LIVESTOCK, BULK AND RURAL CARRIERS ASSOCIATION

PO Box 4243, Manuka ACT 2603
www.lbrca.org.au • **office@lbrca.org.au**

27 October 2026

Transport for NSW
Community and Stakeholder Engagement Team

Via: RegionalProjects@transport.nsw.gov.au

NSW Timber Truss Bridge Strategy review

The Livestock, Bulk and Rural Carriers Association (LBRCA) is the peak body representing rural carriers performing some of Australia's most essential and challenging freight tasks. Our members are located throughout rural and regional Australia and are responsible for the movement of livestock, grain, agricultural inputs, bulk commodities and other essential freight. The LBRCA has been representing the unique interests of rural carriers for over forty years.

Our members operate at the first and last mile of regional supply chains and, in many cases, across the entire freight journey. They depend on safe, reliable and productive road networks, road assets such as bridges and culverts and heavy vehicle infrastructure such as rest areas, decoupling bays and stock washes. They interact extensively with railheads, ports, saleyards, processors, farms, feedlots, grain facilities and intermodal terminals.

Rural carriers rely heavily on infrastructure that is often owned or managed by local governments and Transport for NSW (TfNSW). This includes heritage and timber bridges, particularly along first, last mile and farm gate routes, such as farms, saleyards and livestock loading facilities that support safe and productive supply chains.

LBRCA's interest in this review is therefore principally in how governments identify issues with existing heritage bridge infrastructure, rectify barriers to efficient freight movements and balance heritage and community interests with safety and productivity. LBRCA seeks an evidence-based access methodology and a transparent intervention pathway for constraints.

Yours sincerely,

Wade Lewis
President
Livestock, Bulk and Rural Carriers Association Inc.

LIVESTOCK, BULK AND RURAL
CARRIERS ASSOCIATION

PO Box 4243, Manuka ACT 2603
www.lbrca.org.au • office@lbrca.org.au

Protecting heritage, supporting rural communities and removing local freight bottlenecks

Review of the NSW Timber Truss Bridge Strategy

Submission to Transport for NSW | October 2026

TfNSW should consider conserving significant timber truss heritage where safe and practical to do so, while reassessing whether each bridge should remain the principal operational crossing. The revised Strategy should apply the 2019 operability principles, remove avoidable heavy vehicle access barriers through safe bridge-specific engineering decisions, and publish a funded investigation and accountable intervention pathway for priority network constraints.

In retaining heritage bridges on the network, TfNSW and road managers more broadly should apply an evidence-based approach to access, lifting productivity and improving access for the rural fleet.

The revised Strategy should apply a transparent freight and regional productivity test and create a funded pathway to strengthen, duplicate, bypass or replace crossings where the network cost of retention is material.

TfNSW should consider alternatives to in-service retention for heritage protection and preservation as part of this strategy.

LIVESTOCK, BULK AND RURAL CARRIERS ASSOCIATION
PO Box 4243, Manuka ACT 2603
www.lbrca.org.au • office@lbrca.org.au

Executive summary

LBRCA welcomes the NSW Government's review of the Timber Truss Bridge Strategy and recent consultations with LBRCA and our members. TfNSW manages 27 historic timber truss bridges dating from 1880 to 1930. The government has acknowledged that some bridges no longer meet local transport or community need, while maintenance demands and changing regional traffic patterns are creating pressures on the network.

The policy problem is not heritage conservation itself. It is an assumption that conservation necessarily requires a historic bridge to remain in service as the principal road crossing, even where its structural or dimensional capacity creates a material and enduring barrier to regional freight or essential community access. Conservation options and the appropriate ongoing transport role should be considered separately, subject to applicable heritage requirements.

For rural freight, network continuity is decisive: a single bridge may interrupt an otherwise viable heavy vehicle route, including for some vehicles operating within general mass limits. The consequence can be smaller loads, additional trips, detours or forgone access, increasing costs for carriers and producers. Communities can also face restricted access between farms and towns and reduced resilience during emergencies. Where existing restrictions are necessary for safety, the objective should be to identify safe alternatives and a proportionate long-term response, not to assume immediate unrestricted access.

The 2019 retention review treated operability and network need as fundamental considerations. The revised Strategy should apply those principles afresh to the operational role of every retained bridge, testing present and forecast freight demand, structural condition, safe access, heritage obligations and whole-of-life network costs rather than merely reconfirming the existing portfolio.

