

Figure 5.8
The Proposed Regional Strategic Freight Network – Roads in Rodney District

6 Other Modal Components of the RSFN

6.1 Introduction

The discussion above has mainly focussed on the road network, which carries the great majority of traffic within and to and from the Auckland Region. However, the full RSFN also needs to take into account movements by rail, sea and air.

6.2 Rail

6.2.1 The Form of the Strategic Rail Freight Network (RSFN-Rail)

The rail network in the Auckland region provides links the areas to the north and south, but currently has a very limited intra-regional function. Within the region, the main access points to the rail network are at Ports of Auckland and Southdown/Metroport, although substantial volumes are also carried to and from the Glenbrook steel mill, mainly coal into the plant and finished steel products to Tauranga for export. There are also other private sidings particularly in the Westfield area which handle lower volumes of freight, and there may be the potential to expand the number and role of these.

There are however two other potential intermodal facilities which are not currently rail served, the Wiri Inland Port and Onehunga port.

For the **Wiri Inland Port** it was been announced in mid 2008 that the Government was prepared to fund the provision of rail sidings and the final confirmation of this was made in November 2008. These sidings would permit the operation of shuttle trains to and from the main port, so allowing freight traffic on the motorway network to be reduced traffic. It is understood that the rail facility will be operational in the third quarter of 2009 and will permit the transfer of up to 100,000 heavy vehicle movements per year away from the Auckland road network.

For **Onehunga Port** the existing rail line to Onehunga, which is currently being refurbished, effectively stops just short of the port itself, although in the past the rail line has continued into the port and the right of way appears to be still available.

As part of their upgrading of the Onehunga Branch Line, KiwiRail are refurbishing the base of the track up to the entrance of the port as illustrated in Figure 6.1, giving the potential to relay the line itself. However, a decision on this would depend on Ports of Auckland undertaking matching work relaying the rail network within the port and it is understood that there are no firm plans by POAL to undertake this work in the immediate future, unless funding from other agencies is available.

It is also understood that there may be the potential to attract some rail freight traffic from premises located between Penrose and Onehunga and this is currently being explored by KiwiRail.

The rail network in Auckland is also becoming under greater pressure from the growth in the number of passenger services which would restrict the capacity available for the movement of freight. To address this issue proposals have been developed for:-

- The provision of a third track in the Westfield area
- A new route between Avondale and Southdown which would bypass the central areas within the city

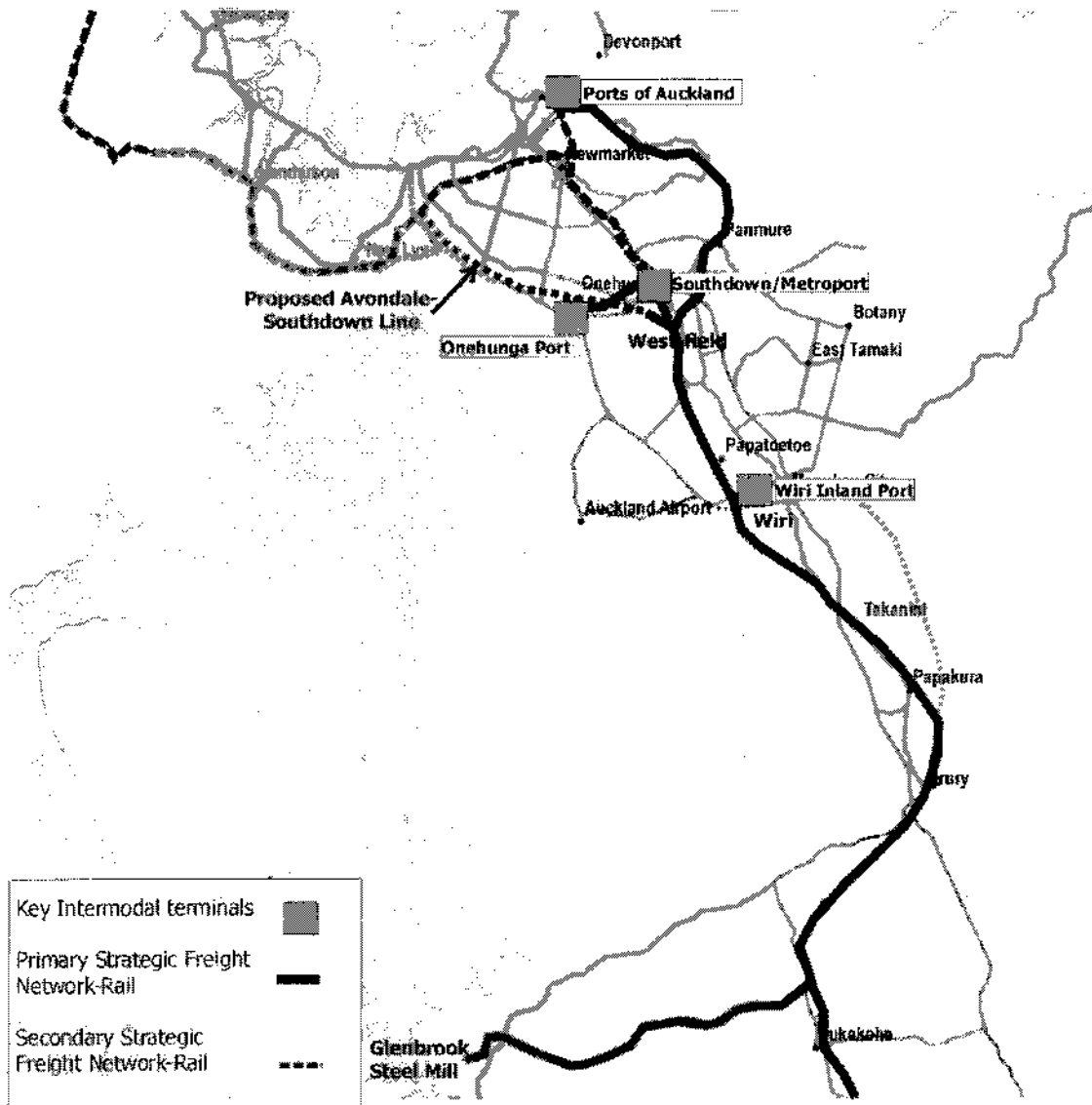
Both of these would provide additional capacity for the movement of freight.

