

## VEHICLE DIMENSIONS AND MASS REVIEW

### SUBMISSION FORM

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If your submission is made on behalf of an organisation, please name that organisation here:

THE CAMPAIGN FOR BETTER TRANSPORT Inc.

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The deadline for submissions is Wednesday 17<sup>th</sup> February 2016

A summary of submissions will be published on the Ministry of Transport's website at <http://www.transport.govt.nz/land/vdam> in May 2016. This summary may include the names of the individuals or organisations that made submissions. It will not include contact details.

Your submission may be requested under the Official Information Act 1982. If you do not want some or all of your submission released you should let us know, at the time you make your submission, what material you want withheld and why. The Ministry of Transport (in consultation with the NZ Transport Agency) will decide whether to release or withhold material. Requesters can appeal any decision to withhold information to the Ombudsman.

I request that the Ministry consider withholding the release of some or all of my submission  NO (please indicate your response)	If yes – describe the reasons why:
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This submission form is designed to be read in conjunction with the *Vehicles Dimensions and Mass Discussion Document*. The document is available at <http://www.transport.govt.nz/assets/Uploads/Land/Documents/VDAM-Discussion-Document-2015.pdf>

The review covers three major areas:

- general requirements for dimension and mass limits
- permitting and access conditions, and
- management of significant over dimension loads.

You do not need to answer all of the questions in this submission form. You can focus on the issues and questions that are of interest to you. There is also space for general comments.

## 1. Axle mass and gross mass (pages 15 – 25)

Under the VDAM Rule 2002 New Zealand currently has limits on vehicle mass in two main ways. Firstly, limiting the gross mass of a vehicle, or combination of vehicles, to protect the main structural elements of bridges and other structures. Secondly limiting the mass on axles and axle sets to protect road pavements from excessive wear and damage, as well as protecting bridge decks. Under the existing Rule productivity has increased substantially especially in recent years through the introduction of HPMV permits (including the 50MAX pro-forma class), and more recently with increases to axle mass for high capacity urban buses. The purpose of the proposals is to ensure we are fully utilising our network and keep up with international standards.

Seven proposals have been identified and are listed below (including maintaining the status quo). It is possible to select a suite of proposals rather than just the one.

### Questions for your submission:

a) Select the proposals you support in relation to axle mass and gross mass limits:

- Proposal 1: Maintain the current axle mass and gross mass limits.**
- Proposal 2: Revise current Schedule 2 limits (as shown in Appendix A in the discussion document).
- Proposal 3: Increase general access gross mass limit from 44,000kg to 45,000kg.
- Proposal 4: Remove the permitting requirement from the operation of 50MAX.
- Proposal 5: Increase axle mass limits for specific categories of vehicles (please state which categories of vehicles, and your reasons).
- Proposal 6: Amend tyre size categories for axle mass.
- Proposal 7: Reduce weighing tolerance from 1,500kg to 500kg.**

(Note: It is intended that Proposal 3 will only be adopted if Proposal 7 is also adopted, due to the impact of heavier gross mass limits)

b) Why have you chosen these proposals?

The NZTA discussion document lacks credible, validated, evidence to support changes. The CBT sees no clear, logical reason to rush decisions at this point while it is obvious NZTA lack quantifiable evidence to support changes it is recommending. Many of the recommendations appear to be driven by the trucking industry rather than from objective rationale.

- Document subjectively states "expected to result in a reduction in the number of vehicle trips required same freight task." The CBT requests the Ministry of Transport (MoT) provide evidence this has been the case in the past, and quantifiable evidence of productivity gains. While in certain situations it is possible this statement may be correct MoT have not furnished evidence to support claims in this document. The CBT believes it will be impossible for any submitter to make an informed decision other than except the "status quo" under proposal 1.
- Proposal 3 will encourage further loss of rail freight and coastal shipping freight to the road network. This will result in increased congestion with negative safety, social and environmental impacts. With the introduction of HPMV's significant rail customers have moved to road e.g. fertiliser and logging traffic.
- Proposal 3 implies under "Potential Gains" it will reduce congestion for other road users. Please provide evidence to prove this has occurred in the past.
- Proposal 3. Please quantify the statement "pavement friendly"? Does that imply all other trucks are not "pavement friendly"?
- Proposal 4. CBT agrees with the MoT assessment of risks that by removing permitting it will most likely result in increased poor compliance levels as operators potentially could cut corners in order to gain unfair advantage over other operators and other transport modes such as rail and coastal shipping.
- Proposal 4. The MoT must provide estimates of costs to upgrade the 3,000 local road bridges which are not 50MAX compliant. Without a permit system in place it will most likely result in 50MAX operators using unsuitable bridges with negative financial, safety and environmental consequences. The costs of upgrading these bridges, which will have to be at local and central Govt expense, needs to be presented in this discussion document.
- Proposal 2, 5, mention productivity gains without any measurable figures to back up those claims. The MoT need to provide quantifiable figures so submitters can measure benefits vs. costs to upgrade roading infrastructure.
- Proposal 5 mentions "Productivity gains can be difficult to quantify..." Therefore it is impossible for submitters to make an informed judgement as to whether costs and risks are worth the benefits MoT are supporting.
- Proposal 7: Given the rapid advances in technology it can be expected operators now have access to accurate weighing devices. The CBT fully supports MoT reducing the weighing tolerance to 500kgs as potentially many operators are evading Road User Charges for the additional tonnage carried. The MoT should provide estimates of RUC evasion due to under estimation of load weight to help submitters form a balanced, informed decision.
- The paragraph headed "Axle mass and gross mass" states that one of the purposes of the proposals is to "keep up with international standards". It is arguable that international best practise is to move more goods via the freight railway network, not on roads.