LBRCA recommends an initial Rural Transport Productivity Test for every bridge within the retained portfolio, completed as part of the Strategy review, followed by proportionate options appraisals for demonstrably constrained crossings. This should distinguish three decisions: what access can be safely provided now, what ongoing transport role is appropriate for the existing structure, and whether targeted works, strengthening, a parallel crossing, bypass or replacement warrants priority investment. Funding should be provided for priority investigations, with any capital commitment determined through transparent appraisal rather than presumed in advance.

Where a proposed lawful heavy vehicle movement is excluded under existing access conditions, TfNSW and the relevant road manager should identify the bridge specific engineering basis and examine whether safe, proportionate operating conditions are feasible. Conditional access should be approved where a competent engineering assessment demonstrates acceptable risk, not assumed to be suitable for every structure. Where restrictions remain necessary, the decision should explain why, identify lawful alternatives where available and state when reassessment will occur.

LIVESTOCK, BULK AND RURAL CARRIERS ASSOCIATION
PO Box 4243, Manuka ACT 2603
www.lbrca.org.au • office@lbrca.org.au

Recommendations for Transport for NSW

1. Reassess the status of all 27 bridges against the 2019 operability and network need principles, current and forecast freight demand, community function, engineering condition and whole-of-life cost. Publish which crossings remain suitable for their existing transport role and which require further intervention analysis, while respecting separate heritage and statutory requirements.

2. Complete and publish a bridge specific Rural Transport Productivity Test as part of the current Strategy review, including identified access constraints, relevant freight demand, and safe interim arrangements.

3. Establish funding for priority engineering investigations and strategic options/business-case development, together with a rolling, publicly reported 10-year bridge intervention pipeline. Distinguish investigations, option selection, proposed capital projects and funded delivery commitments.

4. Consult rural freight operators, primary producers, councils, local communities and emergency services on actual and suppressed vehicle demand, seasonal freight tasks and detours before finalising bridge specific decisions. Validate operator evidence against available traffic, access and commodity information including permit decision making.

5. Require a clearer explanation and engineering information for access restrictions and permit refusals. Before excluding a proposed heavy-vehicle movement, examine safe, proportionate controls or load-management options where technically feasible. Where access is an unacceptable risk, provide reasons to the operator. Include comparative road and bridge impact of higher productivity and PBS vehicles in contrast to additional daily movements of general mass (or equivalent) vehicles.

6. Integrate bridge assessments and investment priorities with NSW freight reform, PBS/HML/HPFV and general mass networks, route planning and the National Automated Access System. Prioritise attention to isolated bridge constraints that prevent otherwise viable end-to-end access, reuse competent structural assessments so the same asset is not repeatedly reassessed.

1. The review should commence with freight capacity

Timber truss bridges were productive infrastructure at the time of construction, connecting regional communities and reducing the cost and risk of moving agricultural and other goods. Their heritage significance and their transport purpose are not mutually exclusive concepts and LBRCA acknowledges that they are part of the same history.

The 2019 TfNSW review recognised that retention decisions must address customer and network needs as well as heritage responsibilities. It recorded each bridge's classification, location and operational attributes. The 2026 review should update that baseline and test whether existing restrictions continue to be necessary and proportionate, while separately considering the appropriate long-term conservation and transport response.

LBRCA's position is that safety and competent structural assessment are prerequisites for access. Heritage significance should influence conservation and design options but should

not automatically determine indefinite use of an ageing bridge as the primary freight crossing. The appropriate response must consider network functionality, community needs, heritage obligations, resilience and whole-of-life costs.

1.1 The 2019 Strategy: a key baseline

The 2019 review placed operability first among the criteria informing which bridges should remain in the operational retention portfolio, including the ability to meet network and community needs, the capacity and width required by larger vehicles, and other functional requirements. It contemplated removal from the operational retention list where operability could not be achieved. LBRCA asks TfNSW to apply this established decision principle consistently, while recognising that any alteration to conservation commitments or heritage protections requires the assessment and approvals.

The key consideration in 2026 is whether the operating assumptions behind individual retention decisions remain sound in light of changing rural freight tasks, higher general mass limits, demand for PBS and higher-productivity access, structural condition and community requirements.

