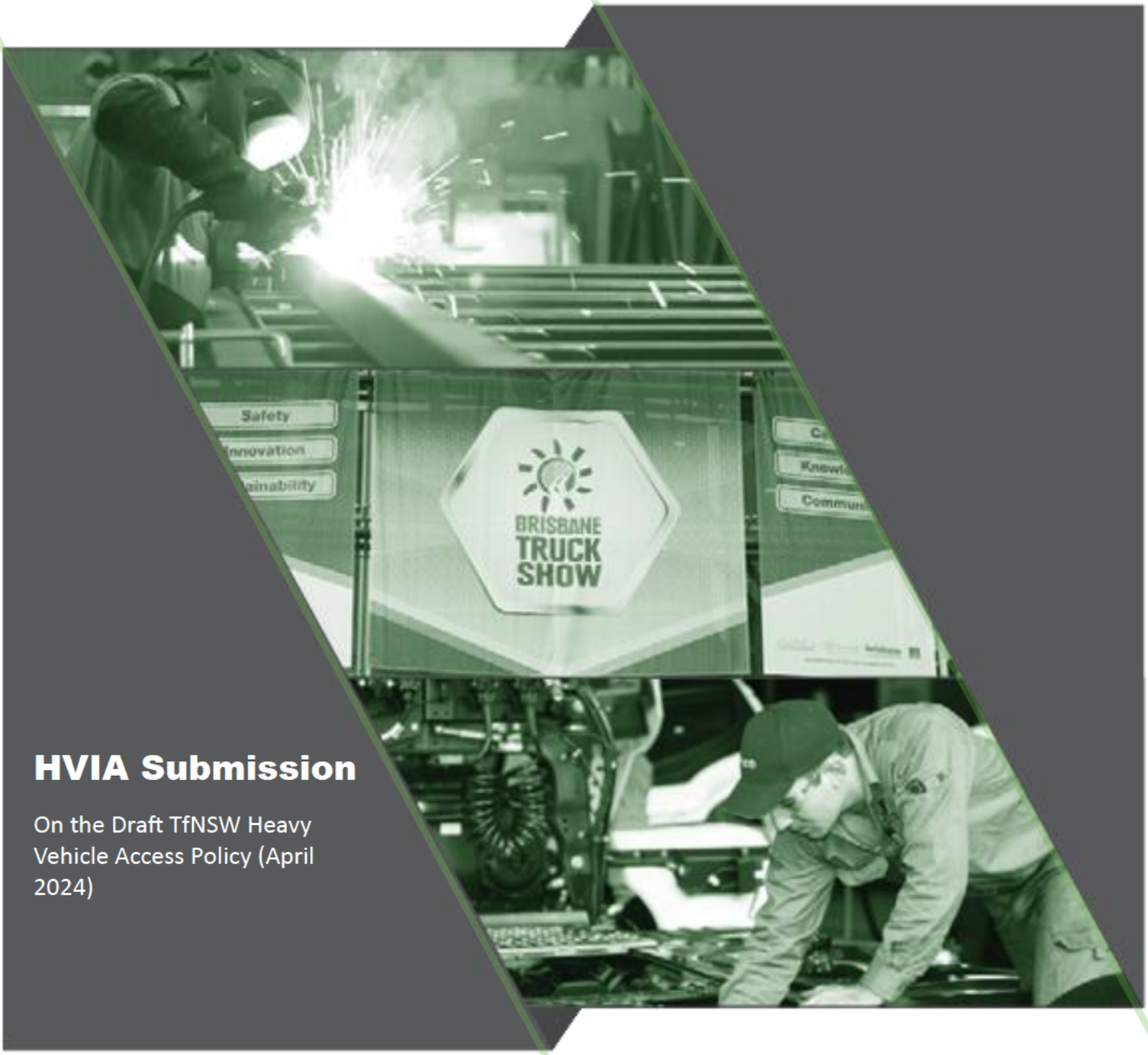
HEAVY VEHICLE
INDUSTRY AUSTRALIA



HVIA Submission

On the Draft TfNSW Heavy Vehicle Access Policy (April 2024)

May 2024

Heavy Vehicle Industry Australia
Represents and advances the interests of manufacturers and suppliers of heavy vehicles and their components, equipment and technology.

