



NSW & ACT

IPWEA

INSTITUTE OF PUBLIC WORKS
ENGINEERING AUSTRALASIA



31 May 2024
Scott Greenow
A/Executive Director Freight
Regional and Outer Metropolitan
Transport for NSW

NSW DRAFT HEAVY VEHICLE ACCESS POLICY

Dear Scott,

I write with regard to the NSW Governments Draft Heavy Vehicle Access Policy. Please find below a non-exhaustive list of comments from the Institute of Public Works Engineering Australasia (NSW & ACT) (the "Institute") in regards to this policy.

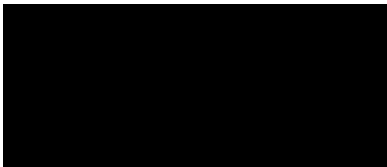
By way of background, the Institute has served the people of NSW for more than a century and stands as the leading professional association representing Public Works Professionals in NSW and ACT. With around 1000 members and Her Excellency the Governor of NSW as Patron, the Institute is dedicated to enhancing the quality of life of NSW communities.

The Institute has considered the Draft Heavy Vehicle Access Policy and are pleased to submit views on the impacts of heavy vehicle access on the local road network in terms of asset management and maintenance, funding, sustainability, innovation and efficiency gains.

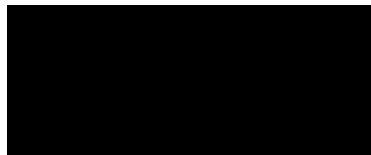
Thank you for the opportunity to submit our position on this draft policy. For more than 100 years the Institute has worked with Government to ensure public works across this state are carried out in the best interests of communities and taxpayers. The Institute would be pleased to present representatives of the Executive and Board in relation to this matter should an opportunity arise.

If you have any further questions regarding this submission, please feel free to contact me.

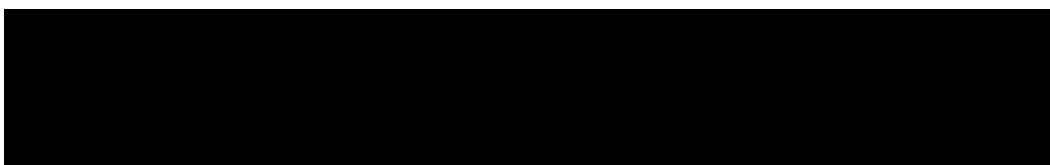
Yours sincerely,



The Honourable David Elliott
CHIEF EXECUTIVE OFFICER



Mr Joshua Devitt
CHIEF ENGINEER



NSW Draft Heavy Vehicle Access Policy Submission

The NSW Heavy Vehicle Access Policy, originally released in 2018, features a new strategic approach to heavy vehicle access in NSW. Significant improvements in heavy vehicle access have been achieved, including unlocking key freight routes and greater access for higher productivity vehicles.

The draft Policy sets out five policy pillars to enable a future focused freight network:

1. Agile and resilient networks

IPWEA NSW & ACT are supportive of effective collaboration between the freight industry, local councils, rail infrastructure managers, Commonwealth and State agencies to develop end-to-end networks. However, we seek assurances, on behalf of our members, that local government will be engaged in a true collaborative process, and treated as equal partners in regards to any network level decisions that are made.

We are also extremely supportive of undertaking a network analysis to understand the impact of increased vehicle mass and dimensions on infrastructure and inform decisions on road access for modern high productivity vehicles and heavy low and zero emission vehicles. This is a critical concern of our members, particularly in relation to the impacts of heavier LZEVs on the local road network from an asset management and maintenance perspective. We are concerned by the position in the draft policy to shift from 'preserving assets to optimising assets' and what this could mean for the lifecycle implications of these assets. Presumably optimisation would mean greater use on certain roads, and we would like clarification on whether this will include an accompanying increase in maintenance expenditure to offset this additional usage.

Lastly, will the research into future operational and cost impacts on infrastructure outlined in the draft policy extend to the local road network? We are concerned that the full impacts of the future freight task on the local road network, particularly as they relate to heavier LZEV's with increased axle loadings, have not been fully quantified. We are of the opinion that funding reform is required in order to ensure that any costs associated with the future impacts of these vehicles are recouped by the impacted road manager. We also believe that additional funding and support should be provided for road safety improvements relating to freight access on the local road network.

2. Innovative vehicles

IPWEA NSW & ACT are supportive of the move towards more PBS vehicles on the road network, and the associated improvements in road safety and emissions reductions that will result due to less heavy vehicles on the road network. However, we note the need for significant investment in the local road network to ensure that access for these vehicles can be accommodated, with the main concerns being related to road geometry, space for de-coupling facilities, and safety concerns such as the potential for short-stacking of level crossings. The required investment on the local road network only magnifies when considering the potential rollout of heavy vehicle CAVs on these roads. This is due to the need for particular road conditions to accommodate such vehicles, which will likely require shoulder widening, line marking, and vegetation management on a large number of local roads.

3. Streamlined access

IPWEA NSW & ACT are fully supportive of the draft policy with regards to streamlining the access and approval process for freight operators and road managers. We acknowledge the work that has been done to date by Transport for NSW through consulting with NSW local government with regards to the Automated Access Assessment Program (AAAP). It is critical that local government are engaged as an equal partner in the rollout of the AAAP, and that the benefits of this program to improve efficiencies for local government officers are clearly highlighted as a part of this process.





There will also be a significant amount of work required to gather data on the load capacities of bridges and other structures on the local government network to facilitate the AAAP rollout. Funding will be required to assist councils in upskilling their workforce to undertake these assessments on an ongoing basis, as well as assistance from Transport for NSW officers during the implementation and onboarding process.

4. Telematics and data

IPWEA NSW & ACT support the widespread adoption of mandatory telematics on all restricted access vehicles under notice. This data would provide councils with value insight into where heavy vehicles are accessing the local road network, which would assist in developing council asset management plans, and lead to greater optimisation of council resources to undertake capital and maintenance works. As such, we would support a phased introduction of telematics across the entire heavy vehicle fleet, up to and including general access heavy vehicles.

5. Strong partnerships.

IPWEA NSW & ACT are fully supportive of the position outlined in the draft policy for greater collaboration with stakeholders relevant to the freight task, and note the particular focus placed on engaging effectively with NSW local councils. We acknowledge the work that has been done by the Transport for NSW freight branch in relation to consultation with local councils to date, and are pleased that the concerns of councils in relation to required support to implement these initiatives have been clearly articulated. We look forward to hearing from our members about the successful delivery of the activities and support outlined in the draft policy and we stand ready to assist Transport for NSW in their implementation.

