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## **Response to National Transport Commission's issue paper: A risk-based approach to regulating heavy vehicles**

The review of the HVNL needs to consider two factors that impact significantly on pedestrians – risks to safety and impacts from noise and vehicle emissions on the amenity of streets and towns. The efficiency of larger vehicles should not be allowed to override the priority of other groups in specific environments where they naturally have greater priority.

### Identifying risks to pedestrians

Heavy vehicles pose significant risks for pedestrians and review of the HVNL needs to apply a Safe Systems approach which specifically targets risks posed to pedestrians and advances Vision Zero goals.

Prior crash histories have not always proved to be a reliable indicator of what will happen in the future especially for pedestrian crashes, and a systemic approach is necessary to identify the factors and locations which contribute to pedestrian crashes. Assessing the relationship of risk-related variables (or crash predictors) to crash frequencies has been found to be more reliable than prior crash frequencies alone. Surveying and direct engagement with drivers needs to identify links between driver attitudes and behaviours and the frequency and severity of incidents, and the modelling used to develop the risk-based framework needs to be made publicly available.

The draft NSW Road Planning Framework prioritises different customer groups according to both **movement and place**, where **pedestrians are prioritised in centres and streets with high place value**. In these types of environments the regulation should recognise the priority of pedestrians and remove or minimise interaction with heavy vehicles. This should not simply involve to changes the physical environment to separate heavy vehicles from pedestrians, but should manage risks through reducing speed, time of day restrictions and ultimately providing by-passes or alternate routes.

### Safer vehicles for urban environments

The HVNL review needs to ensure heavy vehicles using urban streets provide greater safety for people walking.

Heavy vehicles with improved direct vision can markedly decrease operator reaction time and reducing the driver height gives drivers a better view of their immediate surroundings. All trucks and trailers need to be equipped with rear, side and front under-ride guards as well as blind-spot sensors, and trucks using urban streets need to accommodate smaller turning radii to allow implementation of safer pedestrian-friendly street designs.

The significant differences between pedestrians and heavy vehicles means any collision has a high likelihood of severe injury or death and, to mitigate these risks all truck and trailer combinations need to be significantly restricted in urban locations with the application of curfews and lower speed limits as well as incentives to use motorways.

#### Routes and impacts on street amenity

Restrictions on routes used by heavy vehicles are needed to minimise the risks to people walking. Main streets such as the Hume Highway through Ashfield or Botany Road in Sydney are complex multimodal, high place value locations with a range of conflicts between different road users including people walking to access local facilities; these locations are also through routes for heavy vehicles. Where there are alternate routes available in close proximity heavy vehicles should be redirected around centres and places of high value.

By restricting heavy vehicles from centres and streets with high place value, amenity is improved through reduced noise and vehicle emissions, allowing more free flowing movement of pedestrians and improving liveability

#### Driver training and health testing

Ongoing driver training and health testing including vision testing must be a high priority in any risk-based approach. People walking and riding bicycles are particularly vulnerable to collisions with heavy vehicles and drivers must be required to complete ongoing training targeting unprotected road users and including intersection-specific training focussing on speed and deliberate visual attention. The ***1m separation rule between all vehicles and cyclists must be emphasised*** when training heavy vehicle drivers because the consequences of any adverse interaction can result in serious injury or death.

Kind Regards

A handwritten signature in black ink, appearing to read 'Brigid Kelly', written over the printed name.

**Brigid Kelly**  
Acting President