Accordingly, TfNSW should reconsider operational retention decisions where a bridge cannot reasonably perform the transport function required of its route, rather than treating the existing list as an immutable outcome. This does not presume demolition or abandonment of heritage conservation of the assets. It treats them as having an alternate function, for example light vehicle or active transport options, where appropriate.

2. The benchmark for “operational”

The T44/42.5-tonne benchmark used in earlier strategy work is a historical reference point, not a sufficient default test for every present-day regional freight corridor. For routes with demonstrated higher-productivity demand, the assessment should consider relevant vehicle combinations, gross and axle group masses, vehicle length and width, agricultural machinery and route continuity. This does not imply that every local bridge must carry every HML or PBS configuration: the appropriate capability must be justified by the road's current and foreseeable role.

Warroo Bridge over the Lachlan River is a practical demonstration, where TfNSW states that its existing 42.5-tonne limit excludes modern vehicles such as common B-doubles and wide farm machinery. The replacement bridge is designed for HML vehicles.

Rawsonville Bridge over the Macquarie River was similarly identified by the NSW Government as unable to carry HML vehicles, with replacement justified by heavy-vehicle access, freight connectivity, safety and economic benefit.

The revised Strategy should therefore assess whether each crossing supports the productive capability reasonably expected of the surrounding route over the next 20-30 years, and not merely whether a conventional semi-trailer can cross today. It should also take into consideration any community impact, including farmers’ access, school buses, residents and access for emergency services.

3. A bridge restriction creates a network cost

A restricted bridge transfers costs of the freight task elsewhere in the supply chain. Depending on the route and commodity, operators may need to use a smaller vehicle, reduce payload, split loads, add truck movements, detour, delay movements or avoid the route altogether.

This can result in additional costs such as fuel burn, driver hours, tyre and vehicle maintenance, lower equipment utilisation, extra exposure to road risk, pavement wear on alternative routes and reduced reliability for farms, saleyards, feedlots, grain receival sites and processors. These effects are most material where the crossing is the only legal and practically available option or where seasonal peaks coincide with restrictions.

TfNSW should therefore compare the whole-of-life cost of continued retention, including network inefficiency and disruption, with the whole-of-life cost and productivity benefit of a alternate crossing.

The lowest initial construction expenditure should not be conflated with the lowest long-term system cost. The counterfactual should account for cumulative freight penalties, safety and traffic effects, maintenance, emergency disruption, conservation works and alternative-route impacts.

3.1 The economic scale of the freight task

The road freight task is large and remains economically significant. BITRE estimates that Australian road freight carried approximately 253 billion tonne-kilometres in 2024/25.

For LBRCA members, the agricultural context is particularly important and ABARES reports that agriculture, fisheries and forestry production reached $100.3 billion in 2024/25 in nominal terms, while around 71 per cent of agricultural production was exported by volume over the three years to 2024/25. ABARES forecasts gross agricultural production of $99.4 billion in 2026/27. These supply chains depend on reliable first and last mile road access between farms, saleyards, storage, processors, ports, and intermodal facilities.

The Commonwealth's TraNSIT work provides a directly applicable analytical precedent. The Commonwealth Department of Agriculture, Fisheries and Forestry relies on TraNSIT data and notes more than 80 million tonnes of Australian agricultural output moves between farms, storage facilities, processors and markets each year. This underscores the critical role of efficient and reliable freight networks in Australia's agricultural supply chains.

TraNSIT evaluates distance, time, vehicle configuration, road condition and other operating costs to identify bottlenecks and infrastructure investments that reduce transport costs, such as investment in restricted roads and bridges. For priority crossings, LBRCA recommends publishing the estimated annual incremental freight cost attributable to the restriction and identifying data gaps.

LBRCA proposes applying TraNSIT style whole-of-route analysis to priority bridges: identify the vehicle and lawful route that would be used without the constraint, quantify additional kilometres, payload penalties, trips and time, and compare the annualised transport cost with the whole-of-life cost of available interventions. National production and freight statistics establish the importance of these networks, but do not establish the benefit-cost

case for any individual bridge. TfNSW should therefore collect bridge-specific freight, detour and resilience evidence before determining priorities.

