High Productivity Vehicle (HPV) network development restrict the uptake of safer, more efficient, and lower-emission vehicles across jurisdictions, despite their proven benefits.

Urban freight networks also require greater strategic coordination¹. Industrial land and freight corridors in metropolitan areas are increasingly threatened by incompatible land use decisions. This weakens the interconnectivity between freight hubs and the customers they serve, especially in growing metropolitan areas. Without integrated, precinct-based land use planning, supply chain performance will decline as congestion, delivery times, and costs rise.

Freight's interdependence with the energy system is also growing. As one of the largest and fastest-growing sources of transport emissions², the freight sector must decarbonise to align with national climate commitments. This transition depends on the availability of charging and refuelling infrastructure, grid capacity, and digital systems that enable zero-emission vehicles, alternative fuels, and automated logistics technologies. These infrastructure components must be codeveloped to ensure system-wide readiness and avoid delays or stranded assets.

Australia's freight task is projected to grow by over 35 per cent between 2018 and 2040³. Accommodating this growth requires planning systems that recognise and support the interconnected nature of freight infrastructure across all levels of government and industry. A modern infrastructure strategy must embed freight as a core national priority—integrated across modes, sectors, and jurisdictions.

To that end, the Australian Logistics Council recommends:

- Designating freight as a core infrastructure stream in all future infrastructure strategies, alongside energy, transport, water, and digital infrastructure.
- Recognising freight infrastructure as a strategic asset class, to guide nationally coordinated investment, support emissions reduction, and improve supply chain resilience and productivity.

¹ https://www.climatechangeauthority.gov.au/sites/default/files/documents/2024-09/2024SectorPathwaysReviewTransport.pdf

² https://www.climateworkscentre.org/wp-content/uploads/2024/06/Decarbonising-Australias-transport-sector-Report-Climateworks-Centre-June-2024.pdf

³ https://www.freightaustralia.gov.au/what-are-we-doing/smarter-and-targeted-infrastructure-investment

In summary, freight is not a standalone network—it is an interconnected system critical to Australia's economic performance, climate transition, and the delivery of essential services. Embedding freight more deliberately within infrastructure strategy is a prerequisite for building a resilient, efficient, and sustainable national supply chain.

Response to Key Recommendations and Future Options

The following sections offer detailed commentary on the draft Strategy's recommendations, grouped thematically to provide a logical structure, and emphasise linkages between urban development, freight operations, planning and governance, road reform, and climate resilience.

1. Urban Growth, Land Use and Freight Interactions (Recommendations 1–34)

While the Strategy's first group of recommendations (1–34) focus on housing, education, social infrastructure and passenger transport access, these elements have important implications for the freight and logistics sector, i.e. freight accessibility, last-mile delivery efficiency, and infrastructure viability. Ensuring freight considerations are embedded in land use planning is essential to protecting supply chain functionality.

RESIDENTIAL INTENSIFICATION AND PLANNING (RECOMMENDATIONS 1, 7-8)

ALC supports increased housing supply close to existing infrastructure, as proposed in Recommendations 1, 7 and 8. However, this must not compromise freight efficiency. Encroachment of residential areas on freight corridors leads to noise issues, operating curfews, traffic restrictions, and land use conflict.

ALC recommends:

- Strengthening freight corridor protection within planning schemes.
- Preventing the rezoning of freight precincts without comprehensive freight impact assessments.
- Establishing a state-level policy framework to ensure the integration of freight infrastructure with surrounding land uses.
- Embedding freight-responsive design requirements (e.g. delivery zones, HPV access, and noise buffers) into new urban developments.

PUBLIC AND ACTIVE TRANSPORT INFRASTRUCTURE (RECOMMENDATIONS 9-13, 14-16)

The expansion and increased frequency of public transport are essential for improving workforce accessibility, particularly in outer metropolitan and regional freight hubs. While the extension of bus, train, and tram networks is a positive development, it is crucial that these networks are designed and delivered in a way that does not inadvertently disrupt freight routes or contribute to congestion.

Similarly, investments in safe cycling and walking paths are commendable but must be planned to ensure they complement, rather than conflict with, key freight corridors.

