



Road Transport Forum NZ Submission to:

Tauranga City Council

on:

**Prohibition of heavy vehicles from Links
Avenue**

emma.joyce@tauranga.govt.nz

Road Transport Forum NZ
PO Box 1778
Wellington
Ph: (04) 472 3877
Contact: Nick Leggett CE

May 2021

Road Transport Forum (RTF) submission on Tauranga City Council proposal to prohibit heavy vehicles using Links Avenue, Mount Maunganui

1. Representation

- 1.1 Road Transport Forum New Zealand (RTF) is made up of several RTF members include Road Transport Association NZ, National Road Carriers, and NZ Trucking Association. The affiliated representation of the RTF is some 3,000 individual road transport companies which in turn operate 16-18,000 trucks involved in commercial road freight transport, as well as companies that provide services allied to road freight transport.
- 1.2 The road freight transport industry is 3.0% of New Zealand's gross domestic product (GDP) and it carries 93% of the nation's freight. We employ around 26,000 people and vocational education is of growing importance in our industry due to a shortage of drivers and other workers.
- 1.3 This submission supplements any submission from the regional trucking associations for which the RTF provides unified national representation.

2. Introduction

- 2.1 Tauranga City Council (TCC) is seeking feedback on its proposal to prohibit heavy vehicles using Links Avenue. Its idea is that due to the road works on State Highway 2 creating access and delay issues to traffic, vehicle classifications of all types are diverting onto other routes, of which Links Avenue is one. The options it is considering are to prohibit heavy vehicles from Links Avenue either "forever", or until the SH2 works are completed.
- 2.2 RTF presumes TCC intends to implement a prohibition under the powers provided in section 22AB of the Land Transport Act 1998.
- 2.3 We are concerned about TCC's approach and we strongly oppose a prohibition of heavy vehicles as it would not be in the best interests of the community.

3. Managing impacts to the road network

- 3.1 We are concerned that it is necessary for TCC to reactively respond to the impact of the roadworks on SH2. The impact on traffic was entirely predictable and had Waka Kotahi NZ Transport Agency and TCC

followed due process and undertaken a risk assessment and management of change, then this issue could have been managed more proactively.

- 3.2 We are also concerned that TCC has not provided any information on the actual problem statement, nor does it appear to have undertaken any benefit/cost analysis to support its thinking.
- 3.3 TCC refers to the impacts of the roadworks increasing use from all classes of traffic. By and large, heavy vehicle traffic is working for the community and wider economy either moving freight, or undertaking community services such as, but not limited to public transport, rubbish collection, on-line grocery deliveries, service and maintenance of local amenities etc.
- 3.4 A typical average value assigned to heavy vehicle transport is \$120 per hour and we request that TCC consider the economic impact of its proposal compared to the impact of imposing restrictions on light vehicle traffic instead of heavy vehicles.

4. Implementation of changes

- 4.1 We expect that prior to making its decision TCC will undertake consultation with local residents and other effected parties.
- 4.2 Notwithstanding the above, in the event TCC chooses to proceed with a prohibition of heavy vehicles, we would like to point out that the residents and maintenance of amenities on Links Avenue depend on heavy vehicles therefore, any prohibition would need to be limited and conditional.

5. Concluding comments

- 5.1 We reiterate we strongly oppose what is essentially blanket prohibition of heavy vehicles from general access routes.
- 5.2 TCC and Waka Kotahi appear to operate in siloes otherwise a proactive plan to manage the impacts of the road work should have been implemented earlier.
- 5.3 We urge all road controlling authorities to work in a more integrated way and consider the impacts of road maintenance and/or capital works on freight movement, and the consequential impacts on the economy and the safety and wellbeing of New Zealanders.