

Mr Jeremy Conway  
Chief Executive  
Infrastructure SA  
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Dear Jeremy

**SARTA Submission re 20 Year State Infrastructure Strategy.**

The South Australian Road Transport Association (SARTA), established in 1908 to tackle the condition of the roads, the price of horse feed and issues with the wages board (all of which are still relevant today albeit with differing details), is the trucking industry's peak body in SA. Our membership of hundreds of operators from all regions of the state and all sectors of the industry, reflects the makeup of the industry, comprising predominantly small to medium operators and a small number of large operators.

The SA Freight Council has made submissions, including its Moving Freight 2019 document and SARTA supports the proposals therein. In addition we offer the following specific comments.

**Road Transport: the Cardio Vascular System of the Economy and Community**

The Road Transport does not exist for its own purposes but rather it carries the freight required and produced by other enterprises and sectors, performing an essential service that underpins the economy and daily lifestyle of the community.

The vast bulk of the road freight task, by category, does not suit (like tomatoes and glass) or can't economically or practically be transported by rail. Rail has a critical and important role to play in land transport and it excels at bulk long haul freight in particular. That said rail has one very obvious and irrefutable limitation: tracks, and the rather limited network of them as compared to the far more extensive network of roads that reach to every corner of human activity.

Combined, road and rail provide the cardio vascular network of the economy, with rail and the major federal and state roads forming the major arteries and veins, whilst the smaller state and local council roads form the minor arteries veins and capillaries reaching into every farm, factory and community centre. With the growth in the economy and the population, it is well established that the road freight task



will grow by 200 to 300% in the coming decades, even after maximising the capacity of the rail network.

The Road Transport industry will and must meet that demand, or the economy and the community will stall and suffer ill-health and a fall in living standards. There is really only one core question in relation to the imminent growth in the road freight task:

### **HOW MANY TRUCK MOVEMENTS SHOULD BE USED FOR THE TASK?**

The freight will be moved, either by a large number of less-productive General-Access Heavy Vehicles (HV) or by far fewer Restricted-Access High-Productivity Vehicles (HPV).

This is the simple choice and it is a stark choice that requires consideration of the facts rather than emotive decision making that has all too often falsely cast HPV, such as B-Doubles, B-Triples and AD-Doubles etc, as the villains that pose safety risks to the community.

The realities are that HPV are and must be accepted as, the preferred option because HPVs:

1. Dramatically (by a factor of 2 or 3) reduce the nos of truck movements required for the task;
2. In doing so they similarly provide substantial reductions in:
  - a. Fuel emissions per tonne/km;
  - b. Congestion;
  - c. Noise emissions; and
  - d. Safety Risks.

Repeated studies, including two reports of analysis of SA Coronial Findings in SA, show that 80% and as high as 90%, of fatal car-truck crashes are caused by a minority of motorists taking unsafe and unnecessary safety risks around trucks. Slashing the number of truck movements required immediately delivers an equal reduction in the opportunities for those motorists to kill/harm themselves and others through failing to Share the Road safely with trucks.

That is the single biggest road safety gain available in relation to road transport and it must be maximised.

The recent approval of a new Super B Quad configuration for the transportation of onions and potatoes by road, has halved the number of truck movements as each Super B Quad movement replaces two movements of the B-Doubles that were performing the work. The safety, environmental and economic benefits are irrefutable and substantial, enabling the primary producers to maintain and even build the competitiveness of their produce in the price sensitive marketplace. The following from Owner Driver Magazine illustrates the point.

[https://www.ownerdriver.com.au/industry-news/1906/newest-pbs-b-quad-unveiled-and-on-the-road?utm\\_source=Sailthru&utm\\_medium=email&utm\\_campaign=OD%20eDM%2007%2006%202019&utm\\_term=list\\_ownerdriver\\_newsletter](https://www.ownerdriver.com.au/industry-news/1906/newest-pbs-b-quad-unveiled-and-on-the-road?utm_source=Sailthru&utm_medium=email&utm_campaign=OD%20eDM%2007%2006%202019&utm_term=list_ownerdriver_newsletter)



The newest performance-based standards (PBS) super B-quad has hit the road in Australia.