The growing integration of active transport is presenting modern emerging challenges. The increasing presence of food delivery services and electric bikes on bike tracks raises safety concerns for pedestrians and disrupts traffic flow. When excluded from pedestrian walkways or if too by, e-bikes often spill onto roads, forcing vehicles to navigate narrower lanes and intensifying congestion on vital freight and commuter routes.

There is an urgent need for advanced traffic management systems that can effectively manage the interaction between freight, active transport, and pedestrian movements, ensuring safety while minimising disruption to critical transport infrastructure.

Infrastructure Victoria should coordinate with the Department of Transport and Planning to ensure:

- Dedicated freight lanes or signal prioritisation where freight routes intersect with high-volume public transport corridors.
- Integrated planning of last-mile freight and passenger movement in activity centres.

SCHOOLS, TAFES, COMMUNITY AND HEALTH INFRASTRUCTURE (RECOMMENDATIONS 3-5, 17-20)

Increased social and education infrastructure in growth areas will directly affect freight demand for building materials, food delivery, waste removal, and medical supplies. Strategic co-location of these facilities should include logistics access considerations, such as off-street loading zones and time-window delivery flexibility.

Expanding TAFE infrastructure, as outlined in Recommendation 4, is particularly significant in addressing the freight sector's persistent workforce shortages. ALC supports expanded TAFE capacity in key growth areas of Melbourne's west, north and south-east, as well as in major regional freight centres. However, this infrastructure investment must be complemented by a deliberate focus on <u>applied</u>, industry-aligned training in freight and supply chain operations—encompassing areas such as heavy vehicle driving, warehousing, logistics technology, and infrastructure servicing roles.

ENERGY INFRASTRUCTURE AND URBAN FREIGHT (RECOMMENDATIONS 29–34)

ALC acknowledges the Strategy's focus on household and small-scale business energy use. However, the freight sector requires tailored infrastructure to support the energy transition. This includes high-capacity electric truck charging, hydrogen refuelling, and enhanced grid resilience in freight precincts. The electrification of ports and intermodal terminals must also be prioritised to enable seamless, low-emissions freight movements across the supply chain. Charging networks must be developed in partnership with freight operators to prevent infrastructure bottlenecks and facilitate the uptake of zero-emission heavy vehicles (ZEVs).

Victoria must also upgrade bridges, tunnels, and pavements to accommodate heavier ZEVs. These infrastructure improvements should be aligned with emissions reduction and freight productivity goals.

ALC recommends:

- Public and private investment in shared, high-capacity, multimodal refuelling infrastructure and locations: electric truck charging, hydrogen refuelling stations, etc.),
- Coordination across planning, energy, and transport departments to streamline infrastructure approvals,
- Grid capacity mapping around logistics precincts to support infrastructure development,
- Upgrades to power supply infrastructure to ensure resilience for 24/7 intermodal terminals and cold chain facilities.

WORKFORCE AND OPERATIONAL READINESS

As Victoria moves to decarbonise its transport system and encourage more off-peak and urban freight deliveries, workforce and operational challenges must be addressed in tandem with infrastructure upgrades.

The transition to zero-emission vehicles requires new technical competencies—for example, managing electric charging systems, maintaining new vehicle types, and adapting to automated technologies. However, current training systems and workforce development pipelines are not yet equipped to deliver these skills at scale.

In parallel, the successful delivery of infrastructure projects themselves is increasingly at risk due to acute workforce shortages across engineering, construction, and logistics occupations. These shortages threaten to delay critical freight infrastructure developments—particularly in regional and growth areas where capacity is already constrained. Strategic infrastructure planning must therefore account for labour market realities and support workforce pipelines in both freight operations and infrastructure delivery.

At the same time, infrastructure strategies promoting off-peak and last-mile deliveries must reflect the operational demands of a 24/7 freight network. Shift work, fatigue management, and occupational safety remain key concerns for freight operators and drivers, particularly when navigating dense urban areas outside of normal business hours.

To ensure workforce readiness and safe operations, ALC recommends:

- Embedding freight-specific workforce training and safety programs into all future transport and energy transition initiatives—particularly those supporting the deployment of zero-emission vehicles and last-mile delivery models
- Developing and implementing land-use planning policies that ensure the physical separation of freight corridors from residential areas, improving safety outcomes for drivers and communities and enhancing the liveability of urban environments.