The provision of a third track between Westfield and Wiri would provide for the operation of freight trains separate to passenger trains. Although not specifically funded the proposal is on the priority list for KiwiRail and would help overcome congestion problems south of the junction between the Southern and Eastern lines.

The Avondale-Southdown line would serve rail freight movements to or from the north or west of Auckland. However, because of limitations on the track north of Auckland with a large number of tunnels with tight dimensional constraints, the scope for substantial increases in longer distance freight traffic may be limited. The potential future role of the port at Marsden Point may also have an impact on the volumes of freight travelling on the line north of Auckland, although with current pressure for port rationalisation the role of Marsden Point may be more focussed on serving the local regional market rather than a broader national market. There are also currently no major rail freight generators or attractors closer to Auckland which might benefit from the new line. As a result, the importance of the line for freight may be limited at least over the short-medium-term.

ONTRACK are also considering the construction of a rail link to the airport, although this would be primarily passenger focussed and given the nature of freight traffic through the airport, would be unlikely to carry significant volumes of freight.

In terms of an RFSN for rail, the main elements of this would be provided by the link between Ports of Auckland and the south and by the link between Glenbrook Steel Mill and the main route to the south at Pukekohe with a possible connection to Onehunga Port via the Onehunga branch line. As well as serving the two ports this would serve the main inland intermodal terminals. A secondary element of the network would be the link from the north and west, with the possibility of supplementing the existing Western Line east of Avondale with the proposed Avondale Southdown route. The proposed Regional Strategic Freight Network- Rail (RSFN-Rail) that results is set out in Figure 6.1.



**Figure 6.1
Proposed Regional Strategic Freight Network-Rail**

However, over the longer term, the growth in passenger train movements in the Newmarket area and on the eastern part of the Western Line following the construction of the CBD loop will mean that there is increasing congestion on the existing route to and from the north. The need to give greater priority to the bypass route will therefore need to be kept under review.

6.2.2 Actions to Support the RSFN-Rail

In principle, the main actions needed to support the RSFN-Rail are:-

- To ensure that sufficient capacity is made available for the movement of freight

- Promote land use planning which locates large freight generators or attractors on sites adjacent to the RSFN for Rail and discourages sensitive new land uses in the vicinity of the network. The expansion of existing terminals or provision of new terminals may also become necessary if rail freight flows are to expand significantly and the land use planning would need to support this.

However, both these actions may conflict with objectives to promote passenger rail use. Increasing the frequency of passenger train services to encourage and accommodate the planned growth in rail patronage is likely to reduce the capacity available for freight trains, especially during the day time. While it may be possible to concentrate a substantial portion of rail freight movements into periods outside the normal working day, the need for rail to expand into new markets if it is to increase its modal share and meet its GPS targets may limit the extent to which this may be possible.

To ensure that proposals for freight are compatible with the provision of a high quality passenger rail network for Auckland, additional track capacity may need to be provided both in the medium and longer term. As discussed above this issue has been identified in the medium term for the section of track between Westfield and Wiri (where the Manukau Rail Link branches off from the main line). Other shorter sections of additional track may be required to overcome shortages of capacity elsewhere.

In terms of supporting rail uses, increases in freight traffic may need to be accompanied by additional terminal capacity and space would be required for this

The plans for the rail corridor also call for greater intensity of development at and in the vicinity of rail stations to encourage public transport passenger use, but this would potentially conflict with the objective of removing sensitive land uses from the vicinity of the railway to prevent or limit reverse sensitivity issues. To some extent, this conflict may be alleviated by the particular design of the developments, but this would need to be recognised in the planning and consenting process.

6.3 Shipping

Shipping services are provided from Ports of Auckland on the Waitemata Harbour, and Onehunga on the Manukau Harbour. The main port provides both international and coastal shipping services and Onehunga supports coastal shipping services.

The main port would be connected directly to both the road and rail components of the Strategic Freight Network. Onehunga would be connected to the road component of the Strategic Freight Network and proposals exist to connect the port to the RSFN for Rail.

There is a privately owned facility at Chelsea on the northern shore of the Waitemata Harbour providing deep-water access for vessels serving the sugar refinery.

At Gabador Place on the Tamaki River there is also a small berth used for the movement of bulk liquids to the terminal operated by Marstel Terminals. A dedicated barge is used to transfer bulk liquids to Gabador Place from the Hazardous Goods Wharf on the Western Reclamation (Wynyard Quarter) in the main Waitemata Harbour. There are proposals to expand the activities at Gabador Place in connection with the possible redevelopment of the Marstel terminal facilities in the Western Reclamation (Wynyard Quarter) but options for the future are still under review.

