

REPORT 01-725

Transit New Zealand's Document,  
"Improving Heavy Vehicle Efficiency on New Zealand's Roads"

Submission of the Wellington Regional Council

1 Introduction

- 1.1 Wellington Regional Council is pleased to make a submission on proposed increases in weight and dimension limits for heavy vehicles. In the course of preparing this submission, we consulted agencies such as EECA, Ministry for the Environment, Land Transport Safety Authority and Regional Councils. The Wellington Regional Land Transport Committee received a briefing from Mr Graham Taylor of Transit and Mr Tony Friedlander of Road Transport Forum, and was informed during discussions by regional representatives. This submission however represents only the view of the WRC.
- 1.2 WRC acknowledges that a strong case on economic efficiency grounds has been made for the proposed increases. That case curiously assesses future economic (and hence additional truck) growth as an unlikely zero by assuming the road freight transport task is fixed at current levels, an assumption we do not share. Our primary concern though, is that the analysis omits some, and undervalues other decision making criteria, principally immediate and long-term social and environmental impacts. It is particularly deficient in considering impacts on the built-up areas that characterise regions like Wellington. It is our view, that a more comprehensive analysis *including* social and environmental sustainability factors needs to be undertaken at an appropriate strategic level before any decision is taken on the cluster of issues nestled within this proposal. A narrowly-based, Transit-focussed economic efficiency case is insufficient to justify an irreversible decision with consequences for communities. It is an interesting example of a *policy* decision going through *non-policy* processes, and underlines the failure of National Transport Strategy.
- 1.3 We understand that alongside the subject weight/dimension limits issue, LTSA is conducting separate consultations on safety/speed rules for heavy vehicles, a logging industry proposal and a dairying industry proposal. We recommend an integrated strategic overview and, staged and reviewable implementation of any decisions. Given community concern around safety/speed/impact issues of the *current* truckfleet that would seem the appropriate starting point. We wish to make it clear we do not rule out the possibility of staged introduction of heavier/longer trucks on selected routes but could not support it on the basis of a case that omits consideration of key impact factors.

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## 2 The Presented Case

- 2.1 The presented case shows allowing greater payloads will reduce the number of truck trips and vehicle-kilometres-travelled, and consequently that transport haulage costs, accidents, fuel consumption and emissions would reduce. Costs would be incurred in improving bridges and road alignments, but the calculated BC ratios are usually fundable and sometimes high, including many in our region. While fundable via the projected increased RUC revenue, these improvements would be available to all users. We acknowledge that by extrapolation, should the proposed dimension increases be allowed, there would be similar reduced VKT for the road haulage component of additional freight *as compared to* carrying the increased payload by the *current* fleet.
- 2.2 **Scenario A** proposes slightly heavier (50 tonne) trucks on all roads, **Scenario B** heavier/longer (62 tonne, +5 metres) trucks on selected routes, mainly State Highways. A hubbing concept (shuttle trucks to depots) is associated with Scenario B, but we note that likely hubs in this region (such as the Port, Airport, Hutt, Masterton) all involve said trucks traversing some local roads. In our view, both options underestimate the cost impact for ratepayers because local roads are not built to State Highway standards and will require greater degrees of improvement than Transit figures estimate, particularly around bridges and corners. Scenario A figures for example, rely on an unjustified assumption that trucks use only 15% of bridges, and will go on using only 15% of bridges forever. Figures used may have underestimated the high costs of any road improvement in urban areas that arises because urban land is scarce and contested but we cannot tell because figures are presented at an aggregate level.
- 2.3 It is understandable that figures present only costs to Roading Controlling Authorities and do not include other costs, but a full economic analysis would do so. The cost to the industry of upgrading to and operating the new rigs for example, is not included meaning full economic costs are understated. A possible concern here is the associated concentration of the industry, but of course, such social effects are outside the brief of the presented case.
- 2.4 The presented case refers to a selected sample of overseas examples where dimension limits are in line with the proposed, and omits reference to countries that maintain the same 44 tonne limit as New Zealand. But the proposal is to take effect on New Zealand's roads, which often encounter difficult terrain and narrow alignments. We are unable to judge whether 44 tonne limits are more characteristic of countries with similar roading conditions to ours or not, because the information is not presented. But in the Wellington region for example, the *current* (44 tonne) truckfleet has difficulty on SH2's Rimutuka Hill Road and SH1's coastal section around Paekakariki, with marked safety and congestion disbenefits for all roadusers. Both of these are included in the selected routes for (62 tonne, 25 metre) Scenario B, causing us some concern.



- 2.5 We accept that the proposal carries with it an implied promise to accelerate the upgrading or replacement of such stretches, but this raises other questions – how can national funding strategies be reset in this adhoc manner – to the detriment of all other competing works and their benefits? Has Transfund accepted this externally-set new obligation? How reliable is the implied promise? We have seen quite enough undelivered promises in transport in the last 10 years, is this another one? Certainly neither Transit nor RTF can deliver on it; it requires an (absent) National Strategy. Execution of the proposal is one-off, irreversible, and prior to execution (by others) of the promise. This is a risky scenario in itself.

### 3 Truck VKT – More or Less?

- 3.1 It is difficult to accept the presented assumption that there will be fewer truck VKT under the proposal. Fewer truck VKT per tonne carried yes, but fewer overall, we doubt. This is because we believe:

- additional freight from economic growth must lead to additional trips; logging projections are a known example, and they will impact on Wellington region (and Port);
- lower unit costs for road freight will mean some previously uneconomic movements would now take place;
- while industry spokespeople assert that road and rail operate in separate specialised markets, there is likely to be some modal shift over time from rail and coastal shipping to road haulage.