[redacted]

Background

Heavy Vehicle Industry Australia (HVIA) is the peak industry association for Australian manufacturers of trucks and trailers (collectively referred to as heavy vehicles), as well as the dealerships, repairers, suppliers, and service providers that support the entire industry. We represent almost every major truck manufacturer/importer, all of Australia's major trailer manufacturers, and an ever-growing list of their component, equipment and technology providers.

HVIA's 300-plus corporate members collectively employ a local workforce of over 70,000 staff. Our member's interests cover an extensive range of vehicles, starting with 3.5-tonne light commercial trucks, and extending all the way up to Australia's unique 50-metre long, 100-tonne road trains.

The industry provides some of the world's most efficient, safe, innovative, and technologically advanced vehicles. HVIA seeks to work with government and industry stakeholders to promote an innovative and prosperous industry that supports a safe and productive heavy vehicle fleet operating for the benefit of all Australians.

General comments on the policy

HVIA is committed to working with all road managers and the national regulator to improve access and productivity outcomes for heavy vehicles. As such, HVIA commends Transport for New South Wales (TfNSW) for its leadership in seeking to reform heavy vehicle access and productivity.

The state of New South Wales has a crucial role in supporting the heavy vehicle industry and wider Australian economy through access decisions, as a significant portion of freight journeys begin in, end in, or pass through the state.

HVIA is broadly supportive of the five pillars outlined in the draft policy. HVIA has previously endorsed the key concepts behind Pillars 1 to 3, as much of HVIA's technical and advocacy work in recent times has focussed on expanding access, encouraging new and innovative vehicles, and streamlining processes.

Underpinning much of that work has been the long-standing call from industry for a shift in the mindset of road infrastructure managers. Encouragingly, it seems that message is being heard, with the policy noting that '*…the basis for access decision-making must move from preserving assets to optimising the use of those assets by safe, productive and sustainable vehicles…'.*

HVIA applauds this inclusion in the TfNSW policy and encourages road managers at all levels to follow suit.

With respect to the remaining pillars, HVIA supports the use of telematics and data to improve network management but cautions against unnecessarily increasing the regulatory burden for the industry. Recent changes in telematics regulations have resulted in a range of telematics options with varying levels of assurance. HVIA encourages TfNSW and road managers to carefully match telematics requirements with infrastructure management objectives, such that costs on industry are minimised.

HVIA notes that in-vehicle telematics are not the only source of data useful for managing the road system. Better investment in the road infrastructure is also important in collecting appropriate data to manage the network.

HVIA is also supportive of the need to build strong partnerships with stakeholders and is particularly interested in working cooperatively with all road managers and regulators to improve messaging on the advantage of high productivity vehicles, specifically to local government.

Further specific comments that address all pillars of the policy are provided below, as well as specific recommendations in breakout boxes.

Specific comments on Pillar 1: Agile and Resilient Networks

HVIA supports identifying end-to-end networks (Action 1.1) for high productivity vehicles connecting key points of freight origin and destination, such as industrial areas, ports, intermodal terminals and roadtrain assembly/breakdown areas. This must include networks that comprise those areas (such as roads within industrial areas), and crucially, must also consider national routes, and seek to harmonise networks with other states. Interstate freight represents more than 50 percent of freight movements in NSW (BITRE, 2022), and as such, the state border cannot be considered the 'end' of a network. HVIA calls on TfNSW to explicitly include actions for furthering national harmonisation in its policy. One of the issues that needs to be considered in the short term is providing adequate roadtrain assembly/breakdown areas at the boundary points of the high productivity networks while the larger end-to-end networks are being established.

As outlined earlier, HVIA welcomes the shift in mindset from network preservation to network optimisation. There are substantial benefits in increasing the use of more productive combinations because they improve the ratio of the total mass of the vehicle to the mass of the cargo. However, the use of those vehicle combinations has historically been constrained by specific infrastructure limits such as intersection geometry, and bridge capacity. Hence, explicit recognition by TfNSW that it needs to optimise high productivity vehicles access on all parts of the network is welcome.