Marine access to Gabador Place is currently constrained by the low-level bridge at Panmure and the lack of effective fendering there to protect the structure as well as other constraints in the Tamaki Estuary.

The RSFN-Road would provide road access to Gabador Place via SEART and Carbine Road.

The locations of these port facilities are set out in Figure 6.2

6.4 Airfreight

Airfreight services are provided at Auckland International Airport. This would be linked to the road component of the Strategic Freight Network providing access from both the north and the east.

Over the longer term, there are proposals to construct rail connections to the airport from the north and/or the east. It is likely that these would be focussed on passenger services and given the nature of airfreight, typically in small consignment sizes and tight delivery schedules, it is unlikely that these would be carried by rail to any significant extent even if rail facilities were provided.

6.5 Pipelines

The Auckland region is also supplied with petroleum products from a pipeline connecting the New Zealand Refining Company plant at Marsden Point to the terminal at Wiri. This carries about half the output of the refinery, 2.8 million tonnes per year and is the major source of supply for the Auckland region with some product being distributed further south into the Waikato. As presently developed, the pipeline could handle an increased throughput of 20 per cent and the provision of a further 20 per cent capacity could be achieved relatively easily by adding in additional pumping facilities.

Pipelines form a very efficient means of moving certain liquid commodities in bulk. The Wiri terminal is linked to the RSFN-Road to provide for the onward distribution of the product.

The location of the pipeline is also set out in Figure 6.2.

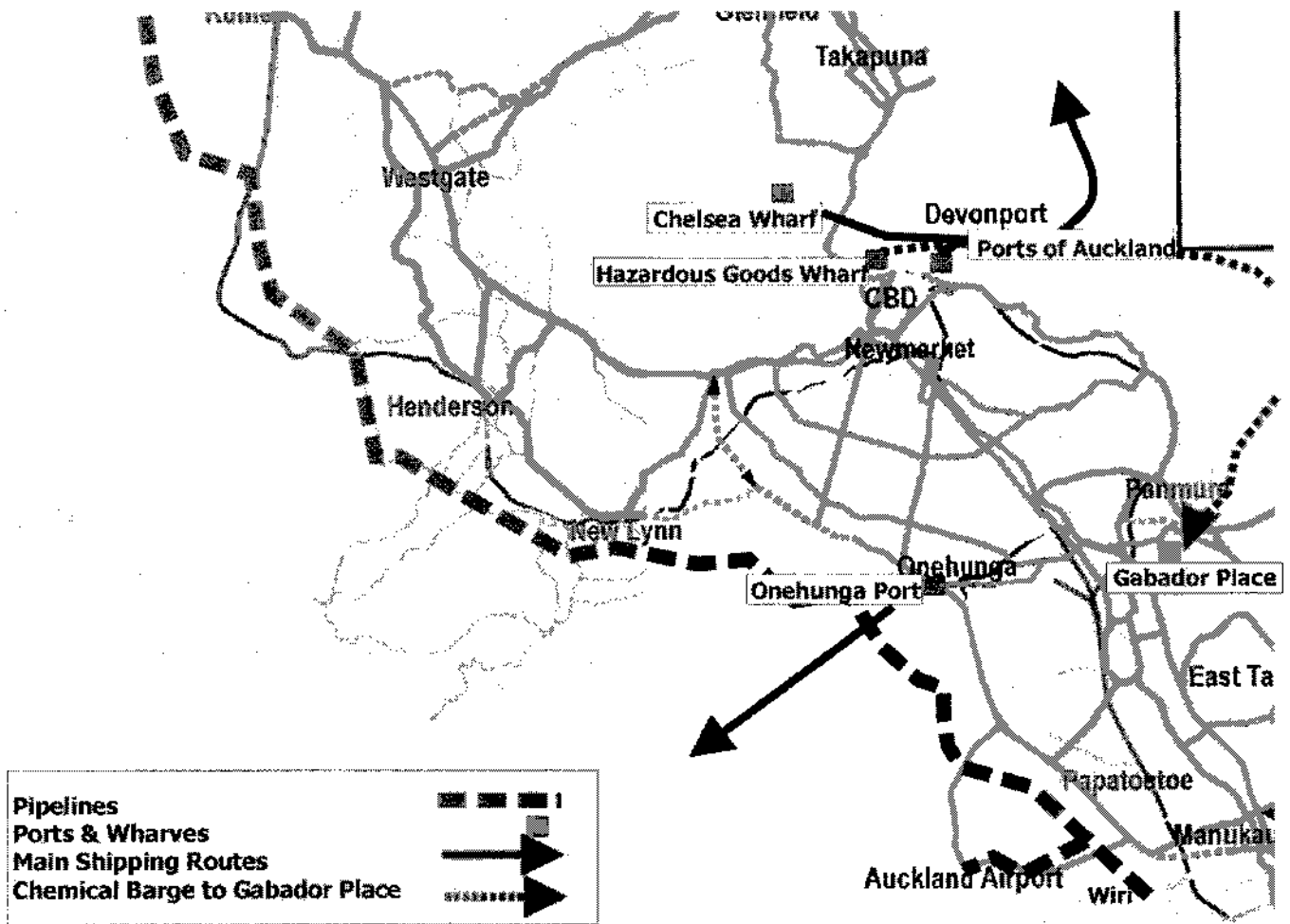


Figure 6.2
Regional Strategic Freight Network : Shipping, Ports and Pipelines

7 Linkages with Other Freight Initiatives

7.1 Introduction

Two other main policy actions in connection with the development of the Regional Strategic Freight Network identified above were:-

- Policy Action 4.4 – Support Incentives for Goods Consolidation
- Policy Action 4.5 – Investigate Freight Priority Measures on Strategic Routes

Action is proceeding separately on both of these.

