



ROAD TRANSPORT FORUM NEW ZEALAND INC

SUBMISSION ON

Vehicle Dimensions and Mass (VDAM) Rule

Discussion Document released

December 2015

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REPRESENTATION

Road Transport Forum New Zealand (RTFNZ) is made up of several regional trucking associations for which the Forum provides unified national representation. The affiliated membership of the Forum consists of about 3,000 individual road transport companies which in turn operate 16-18,000 trucks involved in road freight transport as well as companies that provide services allied to road freight transport.

The Forum is the authoritative voice of New Zealand's road freight transport industry which employs 22,600 people (3.0% of the workforce), has a gross annual turnover of \$6 billion and transports about 80% of New Zealand's land based freight.

The Forum members are predominately involved in the operation of commercial freight transport services both urban and inter-regional. These services are entirely based on the deployment of trucks both as single units for urban delivery and multi- unit combinations which may have one or more trailers supporting rural or interregional locations.

RTF SUPPORT FOR REVIEW OF MASS AND DIMENSIONS POLICY

RTF has been a leading advocate of mass and dimension policy development and has supported the introduction of HPMV and 50 MAX initiatives.

These were introduced as a result of studies and investigations that were carried out between 2000 and 2012 under the Heavy Vehicle Limits Project initiative. The component elements of this work focussed primarily on increasing the productive capability of the vehicle fleet to help achieve the objectives of the NZ Transport Strategy 2002 and government policies of the time. The changes introduced a comprehensive permit regime for vehicle mass management and route access to alleviate concerns regarding network vulnerability to higher than standard axle and vehicle weights. The economic assessments undertaken by the Transport Agency enabled a sound economic framework to be developed upon which to judge the costs and benefits and determine most appropriate investment strategy to support the HPMV and 50 MAX initiatives.

RTF comments on the discussion document will endeavour to follow the online format submission form as far as possible. RTF has no objections to its submission being released.

COMMENT ON SUMMARY OF PROPOSALS SECTION

The section covering the heavy vehicle facts erroneously implies the heavy vehicle fleet to which the principle elements of the discussion document proposals will apply is some 142,000 vehicles when in fact the vehicles likely to benefit from the changes proposed are a much smaller group dominated by truck trailer combinations, B trains and in some cases tractor semis. We suggest potentially 20,000 to 25,000 power units(Prime Movers) could possibly have some benefit along with 12,000 to 15,000 trailers. Using the figure of 142000 vehicles overstates the potential of any positive impact and the likely beneficiaries of the proposals.

With some 1978 prime movers now being utilised in 50 MAX combinations the change in dimensions would be expected to have little impact on these. It is more likely rebuilds and new generation trailers and new heavy duty trucks will take up the new dimensions. The HPMVs with 50 MAX being a subset of the HPMVs we accept make up 25% of the truck trailer fleet which by our estimates could be around 14000 to 15000 truck trailer combinations capable of operating above 42 tonnes. This figure is based on summing the number of 3 and 4 axle full trailers from the TERNZ Report Lower Bound HPMVs –Vehicle Configurations; NZTA: November 2012.

We offer no comment in respect of the benefits and opportunities for bus design or configurations.

We are of the view that in general the changes to the vehicle dimensions proposed are minor and evolutionary and though there are some productivity benefits they are relatively minor falling far short of the language that was used to describe the VDAM reform process. There is no doubt the changes in dimension will provide more choice and scope for equipment vendors, manufacturers, and importers but whether the changes can produce an identifiable and tangible productivity benefit for the actual users of the vehicles will take time to be realised.

One of the down sides of getting too heady about the dimensional changes is the unavailability of the revised PBS frame work and how revisions to tracking performance might change vehicle designs to meet appropriate road fit and lane fidelity. From a commentator's perspective we are being asked to comment on vehicle design characteristics when only half the

criteria is available. It may well be argued that this is not a problem. However in the context of vehicle width changes proposed the PBS lane fidelity requirement might result in a minor change in wheel base (first to last axle spacing) which may in turn compromise the operating mass that would normally be available to some vehicle combinations.

As there is no discussion on the PBS framework we have to assume the vehicle width proposals have already been considered in this context. However NZTA has certainly stressed the lane fidelity requirements in the past and placed an embargo on additional 23 to 25m combinations being introduced to the fleet following the issue being identified. They have raised the same issue in regard to container transporting tractor semis negotiating the Rimutaka route to the Wairarapa. We acknowledge the discussion on width (page 29) does recognise the relevance of vehicle width dimensions to lane design and access capability. By contrast, changes by amending table 6 (page 59) make no reference to the potential impact of longer wheelbase vehicles and their tracking related to lane fidelity.