Indicator	Latest/available evidence	Relevance to the review
Australian road freight task	~253 billion tonne-km in 2024–25 (BITRE)	Small network discontinuities can affect a very large road freight system
Agriculture, fisheries & forestry production	$100.3b in 2024–25; agriculture forecast $99.4b in 2026–27 (ABARES)	Regional road access supports a high-value, geographically dispersed production base
Agricultural export orientation	~71% of agricultural production exported by volume, 3-year average to 2024–25 (ABARES)	Efficient farm-to-market links affect international competitiveness as well as local costs, for carriers and farmers
Agricultural freight moved	More than 80m tonnes annually between farms, storage, processors and markets (TraNSIT/DAFF)	Bridge capability is a first/last-mile supply-chain issue
Road transport demand	Road transport sales/service income rose 7.8% ($6.7b) in 2024–25 (ABS)	Shows rising road transport industry revenue (which may reflect prices as well as activity); it is not direct evidence of physical traffic growth at a particular bridge.

3.2 Alignment with NSW Freight Policy Reform

The *Delivering Freight Policy Reform in NSW* report reinforces the need to assess infrastructure as part of end-to-end freight supply chains rather than as isolated assets. The NSW Government accepted the report's recommendations and is pursuing a reform program intended to develop a more effective and productive freight system.

The Panel's earlier directions work also recognised that road freight will remain a dominant freight mode and that higher productivity modern vehicles can deliver significant safety, efficiency, emissions reduction and infrastructure benefits but are often prevented from doing so by access restrictions. A retained timber bridge that breaks an otherwise productive route is therefore directly relevant to the State's broader freight reform agenda.

The revised Timber Truss Bridge Strategy should be explicitly cross-referenced to the Freight Policy Reform Program[1], heavy vehicle access planning, recent changes to General Mass Limits, the future National Automated Access System[2] and the agreed framework for improving high productivity vehicles, the PBS network. This would prevent heritage asset decisions from unintentionally locking in freight-network constraints that other parts of government are seeking to remove.

Access reform and infrastructure planning should work together. Permitting and the prospective National Automated Access System cannot themselves overcome a genuine

[1] NSW Government, Freight Policy Reform program
[2] National Automated Access System, Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts.

structural limitation. Equally, a restriction should not prevent otherwise viable network access where bridge-specific assessment supports a safe and proportionate alternative. TfNSW should identify these isolated discontinuities in PBS, HML and general mass planning and use verified network benefits to determine intervention priorities.

4. Case studies

4.1 Scabbing Flat Bridge

Scabbing Flat Bridge over the Macquarie River near Geurie illustrates why asset retention should be tested against network needs rather than treated as an automatic endpoint. In June 2024, Dubbo Regional Council called for preliminary feasibility work on a potential new crossing, including consideration of B-double capability and agricultural economic effects. In June 2025 the Council supported further environmental and corridor work. These actions demonstrate a local request for evidence-based strategic assessment.

Local operators report that restrictions at Scabbing Flat affected movements from 2023 and continued through substantial repair works. The nature and duration of restrictions have changed over time, with NSW restoring the 42.5-tonne limit in October 2025, although temporary speed and width conditions continued, a 20 km/h speed limit and 3.4-metre lane-width restriction were reported pending completion of final works. Those historical conditions should not be presented as current without a more recent asset status confirmation. The example illustrates both the practical value of repairs and the need to reassess longer-term route capability independently of a restored historical load standard.

Local operator advice identifies detours of approximately 58 km via Wellington and 63 km via Dubbo for some movements that cannot use Scabbing Flat Bridge. Any economic appraisal should document the journey endpoints and incremental distance of rerouting because of not being able to utilise Scabbing Flat Bridge. It should also confirm whether each alternative is legally available and physically suitable for the relevant vehicle, as parts of the Wellington route may not accommodate some truck or agricultural movements.

The restoration of 42.5 tonne access is an important operational outcome but does not by itself establish whether Scabbing Flat meets the foreseeable requirements of the surrounding freight network. LBRCA recommends that TfNSW apply the same transparent Rural Transport Productivity Test used for all retained bridges, including current and potential agricultural demand, practical and lawful alternatives, resilience and feasible conservation or infrastructure responses. LBRCA does not seek to pre-determine this crossing's ranking against others in the timber truss portfolio.

Scabbing Flat also illustrates the value of network contingency planning. If a crossing near Wellington or the Mitchell Highway were unavailable, alternative river crossings and their heavy vehicle capability could become critical. TfNSW should verify the current loading, dimensional and route restrictions, assess realistic disruption scenarios and publish appropriate regional corridor contingency arrangements, without assuming any single bridge can safely accommodate movements beyond its assessed capacity.