Developed by Southern Cross Trailers and operated by Symons Clark Logistics, the PBS level 3A-quad spans 36.5m – including a Kenworth K200 prime mover – and is the second B-quad on-road in Australia.

It was given the tick of approval by the National Heavy Vehicle Regulator (NHVR) in South Australia, with the launch attended by CEO Sal Petrocchio and chief engineer Les Bruzsa.

The first B-quad, also boasting the work of Southern Cross Trailers and operated by Rocky Lamattina & Sons, was launched in August 2018.

The regulator notes the number of PBS combinations has doubled in the last five years, led by truck and dog approvals, which overtook prime mover and trailer combinations for the first time in 2018.

There are now almost 18,000 separate PBS heavy vehicles registered since the scheme commenced, making up nearly 9,000 PBS combinations.

#### **Recommendation 1:**

**Infrastructure SA must imbed the optimal safe use of High Productivity Vehicles (HPV) as a core principle in all land transport infrastructure planning and ensure the road infrastructure and bridges are designed and maintained to facilitate this.**

This must include:

1. Establishment and protection of an expansive HPV route network throughout the State;
2. Linkage of that network with Rail, Air and Sea transport modes and hubs;
3. Seamless linkage of that network to interstate networks 'sans frontieres';
4. Road and bridge infrastructure designed for both today's and tomorrow's HVP configurations;
5. Maintenance of that infrastructure for life of the asset;
6. Design of all road infrastructure to accommodate the appropriate classes of HPV;
7. Provision of Rest Areas for HV drivers to meet the required peak-demand in locations and at required frequencies (50 to 80km apart) in consultation with the industry; and
8. Obligations on State and Local Governments to adhere to the above.

#### **Fix the Weakest Link: Bridges and Structures, A Bridge Too Far**

Increasingly the weakest link in the road freight infrastructure and task, is bridges and structures. These structures are most commonly the rate-limiting step/factor that constrains optimal safe use of HPVs due to load limits. There is an important dynamic which must be revisited and a new paradigm adopted. Currently, under the Heavy Vehicle National Law (HVNL) the national Heavy Vehicle Regulator (NHVR) and the Road Authorities (eg DPTI) and the Road Managers (ie Local Councils) control the access of Restricted Access Vehicles on the basis of their suitability for the routes, including bridge

loadings. Whilst this principle is appropriate and understood, its application is outdated and bound up in a paradigm that is no longer affordable if we are to achieve the Growth.

Currently access for a HPV to a given route will all too frequently be limited, not by the suitability of the road(s) but by weight limits on the bridges. Those weight limits are established at levels to preserve the bridge asset for the planned life of the bridge up to its replacement. So for example access may be available across the bridge at say 80 tonnes but not for a new HPV rig at 85 or 90 tonnes, as that access would shorten the life of, ***but not imperil***, the bridge.

SARTA contends that this paradigm needs to change so as to facilitate higher productivity and economic growth by adopting a new principle regarding the life and use of key bridges/structures. Investment decisions must be made by Government to bring forward the bridge replacement program so as to facilitate the optimal safe use of HPVs.

**Recommendation 2:**

**The bridge/structures infrastructure in SA must be reviewed to identify key structures limiting the use of HPVs and investment decisions must be made to bring forward the replacement of those assets in the works program to facilitate access by HPV in the interim.**

**Recommendation 3:**

**B-Triples and Roadtrains and their equivalent performance envelopes should be adopted as the new minimum standards on all major road freight routes.**

**Recommendation 4:**

**Infrastructure SA should initiate an ongoing program of at least annual consultation with the road transport industry, including SARTA, to identify infrastructure issues and consider network development.**

**Recommendation 5:**

**The Horrocks, Princess and Mallee Highways should be upgraded as a matter of priority to facilitate improved HPV access.**

Yours sincerely

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S. B. Shearer  
Executive Officer