c) Are there any potential gains, risks or implications of these proposals you think have not been discussed?

Risks not discussed is the transfer of alternative transport modes (rail and coastal shipping) to the road network. Many of the proposals in this section will have negative impacts on the established rail and coastal shipping networks. This has and will result in increased traffic congestion and associated negative impacts on safety and the environment.

E.g. Kiwirail forecast during the first half of 2016 they will operate 36,711 rail services which is the equivalent to reducing 545,311 truck trips, saving 39.4 million litres of fuel and 106,011 tons of CO2 emissions if the same freight task had of been moved by road. Increasing gross mass weights (or width or height) for trucks as proposed in this document will potentially jeopardise the ability of rail to keep freight off the road network and will induce traffic congestion (which is completely contrary to some of the objectives this document is attempting to achieve).

d) In relation to increasing mass limits beyond current proposals, indicate whether you would support heavier limits or not, and how this is likely to impact your area of interest?

The CBT recommends the Ministry of Transport reviews proposals in this section only after taking into account the active roles rail and coastal shipping play in domestic freight movement. Most proposals mentioned in this section appear to simply aimed at allowing trucking operators gain more freight away from alternative transport modes onto NZ's congested road network. The Ministry of Transport must broaden the scope to measure benefits and risks to rail and coastal shipping by many of the proposed changes.

As mentioned in this document, due to the geography NZ roads are built to a lower standard and not suitable for heavier loads compared to many overseas countries due to the geography. Additionally, almost none of New Zealand's roads are constructed using a concrete pavement which is better suited to the higher axle loadings proposed, than the more common compacted base and tar seal construction. Costs of upgrading to a concrete pavement necessary for higher axle loadings needs to be provided by the Ministry of Transport.

e) Do you have another proposal that has not been presented?

## 2. Width (pages 26 - 32)

The Rule currently prescribes a general maximum width of 2.50m for all vehicles and their loads (some vehicles carrying particular types of loads; hay bales, wool bales and concrete pipes, are allowed a width of 2.70m). There is a list of exceptions that allow a vehicle's width to extend beyond 2.50m. These include load-securing devices, such as ropes, lashings, straps, chains, and j-hook assemblies, which can extend an additional 25mm from either side of the vehicle. Currently many vehicles in the fleet operate with an effective permitted width of 2.55m resulting in two sets of standards depending on whether a vehicle carries a fully enclosed load (2.50m maximum width) or an 'open' load requiring securing devices, such as logs (2.55m).

The preferred option is Option 2, which allows vehicles to fully utilise the air space above the currently allowable 2.55m road width foot-print.

### Questions for your submission

a) Select your preferred option in relation to current maximum width of 2.50m:

- X Option 1: Status Quo – retain current maximum width of 2.50m.
- Option 2: Increase maximum width to 2.55m (including securing devices).
- Option 3: Increase maximum width to 2.55m (plus 50mm for securing devices).
- Option 4: Increase maximum width to 2.60m (plus 50mm for securing devices).

b) Why have you chosen this option?

- Gains claimed are too small to warrant a change being made. Gains at only \$93 million NPV over 30 years (up to 2046) are insignificantly small when compared with anticipated total transport spending in New Zealand over that period.
- CBT is concerned with larger number of vehicles at 2.55 metres there will be a significant increase in crash risks. The CBT supports the MoT assessment of this serious risk as noted in Option 2.
- MoT has not provided any evidence that increasing width will reduce the total number of trucks on the roads.

c) Are there any potential gains, risks or implications of these options you think have not been presented?