2. Strategic Infrastructure Planning and Governance (Recs 35-43)

As outlined in the 'Embedding Freight' section, coordinated governance is essential to support freight's interconnected, cross-modal nature. A recurring industry frustration is the lack of delivery against long-term strategies. Many submissions and reports generate recommendations but fail to translate into funded implementation plans.

RECOMMENDATION 35: PREPARE AND PUBLISH INFRASTRUCTURE SECTOR PLANS TO SHAPE VICTORIA'S CITIES.

Freight must be embedded in all infrastructure sector plans, including integration of intermodal hubs, terminal access, and national freight network links. Freight has often been a downstream user—this must shift to co-equal priority in planning.

RECOMMENDATION 36: REFORM INFRASTRUCTURE CONTRIBUTIONS.

Logistics operators rely on road access, terminal connectivity, and land availability. Infrastructure contributions reform must ensure fair investment into freight infrastructure in growth corridors.

RECOMMENDATION 37: IMPROVE ASSET MANAGEMENT OF ALL GOVERNMENT INFRASTRUCTURE.

Transparent and coordinated asset condition reporting for freight-relevant infrastructure—roads, terminals, rail lines, and bridges—is essential for long-term planning and resilience.

RECOMMENDATION 38: PREPARE FOR MORE RECYCLING AND WASTE INFRASTRUCTURE.

Waste and recycling facilities are emerging as critical and growing freight nodes. Infrastructure design must prioritise emissions reduction, local traffic integration, and freight access to support the circular economy.

RECOMMENDATION 39: USE DIGITAL TECHNOLOGIES TO BETTER DESIGN, BUILD, OPERATE AND MAINTAIN GOVERNMENT INFRASTRUCTURE.

BIM, digital twins, and logistics data platforms offer strong potential to optimise freight assets. ALC supports expanding their use to reduce costs, improve coordination, and enhance multimodal efficiency.

RECOMMENDATION 40: USE MODERN TRAFFIC CONTROL TECHNOLOGY FOR EFFICIENT AND SAFE JOURNEYS.

Heavy vehicle priority lanes, dynamic signalling, and real-time freight data should be embedded into freight corridors to manage congestion and improve safety.

RECOMMENDATION 41: RAIL FREIGHT

ALC welcomes the Strategy's recognition of the critical role of rail in meeting Victoria's long-term freight needs. ALC supports Recommendation 41, which calls for the development of a 30-year integrated rail freight network plan, a 10-year maintenance funding program, and a freight network coordination policy. These are essential to improving productivity, reducing emissions, and enhancing the reliability and resilience of the Victorian freight network.

While the Strategy acknowledges the need to shift more freight from road to rail, practical constraints—particularly poor reliability, limited capacity, and misaligned policy settings—continue to impede progress. The existing approach to passenger priority on shared corridors, including provisions within V/Line access agreements, restricts freight growth and undermines mode shift targets. Without a policy review that reconciles passenger and freight access, network optimisation will remain constrained, risking further congestion, unnecessary infrastructure duplication, or loss of rail mode share.

Reliability remains a major barrier to increasing rail freight uptake. Track and infrastructure limitations, outdated rolling stock, and poor scheduling flexibility continue to undermine rail's competitiveness. Current infrastructure and policy settings do not incentivise investment in modern locomotives, resulting in the continued use of ageing assets, many over 30 years old. In addition, the network does not adequately support modern rolling stock, such as AC traction locomotives or higher axle loads. Greater alignment between infrastructure investment and policy changes is needed to drive uptake of more productive and efficient equipment, improving rail freight's reliability, productivity, and environmental performance. Without these changes, rail will remain a less dependable and less attractive option for freight customers, further entrenching road transport use.

Infrastructure investment must be designed to drive complementary investment in rolling stock and terminal development. There is also limited incentive for investment in new terminals, as capacity planning does not sufficiently accommodate peak demand, causing freight to shift to road. ALC recommends the establishment of an independent Rail Freight Coordinator to facilitate multi-user scheduling, resolve operational conflicts, and advocate for freight outcomes

across the network. This function must be empowered to address systemic inefficiencies, including the impact of Metro Trains Melbourne (MTM) possessions, which severely disrupt freight services and further reduce reliability.

