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Att: PBS Effectiveness Review
National Transport Commission
Level 3
600 Bourke Street
MELBOURNE VIC 3000

**NTC DISCUSSION PAPER:
ASSESSING THE EFFECTIVENESS OF THE PBS SCHEME**

Thank you for providing VicRoads with the opportunity to make a submission on the discussion paper, '*Assessing the effectiveness of the PBS Scheme*' published by the NTC in August 2017.

Victoria is a strong supporter of the Performance Based Standards approach to improving heavy vehicle productivity and supports many of the findings contained in the report. In particular the quantification and identification of the key benefits of the PBS Scheme related to safety, productivity and the environment.

Responses to Section 8, Possible Actions that include proposed actions and suggestions for consideration by NHVR and road managers are contained in Attachment A. While many of these are broadly supported, more detail is required before definite decisions can be made.

Should you require further information, Peter Schofield, Manager Heavy Vehicle Productivity and Safety (Tel: 9854 2108) would be pleased to assist.

Yours sincerely



**ANITA CURNOW
EXECUTIVE DIRECTOR ACCESS AND OPERATIONS**

12/10/2017

Attach

Section 8 – Possible actions

8.1 Proposed actions

*Review the PBS framework and the standards to improve productivity, safety and the precision of matching vehicles to roads. **Support.***

- Victoria supports a review of the standards and believes in some instances innovation has been stifled through a black and white approach to meeting existing ADRs.
- Victoria believes that IAP with TCA type approved On-Board Mass systems presents a significant opportunity nationally to increase access for PBS combinations.
- Victoria believes the PBS scheme already provides an exemption to a significant part of the ADRs. It is important that jurisdictions adhere to the currently listed exempted ADRs under PBS – the most controversial of which is width.

*Investigate the need to develop a simplified PBS scheme for popular and mature PBS designs backed by greater access certainty. **Support.***

- Victoria supports this approach and has produced design drawings for variants of 30 metre A Doubles to assist industry in selecting the most appropriate combination to meet their needs.

*The NHVR publish national notices for all four levels of PBS network. **Support.***

- Victoria has an extensive network mapped for PBS vehicles. In the majority of cases permits are needed to allow travel off the mapped network. Victoria would support HPFV access falling under a national gazette notice.

*Austrroads and the NHVR develop a nationally harmonised infrastructure capability assessment framework for use in all access decision making. **Support in principle.***

- Victoria supports this in principle but there needs to be a great deal more clarity and detail. VicRoads already uses a Vehicle Assessment Tool developed by Monash University that could be used by jurisdictions as a standard for generic bridge assessments.
- Victoria strongly supports the approved PBS assessor arrangements and already uses approved assessors for geometric assessments. Victoria would also welcome an investigation into the feasibility of establishing a rigorous regime for third party bridge assessments supported by a certification and audit process developed by either the NTC or Austrroads.

*Develop a Regulatory Impact Statement (RIS) to assess whether a performance based approach should be the standard to assess and register a heavy vehicle's suitability on the road. This would apply to all new heavy vehicles over 42.5 tonnes. **Not support.***

- While improved safety is an outcome of this approach it would result in an increased red tape burden on both industry and road agencies. This

proposal should be subject to a rigorous policy investigation and analysis with appropriate approvals by Ministers before contemplating a RIS.

*Engage with non-road infrastructure owners to identify the costs and benefits of upgrading their infrastructure to accommodate PBS vehicles. Also engage with ancillary operators to identify if the PBS scheme can optimise the productivity and safety of their heavy vehicle fleet. **Support.***

- While this approach is supported, Victoria believes other suggested proposals are more of a priority.

*Identify if there is a need to develop a performance based approach for medium-to-heavy duty commercial vehicles (8t to 42.5t total mass) and buses operating in urban areas. **Support in principle.***

- Victoria would need more detail on the scope of work to be undertaken including the dimension limits for vehicles particularly those related to buses. Dimension limits for buses need to reflect international practice.

8.2 Suggestions for consideration by NHVR and road managers

1. Encourage local governments to approve the use of PBS vehicles as a better alternative to prescriptive vehicles. **Support.**
2. Develop nationally harmonised operating conditions for different PBS vehicle types, network levels and mass limits for use in both state and local roads. **Support.**
3. Substitute existing in-principle assessments by issuing permits with a delayed start date unless there are unacceptable levels of changes in vehicle design, mass limits, routes or PBS safety and infrastructure performances. **Not support.**
 - Victoria believes this would lead to a greater administrative burden should changes be made following in-principle assessments. Additionally, parameters for unacceptable levels of change need to be defined, for example small changes in axle spacings can have a significant effect on proposed mass limits.
4. Accelerate the development of the strategic freight network and work done on major and popular highways (Hume and Pacific highways) to simplify the task of managing heavy vehicle access for road managers. **Support.**
 - Victoria is unsure of what defines a strategic freight network and how it differs from the National Key Freight Routes and Victoria's Principal Freight Network.
5. Address the lengthy and expensive PBS approval process. Industry suggestions include developing a means to allow prospective applicants to self-assess their innovations against PBS requirements, and developing a centrally managed database for heavy vehicle components. **Not support**
 - Victoria supports the current arrangements where approved PBS assessors scrutinise vehicle design to ensure they meet the PBS standards.
6. No comment