In support of a view that truck VKT will increase rather than decrease under the proposal, we point to recent local precedent – in 1987 New Zealand increased weight limits from 39-44 tonne. It is our understanding that truck VKT subsequently *increased* (even as economic growth slowed); and so, for a time, did truck-related accidents.

- 3.2 The presented economic efficiency case could be extrapolated to support these increased movements; instead it tends to deny them. A fuller analysis needs to include them in the assessment. While increased truck VKT can be associated positively with regional economic and employment growth, it can also be associated negatively with increased adverse effects. These effects lie more in the social and environmental domains and the (BC) methodology employed in the presented case, is incapable of assessing them properly. It is to be hoped however, that a more comprehensive analysis would include them in the assessment.
- 3.3 We acknowledge that the presented case includes safety and environmental valuation as two of the six investigations, “on the assumption that fewer trips will be needed to perform a specified freight task.” The environmental valuation monetises impacts and presents coarse national figures. This is possibly acceptable for CO<sub>2</sub> as the scale of impact is international, but seriously mistaken for issues such as noise, where the scale of impact is local. Nationalised and monetised valuations of noise impacts are simply irrelevant

to the reality of communities adjacent to truck routes. In our region these communities include rural towns (Greytown, Carterton) and urban suburbs (Mana, Plimmerton, Paremata, much of the Hutt Valley). The national figures presented *misrepresent* local (urban) environmental impacts, understating their severity and relying on an unproven willingness-to-accept.

- 3.4 Similar points can be made about the safety analysis. Its aggregation misrepresents local impacts, especially for urban and town communities. The concentration on (modelled) numbers of crashes obscures the increased *severity* of each crash and rollover. Indeed the alleged economic benefit of Scenario A to this region (19.8 times an unidentified expenditure, assumed here to be 10% of the total), would be wiped out in the costs including congestion of one rollover and one crash on the “wrong” part of our section of SH1 at the “wrong” time of year. Full compliance with the proposed regime is assumed, especially in Scenario B, but a perceived problem is that while 95-99% of the industry may be reasonable compliers, the extra dimensions are also given to the rogue 1-5%.
- 3.5 We have included safety and local and environment concerns under the heading “more VKT or less?” because the answer to “more VKT or less?” is critical to the acceptability of the case under these headings. *If* there is less VKT, then perhaps the adverse local environmental effects and different safety risks are on balance *acceptable (compared to current truckfleet doing the same task)*; but *if* there is more VKT then these effects are magnified irreversibly.

#### 4 The Absent Case

- 4.1 Concentrating as it does on economic efficiency arguments, and from Transit’s (not the community’s) point of view, and relying completely on BCA to present that case, the presented case fails to assess social and environmentally values. In particular:

- safety/speed issues on local roads both urban and rural;
- Safety/intimidation issues for other road users;
- Energy efficiency issues arising from any modal shift;
- Local air quality issues in urban areas;

are all matters not addressed in the presented case. As noted above, a comprehensive policy analysis of the proposal must include assessment of these issues. We would not expect such an analysis from Transit, who is a narrowly-focussed roading agent doing its job of promoting efficient roading. Assessment of these issues need not be negative for the proposal. Parallel introduction of better loading practices, better safety/speed regimes and improvements in diesel technology could in fact make them positive for the proposal, with much better energy efficiency and local air quality arising from more efficient loading of bigger, more efficient trucks. Our point is more that they are simply absent, and this is no basis for a policy decision.

- 4.2 Similarly, we note the absence of any strategic analysis as to why this particular issue merits detailed priority consideration outside of and ahead of any of a large number of issues facing, e.g. Transit, such as urban congestion, tourists routes, substandard Levels of Service (capacity v demand), or vulnerable routes. The proposal involves a plan to spend an additional \$10 Million a year for 5 years on targeted improvements, i.e. to prioritise this programme ahead of all others to that extent for that period. What are the parallel claims of the unknown competing programmes? Since they are absent from the case, it is an impossible judgement to make.
- 4.3 We understand there are separate consultations ongoing about some of these matters. In particular LTSA are considering rules about speed/safety, and the industry is, commendably, addressing loading efficiency. But all these issues are connected in our mind to at least this extent; *if* there is improved speed/safety and *if* there is better loading efficiency *then* the case for the proposal is much stronger and many of our concerns are answered to a degree. In that case, we could support staged introduction, e.g. 50 tonnes on selected routes (as they are upgraded) first. But the isolated nature of this consultation makes such consideration impossible. It is our view that the proper body for undertaking consultations on strategic policy matters at national level, is the Ministry of Transport, and they cannot delegate that responsibility. Transit is not well placed to consider multi-modal impacts for example.

## 5 Conclusion

- 5.1 On the basis of the limited and narrowly-focussed case presented, Wellington Regional Council cannot support the proposal to increase weight/dimension limits for heavy vehicles under either Scenario A or Scenario B. We urge that before the case enters any decision making round, further analysis is commissioned on social and environmental impacts, especially at differential local levels (e.g. urban, rural town, rural). The further analysis could be called “sustainability analysis” and is to be balanced with the “economic analysis” already presented. We further urge that the sundry national consultations around heavy vehicle regimes be integrated into a co-ordinated strategy consultation, through the MOT. Given the right controls on adverse effects and a reliable programme of roading upgrading (within a known funding strategy), the Wellington Regional Council could support gradual introduction of amended proposals, but until the recommended sustainability analysis and co-ordinated strategy consultation take place, we have no basis on which to make that judgement.
- 5.2 It is the practice of submission-analysers to assign submissions to broad categories to assist analysis. The Wellington Regional Council submission falls into the “Qualified No” category.