To ensure tangible outcomes, Victoria's strategy must embed mode shift targets supported by emissions metrics, infrastructure upgrades—not just maintenance—and operational incentives such as track access discounts or public-private partnerships for regional shuttle services. Reforms to rail access pricing and stronger integration of freight within planning, investment, and emergency management frameworks are essential to level the playing field with road transport, which continues to benefit from substantial investment and regulatory flexibility.

ALC recommends:

- Appointment of an independent Rail Freight Coordinator to improve network-wide access, scheduling, and stakeholder coordination.
- A review of policy settings to balance freight and passenger rail priorities on shared corridors.
- Funding of infrastructure upgrades beyond maintenance to improve reliability, including track upgrades, new locomotives, and support for heavier axle loads.
- Establishment of clear, accountable mode shift targets aligned with emissions goals.
- Operational incentives for metro and regional rail shuttle services.
- Preservation of strategic land for intermodal and container handling infrastructure.
- A reform in access pricing to improve transparency and support freight competitiveness.
- Freight rail inclusion in state resilience and emergency management planning.
- Commitment to network upgrades and investment in modern rolling stock to support long-term freight growth and improve reliability.

RECOMMENDATION 42 AND FUTURE OPTION: OFF-PEAK AND URBAN FREIGHT:

The Strategy rightly identifies urban freight as a growing challenge, constrained by land use conflicts, curfews, congestion, and a lack of fit-for-purpose infrastructure. ALC welcomes the recognition of solutions such as urban freight precincts and off-peak deliveries but urges a shift from conceptual discussion to funded, time-bound implementation through fiscal mechanisms. A practical first step would be converting the "Future Option" into a formal recommendation.

Urban Freight Precincts

The proposal to develop a network of urban freight delivery precincts across Melbourne is essential to meet the current and future freight task. ALC strongly supports this concept and recommends accelerated implementation in key locations, including:

- Truganina
- Altona North
- Dandenong South
- Geelong Port Precinct

These freight hubs should be supported by:

- Land protection policies to safeguard future freight and logistics capacity. Urban encroachment remains a
 persistent threat to the viability of key freight infrastructure, particularly through rezoning pressures and the
 spread of sensitive land uses near critical freight corridors. ALC recommends that state planning schemes be
 updated to:
 - Prohibit the rezoning of strategic freight land without comprehensive freight impact assessments.
 - Mandate buffer zones, noise attenuation measures, and protections for 24/7 operations in the approval of nearby sensitive-use developments.
 - Establish a freight overlay or dedicated policy framework to preserve and future-proof the functionality of the freight network.
- Integrated last-mile connectivity and freight consolidation infrastructure to reduce intra-urban congestion and emissions.

- Micro hubs, smart loading bays, and digital access management systems to improve delivery efficiency.
- ALC recommends embedding freight considerations in early-stage planning processes, including activity centres
 and the Suburban Rail Loop, and collaborating with councils to streamline freight-supportive land use approvals.
- Integration of freight kerbside parking and loading access into municipal parking strategies, with consideration for different freight vehicle types such as zero-emission vans, small trucks, and cargo bikes. Prioritisation of these modes can support quieter, more space-efficient deliveries aligned with sustainability objectives.

ALC also recommends embedding freight considerations into early-stage land use planning—including activity centres, the Suburban Rail Loop, and major urban redevelopment projects—and collaborating closely with local councils to streamline freight-supportive land use approvals.

Off-Peak Freight Deliveries

The Strategy appropriately acknowledges the value of off-peak freight delivery in improving network efficiency, particularly for high-turnover sectors such as supermarkets, food services, and e-commerce. However, restricting action to a single pilot in a high-density area falls short of the scale required.

ALC recommends:

- Expanding off-peak delivery programs across major logistics precincts including the Port of Melbourne,
 Dandenong South, and Altona
- Investing in enabling infrastructure such as noise-reducing pavement and 24/7 access zones.
- Aligning planning systems and local government zoning to support continuous freight operations.
- Pilot initiatives must be scalable and underpinned by transparent performance monitoring, with public reporting to inform further expansion and investment.

ALC urges the State to move beyond pilot programs and commence implementation of urban freight solutions that reflect global best practice—urban consolidation centres, designated freight routes, and zero-emission delivery zones. Delivering a coordinated, future-focused approach to urban freight will enhance supply chain efficiency, reduce emissions, and support Victoria's growing urban economy.

