NHVR
National Heavy Vehicle Regulator

Consultation Paper – Our Productive City: Brisbane's Industrial Future

Submission to Brisbane City Council

23 August 2021

Introduction

The National Heavy Vehicle Regulator (NHVR) commends the Brisbane City Council (Council) for its development of the draft *Our Productive City: Brisbane's Industrial Future* (the draft Strategy), which considers:

- the impacts of coronavirus on industrial businesses and the industrial sector including emerging trends
- how to maximise industrial land to generate jobs and drive economic growth
- the role of Brisbane's industrial sector in the South East Queensland region
- the relationships between industrial areas and Brisbane's Knowledge Corridor
- how to balance industrial activity with creating welcoming precincts for industrial businesses and workers.

Addressing these issues is critical to delivering tangible and meaningful outcomes for the freight industry.

The NHVR is tasked with minimising the regulatory burden of the heavy vehicle industry; reducing duplication of and inconsistencies in heavy vehicle regulation across state and territory borders; and providing leadership and driving sustainable improvement to safety, productivity and efficiency outcomes. In this context, the NHVR supports the vision of the draft Strategy: '*to renew Brisbane's industrial precincts to be globally competitive and locally resilient*'.

The NHVR supports higher productivity freight vehicles (HPFV), particularly those operating under the Performance Based Standards (PBS) Scheme. The link between transport infrastructure and land-use planning are critical to freight safety, productivity and economic prosperity, in Brisbane and beyond.

The NHVR looks forward to working with Council on the successful delivery of actions from the draft Strategy, in particular Action 2.2, which nominated the NHVR as a key stakeholder.

The NHVR congratulates Council for taking the initiative to build on the success of the previous Brisbane Industrial Strategy. We appreciate the opportunity to put forward our submission on the Strategy's review, to ensure it remains up-to-date and meets Brisbane's needs.

For further information, please contact Brayden Soo, Acting Manager, Freight and Supply Chains on 0438 240 587 or brayden.soo@nhvr.gov.au.

About the National Heavy Vehicle Regulator (NHVR)

The NHVR is Australia's dedicated statutory regulator for all heavy vehicles over 4.5 tonnes gross vehicle mass or aggregate trailer mass.

It was established in 2013 as a statutory authority pursuant to the Heavy Vehicle National Law.

Our Purpose

We provide leadership to, and work collaboratively with, industry and partner agencies to drive sustainable improvements to safety, productivity and efficiency outcomes across the Australian heavy vehicle road transport sector.

Our Vision

Delivering safe, efficient and productive heavy vehicle movements supporting a strong and prosperous Australia.

Our Mission

Through leadership and advocacy, we administer a national statutory system to deliver streamlined regulatory services and administration to the heavy vehicle road transport sector, minimising regulatory burdens while fostering greater safety and productivity.

The NHVR's stakeholder profile

200,000 people in the Australian road freight industry[1]

425 road managers under the HVNL

50,000 Australian road freight businesses[2]

6 HVNL participating jurisdictions[3]

Australia's heavy vehicle profile[4]

353,759 heavy rigid trucks

103,038 articulated trucks

924,860 Registered heavy vehicles and trailers[5]

99,379 buses

1 Australian Bureau of Statistics, 2018, 6291.0.55.003 - Labour Force, Australia, Detailed, Quarterly, November 2018
2 Australian Bureau of Statistics, 2018, 8165.0 Counts of Australian Businesses, including Entries and Exits, June 2013 to June 2017
3 The Australian Capital Territory, New South Wales, Queensland, South Australia, Tasmania and Victoria.
4 Australian Bureau of Statistics, 2018, 9309.0 - Motor Vehicle Census, Australia, 31 January 2019
5 NHVR, 2020, Registration demographics as at January 2020

Submission Response

We welcome the opportunity to provide input to the draft Strategy. Our submission is unique in that we are a national regulator and statutory authority for heavy vehicles, with strong relationships with road managers and industry through our constant engagement and service delivery.