To undertake the analysis outlined in Action 1.4 effectively, HVIA believes that TfNSW must first set aspirational standards for road geometry, bridges and pavements that reflect the PBS standards for the various levels of vehicles. In the short term, those standards should consider the increases in dimensions and mass limits necessary to accommodate Euro VI vehicles, Safer Freight Vehicles (SFVs), and the current generation of battery electric and hydrogen fuel cell vehicles. In the longer term, the aspirational standards should be aligned with the increased mass limits in Europe, which influence the design of European heavy vehicles, and next generation low and zero emissions vehicles (LZEVs). The key segments of the network need to be assessed against those standards to identify weak points and priorities.

HVIA acknowledges that the existing network will not necessarily meet those standards. However, setting aspirations is an important part of the longer-term planning that is necessary for achieving functional end-to-end networks and developing the business cases outlined in Action 1.5.

Wherever network deficiencies are identified, HVIA strongly recommends that road managers take a more risk-based approach to classification. The first task should be aligning the access for PBS vehicles with the corresponding access for prescriptive vehicles at the same level, as current disparities do not support productivity improvements. The next focus should be on improving access by removing restrictions and bottlenecks. For example, consider a situation where a freight route contains a single low-standard bridge that limits mass along the entire route. A risk-based approach would involve implementing management strategies for the bridge such as condition monitoring and increased maintenance, such that an increase in mass for the route could be tolerated in the short-term, until the bridge is eventually upgraded to the correct standard.

It is also important to recognise that upgrading network geometry to accommodate higher productivity vehicles may be more cost effective than upgrading the vehicle fleet to PBS to deal with existing network geometry problems.

HVIA recommends:

- Action 1.1 – include national harmonisation as a priority in the development of end-to-end networks.
- Action 1.4 – include short- and long-term aspirational standards for infrastructure and access, eventually aligning with overseas jurisdictions. Align the access for PBS vehicles with the corresponding access for prescriptive vehicles at the same level. Adopt a more risk-based approach to route and network rating.

Specific comments on Pillar 2: Innovative Vehicles

HVIA commends TfNSW for acknowledging the PBS scheme's role in promoting innovative vehicle designs, and in identifying LZEVs and safety technologies as important elements in further reform.

However, while the use of vehicle templates outlined in Action 2.1 may be a mechanism for increasing the number of some high productivity combinations, it is not a substitute for the PBS scheme and runs the risk of reducing innovation rather than promoting it. HVIA does not oppose template designs but notes that previous attempts in the PBS space have not been widely adopted. One example is the template designs released when PBS was first launched. HVIA encourages TfNSW to consult further with industry before finalising any template vehicles to ensure they reflect best practice. HVIA has not consulted with its members extensively on that point, due to time constraints.

It is also essential that the PBS scheme continue in parallel to initiatives such as template vehicles to provide an opportunity for further innovation. To improve the PBS scheme, HVIA would like to see less focus on the designation of the vehicles within the current naming conventions (e.g. Truck and Dogs, B-doubles, A-doubles, etc.) and more focus on allowing access based on axle groupings and the spacings between axles, as the critical factor in infrastructure considerations.

HVIA also endorses the facilitation of trials and evaluation for innovative non-standard vehicles as outlined (Action 2.2), the uptake of advanced driver-assist and safety technologies (Action 2.3) and facilitation of access for LZEVs (Action 2.4).

HVIA recommends:

- Action 2.1 – consult widely with industry before finalising any template vehicles. More focus on the axle groupings and spacings as the critical factor for infrastructure, rather than the vehicle's name/description.

Specific comments on Pillar 3: Streamlined Access

HVIA supports the streamlining of the administrative processes surrounding access approvals through the Automated Access Assessment Program (AAAP, Action 3.1) and streamlining rail infrastructure approvals (Action 3.2), particularly if able to improve consistency and certainty in access decisions.

One of the on-going problems with PBS and other high productivity vehicle schemes has been the mismatch between the level of access proposed at the design stage, which is then reduced or otherwise limited at the permit stage. To that end, access decisions made using the future AAAP, or any other automated systems, must be accepted by road managers without any derogation or review.

