

Addendum to David Lloyd's Submissions

Fresh Choice application – 220081 at 134 Main Street

To: Lindsay Daysh, Independent Commissioner

Date: 22 September 2023

From: David Loyd, Submitter, 19 Humphries Street, Greytown

Road Safety & Pavement Damage

As you are aware I have given previous evidence pertaining to the use of PHV's (Permitted Heavy Vehicle) entering, and exiting off SH2 (State Highway 2), from a safety perspective. This latest addition to my submission concerns the use of North, West, and Humphries streets, as it has clearly become already the main route for deliveries by the Woolworths NZ Limited group using PHV's. I have enclosed a photo below (page 2) that I took, which clearly shows a Fresh Choice PHV exiting Hastwell Street, and entering onto SH 2 after making a delivery.

Over the last few weeks, I have taken the time to study this same vehicle going about its business on behalf of Fresh Choice on the aforementioned streets, and what I've seen should be taken into account. In all cases where I observed this truck, and trailer unit (PHV) operating in our back streets, the vehicle had to compromise in much the same way due to its length, and the limited cornering conditions it had to utilise in order to facilitate its own safe passage.

All the corners on the route are clearly too tight in my opinion, and the driver is clearly forced because of this fact to place his vehicle on parts of the highway, as well as our streets in a completely unsafe manner in order to execute his turns. Crossing the centre line, cutting corners, and blocking oncoming vehicles is the drivers only option. The photo below makes this very clear.

I have also observed this same vehicle pictured below executing corners at both ends of the town, whereby I've seen the sledging effect that comes about from the heavily loaded axle groups that are unavoidable when these tight turns were made. I have made it my business to track this vehicles movements in order to share my observations.

I have also written, and made my concerns known to both the SWDC, as well as Waka Kotahi for their comments. These facts alone I would have thought should have rung warning bells for both parties from a maintenance cost basis, as well as a safety perspective, but no comments have been forthcoming to date.



Maintenance Cost Concerns

I was somewhat surprised to hear that the SWDC's roading divisions position in regard to West Street was that they deemed that the street was suitable for heavy vehicle use, which I found surprising.

The fact that this particular street was designed in the early 60's, and then constructed in the early 1970's for an entirely different weight range of a maximum of (39) tonnes, for heavy vehicle use, well the councils own view of the road's durability should be questioned.

As there appears to be no major roading upgrades planned by either party to this 50-year-old residential street, or the SH itself to overcome any possible excess wear issues, well that must be another concern.

As a ratepayer that has just had to except a rate rise of 19.5%, the highest in the country, it's of great concern to me, and many others that further costs will be heaped onto our districts massive roading bill, due to allowing our streets to become a designated route for PHV's.

The Heavy Weight Issue

To add weight to my arguments against the Woolworths proposal, I put forward the following information that lays out clearly why, and where PHV's were meant fit into our transport network.

Most Kiwis I'm fairly sure are completely unaware that in 2010 the maximum gross weight of heavy trucks moved up from (44) to (53) tonnes, operating only on designated routes that met strict parameters, refer to Heavier Trucks Approved (page 5).

I was in the industry in the early (90's) when gross weights moved from (39) to (44) and I must say I was rather surprised to see the Plus (50) Initiative introduced, as NZTA back then were adamant NZ's roading infrastructure had reached its maximum capacity weight wise.

This new idea to create an environment that would drive productivity gains in the range of 10 to 20%, while using fewer trucks seemed a good move.

Safety, heavy vehicle congestion, and emissions, as well as the lowering of operating costs were the primary factors driving it all.

The whole proposition was wrapped around very strict regulations over designated routes that would all be overseen by New Zealand's Road Controlling Authorities. These being Waka Kotahi, and local councils, who manage a large section of NZ's vast roading assets.

These authorities would have the final say, whether, or not the routes applied for by transport operators were actually suitable to cope with these larger, heavier vehicles.

One of the key ingredients in this new move by government was that any vehicle that gained a permit to operate in this way would have to meet ALL the known safety requirements.

Interestingly today it is now thought that a 20% increase in axle weights on the road actually increases road damage by more than double. This thinking may go some way towards explaining why a great many of our SH's are in such terrible condition, after (13) years of such heavy use, and a clear lack of government, or council funding.

This application to allow Woolworths to use PHV's to operate in areas that are clearly unsuitable, that being the streets of Greytown do not fit the original intention of the law, and must be avoided at all costs.

In Conclusion

There appears to be a gap in the whole planning system, where little thought has been given to defining just where these vehicles (PHV's) fit into scheme of it all.

The intent of these new weight limits, when they were introduced into law back in 2010 were clearly designed for heavily loaded vehicles to move bulk loads point to point into pacifically designed warehousing installations, where further distribution by smaller vehicles would take precedent.

All taking place on designated routes.

The Woolworths application clearly seeks to circumvent the very intent of the clear rules that were put into law, and were intended to protect the National, as well as local roading assets.

This whole proposal fails to meet all of the requirements needed to protect the safety of the public, as well as local assets of the town of Greytown itself.

My hope is that common sense will prevail and that the entire proposal will be rejected.

Yours Sincerely

David Lloyd

Heavier Trucks approved

admin | April 3, 2010 | 33 Comments

Despite fairly overwhelming opposition, it has been decided (<http://www.transport.govt.nz/ourwork/Land/VDMAMendment2010/>) to allow the maximum weight of trucks on New Zealand's roads to increase from 44 tonnes to 53 tonnes – although only on particular routes designated for this increase. Supposedly this increase will lead to the more efficient shifting of freight around New Zealand. This is what the government says (<http://www.scoop.co.nz/stories/PA1003/S00493.htm>) anyway:

“Developing this permit system creates an environment where productivity gains in the range of 10 to 20 percent could be realised by using fewer trucks to carry a given amount of freight while enabling the impacts of heavy vehicles to be properly managed.

“This will help to reduce road congestion, operating costs, vehicle emissions and improve the road safety environment by slowing the increase in heavy vehicle movements on New Zealand's roads.”

Trucks carrying heavier loads will not be any wider or higher than present vehicles, though a limited number may be slightly longer. Roads that are allowed to be used by vehicles will be specified in their permit and road controlling authorities will have the final say on whether routes applied for are suitable for heavier vehicles.

Any vehicle issued with a permit to operate at a heavier weight under a permit system will have to meet all appropriate safety requirements.

I must say I would be rather surprised if that result of this change was seeing 10 to 20 percent fewer trucks on the road, although it seems as though that's not quite what being promised here. It seems a bit more likely that this change enables trucks to

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