The NHVR recognises that the scope of the draft Strategy extends beyond the NHVR's remit, such as consideration for non-heavy vehicle freight modes, technology and the knowledge economy, and placemaking. Accordingly, our response to the draft Strategy is focussed on feedback to inform the direction, intent and outcomes of the below three actions.

- **Action 2.2:** Reducing red tape for government and industry through stronger partnerships with the NHVR
- **Action 3.1:** Developing new building and site design provisions; and determining and prioritising infrastructure requirements
- **Action 3.3** Implement new statutory actions to support this strategy and continue to advance statutory actions from the Brisbane Industrial Strategy 2019.

Our response is also based on our knowledge and experience with road managers and industry, from recent feedback received through our own consultation process in the development of the NHVR Heavy Vehicle Productivity Plan (HVPP) 2020-2025 which was released in August 2020. The HVPP outlines our objectives, goals and actions to deliver safe, efficient and productive heavy vehicle operations in Australia.

Throughout consultation on the HVPP, we engaged with 55 stakeholders in pre-submission consultation, received 23 formal submissions, presented a webinar with 178 registered participants, and held nine workshops with the Commonwealth Government, all state and territory transport agencies, and all local government associations in participating jurisdictions.

The outcome of the HVPP consultation process provided the NHVR with unique insight to the challenges and opportunities of improving heavy vehicle productivity and safety. Many stakeholders commented on the importance of sustainable road infrastructure investment and investing in infrastructure at the right location, at the right time and to the right standard.

Planning that supports heavy vehicles

The NHVR is aware of cases in Brisbane where truck bans and curfews have been implemented in industrial and commercial areas because of adjacent residential development and communities misunderstanding the freight task and the impacts of heavy vehicles. There is also evidence of historic urban encroachment on established industrial areas in Brisbane.

These decisions impact productivity, can increase the cost of goods and services for the community, and may affect logistics operations for domestic and international supply chains. An increased risk to safety, infrastructure and amenity may eventuate when the opposite effect was desired.

The NHVR supports Council's acknowledgment that there is a 24-hour freight system and that industrial precincts should be protected from urban encroachment.

Recommendation:

Council's City Plan, neighbourhood plans and urban renewal plans should appropriately support the safe and efficient conduct of freight operations, particularly those needing to operate overnight or 24 hours a day to serve the community.

Planning in Brisbane must:

1. include protection measures for key freight gateways and industrial land

2. ensure industrial land is in the right location and is supported by the right infrastructure
3. ensure that the application of Council's policies and local laws relating to truck bans and curfews is consistent with the safe and efficient operation of supply chains.

The Performance Based Standards (PBS) Scheme

The challenge for the growing road freight task is to ensure goods are transported in the safest, most sustainable and cost-effective manner. This can be achieved by having fewer trucks on our roads.

Under the HVNL, the NHVR has oversight of the PBS Scheme, which is a national scheme designed to offer the heavy vehicle industry the potential to achieve higher productivity and safety through innovative and optimised vehicle design. In simple terms, this means moving more with fewer vehicle movements in safer vehicles.

From 2007 to 2019, compared to the vehicles that would have otherwise been required to complete the same task, PBS vehicles have[1]:

- reduced CO_2 emissions by more than 2.2 billion kilograms
- reduced fuel consumption by more than 800 million litres
- removed more than 2,700 trucks from the road
- reduced truck distance travelled by more than 1.6 billion kilometres.

With respect to safety, the NHVR's recently published Review of Major Crash Rates for Australian Higher Productivity Vehicles: 2015 - 2019 identified that:

- PBS vehicles are involved in 60 per cent fewer major crashes than conventional vehicles
- PBS vehicles are forecast to save 143 lives over 20 years
- PBS articulated combinations had the lowest rate of crashes per distance travelled with 5.4 crashes per 100 million kilometres travelled, compared to 17.6 crashes for their conventional counterparts—almost 70% lower.

