

29 August 2019

National Transport Commission  
Submission – Easy Access to Suitable Routes  
Level 3, 600 Bourke Street  
MELBOURNE VIC 3000

### **SUBMISSION: HVNL ISSUES PAPER - EASY ACCESS TO SUITABLE ROUTES**

Cement Concrete and Aggregates Australia (CCAA) is the peak body for the Heavy Construction Materials Industry in Australia. Our members operate hard rock quarries, sand and gravel extraction sites, cement production and distribution facilities and concrete batching plants. The majority of material producers and suppliers form our membership, ranging from large global companies, to SMEs and family operated businesses.

Our sector is vital to the nation's \$200 Billion building and construction industries and underpins the development of Australia's physical infrastructure, generating approximately \$15 Billion in annual revenue and employing approximately 30,000 Australians directly and a further 80,000 indirectly. In Australia each year, the heavy construction materials industry produces approximately: 200 million tonnes of sand, stone and gravel (ie aggregates); 30 million cubic metres of pre-mixed concrete; and 10 million tonnes of cementitious material (eg cement, flyash).

Most of the material produced by the industry is transported via heavy vehicles (with a minor proportion transported by rail, and with some cement clinker transported by ship via ports) and in relatively short distances in urban and peri-urban areas (eg under 60km per delivery for aggregates and under 15km for pre-mixed concrete). There are about 100,000 average heavy vehicle movements in Australia per day (usually during daylight hours) relating to our industry. Our industry contributes up to 10% of total road freight by volume and operates a fleet of some 6,500 concrete agitators, 2,500 tippers and 1,200 cement tankers.

### **OUR VIEWS ON EASY ACCESS TO SUITABLE ROUTES**

Our industry believes significant improvements can be made in the framework for providing access to suitable routes, and we support many of the issues raised in the discussion paper, in particular:

- Whilst improvements have been made, the decision-making process for access to suitable routes for our industry is prescriptive and inflexible.
- We accept that road managers do not necessarily always have a high degree of expertise with heavy vehicle classifications. While the NHVR has a detailed understanding of the many heavy vehicle types, not all road managers have the same level of knowledge. This can complicate and protract their access decisions, causing lengthy delays. Road Managers are obviously keen to protect their assets – but often fail to understand that new configurations will have less impact on this asset.
- There are many opportunities for parties to lose sight of or delay a permit application under the prescribed process in the HVNL.
- Reasons for access refusal are broad and varied, and first and last mile issues are a major barrier to an efficient freight system for our sector, particularly in relation to access to quarry sites and premixed concrete plants at (usually in industrial zones in outer urban areas)

Our members continue to have having access issues either with the time it takes for applications to be looked at and a response given back to operators or access is denied or even taken off our permits after the roads have been listed on PBS permits for over 12 months.

For example, the introduction of PBS vehicles was seen to be an important initiative to allow for safer and more productive vehicles, and resulting in a reduction in the number of truck movements over time. In this context, our members have been making major capital investments with (for example) the replacement of standard truck and dogs with PBS equivalent. Unfortunately there remain significant difficulties in accessing routes off the B Double network.

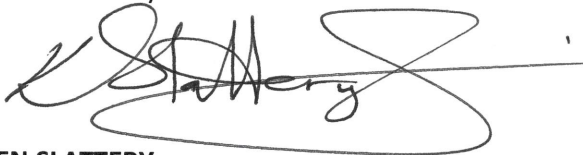
In summary, whilst there appears to be good will for change, and the NHVR has worked hard with road managers to make improvements, there is still a significant room for positive change.

As such, we would support the HVNL being able to allow for:

- Access decision-making be simple, consistent, fair and transparent. It should be proactive wherever possible. Decisions in response to a request should be made quickly.
- Road managers to make proactive access decisions. As outlined in the issues paper, road managers could use available information to anticipate potential RAV routes. This includes using current and planned land use data, transport analysis and strategy. They could then 'pre-condition' key routes. This would allow them to give either proactive or immediate consent advice to the regulator if there's an access request. Under this approach, there could be standing consents for suitable HPVs in specific locations. For example, roads in industrial areas and ports and intermodals.

To discuss our submission, please contact Aaron Johnstone on 07 3227 5210 or email [aaron.johnstone@ccaa.com.au](mailto:aaron.johnstone@ccaa.com.au).

Yours sincerely



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