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Dedicated to a better Brisbane

17 July 2018

Mr Paul Retter AM
Chief Executive Officer
National Transport Commission
Level 3/600 Bourke Street
MELBOURNE VIC 3000
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Dear Mr Retter, Paul

Thank you for providing the opportunity to provide feedback on the *Mass limits for three-axle buses: Discussion paper June 2018*, released by the National Transport Commission (NTC) on 15 June 2018.

Brisbane City Council (Council) acknowledges that legislative change on a Federal level has resulted in an increase in bus tare mass due to safety and environmental technology requirements. Council also acknowledges that this has occurred without a change in regulatory bus mass limits, thereby affecting the productivity of public transport buses and the private coach industry. It is encouraging that the NTC recognises the importance of regulatory reform and Council considers this an opportunity to improve public transport options available to Brisbane residents and visitors. Council therefore supports this initiative in-principle, and recommends that the NTC conduct further work to refine its proposal.

Infrastructure protection and road safety is of the utmost importance when considering any changes to the regulation mass limits of heavy vehicles such as three-axle buses. Council is pleased to see that these are two of the guiding principles underpinning the options and recommendations proposed to be presented to the Transport and Infrastructure Council. However, the proposal for uniform national adoption of a two-tonne regulation mass limit increase, for operation of three-axle buses on all roads, does not provide the best outcome.

Buses loaded to full capacity may accelerate the rate of road pavement deterioration and increase the cost of road maintenance expenditure. Council supports an approach that will provide state and local governments across Australia with sustainable infrastructure protection and road maintenance expenditure levels. Council therefore supports increases to regulation mass limits for three-axle buses being restricted only to buses supporting a public transport service, not the private coach industry.

With respect to the proposed increased mass limits, Council's Transport for Brisbane has calculated that they do not operate at full capacity, with a current fleet of 157 low floor three-axle buses with a tandem rear axle and 50 low floor three-axle articulated buses with three single axles. Some of these buses are currently operating under a mass exemption by permit, issued by the National Heavy Vehicle Regulator, due to operating mass being higher than current regulation limits and the limits proposed by the NTC.

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Council makes the following key recommendations to the NTC: further research is required on quantifying the cost impacts of increased mass limits; more accurate information must be provided on the extent of industry non-compliance with current regulation mass limits; consideration should be given to alternative axle mass limits; consideration should be given to increase the total mass limit to 22 tonnes for tandem rear-axle combinations and 28 tonnes for articulated combinations with three single axles; and consideration should be made for total mass, which may be a concern for unsigned bridge and culvert structures below T44 standard in some jurisdictions across Australia.

Regardless of the ultimate recommendation to the Transport and Infrastructure Council by the NTC, a focus on creating a better regulatory environment that leads to good outcomes for the bus industry, community and state and local governments is supported.

If you wish to clarify any of the matters raised in Council's submission, please contact Ms Marie Gales, Manager, Transport Planning and Strategy and Congestion Reduction Unit, Brisbane Infrastructure, on (07) 3178 1418.

Yours sincerely

Colin Jensen
CHIEF EXECUTIVE OFFICER

Att.

COUNCIL'S RESPONSE ON THE NATIONAL TRANSPORT COMMISSION'S *MASS LIMITS FOR THREE-AXLE BUSES: DISCUSSION PAPER JUNE 2018*

Towards the aim of ensuring a more productive public transport network and an accessible, connected city, Council would like to indicate support for **Option 2 – Increase the axle mass limits with amendments**. Council recommends that the National Transport Commission (NTC) amend the proposed mass limit increases (see response to Question 1, below), as it does not address the needs of Council's current and future public transport fleet. For infrastructure protection reasons, Council recommends that the NTC amend Option 2 to apply to buses that support public transport services only.

This amendment to Option 2 would provide Council with the highest level of confidence as it is expected to; increase Council's public transport productivity; lower Council's administrative and financial burden in applying for mass exemptions by permit from the National Heavy Vehicle Regulator; capture and address safety risks; and protect Council infrastructure.

Consultation questions:

1. Do you believe the suggested limits allows three-axle buses to run at full capacity, for both route services and charter services?	No. Council agrees that current regulation mass limits are not in alignment with the increased tare weight of buses and the increasing average weight of passengers. However, the suggested limits are not fit-for-purpose and do not meet the needs of Council's current and future fleet of three-axle buses. Council proposes that the mass limits for low floor three-axle buses with tandem rear axle combination be: • front axle seven tonne • tandem rear axle 15 tonne • combined axle mass limit 22 tonne. Council proposes that the mass limits for low floor three-axle articulated buses with three single axles be: • front axle seven tonne • centre axle 10 tonne • rear axle 12 tonne • combined axle mass limit 28 tonne. The default position of increasing regulation mass limits, without ancillary work on management of business practices to prevent bus overloading is not sustainable. Council is concerned that, without this supporting work, overloading will continue to occur, but at higher masses and to the detriment of Council infrastructure. Therefore, until such a time that the bus industry develops reliable business practices to manage overloading, Council believes that mass exemptions for all types of three-axle buses should be restricted only to buses supporting a public transport service. Council believes this would achieve a balance between improving bus industry productivity, improving public transport options and ensuring adequate measures are in place to protect state and local government infrastructure across Australia.
2. 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?	The NTC has not provided Council sufficient time to conduct an assessment into the costs to Council from road maintenance associated with the mass limit increases proposed for three-axle buses. As per the calculations done by the New Zealand Ministry of Transport and the Queensland Government Department of Transport and Main Roads, the mass increases proposed by the NTC is likely to accelerate road pavement deterioration and

	increase the cost of road maintenance expenditure (section 2.3 of the discussion paper). Assuming buses are loaded to full capacity, the proposed mass increase has the potential to increase the rate of road pavement deterioration and increase the cost of Council's road maintenance expenditure. Council supports an approach that will provide state and local governments with sustainable infrastructure protection and road maintenance expenditure levels. Council believes that mass exemptions for all types of three-axle buses should be restricted only to buses supporting a public transport service.
3. 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 suggested options?	Yes. Council considers that an optimum national policy position, where an increase in regulatory mass limits is the desired outcome, can only be developed after rigorous research and consultation. Further work is required by the NTC so that state and local governments across Australia can make an informed decision regarding the suitability of their infrastructure to accommodate any increase in three-axle bus regulation mass limits. Council does not support that an increased regulation mass limit figure be decided without adequate consultation with local government. Council does not support the increase in mass through an amendment to the *Heavy Vehicle (Mass, Dimension and Loading) National Regulation*. Alternatively, Council does support a Notice to allow all three-axle public transport buses to operate on the revised increased axle and total limits. If a mass increase is determined to be the way forward by Notice, individual state and local governments across Australia should be able to determine applicable routes and areas of operation, to ensure that their respective road networks can accommodate the increase in mass. Further research needs to be conducted to confirm the accuracy of the assumptions and to determine the extent of overloading of buses above regulation mass limits. Consideration should be given to what the proposed total mass limit is. A low total mass limit may preclude access to the network for some public transport providers, irrespective of any axle mass limit increases. The discussion paper does not adequately consider the impact of mass increases for some unsigned bridge and culvert structures below T44 standard in some jurisdictions across Australia.