The success of the PBS scheme is a clear statement of the Australian heavy vehicle industry's desire to innovate and be safer and more efficient.

More information on the PBS Scheme and PBS vehicles can be found in the NHVR's publication Performance Based Standards – An introduction for road managers.

Recommendation: Council acknowledgement of the PBS Scheme and PBS vehicles

The PBS Scheme will play a critical role in achieving the draft Strategy's aspirations for safety, sustainability, productivity and economic competitiveness. The draft Strategy and City Plan 2014 do not currently make mention of these aspirations and should acknowledge the PBS Scheme and PBS vehicles in this regard.

Resilient and reliable infrastructure

Industry and government have indicated to the NHVR that heavy vehicle access was refused due to substandard site and road design, even within industrial and commercial areas (often where key gateways are located). Importantly, examples were provided where everyday general access heavy vehicles (e.g. waste removal trucks) and emergency vehicles (e.g. fire engines) could not service properties safely and effectively because of inadequate site and road designs.

Common design deficiencies include: narrow lanes; inadequate driveway designs; insufficient lot size; rear of vehicles protruding into oncoming traffic because of short turn-pocket space; and small intersections requiring vehicles to veer onto the wrong side of the road to make turns.

[1] NHVR, 2020, Heavy Vehicle Productivity Plan 2020-2025

Many industrial and commercial developments and roads were constructed for historically smaller and lighter vehicles. Continued use of outdated design standards will mean land and infrastructure will increasingly fail to accommodate innovation in the heavy vehicle fleet.

Recommendation: Upgrading infrastructure to unlock the potential of freight networks

Planning for new infrastructure and industrial estate developments should cater for a minimum level of access for heavy vehicles, particularly for the growing number of longer PBS vehicles.

Upgrading existing freight networks to safely accommodate the length of higher categories of freight vehicles will lead to significant productivity benefits for industry and, at the same time, deliver significant improvements to safety and environmental sustainability.

An important example of planning and design to unlock the potential of freight networks is upgrading B-double networks to be able to accommodate PBS Level 2B vehicles, such as the 30m A-double.

Heavy vehicle combination types	Length (m)	Network Access	GCM (t)	Nominal Payload (t)	Payload Efficiency	Trips per 10,000 (t)	Trip Savings (%)
	≤ 26	B-double network	68.5	43.5	1.62	230	39
	≤ 30	PBS Level 2B	85.5	63.8	2.39	157	59

The NHVR recommends that the Brisbane City Plan 2014 Infrastructure Design Planning Scheme Policy be updated to reflect the design requirements of longer PBS Level 2B vehicles, recognising that Level 3 and Level 4 vehicles cannot be reasonably expected to operate in Brisbane.

The NHVR offers the below case study, and points Council to the Department of Transport, Victoria Road Design Note 04-01, to assist Council in undertaking this task.

Case study: Victoria Heavy Vehicle Network Access Considerations

The Department of Transport, Victoria has developed a Road Design Note for heavy vehicle road access considerations.[2] The Road Design Note contains guidelines that must be considered on all new road and road upgrade projects during the design phase along corridors used by heavy vehicles. It outlines the minimum requirements that should be adopted to ensure the current and future performance of the network for large and heavy vehicles.

Proactive initiatives from planners and infrastructure providers, such as this Road Design Note, contribute to progressive and suitable updating of road networks. Accordingly, access is expanded over time to accommodate larger and more modern vehicles that are safer, more productive, and better for the environment and communities.

Provide access to equivalent prescriptive gazetted networks

The approval of end-to-end permit-free networks that optimise the use of roads is critical to delivering significant economic benefits across the country, and reducing the regulatory and administrative burden for governments and industry.

In partnership with state and territory transport agencies, the NHVR has developed a PBS Notice for Tier 1 PBS Vehicles (PBS Level 1 – 4). This Notice will enable lower-risk PBS vehicles that meet the PBS Tier 1 bridge formulae to access approved networks without a permit. The consent process with road managers commenced in May 2021.