Proposal 2: Revise Current Schedule 2 limits

The RTF would support proposal 2 which simplifies the general mass limits in Part A. The rounding up of the axle mass limits in table 1, table 2 table 4 and table 5 are logical changes with no identifiable risks. However the changes don't solve all the vehicle related twin steer problems that lead to overloading. NZ has a unique approach in that twin steer sets are not required to load share even though this is covered by implication through the axle mass limits shown. Other jurisdictions such as Australia expressly require load sharing and the twin steer vehicles are set up to achieve this when the axles are fully laden. However the same vehicles sold in NZ have no such requirement and in practice it is not uncommon for the twin steer group to mis-distribute the load between the two axles by at least a tonne when fully laden. The only way this can be fixed is to place wedges under one of the axles to provide better load distribution. There have also been incidences reported to the Forum where twin steer trucks have been so badly set up the second steer axle is the one carrying the dominant load. As consequence this has the effect of shortening the effective wheel base impacting negatively the handling and ride characteristics of the vehicle. We would not advocate the introduction of mandated load sharing but some evidential process confirming the front axle load distribution on twin steer trucks introduced into service might be worth consideration. It is worth noting the 5.5 tonnes per axle and 11 tonnes for the group proposed in the discussion document will have only a very minor impact on mass compliance levels of confidence.

The changes to table 4 quad sets clarifies the intended mass limits for this type of axle arrangement and hopefully will reduce the growing propensity for some vendors to market a wide spaced quad axle assembly that includes a spaced single axle which is acknowledged as damaging to pavement surfaces due to its scuffing effect.

The quad set limit under PART B table 4 needs to be increased to 24 t so as to meet the current needs of the container transport community. The container trucks have been under some focus due to their road space needs and an amended wheel base or first to last spacing to meet road capacity constraints may well require an increased axle mass to meet customer needs and assist offsetting any loss in productivity. The difficulty with offering a rational comment here is that without the impact of the PBS being known we are commenting on something purely hypothetical. However an increase in the quad set mass to 24 tonne is not unreasonable given the review is focussed on productivity increases.

Proposal 3: Increase General Access Gross Mass Limits From 44 to 45 tonnes

This proposal falls well short of industry aspirations and to present it as a productivity gain is somewhat misleading. Increasing the mass on 8 axle combinations to 45 tonnes and reducing the weighing tolerance back to 500kg is for all intents and purposes only legitimising a mass that grew out of a common practice that for some operations was seen as normal given the paucity of enforcement coupled with client pressure. In essence the change simply confirms a business as usual approach. In defence of our comments NZTA often argued 45.5 tonnes GCW was so prevalent that despite the best efforts to clarify the law by the authorities the practice was so ingrained in the sector forcing vehicle weights back to 44 tonnes would result in a net productivity loss- which arguably wouldn't be good for NZ Inc particularly in a climate of government's mandate for increased transport efficiency. However a separate discussion document outlining proposed changes to enforcement practice (Land Transport Act 1998 VDAM Reform Amendments) presents a more modest picture of the alleged overloading citing some 6% of 8 axle combinations overloaded by more than 2 tonnes. Based on the information provided by MOT if the prevalence of overloading is as common as NZTA suggests (using the WIM records) the proposed change from 44 to 45 tonnes is in fact no change at all but simply a mop up sort of policy change.

The discussion about road impacts of 7 axle combinations versus 8 axle combinations and the relative road wear attribution of each and corresponding payload advantages should not be swept away by the idea

that 8 axle combinations should be encouraged because they are more pavement friendly and allegedly safer. 7 axle truck trailer combinations consisting of a 3 axle truck and 4 axle trailer have traditionally paid more RUC than similarly laden GCW 8 axle combinations so the pavement impact difference between the two combinations has been well recognised.

