

**EASY ACCESS TO SUITABLE ROUTES
HVNL REVIEW ISSUES PAPER
SOUTH AUSTRALIAN ROAD TRANSPORT ASSOCIATION SUBMISSION
19 AUGUST 2019**

1. About the South Australian Road Transport Association (SARTA)

SARTA is the peak industry body in SA and a member of the Australian Trucking Association (ATA) and we share the strong commitment to safety, professionalism and viability.

SARTA is working closely with the ATA in response to the HVNL Review and the NTC's Discussion Papers and so we are in broad agreement with the ATA submission on this matter; which presents cogent and well supported arguments both on the absolute need to achieve "**Easy Access** to suitable Routes", as the discussion paper suggests, and in relation to the need for specific changes. We submit the following additional thoughts.

2. First Principles Approach

Prior to the HVNL and indeed right up until the final draft of the HVNL, Local Government did not have the role and power that it currently has. This only came about essentially through strong political lobbying re the draft HVNL at the 11th Hour.

The most problematic element of HV access under the current HVNL regime is the decisions of too many Road Managers to limit HV access for reasons that are important to them but which are more often than not less well-informed and less strategic than they ought be. The fundamental reality that must be remembered in relation to the road freight task, even after rail freight is maximised, is that:

The road freight WILL be moved by truck, the ONLY QUESTION is by HOW MANY TRUCK MOVEMENTS; by far fewer High Productivity Vehicles (HPV) or by far more General Access Vehicles?

a. Objective:

Under First Principles, the question must be asked what ***should*** be the Objective of any regulated HV access regime and we strongly suggest that it should be:

To underpin the economy, through productive and efficient heavy vehicle road transport access, safely and sustainably, with absolute minimal reliance upon providing access by exception through individual Permits.

This objective should be enshrined in the HVNL 2.0 as the fundamental principle that should direct (not guide) all access decisions and processes.

Whilst not a matter for the HVNL 2.0 itself, the achievement of this Objective is clearly heavily dependent upon the levels of funding afforded both Road Authorities and Road Managers and upon their performance under appropriate Service Level Agreements.

b. Construct:

The second question under First Principles re HV Access should be what would be the best construct for HV Access, regardless of past or current politics, and we suggest that it would be:

- i. The NHVR should play the central role and have the ultimate authority re granting of access within an agreed and approved HV route network.

The NHVR must **not** be restricted to its current letter-box function, acting as the postman passing messages between the actual players. This wastes time and builds in delays and procedural costs and problems, adding little if any value.

- ii. Road Authorities and Local Road Managers must, in consultation with the NHVR, classify **ALL THEIR ROADS** as HV routes in one of the various HV access Performance Envelope categories for inclusion in an agreed and approved route network, for automatic access by the various classes of HV from General Access to all levels of Restricted Access Vehicles (RAV).
- iii. Road Authorities and Road Managers must justify those route classifications to the NHVR against standards established under the HVNL. The NHVR must be the final decision maker.
- iv. HV Operators should be able to challenge those route classifications through the NHVR, which must have the authority to alter the classifications within **TWO WORKING DAYS**, in consultation, if necessary, with the Road Authorities and Road Managers.
- v. Once access is granted for a particular HV Performance Envelope category it becomes an as-of-right route for HVs within that Performance Envelope, unless the NHVR accepts that there is genuine justification for limiting the instances of access on that route for a particular HV Performance Envelope category through Individual Permits.

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