RECOMMENDATION 43

As detailed under the Residential Intensification and Planning section, long-term protection of freight corridors is essential and should be embedded into state and local planning frameworks.

3. Road Reform, Pricing and Future Freight Planning (Future Options A-G)

Among the seven "future options" presented in the draft Strategy, several bear significant relevance to freight and logistics.

ROAD PRICING REFORM (FUTURE OPTION - "CHARGE PEOPLE FAIRLY TO USE ROADS")

ALC supports the long-term need to reform road funding through user-based charging. However, any move towards congestion pricing, tolling reform or mass-distance-location charging must:

- Be nationally harmonised to prevent distortion across state borders. Any state-based pricing initiatives must be aligned with National heavy vehicle pricing reforms to avoid regulatory duplication, cost imposition, and network fragmentation. Freight operators should not be burdened with inconsistent or overlapping pricing frameworks.
- Reflect the higher economic contribution and productivity focus of freight vehicles,
- Funds raised for freight-related infrastructure projects are used specifically for their intended purpose and are reinvested into freight infrastructure and productivity improvements.

A national road user charging scheme, developed in partnership with the Commonwealth and the freight sector, should be prioritised as part of Victoria's contribution to a coherent national freight system.

URBAN FREIGHT PRECINCTS AND MODE SHIFT (FUTURE OPTION – "PLAN FOR MORE EFFICIENT AND SUSTAINABLE URBAN FREIGHT")

Please refer to Recommendation 42 for ALC's full position and recommendations.

CITY LOOP RECONFIGURATION AND FREIGHT RAIL INTEGRATION

Although primarily a passenger-focused proposal, reconfiguration of the City Loop and expansion of metro rail capacity must not inadvertently constrain freight rail access. ALC recommends all major metropolitan rail planning consider potential freight pathways and terminal linkages in early design stages.

4. Missed Opportunities and Strategic Gaps

FREIGHT DECARBONISATION STRATEGY

Although the draft Strategy identifies many important challenges, several opportunities remain underdeveloped. This section highlights priority areas that should be strengthened to ensure freight resilience and decarbonisation.

Victoria lacks a clear freight emissions reduction pathway.

ALC recommends a dedicated Freight Decarbonisation Roadmap with:

- · Defined emissions targets.
- Infrastructure priorities (e.g. ZEV-compatible corridors).
- Policy levers (e.g. incentives, trials).
- Modal shift metrics and performance tracking.
- Resilience of Freight Infrastructure

Victoria's freight-critical routes, such as the Hume Freeway and Port of Melbourne rail access, require resilience audits to prepare for climate impacts and future disruptions.

MARITIME EMISSIONS AND SHORE POWER

Idling vessels at port generate localised pollution. Victoria should mandate shore power infrastructure at key ports to align with international regulations and support sustainable port operations.

SUPPORT FOR LOW-EMISSIONS FUELS

The Strategy should recognise renewable diesel and other interim low-emissions fuels as viable transition options, supported through procurement and policy alignment.

ENABLING INNOVATION THROUGH REGULATION

Victoria should adopt outcome-focused, risk-based regulatory models. Flexible axle weights, streamlined ZEV approvals, and trial exemptions are necessary to accelerate industry investment.

LOCAL GOVERNMENT CAPABILITY AND COORDINATION

Local councils play a vital role in freight delivery. They require planning tools, freight education, and infrastructure funding to improve curb side access, zoning, and emissions outcomes.

These strategic additions complement the broader infrastructure priorities outlined in earlier sections and bring coherence to Victoria's freight and climate strategies.

LACK OF INTEGRATION WITH INLAND RAIL AND NATIONAL FREIGHT INITIATIVES

The Strategy makes no mention of Inland Rail or its implications for terminal investment, landside freight access or mode shift. Similarly, there is limited reference to:

- The National Freight and Supply Chain Strategy⁴,
- Victorian Freight Plan: Delivering the Goods⁵,
- The Commercial Ports Strategy: Navigating Our Port Futures⁶.

⁴ https://www.freightaustralia.gov.au/

⁵ https://www.vic.gov.au/sites/default/files/2023-09/delivering-the-goods_1.pdf

⁶ https://www.vic.gov.au/sites/default/files/2023-09/Navigating-our-Port-Futures-Summary-Copy.pdf

All future planning and infrastructure investment decisions must align with these frameworks to maximise productivity and ensure national consistency.