De Pont presented data in his Lower Bound HPMV Report 2012 that 7 axle truck trailers (R12T22) did 20% of the travel and 21% of the freight task compared to 80% of the travel and 79% of the freight task by the 8 axle R22T22 combinations the difference in payload occurring because the R12T22s have better payload efficiency. The proposition in the reform discussion document suggests sacrificing that payload difference by granting only R22T22 combinations an additional tonne to 45 tonnes. MOT has suggested the tonne increase might not result in a RUC rate adjustment for R22T22s but an increase in mass above this would, a factor that most users according to our feedback would be prepared to pay for the additional benefit of a GCM above 45 tonnes. The discussion in the document also argues the R12T22 at 45.5 tonne (mass limit and tolerance) would cause 50% more pavement damage than the R22T22 at the same weight which is valid only if the objective is to argue against 7 axle combinations as an option. However this is not borne out by dePont's discussion in the publication titled the; Pavement Implications of Operating 8 axle Truck and Trailer Combinations at Higher Weights. By our assessment of dePont's tables the increase in pavement wear would be 35% if they were at the same weight (45 t) (based on gross ESAs) and closer to 25 % between these two combinations at different gross weight thresholds(45t versus 46t).

We would submit there is considerable justification in a step change that actually provides a real productivity increase for both 7 and 8 axle combinations. Such a change would improve the payload parity of the two combination types leaving operators to make a real choice in vehicle types without necessarily elevating pavement wear beyond what is an affordable rate of consumption.

According to dePonts figures in various reports the 7 axle truck trailer has a 28.37 tonne average payload and the 8 axle truck trailer 26.83 tonne average payload.

VEH TYPE	GCW tonnes Legal/ RTF proposed	GROSS ESA	PAYLOAD tonnes	PAYLOAD ESA	WIM PAYLOAD ESA	Sum of Total weights possible
R12T22	44	3.68	28.37(26.84)	0.154	0.149	51.0
	45	3.87	29.37	0.158		
R22T22	44	2.81	26.83(25.85)	0.113	0.117	55.8
	46	3.09	28.83	0.120		
R22T23	50	3.20	(30.8)	0.112	0.118	58.8

The numbers in brackets above are from dePonts Lower Bound HPMV report prepared for NZTA November 2012. The other figures are extracted from that same publication and from various tables of a report prepared by TERNZ for one of our member associations; Pavement Wear Implications of Operating 8 axle Truck Trailer combinations At Higher Weights, August 2014 referred to above. In his report dePont does make the point the 7 axle combination presents a higher pavement wear factor than either the 8 axle combination or the 50 MAX combination. However, our view is the relativity in that aspect doesn't change significantly at the higher weights we have suggested and there is no doubt MOT would adjust RUC rates for these vehicles accordingly.

Each of the options put forward above is based on Part A general mass limits. The ESA values per payload tonne are based on a one way loading scenario which is typical of most transport services in NZ although we acknowledge some operations are able to back load. The proposition we are submitting is to ensure the payload equivalency is improved along with productivity. At the moment the industry tells us the trend is toward more 7 axle combinations in part due to the better payload efficiencies. The option we've suggested ensures better payload equity between the two primary truck trailer types.

Other factors in favour of the 7 axle combination are reduced capital cost and reduced maintenance costs. Depont makes a valid point in his report that the 7 axle combination will be preferred where a high degree of

manoeuvrability to access farms forestry blocks and rural facilities is required.

The 7 axle configuration has particular advantages in terms of tare weight, load distribution, traction, payload capacity, and the 3 axle trailer often used with a 4 axle truck has improved significantly giving benefits in wheelbase options and a lower centre of gravity. This allows an improved overall load height to be achieved with increased stability. The aggregate sector also finds the 3 axle truck with a 4 axle trailer preferable for tipping, traction and accessing difficult off road sites. The issue of safety performance of 7 axle combinations versus 8 axle combinations is referred to in the NZTA proposal. We are not convinced there is a meaningful difference between the two combinations. The SRT requirements applicable to unit vehicles has neutralised any propensity for one type to be more rollover prone than the other and full application of the revised PBS menu will ensure both combinations meet the vehicle dynamics target values, a positive objective from a public safety policy perspective.

The RUC issue is more complex because there a reluctance to set the RUC attribution within the cost allocation model based on proportional road use e.g a mix of highway and rural road use determined by weighted VKTs for the different combination types. MOT has suggested this would present an unnecessary complication to the model. We can understand their view but if the use of the 7 axle and 8 axle combinations at our suggested higher weights requires RCAs to be placated about increased pavement costs then a mixed cost recovery model should be explored to help them overcome some of their concerns. The problem we see with RCAs are more likely to revolve around the revenue allocation model not the collection model and maybe the financial assistance rates should be reviewed.

