

16 August 2019

Dr Gillian Miles  
Chief Executive  
National Transport Commission  
Level 15/628 Bourke Street  
Melbourne VIC 3000  
Via NTC portal

## EASY ACCESS TO SUITABLE ROUTES

Dear Dr Miles

Gas Energy Australia (GEA) appreciates the opportunity to respond to the National Transport Commission (NTC) Issues Paper Easy Access to Suitable Routes (Issues Paper) released in May 2019. GEA is concerned that the Issues Paper concentrates on the suitability of infrastructure to cater for special vehicles but misses the elephant in the room which is prohibitions that are not infrastructure related.

Vehicle size and mass are not the only considerations for suitable access routes as there are increasing prohibitions on noise, traffic congestion, pollution and dangerous goods that hinder finding suitable route options for vehicles, with the following some notable examples.

- Noise: the Rosanna Road – Greensborough Highway Heavy Vehicle Assessment Acoustic Report April 2016 commissioned by VicRoads identifies heavy vehicle noise issues<sup>1</sup>.
- Traffic congestion: the Victorian Government is helping to reduce traffic congestion in the bayside area by extending truck restrictions along Beach Road<sup>2</sup>.
- Pollution: the Victorian Government teamed up with community and industry groups to introduce tough new curfews for trucks, encouraging the use of **cleaner** vehicles to deliver safer conditions for drivers and residents<sup>3</sup>.
- Prohibited areas NSW Dangerous Goods: Bradfield Highway between the hours of 7am and 9.30am Monday to Saturday both days inclusive and between the hours of 4pm and 6.30pm Monday to Friday both days inclusive.<sup>4</sup>

In 2014 with the commencement of the Heavy Vehicle National Law (HVNL), the newly created Heavy Vehicle Regulator (NHVR) was touted as being a one-stop shop for fast-tracked access applications when it launched its national online Access Management System. GEA understands the difficulty of this task given the different tiers of government that own and have jurisdiction over road infrastructure. Nevertheless, GEA urges the NTC to use this review as an opportunity to consider ways to make easy access to suitable routes a reality by making all route access issues reviewable by a one stop national shop.

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<sup>1</sup> <https://www.vicroads.vic.gov.au/-/media/files/documents/planning-and-projects/melbourne/northeasttruckcurfew/mb97801f03-acoustic-report-r1.ashx?la=en&hash=318BB5DC2EDDAC01DAF700E0789A6831>

<sup>2</sup> <https://www.premier.vic.gov.au/truck-curfew-to-ease-congestion-on-beach-road/>

<sup>3</sup> <https://www.premier.vic.gov.au/wp-content/uploads/2019/07/190709-New-Limits-Curfews-To-Make-The-Inner-West-Cleaner-And-Safer-1.pdf>

<sup>44</sup> [http://classic.austlii.edu.au/au/legis/nsw/consol\\_reg/rr2014104/s300.2.html](http://classic.austlii.edu.au/au/legis/nsw/consol_reg/rr2014104/s300.2.html)

GEA offers the following response to specific questions posed in the Issues Paper.

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 pertains only to pavement issues. With the advent of additional constraints on vehicle routes, GEA suggests that classification system will need to be much more detailed to incorporate noise and vehicle emissions requirements.

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

GEA supports the introduction of a framework to review access decisions.

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

The HVNL is not the only access requirement for roads. Councils and State and Territory Governments place prohibitions on access for reasons other than infrastructure limits. Recognition of these prohibitions and visibility is the first step.

### **Conclusion**

GEA urges the review to consider making easy access to suitable routes a reality by making all route access issues reviewable by a one stop national shop.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Griffiths', with a long horizontal line extending to the right.

John Griffiths  
CEO  
Gas Energy Australia