Action 3.3 refers to the extension of notices and schemes to streamline access. Where practicable, HVIA prefers that road managers use notices and schemes rather than permits, but seeks more clarity from TfNSW on the specifics of that action, as it does not appear to be discussed in the paper. Without any detail, it could be interpreted in one of two ways: either that TfNSW seeks to expand its range of regulatory instruments for access, including both notices and permits; or that it is removing the need for permits by transitioning to gazettes and notices.

The difference is particularly important, as additional permits and special access schemes can often add administrative burden and cost to the industry. The transport industry already contends with dozens of gazettes, notices and schemes. The NHVR's webpage lists thirty HVNL notices for NSW alone, most of which provide exemptions to mass, dimension and loading requirements of the Heavy Vehicle National Law (HVNL).

Simplifying and eliminating the need for those documents would be the most effective way of achieving the 'Best First' policy principle of the paper, which is described as 'making it easiest for the safest, most productive and sustainable vehicles to access the network'.

HVIA supports increasing mass limits (Action 3.4), but again calls on TfNSW to clarify the application of the action proposed. HVIA's preference is that general access (i.e. 'as of right') vehicles operating at the HVNL GML axle loads will be allowed the same level of access when operating at the higher CML axle loads (i.e. the current CML limits become the new GML limits, without access reductions).

HVIA also supports facilitating access for OSOM vehicle movements (Action 3.5).

HVIA recommends:

- Action 3.2 – Ensure that access decisions from automated systems are accepted without derogation, nor review.
- Action 3.3 – HVIA prefers road managers use notices and schemes wherever possible rather than permits, but calls on TfNSW to simplify its existing schemes in the first instance, under the 'Best First' policy principle.
- Action 3.4 – clarify the application of the CML / GML proposal.

Specific comments on Pillar 4: Telematics and Data

HVIA is broadly supportive of the concept of better utilisation of telematics, data, and other technology to manage the road network but is concerned that the approach outlined lacks detail and may increase costs for industry.

The growth in the use of telematics systems in Australia has been driven by systems which provide data to operators to allow them to better manage their businesses. In those cases, there are clear benefits to the operators, whom readily adopt the technology.

Previously, the use of telematics for regulatory purposes by government (e.g. through the Intelligent Access Program) has not experienced similar levels of adoption, possibly due to the costs involved. It is important to include industry in the design of such policies to avoid unnecessary costs and to ensure wide uptake. HVIA supports TfNSW's aim to partner with industry in this space. Recent changes in telematics regulations have resulted in a range of telematics options with varying levels of assurance. HVIA encourages TfNSW and road managers to carefully match telematics requirements with infrastructure management objectives, such that costs on industry are minimised.

HVIA also encourages TfNSW to ensure that all possible mechanisms to collect relevant data are considered (e.g. infrastructure-based systems such as strain gauges, cameras, radars, number plate recognition, and mobile phone application data).

HVIA does not support Action 4.2 as currently worded, as it appears to be contrary to the current access conditions for restricted access vehicles. HVIA understands that under current arrangements, those vehicles are only required to have telematics under specific notices for routes containing critical infrastructure. It also conflicts Action 4.1, which HVIA believes would need to be completed before proposing a 'blanket' application of telematics to all restricted access vehicles in NSW.

Any blanket requirement for telematics including mass monitoring must be accompanied by a reduction in the safety margins used in bridge assessments. HVIA understands that those margins have historically been used to mitigate the overloading risk. Greater certainty of mass compliance through telematics naturally reduces that risk. Appropriate increases in load limits for bridges will allow operators to carry more freight, thus offsetting their increased compliance costs.

HVIA recommends:

- Action 4.1 – include consultation with industry, and consideration of other data sources. Match telematics requirements with infrastructure management objectives, such that industry costs are minimised.
- Action 4.2 – reword to '*pending the results of consulting with industry, explore the potential of telematics to be used where necessary for restricted access vehicles under notice and permit in NSW'.* Reduce safety margins in bridge assessments in-line with increases in mass compliance.

Specific comments on Pillar 5: Strong Partnerships

HVIA supports the Actions proposed under Pillar 5. HVIA is committed to working cooperatively with regulators and road managers at all levels and is happy to work with TfNSW on any of the initiatives under Pillar 5 where HVIA's expertise and industry contacts can be of assistance. HVIA has a specific interest in engaging with local government, as proposed under Action 5.1.