4.2 Wallaby Rocks Bridge

Wallaby Rocks Bridge on Hill End Road illustrates how a structural finding can immediately affect regional access. Bathurst Regional Council advised that a precautionary 10-tonne limit commenced on 31 July 2026 after deterioration was identified in a component, with vehicles over that limit directed via Sofala Road and the Castlereagh Highway. Council initially reported an expectation of restoring increased access within approximately one month. The latest confirmed engineering outcome and current access conditions should be verified with TfNSW rather than treating the July notice as a permanent restriction.

A temporary restriction is not evidence, by itself, that replacement is justified. It is a reason to record the duration and frequency of disruption, the availability and cost of lawful detours and whether safe repair or operating controls can restore appropriate access. TfNSW should publish the completed assessment, the current approved load capability and any remaining decision or completion date. Capital options should be considered through the same comparative priority test used for the wider portfolio.

The short-term access query is whether bridge-specific engineering evidence supports restoration, repairs or safe interim operating arrangements. Where it does not, restrictions should remain until the identified risk is satisfactorily addressed, with documented reasons and a reassessment trigger. This approach is consistent with removing avoidable barriers without weakening structural safety requirements.

4.3 Beryl Bridge

Beryl Bridge over Wyaldra Creek remains part of the retained portfolio. Earlier strategy material noted that future route demand could exceed the historical T44 benchmark. On the evidence presently presented, this is a candidate for updated screening, not a demonstrated high-priority investment case. TfNSW should establish the bridge's current approved capability and compare it with observed and latent HML/PBS, commodity and community demand before classifying its relative network impact.

Any proposed new Beryl access condition or refusal should be tied to bridge-specific load modelling and a documented assessment of whether practical operating controls are safe, rather than inferred solely from its age or heritage designation.

4.4 Rawsonville and Warroo

Rawsonville and Warroo are important precedents because NSW has already recognised that retaining an ageing timber crossing in its existing transport role can be inconsistent with modern freight needs. At Rawsonville, the Government explicitly linked replacement to heavy-vehicle access, freight connectivity, safety, reduced travel times and regional economic growth. At Warroo, the existing bridge cannot accommodate modern agricultural equipment or HML heavy vehicles. A closure can impose a 93-kilometre detour, and the replacement is designed to carry HML vehicles including B-doubles.

Rawsonville and Warroo provide relevant precedents for separating heritage conservation from the need to maintain an adequate contemporary transport crossing. TfNSW should publish the operability, freight, safety and community criteria informing those decisions and apply comparable criteria to bridges still in operational service. Where a different outcome is

proposed for an apparently comparable constraint, the reasons should be explained, including any different heritage obligations or feasible alternatives.

The revised Strategy should institutionalise this decision-making approach so that local communities and operators are not repeatedly required to establish the same principles through ad hoc, bridge-by-bridge advocacy. Comparability of criteria does not mean that every bridge requires the same engineering or investment solution.

5. Proposed Rural Transport Productivity Test

LBRCA proposes a standard Rural Transport Productivity Test for every bridge in the retained operational portfolio. The initial screen should identify where access can be safely improved through engineering-supported arrangements and where longer-term interventions merit detailed comparison. Results should be sufficiently transparent for councils, carriers, producers and communities to understand why a bridge is retained, strengthened, bypassed or replaced, without presuming the outcome before assessing safety and heritage constraints.

Assessment dimension	Evidence required
Network	Road classification: strategic freight function, alternative crossings, connection to HML/PBS/B-double networks, access to saleyards, grain sites, feedlots, processors and major production areas.
Freight demand	Heavy vehicle counts, vehicle classes, commodities, seasonal peaks, agricultural machinery; current permits/notices, latent demand for more productive combinations.
Constraint impact	Approved mass, axle-group, length and width capability; vehicle-specific restrictions, safe conditional-access options, closure duration, and whether one crossing interrupts an otherwise lawful freight route.
Economic consideration	Verified origin/destination detour increments; lost payload, extra trips, time, diesel, transport and road wear costs, producer impacts and resilience benefits. Use local evidence, not national aggregates, to rank crossings.
Resilience and safety	Structural vulnerability: inspection findings, emergency intervention history, flood/fire redundancy, detour quality, exposure created by additional vehicle kilometres.