- NZ roads are narrow and windy in many places. Wider vehicles will pose significant safety risks for other motorists, cyclists and pedestrians. They will increase danger for vehicles overtaking due to less room for passing. Data provided in the MoT Social Cost of Road Crashes and Injuries 2014 update show average social costs of head on crashes is \$1,005,000 per crash for fatal and injury crashes (head on crashes could increase in number if wider vehicles, as proposed, are allowed). The average cost per road fatality is \$3,981,700. For non-fatal injuries, the updated average social cost is estimated at \$419,300 per serious injury and \$22,400 per minor injury. After scaling up the estimates to account for non-reported cases, the average social cost estimates increase to \$724,000 per reported serious injury and \$70,000 per reported minor injury.
- Significant job losses in the bus manufacturing industry could occur relatively quickly should width be increased to 2.55mtrs. This is due to the resulting importation of cheaper mass produced North American buses which will undercut the locally produced buses. MoT has not provided any detailed data as to the value of this industry so an objective decision can be made by submitters. However, it is highly likely this industry is worth well in excess that of the 30 year gains of \$93 million.
- NZ bus manufacturing industry employs over 235 skilled staff directly and has over 500 subcontractors and suppliers with considerable benefits to New Zealand's economy with regards to employment, skills training, and taxation revenue. In 2016 turn-over is estimated above \$50 million.
- MoT have failed to provide costing for upgrading infrastructure to allow wider (or higher) vehicles (buses and trucks) this discussion document. Currently a **700 meter section** of Mt. Eden Road, Auckland, is undergoing upgrading to allow high occupancy HPMV buses. Financial costs to utilities providers for moving power poles, street lighting and associated equipment to allow for "tail swing" and reduce "strike" is in the order of \$200,000 for this small section alone.
- MoT have omitted costs of removing privately owned overhanging structures (i.e. shop verandas, signage) close to roads proposed to carry wider vehicles than at present.
- Based on the above, a move to 2.55 meters width makes little sense to New Zealand as a whole in relation to proposed economic gains or decreasing road safety.

d) Do you have another option that has not been presented?

### 3. Height (pages 33 – 37)

The height of vehicles of New Zealand's roads is regulated by the VDAM Rule. Height restriction is needed to ensure network fit and the VDAM Rule prescribes a general access height limit of 4.25m for all vehicles with some exceptions. These items include, load restraining devices such as ropes, straps, chains and covers, provided they do not exceed 25mm above the body or load of the vehicle (bringing the total height to 4.275m); and trolley bus poles when extended to collect electric power from overhead wires.

The transport industry has raised concerns that the current general access height limit is restricting innovation in the vehicle fleet.

Aligning the height limit between fully enclosed vehicles and vehicles with external load restraints would improve standardisation of the vehicle fleet and would result in an improvement in volume capacity.

#### Questions for your submission

a) Select your preferred option in relation to the general access height limit:

X Option 1: Status Quo – maintain current height limit of 4.25m, plus 25mm for load restraining devices.

Option 2: Increase the general access height limit to 4.275m, inclusive of load restraining devices.

Option 3: Increase the general access height limit to 4.30m, inclusive of load restraining devices.

b) Why have you chosen this option?

- Extremely low benefits of only \$75.3 million over a 30 year period do not justify change to existing general access height limit.
  - Lack of any authoritative estimates of the anticipated additional expenditure needed to upgrade roads to accept higher vehicles being provided by the MoT.
  - No logical reason to move forward with this rule change until authoritative and realistic anticipated estimates are provided and discussed.
  - Costs of upgrading tunnels, bridges and other infrastructure more than likely to be many times higher than quoted 30 year benefits.
  - Risk of vehicle roll-overs increase.
  - As regards the claims of the transport industry that "innovation in the vehicle fleet" is being restricted – simply allowing the transport industry to purchase taller trucks is not an innovation. To replace the Ford Mondeo car with a Toyota Landcruiser for the purposes of transporting the family is not an innovation.

c) Are there any potential gains, risks or implications of these options you think have not been discussed?

- Increases in heights can lead to an increase in vehicle roll-overs due to loading error. Truck drivers were responsible for 23% of all truck related deaths and 58% of trucking related minor injuries 2010 -2014 (MoT data).
- Potentially massive costs to local, central government and private land owners of allowing taller vehicles on the road network. MoT must provide quantifiable costs so that submitters can make objective, informed decisions on this proposal.
- Increasing height will allow the road transport industry to further attract freight from alternative modes (rail and sea) resulting in an increase in congestion on the road network, pollution and environmental harm. This is the opposite effect to that of which the MoT is suggesting will happen should their desired proposal be permitted.

d) Do you have another option that has not been presented?

e) Are you aware of clearance issues on local roads where an increase from 4.25m to 4.275m or 4.30m would be problematic?

