

23 July 2009

Rose Hobden  
Team Administrator/Project Co-ordinator  
NZ Transport Agency

Email: [rose.hobden@nzta.govt.nz](mailto:rose.hobden@nzta.govt.nz)

Dear Rose

**BUSINESS NZ SUBMISSION TO THE NZ TRANSPORT AGENCY ON THE DRAFT  
LAND TRANSPORT RULE: VEHICLE DIMENSIONS AND MASS AMENDMENT  
[(NO.2) 2009] RULE 41001/5**

Business NZ welcomes the opportunity to make a submission to the NZ Transport Agency on the above Draft Land Transport Rule.

Business New Zealand is New Zealand's largest business advocacy organisation.

Through its four founding member organisations – EMA Northern, EMA Central, Canterbury Employers' Chamber of Commerce and the Otago-Southland Employers' Association – and 70 affiliated trade and industry associations, we represent the views of more than 76,000 employers and businesses of all sizes, reflecting the make-up of the New Zealand business landscape.

It almost goes without saying that transport is critically important to the New Zealand economy. Business NZ welcomes the Government's decision to make changes which will broaden the grounds on which a heavy motor vehicle can operate in terms of weight and, in some cases, length. Business NZ therefore supports the proposed Draft Land Transport Rule.

It is understood the proposed changes will

- increase the allowable overall length on certain types of vehicle configuration;
- increases weight limits on certain axle sets;
- allow vehicles to operate up to 44 tonnes with shorter first-to-last axle spacings than are currently allowed; and
- allow high-productivity motor vehicles to operate at gross masses above 44 tonnes (for divisible loads).

Business NZ congratulates the NZ Transport Agency for the clear and concise background papers provided justifying the proposed changes, namely that the amount of freight that will be moved on New Zealand's roads is projected to increase substantially over time. This projected increase therefore needs to be moved in the most efficient manner possible.

Second, Business NZ has been supportive of the trials adopted since mid-2008, which allowed heavier and longer vehicles to operate on specified routes. These trials have shown that significant productivity benefits would result from allowing vehicles to operate more freely at mass and dimension limits above those currently prescribed in the Vehicle Dimension and Mass Rule.

According to the Road Transport Forum, increasing the maximum weight by just six tonnes can improve heavy truck productivity by approximately 20%, while estimates from the Ministry of Transport's year-long trial of a 50 tonne limit suggest productivity gains of around 16% with 16% fewer truck trips.

In short, fewer truck trips mean lower overall transport costs and this flows through to the business community and ultimately to consumers. While Road User Charges (RUC) will obviously substantially increase for vehicles with heavier loads, there will still be significant transport efficiency gains.

The flow-on effects will not only be reflected in lower projected freight costs, but also will have other significant benefits in terms of reduced congestion and fewer accidents. Lower fuel use will produce reductions in exhaust emissions.

Controls on specific routes should ensure any public concerns regarding safety issues due to say narrow roads or tight corners are minimised.

For all of the above reasons, Business NZ strongly supports the proposed Rule changes.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'John Pask', is written over a light blue circular stamp.

John Pask  
**Economist**