

Living Streets Aotearoa



Submission from Living Streets Aotearoa on Vehicle Dimensions and Mass Rule change

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Thank you for the opportunity to make this submission.

1. The major justification given for increasing vehicle dimensions and mass is that the same freight task will be able to be performed with fewer trucks, with consequent safety & economic benefits.

The key assumption here is that the road freight task will be unchanged, and the discussion paper takes that for granted. But road freight is just a part of the logistics chain, and making road freight cheaper (as proposed) will be likely to have two effects beyond road transport, both tending to increase the road freight task:

- a) other modes, eg rail and sea, will not have the same cost advantages and will therefore become less competitive;
- b) any distribution system is a combination of transport and storage, and reducing the cost of transport will be likely to increase the use of transport and reduce the amount of storage, eg by longer delivery runs from fewer depots.

We note that most estimates for freight show an increase in volumes over time rather than the static task that this rule change assumes, e.g Figure 3

<http://www.transport.govt.nz/assets/Uploads/Research/Documents/Future-Freight-Scenarios-Study.pdf>

2. The effects of larger vehicles on pedestrians and other vulnerable road users barely gets mentioned, and the proposed changes mostly appear fairly small. Each time similar rules are reviewed the incremental change is small but they add up to larger changes over time and there is no opportunity to consider the larger total change.

Given the above, we submit that:

- a) the proposal be reviewed to check the assumption that it will not increase the road freight task, and the proposal be reconsidered if that assumption does not hold;
- b) the relationship between larger vehicles and pedestrians be reviewed, to ensure that the issues of pedestrian safety and convenience are given adequate weight.

About Living Streets

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

The objectives of Living Streets Aotearoa are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see: www.livingstreets.org.nz