#### 4. Car transporter gross mass (pages 38 – 40)

The VDAM rule classifies car transporters as simple trailer combinations. Under the VDAM rule, simple trailer combinations are prescribed a gross combination mass limit of 36,000kg.

An increase in the mass limit would compensate for increases in the length, and therefore the chassis weight of pro-forma car transporter designs. It would enable operators of these vehicles to maintain the same level of payload as for previous vehicles (nine cars).

Enabling the pro-forma designs to maintain the same level of payload as standard designs would update the VDAM rule to reflect changes in the vehicle fleet.

#### Questions for your submission

a) Select your preferred option in relation to mass limits for pro-forma car transporters:

- X Option 1: Status Quo – maintain current mass limit for pro-forma car transporters at 36,000kg.**
- Option 2: Increase the gross combination mass limit for pro-forma car transporters to 38,000kg.

b) Why have you chosen this option?

In the absence of MoT supplying of proof of significant, quantifiable benefits the CBT recommends the status quo.

Status quo allows for existing levels of safety for all roads users to be maintained.

c) Are there any potential gains, risks or implications of these options you think have not been discussed?

d) Do you have another option that has not been presented?

e) Are there other applications for the pro-forma car transporters design (i.e. not transporting cars) where the additional 2,000kg would be useful?



**Permitting** (pages 41 – 45)

Permitting ensures that when vehicles not eligible for general access use the roads, they do so safely and their impact on the roading infrastructure is minimised.

**5. Divisible loads**

Road controlling authorities currently cannot grant permits for overweight divisible loads for non-HPMVs. Permitting some non-HPMV vehicles to carry divisible loads using heavier axle mass could enable greater productivity for some vehicles.

**Questions for your submission**

a) Should RCAs be allowed to grant permits for overweight divisible loads for non-HPMVs?

Yes

No

b) If yes, are there any conditions RCAs should follow when considering such permits?

**6. Indivisible loads**

It is proposed to give formal status to the following 10 loads as indivisible loads: transformer oil, building removals, platform trailers, construction equipment, load dividers, ballast, towing of disabled vehicles, fire fighting vehicles carrying water, slurry sealing and towing of trailers.

**Questions for your submission**

a) Should the items noted above be formally included as part of a definition of “indivisible load”?

Yes

No

b) Should ancillary components of indivisible loads be allowed to be carried with an indivisible load?

Yes

No

c) If yes, which parts?

#### 7. Crane boom sections

It is proposed that crane booms that can be disassembled be allowed to be carried to the equivalent dimensions of a Category 1 overdimension vehicle (maximum width of 3.1m) and to a maximum height of 4.5m.

#### Questions for your submission

a) Select your preferred option in relation to an exception for crane boom sections:

Option 1: Status Quo – do not provide width or height exceptions for crane boom sections.

Option 2: Provide exceptions for crane boom sections, up to 3.1m in width and 4.5m in height.

b) Why have you chosen this option?

**8. HPMV Bulk Fleet permits** (pages 46 – 47)

High Productivity Motor Vehicles (HPMV) permits currently issued by the Transport Agency can be for up to five identical trailers associated with one prime mover. The rationale for this limit is it supports reasonable timeframes for assessment, matches demand with volume, and is manageable from an enforcement perspective.

It is proposed permits issued by the Transport Agency allow identified prime movers to be able to be mixed and matched from a set of pro-forma trailers published by the Transport Agency. Currently there are pro-forma designs for 50MAX vehicles and over-length HPMV vehicles. The trailers in an operator’s fleet conforming to the pro-forma specifications would be able to be used with any of its prime movers.

**Question for your submission**

a) As a transport operator, do you think this proposal offers significant benefits to your business?

Yes

No

b) If yes, please describe benefits:

## 9. Management of overdimension loads (pages 48 – 53)

Under the VDAM Rule the standard maximum width (with some exceptions) for general access to the roading network is 2.5 m. The Rule also sets other dimension limits such as length and forward and rear overhangs.

The Rule allows, with conditions, the transport of indivisible loads of widths greater than 2.5m and other dimensions exceeding those required for general access.

### Proposals for your submission

Select your preferred proposal or proposals in relation to the management of over weight/overdimension vehicles.