Assessment dimension	Evidence required
Whole-of-life asset cost	Routine maintenance: timber replacement, strengthening, traffic management, temporary structures, rehabilitation, likely intervention profile over 20 - 30 years.
Future freight requirement	Forecast freight and agricultural demand, HML/PBS and general-mass route role, potential suppressed demand, whether the preferred safe option avoids recreating the same bottleneck.
Heritage significance and conservation option	State/local significance, rarity, representative value, feasibility and cost of in-service conservation, parallel crossing, adaptive use, documentation or other treatment.

5.1 Proposed decision rule

The test should separate three decisions: (1) what access is structurally safe now, including proportionate operating controls, (2) whether the historic structure should continue to perform the route's principal transport function, and (3) whether permanent strengthening, duplication, bypass or replacement warrants investment after comparing whole-of-life costs and network benefits. Safe interim controls should be reviewed periodically and should not become a substitute for a justified, durable solution.

Stage 1: Screen the retained portfolio

Record structural condition, vehicle capability, freight and community function, foreseeable demand, viable alternative crossings, safety issues and preliminary heritage considerations. Further unresolved access constraints should be managed by further engineering analysis.

Stage 2: Appraise priority constraints

Commission proportionate engineering, freight and economic options analysis where screening identifies material access or community harm. Reuse competent assessments already undertaken by councils, road managers or permit authorities, rather than automatically recommissioning equivalent work. Test safe operating alternatives, whole-of-life costs, heritage requirements, lawful detours, disruption risks and latent freight demand. Preferably, publish the preferred safe response, its rationale and the relative priority of any proposed capital works.

Stage 3: Assign responsibility and monitor delivery

For an adopted intervention, assign the accountable road manager and lead agency, distinguish investigation funding from approved construction funding, set decision and delivery milestones, and provide safe interim access or contingency information where practicable. Report annually on the status of priorities and explain where a recommended response has not progressed.

TfNSW should publish bridge-specific screening outcomes, evidence gaps, priority classification and reasons for intervention decisions. Relevant permanent pathways include:

- Retain and maintain: where freight/network impact is low and in-service conservation is sustainable.
- Strengthen/modify: where targeted works can provide the required future capability at reasonable whole-of-life cost.
- Duplicate or bypass: where conservation of the heritage bridge is appropriate but a separate crossing is justified to accommodate the principal freight or general traffic task.
- Replace: where continued operational retention is not a sustainable transport, safety, economic or conservation outcome.

5.2 Engineering-based access decisions and proportionate risk mitigation

LBRCA is concerned that timber bridges can become systemic access barriers without operators receiving a clear bridge-specific or engineering explanation. Members report that some bridges (for example in the Greater Hunter area) are treated as unavailable to PBS and higher-productivity vehicles, without any clear or known justification. It could be the case that the lack of information or knowledge, combined with being risk adverse nature of road managers, is the real driver behind the decision making. The potential benefits of more productive vehicle combinations include fewer trips and lower transport cost per tonne, but their suitability for any particular bridge depends on axle loads, configuration, structural condition and assessed load effects. A claimed network productivity benefit is not, by itself, proof that the movement is structurally safe.

Where a proposed vehicle exceeds the existing access conditions, road managers should not assume that every movement must be refused or that every restriction can be removed. They should first consider the specific vehicle configuration, axle-group loads and spacing, span response and bridge condition, using engineering assessment. Where safe, proportionate options may include speed conditions, controlled single-vehicle crossings, lane or wheel-path requirements, targeted strengthening, monitoring or vehicle-specific permit conditions. Measures should be selected only where technically applicable to that bridge; temporary load-spreading arrangements should not be assumed effective without supporting engineering evidence.

Operational controls used at other constrained crossings may provide useful questions for engineering investigation, but they are not automatically transferable to timber truss structures. TfNSW should publish an assessment framework identifying which types of restrictions can be reconsidered using vehicle-specific load effects, what evidence is required for conditional access and when a structural limitation necessitates refusal or capital remediation.

Where a safe controlled movement is supported by engineering evidence, access decisions should be combination, route and condition specific. Where access cannot be safely supported, operators should receive clear reasons, alternative route information, where available, and a specified review trigger or date. This is a pathway to remove avoidable access barriers, not a presumption of unrestricted access.

