



ADVANTIA

TRANSPORT CONSULTING

SUBMISSION TO NATIONAL TRANSPORT COMMISSION

NTC Issues Paper: Easy access to suitable routes

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route

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Prepared by:

Rob Di Cristoforo
Victor Trumper

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About Advantia

Advantia Transport Consulting was founded in 2008 by Rob Di Cristoforo, who had by that time established an international profile as a high-productivity freight vehicle expert. Advantia has since gone beyond mastering the design and assessment of high-productivity freight vehicles, having made significant contributions in areas such as heavy vehicle policy development, road access facilitation and knowledge transfer. Advantia is recognised across both the heavy vehicle industry and transport-related

government departments and agencies for the specialised work that it does to advance the productivity and safety of road freight transport, primarily by supporting transport policy reform and improved heavy vehicle operations. The company is known for its tenacity and a deep motivation to push boundaries when the evidence supports it. That spirit has enabled the company to make an everlasting impression on Australia's heavy vehicle industry, which is acknowledged internationally.



ADVANTIA
TRANSPORT CONSULTING

Advantia Transport Consulting Pty Ltd

30/240 Plenty Road Bundoora Victoria 3083 Australia
PO Box 145 Diamond Creek Victoria 3089 Australia

T: (03) 9438 6790 | **E:** contact@advantia.com.au | **W:** www.advantia.com.au

Summary

Thank you for the opportunity to respond to the HVNL Issues Paper *Easy access on suitable routes*. Advantia has intimate experience with the access challenges facing the heavy vehicle industry, particularly in relation to Performance Based Standards (PBS) approved heavy vehicle combinations. Advantia works closely with heavy vehicle operators to secure road manager access approvals beginning with In-Principle Access Support applications through to Permit applications.

Advantia's submission draws out the difficulties currently being experienced by an industry that is looking to transition to safer, more productive, efficient and environmentally friendly PBS combinations, but are currently faced with a HVNL that does little to promote the uptake of PBS combinations. The consequence being Australia's heavy vehicle fleet will continue to age and the introduction of heavy vehicles with increased safety and performance features will be stymied.

Advantia looks forward to a HVNL that encourages the transition of Australia's heavy vehicle fleet to PBS combinations by providing the same, or increased level of access to existing prescribed combinations.

Yours sincerely

ADVANTIA TRANSPORT CONSULTING PTY LTD

A handwritten signature in black ink, appearing to read 'Victor Trumper', with a stylized flourish at the end.

Victor Trumper

General Manager



Response to issue paper questions

Question 1: Why do access decision timeframes vary so significantly? To what extent does the HVNL cause or allow access decision delays?

Advantia's experience with permit applications is that the timeframes vary significantly due to:

- The NHVR application processing time prior to sending to road managers which is a minimum of 3 days and up to 12 days. A further 2-3 days is also added onto the road manager responses to finalise outcomes. These administrative functions do not appear to be captured as part of the review and are a source of frustration given delays in decision makers being able to assess applications and decision being returned to applicants
- Applications requiring assessment of road manager infrastructure adding significant time for decisions to be made compared to applications not requiring infrastructure assessment. Whilst this requirement is accepted for access on roads that don't form part of existing networks, assessments for PBS combinations are often deemed necessary by road managers on roads already forming part of Gazetted B-Double, Road-Train and HML networks for comparable combinations with the same Gross Combination Mass
- Extensions of time of up to 6 months requested by road managers to complete assessments for access as provided for by section 156 of the HVNL require agreement by the NHVR. However, the NHVR does not appear to interrogate request for extension of time, instead the experience is request are passed on by the NHVR to applicants as a formality

Question 2: Most road managers can grant consent within seven days. Given this is the case, should we reduce the 28-day timeframe currently in the HVNL? Should we introduce a mechanism to deal with a nil response?

Permit application consents within 7 days are the exception, with Advantia's experience with permit applications averaging a response period of 30 days. A tiered response period should be introduced to account for (in increasing order):

- Permit renewal
- Permit amendments
- New applications

Reducing the response timeframe has little benefit if the HVNL does not provide provisions for:

- Managing nil responses within a required timeframe
- Justifying extensions of time
- Formal review of road manager decisions, including external reviews

By introducing the above measures, the timeframe that is set should be both achievable for a road manager response, and predictable for industry to expect an outcome. A reduced timeframe of 7 days or less is supported for applications that do not require new decisions, like permit renewals or applications with supporting evidence of prior approval, e.g. In-Principle Access Support decisions (explained further in Q4 response).

