

Access – short form submissions received on HVNL review microsite

V4: 2/12/2020

Contribution ID	Date	Name	Organisation	Which access options do you prefer and why?	Which access options do you least prefer and why?	Do you have any further comments about access?
720	21/08/2020	Vince Wright	Auzzie Pilot	<p>2 Tier</p> <p>"New" pilots require a period of training on the road, further to the course training that is completed to gain accreditation and possibly their industry involvement. Contrary to popular belief truck drivers do not make good pilots as soon as they change jobs. They have to stop being the truck driver and learn the safety job.</p>	<p>Single Tier</p> <p>Persons with no transport experience are able to gain accreditation and enter an industry not knowing the practical side of that industry. Examples: The smell of a hot tyre or binding brake, the condition of the securing chains and straps, turning radius of an extended trailer, braking distances etc. A classroom or training scenario is totally different to on job training.</p>	<p>An inclusion clause is inserted into the HVNL to cover Pilot Vehicles. At the moment you ask NHVR about pilot vehicles and they refer you to the state regulator. If the question is "too hard" the states refer you to the NHVR.</p> <p>A specific colour be allocated to Pilot Vehicle beacons as most road users take you to be service vehicles and ignore you. I suggest that Transport Compliance be red and blue and pilot vehicles take on Magenta.</p> <p>I know police are rather protective of their colours but compliance have little need to be operating at high speed as their intercepts are usually within site and the lights are used for protection around a stopped vehicle. The use of wig-wag lights is an advantage but from practical use amber has a</p>

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						greater safety factor and attention getting than white.
746	3/11/20	Residential Traffic Safety council	Residential Traffic Safety Council			Permits on local roads (council managed) need to be transparent. Heavy vehicles on local roads affect residents. In NSW, many councils do not manage trucks on local roads well, and load limited roads have heavy vehicles every day. There is a regulatory gap if councils are not managers (the verb manage), as Traffic NSW does not touch local roads. Why did an OSOM vehicle Travelling without a permit on my 5 tonne road bring Down a power line and not get fined.. yet if I park near where these trucks enter illegally, council fines me?
764	20/11/20	Leah Stapleton	Qube Logistics	9.1A Increase GML to CML for all operators, given manufacturing improvements with Safety (EBS, ABS etc). 2 tier approach simplifies the industry (GML and HML). Yet as part of the HVNL review, for Higher Mass Limit accredited operators increase / expand capacity and	9.1B Increase GML to CML enrolled operator, would eliminate the key benefits of NHVAS, Trucksafe & WAHVAS etc. The industry has built a strong accreditation system (community), NHVR enrolment would be a government approach. 9.1C Approved OBM	Submission 1 of 2 on further Comments 9.2a Consider this as being the primary reason for the NHVR, recognize precedent and expand process for low risk application. Fundamentally the NHVR was established to standardize & remove the

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				network must occur. As similar improvements (safety) will otherwise not be recognized.	approved CML. Given that the RIS can't verify impact if this was approved, and accreditation levels have remained similar, what is the real impact? Duties cover Mass loading via COR. OBM would simply add further costs to the operator.	<p>inconsistency.</p> <p>9.2c as above (Geospatial map given)</p> <p>9.2d Risk based approach to vehicles classes again requires unanimous agreement from all states. Is this going to happen?</p> <p>For example 30m network in South Australia, yet others still require permitting under the PBS scheme.</p> <p>9.2f - Under the HVNL there are no implications for road managers from access decisions that exceed statutory timeframes. In addition, decisions by road managers are open to internal review only, but with the NHVR's decision subject to external review.</p> <p>9.3a - Statutory timeframe, deemed referral and refusal for nil response contains two sub-options that relate to proposed amendments to statutory requirements. The existing period of 28 days is retained in each, which does not align with industry demand hence NHVR as the industry regulator is directly affecting supplier chains with delays. This area has</p>

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						been reviewed previously with little change, are we simply adding more layers but not resolve the fundamental issue timeline for approval or refusal of access. Fundamentally the NHVR was established as the one-stop shop hence aimed at reducing access processes. Surely if a HNVL review subjecting further NHVR involvement would be looking at statutory timeframe as a key agenda?
772	27/11/20	Philip Roper	O'Brien Traffic		The RIS does not make a case for the reason to grant CML rights to vehicles that are not enrolled in the NHVAS. Section 9.4.2 of the RIS states that CML is only available at present to operators who will enrol in NHVAS for a given vehicle, but it does not explain how this constitutes a problem. In my experience, operators who want to use CML mass limits will enrol, and tend to see it as an easier option than HML. The use of CML is not a reason to pursue PBS approval - CML is available without any permit at all. Further, enrolment in NHVAS is designed to improve maintenance, which leads to	

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					safer and less damaging vehicles. Removing this requirement would be a backward step.	