Conclusion

The Australian Logistics Council strongly supports the objectives set out in Infrastructure Victoria's Draft 30-Year Infrastructure Strategy—enhancing resilience, lifting productivity, supporting population growth, and reducing emissions. These priorities are deeply aligned with the long-term aspirations of the freight and logistics sector.

To achieve these outcomes, freight must be positioned as a central component of Victoria's infrastructure planning and investment agenda. This submission outlines practical and targeted actions to embed freight considerations across strategic planning, including the decarbonisation of freight fleets, strengthening urban delivery systems, and enhancing infrastructure resilience.

The freight industry is increasingly calling for tangible action over continued consultation. To maintain industry confidence, the Strategy must transition from high-level aspirations to concrete, implementable measures that address known infrastructure barriers and unlock greater private sector participation.

ALC welcomes the opportunity to work with Infrastructure Victoria and the Department of Transport and Planning to deliver on this vision by:

- Leveraging technology and data to improve freight planning and performance.
- Investing in integrated intermodal and last-mile freight precincts.
- Accelerating the transition to zero-emission freight transport.
- Protecting key freight corridors from climate impacts and encroachment; and
- Advancing regulatory and pricing reforms that drive productivity and competitiveness.

ALC urges Infrastructure Victoria to establish clear, funded delivery pathways that align with national infrastructure and decarbonisation objectives. The freight sector stands ready to partner with government to ensure Victoria's freight network remains safe, sustainable, efficient, and future-focused.

Summary of Key Recommendations

1. Embed freight within all infrastructure sector plans (Rec. 35)

Designate freight as a core infrastructure stream and treat freight infrastructure as a strategic asset class across all state planning and investment frameworks.

2. Develop a dedicated Freight Decarbonisation and Resilience Roadmap

Set emissions targets, identify priority corridors for zero-emission vehicles (ZEVs), and implement enabling policies and infrastructure to support freight transition.

3 Implement urban freight precincts and off-peak delivery programs (Rec. 42 + Future Option)

Move beyond pilot programs to deliver fully enabled freight hubs in key logistics hubs/locations, supported by 24/7 access infrastructure and local government coordination.

4. Conduct climate resilience audits for freight-critical infrastructure

Assess and upgrade key freight routes (road and rail) to ensure resilience to extreme weather and climate risks.

5. Support nationally harmonised road user pricing reform

Ensure any user-based pricing is harmonised nationally, reinvested into freight-supportive infrastructure, and aligned with productivity objectives.

6. Accelerate planning and investment in intermodal and port infrastructure (Rec. 43)

Safeguard land and coordinate planning for Bay West, Port of Melbourne, and key terminals to support freight capacity and modal shift objectives.

7. Protect freight corridors and precincts in urban planning frameworks (Recs. 1-8)

Ensure land use intensification does not constrain or conflict with freight access and operations.

8. Align energy transition planning with freight infrastructure needs (Recs. 29-34)

Prioritise grid capacity, charging/refuelling infrastructure, and resilient power supply in logistics zones.

9. Integrate freight into emergency and disaster resilience planning (Rec. 41)

Prioritise grid capacity, charging/refuelling infrastructure, and resilient power supply in logistics zones.

10. Support and strengthen mode shift to rail (Rec. 41)

Appoint an independent Rail Freight Coordinator, improve freight access and scheduling, upgrade infrastructure, and implement mode shift targets with supporting incentives.

11. Develop and implement shore power standards at Victorian ports

Reduce maritime emissions through shore-side electricity infrastructure, improve air quality in port-adjacent areas, and align with global decarbonisation regulations.

12. Upgrade freight-critical infrastructure to support ZEV deployment

Assess and retrofit bridges, pavements, and tunnels for higher vehicle mass and safety standards.

13. Establish streamlined approval pathways for ZEVs and clean freight technologies

Enable innovation through axle weight flexibility, access exemptions, and safety regulation harmonisation.

14. Recognise Road maintenance as a decarbonisation enabler

Fund and prioritise road upgrades to reduce emissions from inefficient freight movement.

15. Align Victoria's infrastructure strategy with national freight priorities

Ensure consistency with the National Freight and Supply Chain Strategy, Inland Rail delivery, Victoria's Freight Plan, and the Commercial Ports Strategy.