Question 3: Is vehicle classification useful? Does the new HVNL need a vehicle classification system and, if so, should it be different from the current system?

The vehicle classification is useful as a first tier to differentiate heavy vehicles that comply with prescribed mass and dimension limits and those that don't. However, the current system is very broad leading to significant variations of heavy vehicle combinations within the three vehicle classifications and this does not reflect the reality of how road managers differentiate between heavy vehicles in the same classification. For Class 2 vehicles, experience to date has shown road managers treat PBS combinations significantly different to other Class 2 vehicles in terms of performance and impact on assets by:

- Not recognizing the performance results of longer PBS combinations with no worse on-road performance to shorter Class 2 combinations, e.g. geometric performance of 30-metre PBS A-Doubles to 26-metre B-Doubles
- Not allowing the same PBS axle group masses on Gazetted HML networks, e.g. 20-metre Single-Semi's being restricted to 20-tonne on tri-groups on HML routes.

Question 4: What are the challenges road managers face under the HVNL access decision-making framework? Which road managers do it well, and why? Why are some road managers struggling with access?

The delays associated with making timely decisions on access and permit applications point to restricted road manager capacity and capability to meet the needs of industry and the aspirations of the HVNL. It is recognized that there have been advances in the approaches taken by road managers to accept third party evidence to approve access on geometric grounds and to develop route assessment guidelines for consent staff to facilitate timely decision making. As a provider of Class 2 route assessment guidelines for Victoria and Queensland, Advantia sees significant value in elevating the tools available to road managers to make consent decisions through the development of a National Class 2 Route Assessment Guideline.

Whilst progress is being made in some areas of road manager access decisions, the main influencer on the time taken by road managers to arrive at an access decision are applications requiring bridge capacity assessments. If road managers are to continue to manage all bridge assessments internally, increased priority should be placed publishing and Gazetting pre-approved networks for contemporary heavy vehicles and combinations, including PBS combinations as evidenced by the PBS networks published in Victoria and Queensland's Gazetted Toowoomba to Port of Brisbane PBS Level 2B network.

Question 5: Should the law allow for external review of access decisions?

Yes, but why not also treat the cause of why this is now needed which relates to the lack of transparency in road manager decision making. At present PBS applications for access requiring bridge assessments conducted by Transport and Main Roads (QLD) and Roads and Maritime Services (NSW) are responded to with either a consent or refusal without an actual maximum GCM for the combination being provided. This results in multiple applications being submitted for the same combination at different GCM. Access refusals are also provided to applicants quoting Annual Average Daily Traffic (AADT) volumes yet no granularity of the light versus heavy vehicle composition is provided for the AADT, let alone a recognition that more productive combinations will replace existing general access Class 2 combinations in lesser numbers for the same freight task.

The external review should not simply be a process of asking road managers to justify their decision. Instead there must be a requirement for road managers to furnish relevant docu-

mentation in relation to the original access decision with evidence for access refusal of combinations with the same performance characteristics (PBS vs prescriptive combinations) for review by an independent oversight body under NHVR governance.

Question 6: Have we covered the issues with access under the current HVNL accurately and comprehensively? If not, what else should we consider?

Whilst issues under the current HVNL have been covered, the Issues Paper does not accurately reflect the level of difficulty being experienced by an industry looking to transition to safer, more productive, efficient and environmentally friendly PBS combinations. In fact, certain sections in the Issues Paper suggest there isn't much of an issue when figures like 96 per cent of permit applications are approved and processing times are progressively improving (Table 3) are provided. This is not surprising as a growing number of renewal applications will continue to outnumber the number of new applications. For transparency and completeness of this review processing numbers, times and approval rates must be provided for:

- Permit renewals
- Permit amendments
- New permit applications

The Issues Paper also makes no reference the most critical step involved in purchase decisions by industry in PBS combinations, the In-Principle Access Support (IPAS) application stage. IPAS applications serve to elicit access outcomes from road manager before industry is required to purchase and have combinations PBS assessed and certified that generates a Vehicle Approval for the PBS combination. Only with the Vehicle Approval can a PBS permit application be made to the NHVR.