In conclusion the RTF recommends an amendment to table 6 on page 59 of the discussion document that would allow 16m but less than 17.4m to have a minimum of 7 axles @45 tonnes and a consequential change of 17.4m but less than 18m to allow 8 axles @46 tonnes and then drop out the 16m but less than 17.4m minimum 7 axles @44 tonnes line.

Aspects not covered in the discussion document

One aspect not covered in the discussion document is the use of steer/lift axles on trailers. The members of the Forum particularly those who deploy the 5 axle full trailer in 50 MAX combinations clearly support the use of a steer/lift axles in the rear tri set. Likewise there is significant interest in having steer axles in the Quad and Tri -B train axle sets approved.

Unfortunately a small number of these axles have not performed as expected and there has been evidence of tampering with the lift mechanism. None the less with the right policy framework and post installation calibration these axles can be made to perform reliably and have the capability of reducing vehicle frame maintenance and chassis cracking. We recommend the Agency develop a steer axle policy to approve the installation of these axles beyond the vehicle group where they are presently allowed to be used.

Proposal 4: Remove the permitting requirement for 50 MAX vehicles

This is a logical response to the commitment NZTA has made to progressing the 50 MAX proposal which the RTF fully supports. The fact that there is now a defined 50 MAX network helps this proposal and provides real benefits for operators in that it allows interchangeability of component vehicles within fleets an objective that permitting was always going to frustrate. This proposal will integrate well with the Forums proposal for increased weights on 7 axle and 8 axle combinations although they won't be 50 MAX capable and this will enable a full mix and match opportunity for operators.

There is one outstanding issue to be resolved. This relates to the present system of attributes sheets and how combinations are to be assessed for the adequacy of component ratings and stability compliance under a no-permit regime. The Agency has touted the 50 MAX combinations as being safer than existing combinations so ensuring the safety attributes will continue to be met is an important plank in the Agency's public safety policy framework.

We appreciate the permit provides a safety and compliance incentive as it does trigger a high penalty for breach of permit than would otherwise be the case however we don't want to see the overweight penalties increased to compensate for removing the permits. MOT has already proposed reducing the offloading tolerance significantly and the VDAM reform document proposes reducing the weighing tolerances down to 500kg from the present 1500kg for all vehicles and non permitted 50 Max combinations will fall into this option instead of being subject to the tolerances outlined in Clause 5.8 of the VDAM Rule.

Proposal 5: Increase axle mass limits for specific categories of vehicles

It could be argued the cat is already out of the bag with approving the bus only categories of specific axle mass concessions. Under the current regime it is expected they (the buses) will be permitted. While we don't want to repeat the entirety of the submissions we made on the two bus related VDAM amendments we will point out the road is totally agnostic to what vehicle is traveling on it.

The smart approach with this proposal is to allow all single unit vehicles the same maximum weight axle loadings that the buses have or at the very least the limits specified for axle sets under Schedule 2 PART B applicable to HPMVs. The idea of trying to pick winners e.g. such as rubbish trucks concrete agitator trucks and fertilizer trucks is fraught with administrative and interpretational complications much the same as trying to create a range GST exclusive foods.

One of the cited concerns of allowing single unit vehicles to operate at the bus mass is that the buses as a group are few in number and therefore the VKTs at the higher ESA/km are manageable in terms of cost impact. However this is not unique to buses. Urban delivery trucks operating at the HPMV or bus axle limits are also going to be a relatively small sub group. Urban trucks also travel low VKT on average so the real effect is more like a doubling of the Bus fleet as opposed to a scenario that all urban 2/3 axle trucks would be operating at the higher mass limits. It is also acknowledged most urban trucks and even single unit interregional trucks seldom operate fully laden so suggesting that single unit truck traffic at the higher mass would increase road wear significantly would seem to be over-stating the likely impact. The Forum's position has always been based on equity across the services whether passenger or goods.

