

TRUCKRIGHT ABN 17426245866

<u>TRUCKRIGHT Industry Vehicle (TIV)</u> <u>Ten Years on the road, 2019.</u>

Rod Hannifey, Road Transport and Road Safety Advocate, TIV Driver and Operator. Telephone: 0428 120560 Email: <u>rod@truckright.com.au</u> Website: <u>www.truckright.com.au</u>

TRUCKRIGHT Awarded Highly Commended, 3M ACRS Diamond Road Safety Awards 2015. Finalist 3M ACRS Diamond Road Safety Awards 2016, Awarded Churchill Fellowship 2016. Green Reflector Marking Informal Truck Bays, finally completed the Newell Highway 2019.

Response to HVNL Review Paper 3. Easy access to suitable routes.

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

When we lost Federal control of national highways, the federal government gave the responsibility to the states who only want to look after themselves, not the roads to be used by those from other states. There has been a substantial decline in the maintenance of federal roads since.

Then the states say they don't have enough money, because the money collected from the industry federally, goes mainly to consolidated revenue and not into the roads, which is what we were told, promised and lied to about.

Then you have local councils who get no direct road funding, other than from the states and they want to retain control. So you have three levels of control, two of which are not really there to lift standards, but see it only as a cost. This costs lives on the road, damage to trucks and drivers and contributes to crashes. All then wipe their hands and say, it is not our fault.

With such an overlying system and no national road standard, there is no one to complain to who will listen and each does their own thing. This is not the way to operate a national road system, let alone a supposed national law that each state can and will, change to suit themselves.

Is there any wonder that times and levels of knowledge about trucks and types and needs, lead to delays and holdups. I do not think it is deliberately aimed at trucks or drivers, but more so to retain control and costs and this will only ever mean worse service to those who need the roads to work and deliver all of Australia's needs.

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?

New roads do not appear overnight, therefore there is no reason why a request for access cannot be answered within 7 days. The trucks have not magically grown weird combinations, they have not been allowed to double axle weights, so why is there a delay? Unless it is a new road, they must be required to answer within 7 days and if NO, explain why. This then must be able to be reviewed by someone else. There are no roads made of new untested material, no bridges built from plastic, so if they don't know now what their infrastructure can do, they never will. I do agree that local councils with dirt roads, or very old and poor bitumen roads, need additional funds, but once roads are up to a national standard, then there should be no difficulty in ascertaining if a combination will travel safely on a road.

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?

OSOM is not my field. My comments are mainly toward b-doubles. B-doubles do not vary greatly in specifications nor swept path, though some drivers can still do damage in a semi-trailer. B-double routes need to be easier to access, to read and comprehend. I do not have any issues with the current system, just the way it is used to restrict access and allow overzealous officers the chance to fine us massively for no real damage or road problem.

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?

As a driver I do not deal with these issues, only the delays or fallout. My comments above reflect this and the issues I see.

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

Yes this should be mandatory, no one else can just ignore, not respond, or not then be held responsible. No company wants a permit just for fun. There is a reason and a business imperative and given they don' want something completely stupid, why can't an answer be provided, if rejected, reasons given and if not deemed to be fair reasons for refusal, then able to be challenged. This must be sorted and done properly for the future.

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

I applied for a b-triple permit. The only part controlled by the local council in Laverton was 400m to an intersection, where the main road was under Vicroads control. The local council wanted a swept path done, when I was not even turning on their road. This is ludicrous and must be stopped.

Vicroads will allow b-triples on the Hume, but only up to 68 tonne, saying the bridges need review. The Hume is a divided road, so bridges only have one way traffic, the weights on the group are the same, just more of them. We could have 6, 68 tonne HML b-doubles on one bridge, yet you would only fit 4 b-triples anyway. This makes no sense.

Even stupider, A-doubles have been approved on the Newell which is mostly two lanes, yet they are not allowed on the four lane divided Hume Highway, can anyone realistically explain this? We will allow bigger trucks on worse roads, but not on good roads. How stupid does this look? And how stupid is it?

We used to have OVERLENGTH or OVERWIDTH signs on trucks and pilots and yes, it meant carrying two sets of signs, but then if the pilot was useless, all oncoming traffic could read the sign. I don't

know who made this happen, but it made things worse from where I sit. Now I have to rely on a pilot, some good, some trained, some useless, too close, too far away, can't be understood etc and then I get a load I don't expect and this can be a danger to all.

There must be a standard for all pilots, including training and education. Those who do bigger jobs, where Police do now, should have a higher level in being able to stop traffic and or report offenders. Every truck and ute has a yellow flashing light and people ignore them. In NZ, oversize loads above a certain size, the pilot has a magenta light. Currently the states won't consider this (as they want to keep the magenta lights for themselves the little children) but it would help others recognise a bigger load as the Police do now, but I agree, getting them and paying them takes them and their vehicles away from normal duties and increases costs.

Queensland now allow oversize at night. This might be well and good for those carrying the load, but as someone coming the other way, few drivers will tell us what they are and often, all I can see coming at me is flashing yellow lights that can blind me. This to me is a risk too far.

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

As above.

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

In Dubbo one four lane divided road is not a b-double route and another is. Why? Yes there are places b-doubles should not go, but currently there are routes that do not suit and many unapproved roads that do. This needs to be fixed.

In another road passing a school, b-double access was removed without telling anyone. How can a driver keep up with tis when he travels in four states? A near \$1000 penalty did not reflect the risk (none) the road damage (less than none) and where telematics could help is in better systems to update and with driver input, better help drivers to comply.

Time limits for standard roads and combinations should be open unless conditions or roads change.

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

Unless NHVR is given some authority to mange this better, we will continue to go backward.

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

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?

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?

I agree with Draft principle 3 and if those principles are applied, then it will see a major improvement. As a driver, that is all I can offer here.

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

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

My answer here is the same as above and in previous comments.

There is only one thing I see missing at this time. There are councils building, or allowing to be built, roads and even industrial areas with little consideration to the vehicles that will use these roads. I realise this is beyond the scope of this review, but why should we have such roads built and then have to fight to either get access when they are built wrong, or to prove they are wrong and it is far too late then. Even rest areas, parking suitable for heavy vehicles, not just parking for cars, (then again, why is it factories can be built where most employees have to park on the street and then a truck can't even pull up to access a site. Something has to be done now to stop this stupidity for the future. Can such be included in discussions with councils and others when access arrangements are discussed. I know of a recently built industrial site in Melbourne, with roundabouts you ca barely gate a semi through, but it has major transport terminals. Such sites must also recognise the parking in an industrial area. How can this be?