[2] Department of Transport, 2019, Road Design Note 04-01: Heavy Vehicle Network Access Considerations, Victorian Government

Recommendation: Use evidence from the NHVR Portal to expand gazetted and pre-approved networks

The NHVR recommends that Council consent to the PBS Notice (if it has not done so already).

Where there is sufficient capacity and capability on existing equivalent prescriptive gazetted networks, permit requirements should be eliminated for PBS vehicles. Specifically, B-double networks in Brisbane should be gazetted for access by PBS Level 2B vehicles, where the network can accommodate the additional four metres in length of these vehicles. Further, the NHVR encourages Council to gazette and pre-approve more freight routes in Brisbane.

The NHVR has developed and released to road managers customised access permit reporting and mapping tools through the NHVR Portal to support Council to prioritise its efforts. This tool enables easily accessible information and analytics on historic access permit decisions that can be visualised on a map, and provides Council with the evidence and insights to expand gazetted and pre-approved networks, including those not previously considered.

Additional Feedback

Policy framework

The NHVR strongly recommends that the draft Strategy acknowledges and aligns itself to the following key national policy documents:

- The Heavy Vehicle Productivity Plan 2020-2025
- The National Freight and Supply Chain Strategy and National Action Plan
- The National Urban Freight Planning Principles

We further recommend that the significance of the road freight task is contextualised in the draft Strategy. The only current reference to the road freight task we could identify in the draft Strategy is the volume of B-doubles that could be replaced by Inland Rail.

The NHVR recognises the importance of all freight modes, including rail freight. The following factors influence freight mode preferences: infrastructure, service scheduling, climate, geographic, origin and destination, the commodity being transported, and the distances travelled.

While different modes have advantages and disadvantages, they play different roles in the supply chain. Rail typically has a competitive advantage for transporting bulk commodities, while road transport is more efficient for delivering smaller loads and/or time sensitive freight.

The above national policy documents outline that road freight is, and will continue to be, the dominant mode for delivering freight in Australia. We point Council to the Heavy Vehicle Productivity Plan and the National Freight and Supply Chain Strategy key statistics on freight growth and the future of freight in Australia.

Olympic Games: Brisbane 2032

The selection of Brisbane as the Olympic Games host city for 2032 will provide many opportunities for Brisbane's growth and future. Not only will it be an exciting period for sport, but also for transport, tourism, culture and the economy during and beyond the Games.

The NHVR would like to offer its support to Council to help manage heavy vehicle-related activities in the lead-up to, during, and after the Games.

We recognise that the process is in the very early stages, and determination is yet to exactly be made where and when construction activities will occur and their scale (e.g. including in other cities in South East Queensland). However, the NHVR offers to assist to ensure that Brisbane is best positioned to respond to the significant construction and freight-related demands that will inevitably be generated, not only for sites and venues, but also for infrastructure and development—in particular, ensuring the safest, most sustainable and

most productive vehicles are used to minimise the number of vehicle movements required and to best protect communities, the environment and infrastructure.

Without knowing the detail, we may be able to assist in: developing regulatory exemptions related to heavy vehicles, advising on heavy vehicle-related policies, suggesting and optimising heavy vehicle types and routes for Council and suppliers, and assessing key assets to better understand their structural capacity and capability to accommodate modern heavy vehicles (e.g. through the Strategic Local Government Asset Assessment Project, for which we have recently received Commonwealth funding to support local government to undertake up to 1,000 asset assessments in the next three years).

Thank you again for the opportunity to provide feedback on Council's draft *Our Productive City: Brisbane's Industrial Future* consultation paper. Should you require any further information about the NHVR's submission, please contact Mr Brayden Soo, Acting Manager, Freight and Supply Chains on 0438 240 587 or brayden.soo@nhvr.gov.au.