The question surrounding proposal 5 raises wider issues on road asset management and access approval. The Forum has been working with NZTA toward developing a network hierarchal approach such as the HPMV network, the 50 MAX network and the general access network. This approach provides access for the specific vehicle types and the high axle mass bus would be expected to use a similarly defined network most probably an extension of the HPMV network or series of routes integrated with the HPMV network. Over time more roads will be added to the two categories of higher mass networks. Under the network approach the present structure of permits must be reconsidered. The permit regime should be amended to identify vehicles or combinations. One option in its simplest form could be based on the premise that utilizing one of the

networks allows an appropriately identified vehicle to operate at the axle mass and gross limits set for that network. This proposal would need considerable development and that's not our role here. However to have different RCAs come up with different solutions will be a minefield for both operators and RCAs. The principle of defining networks requires a unified approach with a central repository for the roads adopted into each network level and single database for vehicles approved for network access where the vehicle operator wants to operate at the HPMV or 50 MAX mass limits. The 50 MAX and HPMV network approach has passed as a qualifying concept under the current permit regime and removal of permits for 50 MAX will be the testing ground on how far a unified access management system can be developed.

Alternative considerations for vehicle specific mass

Operators who have invested in modern equipment with enhanced safety equipment find they are payload disadvantaged compared to competitors. Interestingly the addition of exhaust environmental management systems adds considerable tare weight to vehicles. Some overseas jurisdictions acknowledge these systems impact on payload and offer prescribed mass concessions such as 250kg for front under-run and 300kg for emission control systems. The vehicles must display the appropriate EU compliance plate and usually the bodies are fixed load types such as fuel tankers where the maximum load is predefined. These same technologies also undermine productivity gains (if there are any) through the simple approach of increasing current mass limits 45 tonne.

Specific load options

There is no doubt separate consideration must be given to accommodating the needs of specific loads which is what the overweight permit manual was designed for. We are not sure there is much scope in terms of further increases in the mass limits for general freight however the difficulties experienced caused by the current container policy set on VAI 1.1 for vehicles carrying containers should not be overlooked. This goes back some years and there has been recent calls for a single policy for both export and domestic transported containers. With the new SOLAS container weighing convention presently being explored by MSA the opportunity probably exists for relooking at container transport as specific load.

Proposal 6: Amend tyre size categories for axle mass

The discussion under this section makes reference to mega tyres. According to our sources this is a tyre that is greater than 445mm wide having the same nominal foot print as a twin tyred assembly. We don't know where the Australians would have got their mega tyre definition from. We suggest that the table be amended where 449 appears and replace it with 445. The mass limits shown in the table for VDAM proposed are a positive step forward. We don't think the fleet will adopt the mega tyre option as there are operational downsides. Large tyres such as mega tyres are probably best used on paved roads. There have been issues reported in overseas industry literature where catastrophic failure of these tyres is alleged to have promoted a rollover situation especially where the tyre is mounted on a trailer steer dolly. We suggest these tyres perform well in their intended application which is normally in a full trailer rear axle set.

Proposal 7: reduce weighing tolerance from 1500kg to 500kg

Within the discussion of VDAM reforms this is probably one of the most controversial issues as there is little industry confidence in the repeatability of results in subsequent vehicle weighing's. It is our view the 500kg tolerance would only be supported with a more generous approach to vehicle mass limits in the order of those discussed above in our response to the 44 to 45 tonne question. This is in contrast to the statement that option 3 would not be progressed if the 500kg is not accepted. The change promoted has to be seen in the context of the overall changes including the reduction in offloading tolerance back to 2 tonnes. Furthermore the 500kg is not just limited to gross vehicle weights (both individual and combinations) but would be applied to any weight where the tolerance is currently greater than 500kg such as a first to last spacing where the weight measured is greater than 11 tonnes and not more than 33 tonnes. Therefore the impact of the changes affects all those operators who have little or no ability to control inter-axle group weights such as the case with log trucks, aggregate and fertiliser transport. Most weighing devices are capable of measuring gross weights across combinations but even the police have difficulty at times with inter-axle group mass measurement. In many respects that situation is recognised in the VDAM rule in that provides for specific weighing tolerances for vehicles subject to permit. When we argued in favour of removing the permits for 50 MAX we were aware that the 1 tonne tolerance per axle set outline in the VDAM rule would be placed in jeopardy by the proposed amendment. Under clause 5.8 of the VDAM rule the reference to tolerances reads:

[5.8 Weighing tolerances

[[5.8(A) This clause applies to a vehicle operating under a permit to exceed the general mass limits in Part A of *Schedule 2* that is issued under this section.]]

5.8(1) For the purposes of determining compliance with **[[5.1(3), 5.2(6A) and 5.2A(4)]]**, a vehicle is deemed to comply with a specified gross mass limit if the gross mass of the vehicle recorded or calculated exceeds the mass limit by not more than 500 kg.

