

HVNL Review Consultation Regulation Impact Statement

Part 9, Access

Comments

Note, these are my views as the primary Road Manager, they are not the official view of the organisation.

Part 9.4

9.4.2 to 9.4.5

Options 9.1a, b & c

No indication of increased funding for local government to balance the increase in road damage from the higher axle loads, No indication of amount of increase in fuel levies that will be expended on road improvement to support the higher axle loads.

While 9.1a is easiest to operators and enforcement, 9.1c would be best for road authorities as the data will help with working out where to prioritise road upgrades.

Support if funded.

9.4.6

Options 9.1d

Our Local Government area has a many tight corners, a lot with little option for widening without acquiring private land, also several of the railway bridges will require widening to allow the current and longer vehicles access.

This will require increased funding to improve local roads to allow for the increased swept paths.

While technically this is a 1m increase, it is a lot more in practical sense. Compare a typical truck and tri dog with a typical truck and quad dog. The minimum spacing for full loads on bogie – single – bogie is much less than for a bogie – bogie – bogie. The swept paths are noticeably different as few people want to put more tare weight into a vehicle than needed to get minimum lengths to meet load limits.

Support Option 2 if road improvements funded.

No objection to Option 3, but not applicable to our urban area.

Part 9.5

9.5.3

Option 9.2a

A lot of our permits are project based, depending on the particular project requirements and time frame. The permit details may or may not be suitable for the next project in the area.

Option 9.2a not supported

9.5.7

Option 9.2e

The main problem with approvals until there was some recognition is 3rd party consents. HVNL covered railway level crossings but ignored rail bridges. Local government does not own the rail bridge structure, we only control the road wearing course, not the bridge structure. While we are managers of the lines and signs, we don't determine and don't have details of the bridge structural capacity. Some bridges have had a bridge load limit until the bridge was strengthened. If there is no requirement for the bridge owner to provide consent, local government only has the option of refusal of applications using rail bridges. No objection to NHVR approving the use of third party bridge component of the application route with the responsibility for the decision.

The initial problem we had of NHVR rejecting conditions requiring applicants to obtain approval from railways and then not being happy with subsequent refusal of the application when returned to the road manager without the railway condition has thankfully been solved.

Option 2 is the only viable change to existing arrangements.

Part 9.6

9.6.2

Option 9.3a

The timeframes need to allow for road managers resourcing, the road manager task, like most others in local government is competing with other demands and increasing legislation change.

The applications that take a long time are the repeats without taking notice of the reasons for initial conditions or refusal, such as blanket applications where many roads are barely suitable for garbage trucks, let alone General Access articulated vehicles. Happy to provide streetview link to some examples if this will help.

If the transport company has looked at the destination and the options between the gazetted or state road and the destination, the application usually has most things covered. For example an OSOM application may need some conditions about which trees may be pruned and which they will have to go to other side of road to clear, but they don't involve corners that garbage trucks need the whole road.

Option 1 is the supported outcome.

9.6.3

Option 9.3b

Decisions are limited to a narrow band, such as damage to infrastructure or significant risk to safety.

Instead of deciding how these assessments and decisions may be reviewed, the solution include state and federal funds to improve the infrastructure such as widen corners so the swept path doesn't include traffic signal posts or front yards. If there is a review process that overturns road manager decisions, then is NHVR also taking responsibility for the decision and this make the

assessment and regulation system pointless. I haven't been able to have short term routes taken off the renewal of permit. Providing a swept path analysis for a specific route(s) is more effective in increasing access than appealing a refusal for blanket access to an area.

9.11

Questions

9.1 option 9.1c is best for road managers, 9.1a is easiest to administer. 9.1a to c require additional funding to offset increased road damage. 9.1d requires separate additional funding to increase swept paths for larger vehicles.

9.2 Significant reduction in permit applications, with less knowledge of who is permitted where and ability to follow up damage when cut corners.

9.3 Data provided by OBM would assist with road upgrade decisions

9.4 9.2a not supported, different sites on same route has different needs and precedent approvals will restrict ability to recover damage to roadside infrastructure and customise route to get to site and not obstruct roads too much.

9.5 Yes, when on holidays if someone in adjacent Council had better knowledge of NHVR than others in own organisation. No problem with the option being available.

9.6 Cost to road manager depends on knowledge of staff of heavy vehicle performance and network, amount of field inspection needed before entering data. Few new roads so update not expensive, main cost in set up. Existing GIS is good so additional data not much of a system cost.

9.7 If changed, Option 2 Constant freight such as to the only commercial area in the local government area easy to deal with now and with the changes. The time limited sites, such as building sites where access is only needed for 18 months, are the main use of resources. The proposed changes won't reduce the workload.

9.8 Option 1 is better

9.9 Option 1 is better than option 2, to reduce the need for reviews, increased federal and state funding to improve roads so there are less geometric and structural constrictions on the network, leading to less conditional approval or refusals, therefore less need to object to road managers decisions.

9.10 Proposed structure does improve responsiveness but not clear if it reduces road managers options to manage their roads.

9.11 Will leave that to operators and state road authorities who are closer to field conditions.

9.12 Option 9.2e, 3rd party consents required to allow conditional approval, if not included, any application including rail bridges can only be refused as rail bridges are not Council assets. While Council maintain the wearing course, lines and signs, it takes more than 25mm of asphalt to support a vehicle. The structure below the 25mm of asphalt is owned by state railways, not Councils. Removal of 3rd party consents will remove any point in Councils assessing the application if NHVR returns to rejecting conditions requiring applicants to obtain approval from railways for railway bridges. NHVR would take over responsibility for the railway bridges.

9.13 Don't have any data but are now recording time spent on NHVR but not recording time on particular permits

9.14 Education of public on what freight does and that while trucks are larger than their cars, the professional truck drivers have to put up with car drivers ' skills ' and expectation that trucks behave like a Toyota Yaris all day. Driver skill retesting between obtaining licence and 85 years old will help keep skills, knowledge and attitudes more up to date.