Supporting arguments for your selections are also encouraged.

- Proposal 1: Clarify in Rule the responsibilities of 'operator' for overweight and overdimension permits.
- Proposal 2: Flags should no longer be permitted to signal the edge of overwidth loads (but still be required to mark the end of long loads).
- Proposal 3: All tractors between 2.5m and 3.1m wide should be required to use a warning light or hazard panels signifying width.
- Proposal 4: Pilots should be able to use sound warnings to warn oncoming vehicles of an approaching overdimension load.
- Proposal 5: Pilots should be allowed to (or be required) to be positioned on the road in line with the outer extremity of an overwidth load.
  - Allowed
  - Required

Following are a set of broader questions about aspects of the management of overdimension loads for which specific proposals are to be developed. Any specific proposals will be included in the draft Rule which will be released in mid-2016 for public submission.

## 10. Management of loads

### Questions for your submission

- a) If there were to be a maximum width for transporting houses, what should that limit be, and why?

b) Should there be a limit to the speed for very wide loads?

Yes

No

If yes, what should that limit be?

c) If the current hours of travel for moving overdimension vehicles are revised, what hours do you consider appropriate for what size of load?

d) If the travel zones for overdimension vehicles are revised to ensure they reflect changing road use patterns, are there any specific changes you recommend?

e) Do you have a preference as to signage on pilot vehicles warning oncoming vehicles of an approaching overdimension load?

Yes

No

If yes, what is your preference?

f) Do you have a preference as to the positioning and extent of hazard panels, including reflective and illuminating signs/lights on overdimension loads?

Yes

No

If yes, what do you suggest they be?

g) Do you support increasing the number of pilots for very wide vehicles to three pilots?

Yes

No

## 11. General comments on the proposals in the Vehicle Dimensions and Mass Rule Discussion Document:

This discussion document appears in some cases not to be written objectively and is limited in scope. Not taking rail and sea modes into consideration at the same-time highlights weaknesses in the benefits and risks evaluations provided by the Ministry of Transport.

While road transport is important to the economy, rail and coastal shipping are both currently under utilised and offer potential productivity benefits which MoT need to take into consideration.

Many of the changes proposed in this document offer extremely low economic benefits while at the same time it fails to quantify the costs involved in the required infrastructure upgrades. Therefore, submitters are not in a position to make correct decisions as they lack all the information they require.

It would appear safety, environmental factors, direct and indirect costs of truck accidents are not fully taken into account by this document, when it is obvious they must be. According to MoT figures in 2014 trucks accounted for 67 road deaths (23% of all road deaths). Since 1990 truck related road deaths have increased from 14% to 23% of all road deaths. During 2010-14 35% of all fatal truck crashes and 58% of minor injury truck crashes were caused by truck operators. These shocking statistics imply that the trucking industry urgently needs to improve its standards. MoT data shows that when a car collides with a truck, car occupants represent 96% of deaths, 89% of all serious injuries and 83% of minor injuries. The proposals in this document to increase width, heights and mass loadings in this document do nothing to mitigate these worrying statistics.

"The NZ Injury Prevention Outcomes Report - June 2015" released by the Accident Compensation Corporation states that the total costs of all road crashes in 2010 was \$2.23 billion dollars and 18% of that figure was directly attributable to the trucking industry. When the insignificant 30 year economic benefits, as mentioned in this document, are taken into account it is clear that most of the proposals are not worth pursuing when measured against the costs trucking related crashes have alone on other road users and society as a whole.

Trucks cause over 99% of damage to the road network, yet only cover 58% of road maintenance costs through Road User Charges. Other motorists, taxpayers and ratepayers are effectively subsidising this industry to the tune of billions of dollars every year. When compared to rail which covers 84% of its operating costs and must pay 100% of the its maintenance costs it would be sensible for the MoT to be putting more resources into promoting freight to be moved by rail instead of by road where possible.

The *Campaign for Better Transport* recommends that many of the proposals are put on hold until the MoT is in a position to provide the detail we have highlighted as being necessary. Basing decisions on the information contained (and omitted) within this discussion document makes little sense and brings the credibility into question of both the MoT and the Minister.

It is suggested that a comprehensive economic evaluation of all the benefits and costs of the changes proposed here be undertaken by a reputable and independent (preferably overseas based) economic research consultants. It is only in this way that a credible evaluation can be made of the benefits or otherwise to New Zealand of these proposals.

Finally, the *Campaign for Better Transport* notes there have been many stakeholder meetings over the past two years, as mentioned in this document. We are surprised to have never been invited to participate and provide objective input.



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