5.8(2) For the purposes of determining compliance with 5.1(3)(c), 5.1(5)(a), **[[5.2(6A)(c), 5.2(7)(a), 5.2A(4)(c), 5.2A(5)(c) and 5.2A(5)(d),]]** a vehicle is deemed to comply with a specified axle mass limit if the axle mass of the vehicle recorded or calculated exceeds the specified mass limit by, in the case of:

- (a) an individual axle, not more than 500 kg; and
- (b) a twin-steer axle set on a powered vehicle, not more than 500 kg; and
- (c) any axle set other than one in (b), not more than 1000 kg; and
- (d) any two or more axles that together do not constitute a single tandem axle set, single tri-axle set or single quad axle set, not more than 1000 kg.]

The smartest way to resolve the tolerance issue is the keep the 1000kg across all vehicles as defined by (c) and(d) above and drop the whole idea of taking everything back to a 500kg tolerance. (Leave the statement in 5.8(1) as it is for vehicles operated pursuant to permits) This approach would still allow the Agency ample opportunity to claw back RUCs where overloading is detected.

The approach proposed (lowering the tolerance to 500kg) is another example of the Agency overreaching its hand when they have demonstrated a lacklustre capability as a regulator in the past. Instead of bringing operators along with complimentary compliance programmes they instead are relying on the enforcement capacity to change behaviour. The Agency often tells the industry they know who the recidivist offenders are but they appear disinterested in dealing with them on a one on one basis. Instead the whole sector ends up paying for poor operator management. The situation that has now unfolded follows the form of many poorly developed safety initiatives that have been aired in the past and instead of them being a benefit to operators they have had low acceptance due to poor regulatory commitment and under resourcing.

Setting a very low tolerance in itself will not necessarily provide the gains the Agency wants and it runs the risk of obliterating any so called productivity gains from the changes in the VDAM reform. This point is not to justify overloading but reflects the way operators are likely to respond to the lowered tolerance by taking an overly cautious approach by lowering vehicle weights to the extent they end up being below optimal payload.

One of the options in the Agency's tool box is the Chain of Responsibility covered by section 79U of the Land Transport Act 1998 which covers obligations against coercing drivers to exceed gross weights. The Agency

has done nothing to promote this section of the LTA which was touted as a measure to take the pressure off operators and drivers when requested by clients to load vehicles above legal limits. The police have argued this section is difficult to enforce and there has been a limited number of discussions with them on how this section could be improved. It is our view a review of this section of the Act should be given urgent consideration. As we mentioned above penalising operators and drivers who are simply one link in the transport process is limited in how much it might change behaviours. Commercial imperatives have to be changed to improve compliance.

Vehicle width

The discussion on vehicle width largely reflects the need to follow international convention so option 2 becomes self-evident as a minimum approach.

The RTF would support option 3 in that it gives more scope to vehicle designers and doesn't change the current load restraint conventions that drivers are used to. We are not convinced there is such a thing as 2.6 wide axle sets. The axle housings are standard and the rim offsets are changed to suit different markets.

We agree there are risks in terms of road width but without accurate data it could be well over-stated. We accept RCAs may need to re-evaluate some identifiable pinch points but in our view the benefits of option 3 outweigh the problems.

Vehicle height

The best option regarding vehicle height is self-evident and we would support option 3, 4.3m. This option presents a simple un-ambiguous approach for vehicle designers, operators and drivers. Option 2 4.275m is such a discrete value measuring it at the roadside would be next to impossible. Interestingly not all vehicles will likely take advantage of the new height limit as a lot of products are sufficiently dense that height is not an issue as the vehicle tends to mass out. A small question does arise over SRT compliance and there will be vehicles that will have to have their SRT reconfirmed to operate at the new height and in some cases their Certificate of Loading amended.

Car transporter gross mass

The options in this section of the discussion document point toward option 2 that is increase the mass to 38000kg (38tonnes) which we fully support. However the policy should include an option for 40 tonnes to help these vehicles accommodate loads that consist of the current crop of heavy duty utility vehicles that becoming quite popular. This option should be available

through the PBS system. Aligning the policy change to car transporters is somewhat limiting and though the discussion suggests there is a risk if other truck and simple trailer designs are used for other applications. We suggest this is an overly conservative approach. The idea of the PBS approach to qualifying vehicles is designed to ensure they all perform dynamically safely at their given operating mass. We think the truck and simple trailer policy should be more generic as long as established safety performance criteria is met. The truck and simple trailer could be used for light-weight container distribution and empty container recovery which has the potential to offer a reasonable productivity opportunity to the sector.