7.2 Policy Action 4.4 – Support Incentives for Goods Consolidation

Possible options for goods consolidation are being considered as part of the work on Freight TDM measures which are being progressed by a working group led by the ARC. This is looking at a broad range of measures for both freight and general traffic. To some extent, these are linked to improved education and communications and it is anticipated that these will be progressed in part at least by the dissemination of information on best practice. The main initiative for these measures is expected to come from industry with ARC and other agencies providing a supporting role.

7.3 Policy Action 4.5 – Investigate Freight Priority Measures on Strategic Routes

To some extent, the general need for freight priority measures on strategic routes has been identified above. More specific work on the way in which managed lanes, which could include freight priority measures, might be achieved in practice, is being led by NZTA in combination with the Region and the TLA's as part of the Managed Lane Study. This is currently looking at case studies on a number of important freight routes including Te Irirangi Drive, Neilson Street, Te Atatu Road, SH16, Upper Harbour Highway and the Northern Motorway. If appropriate, the findings from this may be applied more generally across the network including a number of sections of the Strategic Freight Network.

8 Next Steps and Possible Timescales

8.1 Initial Steps

The proposed initial steps to progress the development of the Strategic Freight Network would include:-

- Consult with TLA's/ARTA
- Consult with industry, possibly as part of an Auckland Freight Summit
- Wider public consultation
- Confirm links to be included in Strategic Freight Network

Some consultation has been undertaken with the first two groups.

8.2 Subsequent Actions

- Identify measures required to address any deficiencies and upgrade freight network to improve its operational efficiency and reduce any community impacts
 - Traffic Engineering
 - Management /Enforcement including broader TDM measures
- Identify group to promote and manage freight routes
- Agree with TLA's/ARTA approaches to supporting and delivering freight routes and identify possible sources of funding, including possible dedicated budgets for freight, to be used where funding from other sources is not available.
- Identify costs of possible upgrading work and develop and apply measures to prioritise these.
- Develop and agree phased program for implementation of proposed works on the Regional Strategic Freight Network
- Monitor performance and use of the Regional Strategic Freight Network and its role in relation to the rest of the road network.
- Periodically review links to be included in the network and the engineering and management measures required to support its efficient and effective operation.

8.3 Possible Timescale for Implementation

Table 8.1 Possible Implementation Timescale	
Work Component	Implementation by:-
Initial consultation and confirmation of links to be included	April 2009
Review of deficiencies	July 2009
Identification of group or agency to manage freight network	July 2009
Identify potential funding availability	September 2009
Develop phased implementation program for proposed works and management measures	November 2009
Monitoring of performance	2010 onwards

9 Summary and Conclusions

The purpose of the Regional Strategic Freight Network is to support the efficient movement of freight within the Auckland region while minimising its impact on the community

Although the proposed Regional Strategic Freight Network will combine road, rail, shipping and airfreight components, given the nature of activity in the region, the majority of the freight task will be undertaken by road.

The road component of the Strategic Network provides access to all the major existing and new potential future business development areas identified within the region and so should help their integration into the general patterns of regional economic activity. It will provide multimodal opportunities for moving commodities within, and to and from and through the Auckland Region and will support the main intermodal facilities at the port and airport, and Metroport and the Wiri Inland Port.

The proposed road components of the network as proposed will combine State Highways, which form the backbone of the network supported by Regional Arterials and in some instances other local roads. This is intended to provide for the transport of large volumes of freight and would provide a high level of access to a number of intermodal interchanges. The strategic network would be supported by local networks providing access to and from individual sites.

The road components of the Regional Strategic Freight Network have been developed in conjunction with ARTA. These are the same as those comprising the Provisional Regional Freight Network being developed as part of the Regional Arterial Road Plan (RARP).

Because it is proposed that the network would be advisory only, its management will play an important part in it achieving its objectives. The steps necessary to manage these links, enhancing their effectiveness and minimising the adverse impact of freight on the community have been identified, and include both traffic engineering and management and planning elements.

It is recognised that in a number of instances, due to the limited capacity of the road network in Auckland the priorities for freight will have to co-exist with priorities for other users of the roads network, including public transport use and more general community focussed uses. In these areas, it may not be possible to apply the full set of management measures set out in Table 4.1. However, even where it does not have the highest priority, the needs of freight should be recognised alongside those of other uses. Where appropriate, measures to facilitate the movement of freight through, for example pavement design and geometric layout, should still be applied.

It is recognised that the form of the RSN will need to change over time as patterns of economic activity and freight movements evolve. This should be done at periodic intervals to ensure that the network is still appropriate to meet its objectives.

In summary, it is intended that the development of the Regional Strategic Freight Network will play a valuable part in enhancing economic development in the Auckland region while reducing the impact of the movement of freight on those living and working in Auckland and visiting the Region.

Appendix A

Review of Current Potential Freight Generating and Attracting Areas

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Review of Other Potential Freight Generators

The current patterns of employment in wholesaling and warehousing and in manufacturing, activities which are likely to generate high flows of freight, have been identified and these are set out in Figures A1 and A2. These figures also include the proposed Regional Strategic Freight Network and so the geographical relationships between the two can be identified.



