

Bland Shire Council commends the NSW Government for the work undertaken in developing the Draft NSW Heavy Vehicle Access Policy. As a Local Government Authority responsible for a road network of over 3,000km that services a highly productive Agricultural and mining industry within the Shire we are deeply invested in the improvement of efficiency in the transport of these commodities.

Local Government plays a pivotal role in the last mile access arrangements for heavy vehicle transport. Within Bland Shire this equates to nearly 1,000 rural properties requiring heavy vehicle access from their gate to the various logistics hubs, primarily Grain storage facilities. It is imperative that any future policy arrangements in the Heavy Vehicle space acknowledges the Agricultural sector and the need for improved productivity. However this acknowledgement also needs to account for the state of the network and the financial constraints on Councils to firstly maintain the existing networks as well as the need to improve the networks to accommodate the larger vehicles being operated. Local Government recognises the axle loading improvements that these vehicles offer, however there also needs to be acknowledgement that the majority of the regional road networks are of an unsealed nature with substandard width and alignment. These constraints then impact the safe operation of these vehicles on the network. Also the improvement in on farm efficiency has also meant that the need for improved road transport efficiency has compressed the timeframes for harvests and the need for these vehicles to travel at higher speeds than previously. This in itself causes maintenance issues for Local Government on these unsealed road networks.

The submission that follows breaks down these issues further and addresses some other issues.

Pillar 1 highlights the actions of collaboration with industry, local government etc to develop end to end networks as well as the undertaking of network analysis to understand the impact of increased vehicle mass and dimensions on infrastructure and to inform decisions on road access. The Pillar also highlights the need to develop guidance material to inform business cases for development in network improvements to facilitate access.

While the policy refers to working with Local Government to facilitate first and last mile access on local roads it does not refer to support for local government in addressing constraints within the extensive local road network when it comes to unsuitable bends, crests, intersections and lane width. The policy is very quiet when it comes to supporting local government in supporting Council's to address these issues.

Also of interest to Council is the objectives of streamline access under Pillar 3 which includes and automated access assessment program. The policy discusses collection and collation of local government asset data to enable automated assessment based on this data. While this is admirable, there will need to be support which will need funding for assessment of the local road network to have suitable data to make this feasible. There will also need to be a consistent statewide approach to how this data is collected.

The policy does rightfully identify that freight plays a crucial role in driving economic growth and job creation within NSW and for the state to continue to grow freight networks and supply chains must become more efficient, reliable and sustainable to meet the growing demand.

The policy does identify constraints to this philosophy with the key constraint that affects Bland Shire being:

- Pavement
 - o
- Geometric constraints
 - o Lane widths
 - o Intersection layouts

However the policy and the authors rely heavily on the use of modern vehicles to overcome these constraints i.e. advanced safety features which includes lane keeping assist, collision avoidance and blind spot detection which is claimed will mitigate the risks posed and therefore minimise the need for upgrades.

Concerns were raised with Transport for NSW during an information session where there still seems to be no recognition of the last mile issues. The industry is pushing for improved access and higher productivity vehicles, however through the reliance on the modern features inadequate recognition is given to the increased freight task which has been bought about by

- Closure of rail lines
- Closure of smaller grain facilities and the aggregation into larger facilities
- Closure of local saleyards and again the aggregation of saleyards into larger facilities
- Efficiencies of farming operations ie
 - o In past harvest went for many weeks with transport being on heavy rigid trucks
 - o Now harvest is undertaken in days with transport on Heavy Productivity Vehicles such as AB Triples and other larger configurations.
 - o Willingness to transport long distances to get the best price outcomes.

The road freight industry has been talking about last mile for many years and the constraints of getting goods from the source to the destination. However this still has not been addressed, especially in regional areas there still has been minimal action in improving access for agriculture. The model set out in the draft policy is still based on City style where there are factories in industrial estates, rather than a regional LGA with in excess of 2,000km of road with several hundred sites need heavy vehicle access.

The policy and history does set an expectation that Council should approve access for Heavy Productivity Vehicles. This places council staff in the position where they are faced with the arguments that we need to give access because it is necessary for efficiency and that the axle configuration creates less damage on the road.

In regional areas the overwhelming majority of roads are often unsealed with minimal pavement depth, narrow widths of around 6m with poor vertical and horizontal alignment. While Council's would prefer this not to be the case, the road funding as it currently stands (as well as physical resourcing) will not support the upgrading of the networks to remove these impediments.

Council does welcome the wording around the automation of the approval process, however this will require detailed inspections of the road networks to assess the suitability of each part of the network for heavy vehicle access.

Other issues raised in this discussion will need to be given more consideration in the draft policy with a recognition of the freight needs for the agricultural sector, and the constraints that local government

face. There needs to be more support for Local Government in the freight space, through strategic planning, targeted upgrades as well as a long term position when it comes to the aggregation of large receival centres and the closure of branch rail lines.

There also needs to be recognitions that these roadblocks are endemic in the system with awareness being promoted within the freight industry to reduce the pressure on Local Government through lobbying to open up routes which are not satisfactory for the safe operation of all road users.

Bland Shire Council thanks the NSW Government for the opportunity to make comment and looks forward to further working with the industry to improve access while still maintaining safe and well maintained road networks.

Yours Sincerely



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