Recognising the IPAS function was once managed in-house by road managers when applications were made by industry for PBS access and this was not a priority for the NHVR or the HVNL when commenced in 2014, this oversight cannot continue. IPAS applications are currently the gateway to rejuvenating Australia's heavy vehicle fleet with PBS combinations and at present road manager responses to IPAS applications averaging 75 days. This delay has the consequence of industry continuing to bid for work using pre-existing Gazetted access combinations and a slower uptake of PBS combinations. With PBS combinations satisfying all elements covered within the object of the HVNL (s3), the HVNL can no longer afford to neglect supporting heavy vehicle industry uptake of PBS combinations.

It should be also be noted, for successful IPAS applications, these result in permit applications once the combination is built and road manager approval is largely pre-determined. Therefore, the permit application approval rate is artificially enhanced by IPAS process, given IPAS refusals do not proceed to permit application.

Question 7: How can the new HVNL work, most likely with other reforms, to best support optimised use of our transport assets and vehicles?

Whilst Heavy Vehicle Road Reform (HVRR) is not within the scope of the HVNL review, its only through HVRR that road network constraints for heavy vehicle access will more effectively be managed by introducing a forward looking cost base and hypothecation of heavy vehicle charges revenue to fund required infrastructure for heavy vehicle access.

Question 8: How can the new HVNL expand as-of-right access and generalize access authorisations? Can we remove time limits for notices, for example?

Publishing pre-approved networks for all heavy vehicle classifications based on current contemporary combinations that also align with access in neighbouring jurisdictions, will create seamless National networks for heavy vehicle operations. Through a risk-based approach to

assessing the impact of existing approved access arrangements, road managers should also be challenged to extend the same level of access to comparable heavy vehicle combinations based on performance and impact on the road network. This will help to create access harmonization and reduce current level of route specific permit applications.

At the same time as harmonizing pre-approved network access for neighbouring road managers, road managers should also be challenged to harmonise access conditions using a risk-based approach and the use of telematics should serve to continue to increase network access for heavy vehicles. Apart from ensuring heavy vehicles are complying with the permit, telematics should also be used to capture true network utilization that is then factored into asset consumption formulas like the AS5100 bridge assessment formula.

Question 9: Do we have the right tools to implement access decisions? How can we modernise the tools for access authorisations?

National route assessment guidelines should be developed for access decisions to be made using consistent assessment criteria. These guidelines can be used to develop and continually grow pre-approved networks as well as conduct individual case-by-case assessments ensuring parity of access decisions across jurisdictions. As per Q4 response, whilst there have been initiatives by certain road managers to standardize internal access decision making, National guidelines will lead to national consistency.

Question 10: How can the new HVNL accelerate access decisions? Is a proactive approach possible?

A proactive approach will see pre-approved networks being published that are keeping pace with developments and innovations in Australia's heavy vehicle fleet. For heavy vehicle access not captured by pre-approved networks, the new HVNL law should accelerate access decisions by recognizing heavy vehicles with no worse impact on safety or wear and tear on road assets to existing approved heavy vehicles are provided the same level of access.

As captured in Q1 response and Table 3 of the Issues Paper, the NHVR administrative role with access applications needs a maximum limit to be set for the NHVR to accelerate the administrative start and finish of access applications.

Question 11: How should the new HVNL implement access decision-making? Should it specify process and roles? What role is there for the operator? What improvements to access decision-making can be made?

A risk-based approach to access assessments must be introduced that not only recognizes the existing heavy vehicles approved to operate and their performance and consumption of the network, but also balances the performance and consumption of the network of new heavy vehicle entrants to the fleet to recognize improvement in safety, productivity, environmental impact and road asset consumption.

Question 12: How do we reach consistent and predictable risk-based access decision-making? How can we make sure decision-making is transparent and fair?

As per Q9 response, introduce National route assessment guidelines that are premised on a risk-based decision-making approach as well as external review provisions within the HVNL to oversee consistent decision making across road managers. As already covered in the submis-

sion, addressing the current void in road manager decision transparency should also be addressed to curb the current appetite for decisions to be reviewed due to a lack of transparency.

Question 13: How do we best share the risk management responsibilities between parties with a role in heavy vehicle access?

Establishing consistent risk-based access decision making, therefore creating repeatable decisions being made for the same vehicle seeking access to the same or similar roads managed by different road managers.

Question 14: How do we manage the accountability of parties with a role in heavy vehicle access?

Further to the Q2 response, external review provisions as captured in Q5 response (for road managers as well as the NHVR) would create accountability for making decisions and for those decisions to follow a defined criterion that is Nationally consistent, or as a minimum consistent with existing road manager processes.



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