Permitting

The discussion about 50 MAX in the permitting section has probably been overtaken by a wave of support to remove the 50 MAX vehicles from the permitting framework. We have already discussed our concerns with trying to pick winners with single unit vehicles but we agree RCAs should have more flexibility to permit over weight vehicles. The risk here is a whole lot of disconnected aspiration being met by local permitting when the framework should be unified as we mentioned previously. We would support a single permit issuing authority to aid consistency of the policy objectives our concerns with fragmented approach is the unbundling of the equity principles that have been a part and parcel, of permitting through the Agency and its predecessor entities. So in summary we support formalising the indivisible load list but allowing individual RCAs independent rights to issue permits is a risky approach.

Bulk permits for HPMVs

There is clearly support for bulk permitting however it is not without its issues.

The concept that a truck under HPMV approval should be able to tow numerous different trailers within a bulk permit regime with only the power unit needing to be identified. The maximum mass would be dependent on the axle arrangement and first to last spacing and the network the vehicle is operating on at the specified mass. This approach places a greater responsibility and liability on the operator and his/her drivers to know the inter-axle mass limits and route limitations and would make enforcement simpler.

With proforma's the concept would be workable but although alternative trailers may still be a proforma different axle spacings and wheel bases do present some network issues related to bridge structural limitations. The reality is it is not possible to solve these complex issues here and they will require a considered and frank analysis.

We don't believe that with the HPMV network option it is necessary for permits to have permit a start point and end point, only the roads that can

be travelled on. Our members suggest that it is easier to have all roads that can be travelled on with exception and prohibited roads identified which we think is another way of saying the network option shows considerable promise.

In terms of enforcement we are of the view that the police should be able to enter truck rego number into system to find out if a truck has permit, rather than the current paper based system. In addition any permit should be available on a tablet that can be sent by Bluetooth to any police device.

We also have not seen here the relevant HPMV (50 MAX) networks geo fenced on GPS mapping devices but this method of heavy vehicle guidance is available in the USA. When a vehicle attempts to turn onto the non-approved section of network an audible alarm sounds. Most good quality GPS devices have a card slot and it should be possible to develop the same guidance for NZ.

There is no doubt bulk permitting has the potential to reduce administration costs.

Management of over-dimension loads

The management of over dimension loads is critical for road safety. The forum like the heavy haulage association would like to see a new code developed that includes both enforceable and advisory information. This approach would require a substantial change to the VDAM rule.

We support retention of flags for Cat 1 loads. This will be more important due to the possible changes in standard vehicle widths

The RTF is comfortable with the current width frame works (of load) able to be transported – but risks to safety should be balanced by a range of mitigation techniques that enhance the current safety management system.

Specifications relating to signage, lighting, and restricted travel areas should be withdrawn from the VDAM Rule and placed in an Oversize Transport Code (that has similar status to the Truck Loading Code). This will allow these safety management techniques to be more responsive to on-going changes in the environment. We are aware the Heavy Haulage Association has some specific ideas to improve the piloting and the oversize permitting system and in the main we support their proposals.

Hazard Panels and delineation of tractors and agricultural equipment

The discussion on page 49 regarding replacement of hazard panels on tractors drew comment from our rural members. The concern is a single flashing light is inadequate more so when trying to observe a tractor or agricultural vehicle movement against bright sunlight. The lights presently used are also placed in such a position that they cannot be observed from all angles whereas the hazard panels generally can be seen when approaching a tractor from the front or rear. They also assist other road users to gauge the tractors speed which a flashing light is incapable of. The use of head lights on dip beam for an oversize tractor to enhance delineation has no benefit because of the fitment of frontal equipment and accessories blocking out the head lights. Suggestions from members who regularly come across agricultural vehicles is their delineation needs to be enhanced especially as they tend to be travelling on the relatively narrow rural network. One example members have suggested that would help delineated agricultural vehicles are two flashing lights or a multi light bar mounted in such a way as to be clearly visible from at least 200m even in bright sunlight. There is strong support for towed vehicles to have an adequate lighting system if the towing vehicle cannot be identified from 200m. During the hours of darkness the vehicles should be required to display the prescribed flashing lights, width lights and reflectorized hazard panels.