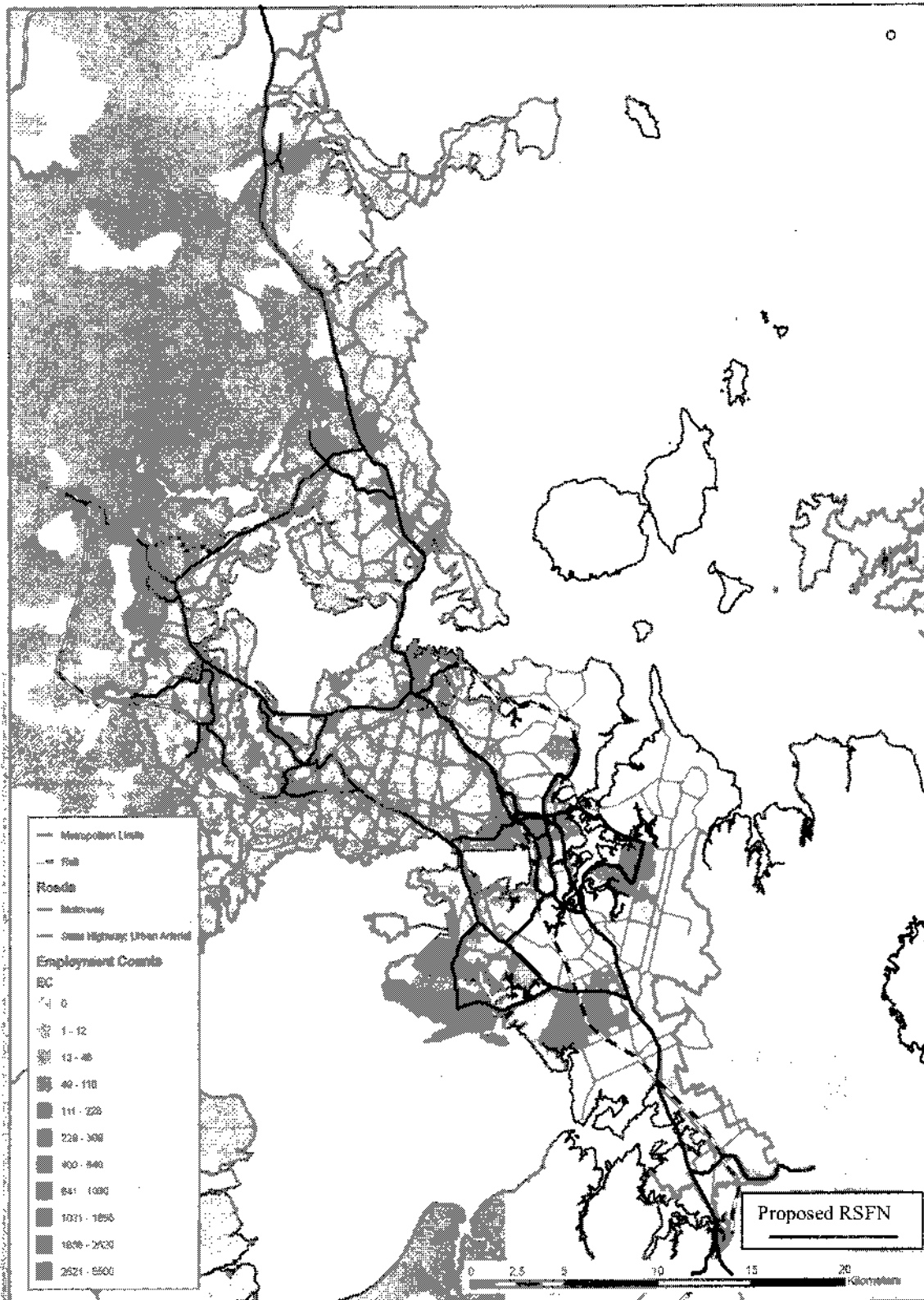


Figure A1
Distribution of Employment in Wholesale Trade & Transport Postal and Warehousing in the Auckland Region 2008 and the Proposed RSN-Road