6. A bridge intervention pipeline

The revised Strategy should establish a rolling 10-year program of priority investigations and possible interventions informed by the Rural Transport Productivity Test. LBRCA does not presume that every retained bridge requires replacement, alternate crossing nor do we seek to nominate a predetermined construction priority. The immediate funding request is for proportionate assessment and options development to better understand existing capacity, improve freight productivity and inform subsequent capital decisions.

The pipeline should identify the responsible road manager, lead delivery agency, access restrictions and indicative project timetable. Where a crossing serves users and freight movements beyond a council boundary, cost-sharing arrangements should reflect demonstrated wider network benefits rather than defaulting solely to local ratepayers.

Signage should show current approved vehicle, mass and dimensional limits, and permit decisions should be informed by the engineering. LBRCA accepts there is often a need for material restrictions to make safe conditional-access an option. This also enables efficient movements, planning and identification of isolated constraints on otherwise viable rural freight corridors. Public reporting must not disclose security-sensitive structural information where inappropriate.

Requiring operators to repeatedly test alternative routes through individual permits can impose unnecessary cost and delay for carriers, road managers and the NHVR. Where assessments demonstrate enduring safe capability, TfNSW should seek to make that capability visible through appropriate notices, network maps or reusable access data, reducing repeated case-by-case applications without removing necessary safeguards.

TfNSW, councils and other road managers should avoid duplicating competent bridge assessments. Where appropriate, capture structured vehicle and asset-specific information that can be reused in NSW assessment processes and support future National Automated Access System implementation. Automated processing is as good as the data it relies on and cannot substitute a structural assessment or itself confer access beyond a bridge's demonstrated safe capacity.

7. Separate out the conservation demand

The 2026 consultation material points to Clarence Town as an example where a new bridge has been built over the Williams River while the existing heritage bridge can be repaired and maintained in accordance with the Strategy. This demonstrates that the policy choice need not be reduced to “keep the old bridge carrying freight” or “lose the heritage asset”.

A parallel or nearby modern crossing may reduce operational loading on a heritage bridge while improving route capability. The revised Strategy should recognise continued conservation with alternative transport provision as a legitimate option, subject to site-specific engineering, heritage, environmental, planning and economic approvals. Appropriate uses for an older bridge might include community, pedestrian, tourism or heritage functions, where safe and feasible.

8. Direct engagement with rural freight operators is essential

Observed vehicle counts alone cannot identify suppressed demand. A route may carry few higher-productivity vehicles precisely because a bridge blocks those combinations. TfNSW should therefore combine traffic and access records with structured operator evidence about the vehicles that would use the route in the absence of the restriction, together with permit history, commodity flows and feasible alternative crossings. In particular, assess the difference between legal access on adjoining roads and the restricted bridge itself.

Engagement should establish potential vehicle classes, seasonal freight volumes, payload reductions, verified origin-to-destination detours, lawful and physical suitability of alternatives and effects on contracting or equipment decisions. Consult local primary producers, residents, agricultural machinery operators and emergency services as well as carriers. Validate this information against available counts, route maps, telematics and commodity data; record evidence gaps rather than equating missing data with the absence of a productivity constraint.

9. Conclusion

NSW can conserve significant elements of its timber truss bridge heritage without permanently constraining modern regional freight and essential community access where a safe, proportionate alternative exists.

The revised Strategy should move beyond an asset-retention list to a transparent framework for deciding what access can safely be permitted, whether the heritage structure should remain the principal transport crossing, and which permanent interventions warrant priority. Retention, targeted strengthening, duplication, bypass and replacement must each be considered where suitable, none should be predetermined before engineering, heritage and whole-of-life assessment. LBRCA requests that TfNSW complete initial screening across the retained portfolio during this review, reconsider operational retention decisions where the 2019 operability criteria are no longer met and identify priority constraints for funded investigation and transparent investment consideration.

TfNSW should also establish a consistent engineering-based process for considering safe conditional heavy vehicle access and explaining restrictions. Existing evidence should be reused, controls should be specific to the bridge and movement, and unsafe movements must remain prohibited until the relevant risk is addressed.

Progress should be measured not simply by bridges retained or assessments completed, but by demonstrably safer and more reliable regional connectivity, fewer avoidable access barriers and accountable decisions on priority infrastructure constraints. LBRCA seeks ongoing engagement with TfNSW on the assessment criteria and operator evidence requirements.