

Re: draft cnds

From Mark Hammond | Cleary Bros <[REDACTED]>  
Date Tue 31/3/2026 9:42 AM  
To Carl Dumpleton <[REDACTED]>; Steve Guy | Maas <[REDACTED]>  
Cc Ethan Brice <[REDACTED]>; Alex Meyer <[REDACTED]>

Hi Carl,

In regards to NHVR, key points are as follows:

- General Access Vehicles
  - "General Access Vehicles (GAV) don't require a permit or notice to access road networks; these vehicles have as-of-right access to the network unless signposted otherwise (e.g. a bridge tonnage restriction)." (<https://www.nhvr.gov.au/road-access/mass-and-dimension/general-access-vehicle>)
  - A General Access Vehicle has restrictions on total vehicle mass which are variable based on vehicle type - there is an absolute maximum of 50.5t (<https://www.nhvr.gov.au/road-access/performance-based-standards/road-and-bridge-access>), however in practice it is generally up to 47.0t for a semi trailer, or 43.5t for a truck and dog arrangement. (<https://www.nhvr.gov.au/files/media/document/247/202602-0114-general-mass-limits.pdf>)
  - For reference, a truck and tri-dog arrangement (with a typical load of up to 32t) when fully loaded complies with the General Access Vehicles requirements.
  - A truck and quad dog arrangement (with a typical load of up to about 38t), still meets the General Access Vehicle Requirements so is able to use the transport routes, but when operating under GAV can only be partially loaded to ensure the 43.5t total vehicle mass isn't exceeded.
- Performance Based Standards (PBS) Vehicles
  - Where heavy vehicles meet certain standards around vehicle design and safety, they can be certified under PBS, which allows higher weight and mass limits under the GAV for gazetted PBS routes. The Princes Highway and all routes to our concrete plants have generic PBS exemptions which allow a truck and quad-dog to be fully loaded (and in fact allow for much larger trucks again). Transport companies can also apply to the NHVR to allow them to operate under PBS exemptions on non-gazetted routes. Cleary Bros and a number of our subcontractors have PBS exemptions for a gross vehicle mass of up to 57.5t on this route.

The Site Entrance upgrade pre-dates me by a long shot. It looks to have been introduced in the 264/01 (KMC) / 01/2536 (SCC) DA which was approved by DPHI in 2003. I've reviewed the Statement of Environment Effects from 2001 (supporting 264/01 / 01/2536) and there is no mention of road upgrades, so I assume it was likely raised in a submission from Shoalhaven Council in response to the 2001 SEE. I've got the approved design drawings/CC for the upgrades (dated Nov 2003), but I cannot find any reference to vehicle types to inform the design. The Masson Wilson Twiney assessment is included in the 2001 SEE which lists the historical vehicle types which likely informed the design. Given the current use of quad-dog trucks on the site, I cannot see why they wouldn't be suitable, but we can easily do a swept paths analysis on this intersection for the quad dogs post-approval if required.

I'm available all day to discuss if you have any further queries on these.