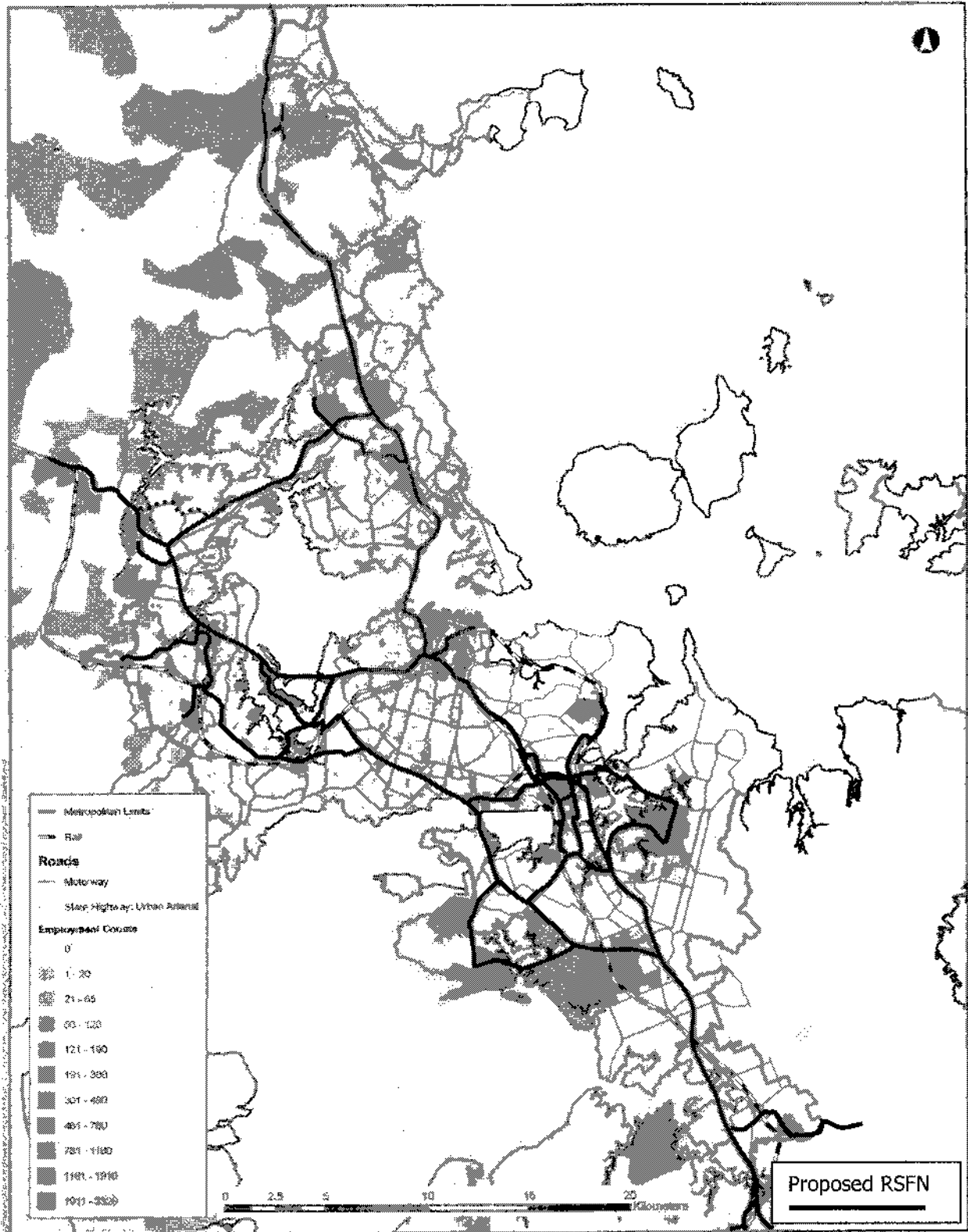


Figure A2
Employment in Manufacturing in the Auckland Region 2008
and the Proposed RSN-Road

The areas of significant employment are indicated in the deeper red colours. For Wholesale Trade & Transport, Postal and Warehousing all the major employment areas are located adjacent to the proposed RSFN-Road. For employment in manufacturing a similar position holds, although there are two minor manufacturing areas at the Span Farm industrial area, located on the edge of the Whau River and the industrial area located along Ben Lomond Crescent off Cascades Road in Manukau. These are both relatively small employment areas with a concentration on light industry and both with access down roads that are primarily residential. It is anticipated that the Regional Strategic Freight Network would be supported by a local freight network and this local network would more appropriately provide the connections to these areas from Great North Road for Span Farm and from Ti Rakau Drive for Ben Lomond Crescent respectively.

In summary, the proposed form of the Regional Strategic Freight Network provides links with all the major manufacturing and wholesaling and distribution areas within the region and also serves almost all the smaller centres. There are no significant manufacturing or wholesaling/distribution areas which are not served by the network.

DRAFT

Land Transport Rule: Vehicle Dimensions and Mass Amendment [(No 2) 2009]

Questions and Answers

Q1 Why is the amendment Rule being proposed?

The amendment Rule will make changes to *Land Transport Rule: Vehicle Dimensions and Mass 2002* (Rule 41001) (the Rule) to allow some heavy vehicles to operate at higher mass limits than they are currently allowed. It will also allow an increase in length for some vehicles to operate without a permit. Under permit, some vehicles will be able to carry divisible loads outside the current maximum mass and dimension limits. The proposed changes to the Rule will allow significant productivity improvements in the operation of heavy vehicles.

Q2 What is the current weight limit for vehicles on New Zealand roads?

The current gross weight limits depend on the number and layout of the axles. The heaviest permitted weight without a special permit is 44 tonnes.

Q3 Why is work on a permit system that will allow increased mass and dimensions being done?

The projected doubling of the freight task (total tonnage multiplied by total distance) over the next 20 years means freight needs to be moved as efficiently as possible.

An increase in the mass and dimension limits for heavy vehicles has been shown in trials to improve vehicle productivity by increasing load capacity and reducing the number of vehicle movements required to distribute that freight. This, in turn, reduces fuel consumption, reduces emissions, improves safety and overall contributes positively to the Government's efficiency and productivity objectives.

Q4 Where did this idea originate?

The idea was originally raised by the trucking industry. In addition, the Ministry of Transport and the NZ Transport Agency (formerly Land Transport NZ and Transit NZ) have investigated options for increasing heavy vehicle limits for some time.

Q5 Does this mean that there will be bigger trucks on the roads?

