



BUILDING AND MAINTAINING
NEW ZEALAND'S LAND TRANSPORT
INFRASTRUCTURE

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31 July 2009

Vehicle Dimensions and Mass Amendment
Rules Team
New Zealand Transport Agency
PO Box 5084
Wellington

Dear Rules Team,

**Proposed Land Transport Rule:
Vehicle Dimensions and Mass Amendment No.2 – 2009**

Roothing New Zealand thanks the New Zealand Transport Agency (NZTA) for the opportunity to make a late submission on the above proposed Land Transport Rule. Roothing New Zealand also congratulates NZTA for seeking ways to improve land transport outcomes and productivity for New Zealand.

Roothing New Zealand represents contractors who build and maintain New Zealand's land transport infrastructure. While our members carry out the majority of the country's roading work, they are also substantially involved in rail and passenger transport infrastructure. The combined turnover of our members is approximately \$3 billion pa. Notwithstanding this, Roothing New Zealand members are also truck, plant and machinery operators and therefore have a direct interest in this proposed Rule as part of the trucking industry.

In summary, we support the proposed Rule but ask that extra funding be made available to cover

- The inevitable extra maintenance costs that this Rule change will create
- The inevitable extra capital costs required to upgrade road geometry and bridges

We support the increased vehicle mass and dimensions proposed in the Rule because of the productivity improvements that will result from them. We also support the use of specified routes for these vehicles.

For our industry the productivity improvements will arise from efficiencies in the cartage of road construction aggregates, chipsealing aggregate and bitumen. These efficiencies should flow into lower road maintenance and construction costs. Having specified routes for these heavy vehicles also makes sense because it will limit increases in infrastructure costs to those routes. In some ways this is not dissimilar to the Class I and Class II roads that existed up until the 1980s.

There will, however, be increased costs relating to maintenance and the upgrading of road geometry and bridges. Increased maintenance costs may not show for sometime, until the equivalent design axles for which the roads have been designed for have occurred. Alternatively, it is possible that the 20% increase in loads of up to 53 tonnes could cause an immediate failure if they exceed the shear resistance of the pavement. This later alternative should be minimized through the use of specified routes.

We are not convinced that the increased maintenance costs will be offset by fewer trucks being on the road. This is because of the non linear relationship between pavement damage and truck loading. Traditionally this relationship has been called the 4th power rule and even though recent research questions "the 4th power" it does not question the non linear relationship.

We trust you find this submission helpful and we wish to speak to it during submission hearings.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Olsen', with a long horizontal flourish extending to the right.

Chris Olsen (FIPNZ)
Chief Executive