

Department of State Growth

TRANSPORT SERVICES

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Our Ref xx/xx



Melissa O'Brien
National Transport Commission
Level 3, 600 Bourke Street
MELBOURNE VIC 3000

Dear Ms O'Brien,

Thank you for the opportunity to provide a submission to the National Transport Commission's (NTC) Discussion Paper – Mass Limits for three-axle buses which was issued on 15 June 2018.

The following are responses from the Department of State Growth (the Department) to the specific questions in the Discussion Paper:

Do you believe the suggested limits allow three-axle buses to run at full capacity, for both route services and charter services?

The Department has not undertaken additional analysis on this subject, therefore we rely on the information provided in the NTC discussion paper. This suggests that, for the existing fleet of buses at least, the proposed increase in limits will cater for full capacity buses, and therefore will ensure they are compliant with legal mass limits.

What would the increased cost of road wear be in your jurisdiction if the mass limits for three-axle buses were increased to the suggested limits?

In Tasmania, there are 60 registered three-axle buses. Several of these would be the articulated three-axle configuration consisting of front steer followed by two single axle groups. Apart from Tasmanian registered buses, it is likely that interstate registered three-axle tourist coaches would also operate in Tasmania. The amount of "occasional" overloading in Tasmania is unknown and may not be occurring at all, consequently the quantum of pavement damage attributable to overloading is not known.

Assuming there is undetected "occasional" overloading occurring currently, and if the suggested mass limit changes are intended to simply ensure that these vehicles are compliant with legal mass limits (ie to legitimise the existing activity, rather than allow further loading capacity or bus tare mass increases) it is not expected there will be any increase in observed road wear from what is currently occurring.

Without further information it is difficult to determine what the increased cost of road wear would be in Tasmania, for the following reasons:

- Actual cost would depend on the axle mass limit scenario utilised. The pavement wear study undertaken by Advantia Transport Consulting¹ suggests actual pavement wear costs due to a change in axle mass limits would depend on factors such as how the mass was distributed across the axles and the type of tyres used in the configuration. These range from the existing \$56 to \$60 per 100km of travel, up to \$76 to \$79 per 100km of travel for a 21 tonne scenario (7 tonne steer and 14 tonne rear axle group), up to \$91 to \$102 per 100km for a 23 tonne scenario (7 tonne steer and 16 tonne rear axle group). Therefore as a worst case scenario a 3 tonne change would see an increase in road wear from these buses of up to 80%. This is unlikely to be a realistic scenario, and so actual increase in road wear would be less than this amount.
- The roads used and distance travelled by these buses in Tasmania is not known. Road wear costs are likely to be different depending on the road construction, and the road owners affected will depend on the roads used when overloaded.

Are you aware of any other issues (not raised in this paper) that you believe would have a negative impact on industry, government or the community should the mass limits be raised as per the recommendations?

The NTC proposed change can be considered as just a short term action to achieve legal compliance based on current operations of the fleet, with an approach that ensures that pavement damage is not greater than what is occurring now with the current level of overloading. A consequence of the proposed changes to bus axle mass limits is that it will further increase the current divide between bus and freight vehicle axle mass limits. This may create pressure for increases for freight vehicle axle mass limits, which maybe undesirable at this time.

The Advantia report recommends axle loads of three-axle buses to 22 tonnes (with a floating one tonne), as it would be comparable, in terms of pavement wear, with two-axle buses being operated currently. Based on this recommendation, the Department suggests that any changes in the law should reflect this, rather than the potential for 23 tonnes with the NTC proposal.

The paper suggests that the tare mass of hybrid fuel, electrified or gas powered buses in the future could increase loaded mass of three axle buses to 28 tonnes. The suggested change would therefore not cater for such increases with the current axle and tyre configuration. A longer term approach is required to ensure that future vehicles are appropriately configured, or loaded, to achieve mass compliance in line with other heavy vehicles.

In the future, it is possible that these issues may be adequately catered for through heavy vehicle charging reform, whereby higher levels of pavement wear could be accommodated through higher road use charges.

I trust this information will be of assistance to you.

Yours sincerely,



Martin Blake

27 July 2018

¹ Pavement wear analysis of three-axle buses with various axle and tyre configurations. Advantia Transport Consulting. 25 July 2018