Generally, no. Trucks will not be any wider or higher than current limits, but some small increases in overall length are proposed. The Rule amendment will allow an increase in length for some vehicles to operate without a permit as well as provide for others to apply to operate at longer lengths under a permit. The latter will be considered on a case-by-case basis where routes are suitable for increased length and vehicle safety would not be made worse through increased length. Longer trucks can be safer because the load height can be reduced and the vehicle is, therefore, more stable during cornering.

Q6 Will the vehicles carrying heavier loads be safe?

Yes. The vehicles will be required to meet all the current safety standards. The increase in the mass of existing vehicles could have an impact on their centre of gravity and the operational Static Rollover Threshold (SRT), and, in some cases, this may require adjustments to driving techniques, particularly in relation to cornering. However, the vehicles will still be required to meet the established standards for the SRT. The NZTA will work with the transport sector to ensure any driver education or training issues are addressed.

Q7 Are there restrictions on what roads/routes the heavier vehicles can travel (i.e. near schools, quiet country roads, narrow windy roads etc.)?

Vehicles issued with a permit will be restricted to specific routes. Roads and routes deemed inappropriate will not be used. All routes will be assessed on the overweight

permit criteria to ensure that the road infrastructure, and in particular any bridges, are able to cope with the heavier vehicles.

Q8 What would a permit system for heavy vehicles achieve?

Improved heavy vehicle productivity under the right conditions will enable a given amount of freight to be carried on fewer trucks. This will help to reduce road congestion, operating costs, vehicle emissions and the number and social cost of crashes involving trucks.

Q9 Why not provide open access for road transport operators?

Open access was not considered primarily because not all roads and routes are suitable for heavier vehicles. In some cases, road and bridge infrastructure is not of a standard that heavier vehicles could safely use it.

Q10 How do you know a permit system will work?

During 2008 and early 2009, a heavy vehicle trial project was carried out across a number of areas in New Zealand to assess the effectiveness of a permit system. The trials indicated that a permit system based on particular vehicles operating on specified routes allowed significant productivity benefits to be realised without any detrimental safety or environmental effects.

Q11 How will the permit system be policed?

The permit system will be monitored by the Commercial Vehicle Inspection Unit of the NZ Police as part of its normal road policing function.

Q12 Heavier loads will mean extra road maintenance costs: who will pay for that?

The Government is aware of the concerns road controlling authorities have about the possibility of extra road maintenance costs over time and continues to work closely with the NZ Transport Agency and local authorities on this issue.

Q13 Will the operation of heavier vehicles increase greenhouse gas emissions?

Heavier vehicles use more fuel than lighter vehicles, but the difference is small. It will usually be outweighed by the greater load on each truck and the consequent lower trip numbers. This will bring about an overall reduction in emissions.

During the trials, emissions from both heavier and existing trucks were measured to assess if there is any measurable or significant difference in emissions. Differences in emissions between 44-tonne and 50-tonne vehicles were found to be negligible.

Q14 What kind of loads will these trucks be carrying?

At present there are no plans to restrict the types of load that heavier trucks may carry.

Q15 Will these trucks still be able to go on the ferry?

Yes, heavier trucks will be able to use ferries - subject to the ferry carrying capability.

Q16 Will they fit through tunnels and can all bridges take heavier trucks?

Heavier vehicles operating under the permit system will be no higher or wider than existing trucks. Some bridges already have weight restrictions and these will continue to apply. However, many bridges on state highways and local roads are already adequate for heavier trucks. Other bridges may be strengthened, replaced or closed to heavier trucks.

Q17 What will happen to the present system of overweight permits?

The existing overweight system will continue to be used for one-off trips for individual overweight loads. The new system will be used to permit multiple and ongoing trips by nominated trucks operating a particular load (divisible) and route or area.

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Q18 There is a view that the public doesn't like heavy vehicles – how will this be managed?

The Government is very aware of possible public concerns about heavier trucks on the road. These concerns were taken into account during the trials and the development of the amendment to the Rule. To allay public concerns about environmental and safety issues the Ministry commissioned studies related to the noise, vibrations, emissions and safety implications of operating heavier vehicles. These studies showed that there were no discernable changes in environmental factors and that heavier vehicles can be upgraded so that braking and towing safety performance is maintained.

As well as this, a survey of the public's perceptions of heavy vehicles was undertaken and the results of this showed that 71% of motorists surveyed viewed sharing the road with trucks either positively or were neutral in their response.

Q19 How do I apply for a permit?

You will need to provide details of your vehicle, the mass you wish to operate at (refer to the Rule for maximum allowed masses under permit for your particular vehicle configuration) and route you wish to travel on to the relevant road controlling authority; usually either NZ Transport Agency for State Highways or local councils for local roads).

Q20 How long will it take to get a permit and what will it cost?

It is expected that it will take no more than 28 days to process a permit application. The exact length of time will depend on the complexity of the route assessment, the number of applications received and the general workload of the issuing authority. A permit fee has not yet been established. However, a common fixed application fee will be set for each permit applied for. The overall fees collected will be appropriate to cover the cost of processing the permits, including route assessments.

Q21 Will I always get a permit?

No. Some applications will not be acceptable primarily because of infrastructure limitations and/or safety reasons. The reasons for declining an application will be notified to the applicant.

Q22 What happens if I am caught either over my permitted mass, or on a road that is not included in my permit?

If your vehicle is over-loaded, you will be fined for the difference between what you are weighed at and the standard allowed value in Schedule 2 of the Rule. If you are found to be off-route, the outcome will depend on the reason. In most cases, you will be fined, as stated earlier. However, if you have been diverted by Police it is possible that no further action will be taken, as long as you have complied with any bridge restrictions on the alternative route. This may mean you have to park the vehicle until the permit route re-opens or you may have to back-track to get onto another route of sufficient capacity. Immediate revocation of permits will also be possible for breach of permit conditions.

Q23 How will the police know that a heavy vehicle travelling on a road is operating under one of these permits?

The Police will have to pull the vehicle over and check the permit paperwork that must be carried in the vehicle.

Q24 What is the legal authority for the amendment Rule?

Section 152 of the *Land Transport Act 1998* allows the Minister of Transport to make ordinary rules assisting land transport safety and security, including (but not limited to) personal security. Section 155 of the Act allows the making of Rules setting out standards and requirements concerning vehicles, their systems, components, fittings or equipment.

Q25 When will the proposed changes come into force?

Subject to Government approval, the amendment Rule will come into force in February 2010.

Consultation details

Q26 Where can I get printed versions of the proposed amendment Rule?

A printed copy of the draft Rule and overview may be obtained by calling the NZ Transport Agency Contact Centre on Freephone 0800 699 000. The draft amendment Rule and the accompanying consultation material can also be found online at www.nzta.govt.nz/consultation/vehicle-dimension-and-mass-amendment/index.html.

Q27 Does the draft amendment Rule give me all the information I need to fully understand what is proposed?

Because this is an amendment Rule, it contains only the proposed amending provisions. However, the accompanying overview provides information about why the amendments are required. A full copy of the 2002 Vehicle Dimensions and Mass Rule can be found online at www.landtransport.govt.nz/rules. Printed copies of Rules can be purchased at selected bookshops that sell legislation and most Rules can also be ordered direct from Wickliffe Limited, PO Box 932, Dunedin.

Q28 How long do I have to make a submission?

Submissions on the draft amendment Rule close on 24 July 2009.

ENDS

Submission on the Land Transport Rule

Vehicle Dimensions and Mass Amendment [(No 2) 2009]

Rule 41001/5

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This submission has been prepared by officers of Waitakere City Council. Due to the tight timeframes on the submission process it has not been possible to obtain formal endorsement of the Council prior to the lodgement of the submission. However the content of the submission will be submitted for endorsement by Council Committee in early August.

Issues

Efficiency of Transport

We note that the changes are being proposed because,

"The amount of freight to be moved on New Zealand's roads is projected to double over the next 20 years. This freight needs to be moved as efficiently as possible"

While we agree that freight needs to be moved as efficiently as possible we note that this needs to be considered from a whole of transport system perspective and not considered only as a road transport issue.

It is important that the underlying efficiencies of other modes of freight transport such as costal shipping and rail freight are also considered and that steps are taken to address the cost distortions that exist between the modes. It would not produce an overall transport efficiency gain if the proposed changes to make the road transport more efficient had the effect of shifting freight from other more energy efficient modes due to road freight enjoying a subsidy through rates and road user charges on light vehicles paid by the community at large.

Costs of the Proposed Changes

We are concerned that the cost implications of heavier vehicles have not been comprehensively addressed, particularly the costs associated with pavement deterioration.

We request information from the trials be made available so that we can assess the impacts of these, particularly with regard to matters of safety and pavement deterioration.

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At a most basic level increasing the permissible maximum axle loadings can be expected to cause significantly greater pavement deterioration for a given quantity of freight being moved even if the number of axle loadings is reduced. Any change that shifts the balance between freight modes resulting in a greater proportion of freight going by road can be expected to further increase pavement deterioration.

We submit that it is essential that all additional costs resulting from the rule change be identified and allocated back to heavy vehicle road user charges to avoid placing a further burden on ratepayers and light vehicle users. This will require a review of the NZTA Funding Assistance Rates (so that the increased maintenance costs are fully funded from RUCs and not from local authority rates). It will also require determination of appropriate RUCs for the heavy vehicles to ensure that the additional costs are ultimately funded from that portion of road user charges.

We submit that it is desirable that the movement of overweight and/or high productivity vehicles should be as much as possible confined to the state highway network. These roads are generally engineered to higher standards than local roads and constructed to carry heavier traffic loadings. Confining these movements to state highways minimises the extent of upgrades to pavement and structures that would be required and avoids imposing these upgrading costs as a burden on ratepayers.

Establishment of a Single Permit Authority

We reject the proposal to centralise the issuing of permits for high productivity vehicles and/or overweight vehicles. Road controlling authorities need to retain the control over the use of their assets by heavier vehicles so that the impacts on the assets can be properly managed and local knowledge is applied to the decision making on any approvals.

We note that the current centralised issuing of over-dimension permits has resulted in it being difficult for us to identify which over dimension operators are using our roads on particular dates and times. This makes it very hard to identify the operators involved when damage to our assets (particularly traffic control devices) occurs during the movement of over-dimension loads.

Enforcement

We note that with the proposal to allow heavier trucks on selected routes there will be a need for additional enforcement to monitor compliance and ensure high productivity vehicles do not stray into areas in which they are not authorised to operate.

We submit that consideration should be given to introducing some sort of GPS data logging systems initially to high productivity vehicles, but ultimately to the heavy vehicle fleet in its entirety. This could be used to provide easy verification of route compliance. Such technology could also provide additional benefits in such areas as the cost allocation related to pavement deterioration, and as a compliance tool for verification of log books, driving hours, etc.

A94