

Review of the Vehicle Dimensions and Mass Rule 2002 Summary of Submissions Report

May 2016

New Zealand Government

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Purpose

This document provides a summary of submissions received on the Vehicle Dimensions and Mass Rule 2002 (the VDAM Rule) review proposals presented in the discussion document, which was released on 9 December 2015.

Background

The review aims to deliver benefits that:

- improve road safety and community well-being through encouraging the use of safer vehicles used by freight and passengers
- improve vehicle operator compliance
- optimise the use of New Zealand's roading network.

The Vehicle Dimensions and Mass Rule (VDAM) needs to support a range of elements, such as; economic growth, public road safety, delivery of goods and services. As well as provide confidence and certainty to business and public entities wanting to invest or innovate in the transport marketplace. The regulatory environment that the Rule creates needs to be relevant, robust, and fit for purpose.

The Rule has been in place for 14 years and has undergone 11 amendments, however no comprehensive review has occurred. The Rule generally works well, but it requires well-placed change in order to:

- Meet projected increases in land-based freight and passenger transport demand
- Take advantage of on-going innovation in vehicle technology, design and use
- Provide an agile regulatory platform that can systematically meet economic growth while maintaining New Zealand's roading assets
- Meet Government's commitment to Better Public Services¹ and better quality regulation
- Be consistent with Government's Safer Journey² commitment to improvements in road safety.

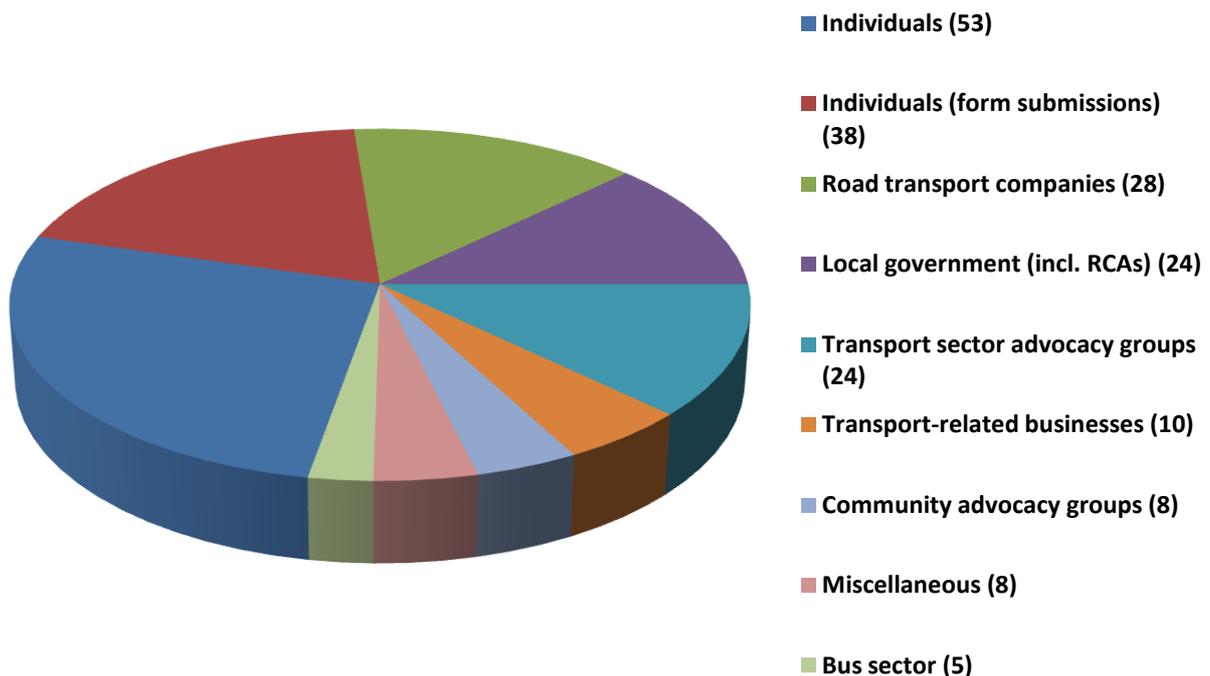
The discussion document was open for public consultation until 17 February 2016. During this period seven regional and sector workshops were held. The workshops were attended by about 210 road transport industry representatives and other interested groups and individuals. A total of 198 submissions were received.

¹ Better for Business – Result 9 is delivering better public services to business customers, <http://www.ssc.govt.nz/bps-results-for-nzers>.

² Safer Journeys strategy is available, <http://www.saferjourneys.govt.nz/>.

³ For example, see the National Freight Demand Study, at <http://www.transport.govt.nz/research/>

Submitters



Industry sector groups that made submissions included:

- Road Transport Forum
- Automobile Association
- Bus and Coach Association
- Motor Industry Association
- Road Transport Association
- Heavy Haulage Association
- Crane Association

Key submission themes:

- **Increasing Mass:** Proposals to increase mass limits were broadly supported by the road transport sector. The main reasons given for supporting the proposals included: the improved productivity benefits; greater utilisation of existing and future vehicle capacity; and bringing New Zealand closer to international standards.
- **Safety:** A prominent concern for many individual submitters and road controlling authorities (RCAs) was that heavier, wider trucks could result in a reduction in safety and an increased risk to other road users, particularly pedestrians and cyclists. However, it was noted by several transport sector operators that the increased capacity provided by the proposals would have a positive safety outcome, as a result of a reduction in the number of heavy vehicle trips required.
- **Pavement wear:** Several RCA submissions stated that heavier vehicles would accelerate pavement wear, and that in order to manage this, a new cost recovery mechanism would be required to maintain the local road network.

- **Weighing tolerance:** In response to the proposal to reduce the weighing tolerance from 1,500kg to 500kg, several transport industry operators submitted that 45,500kg is now the 'default standard' weight limit used by many industry operators. It was pointed out in these submissions that reducing the current tolerance would expose the industry to increased risk and decreased productivity. A different view was expressed by other operators, who stated that they loaded to legal limits, and considered the reduced tolerance was manageable. They further stated that they would support a reduced tolerance if this helped to facilitate an increase in legal mass limits.

Out of scope issues:

Some submitters raised issues that are beyond the scope of the VDAM review.

- **Rail and Coastal Shipping:** Consideration of rail and coastal shipping as alternatives to road transportation of freight was raised in many individual submissions. These submissions suggested that proposed mass increases for road transport operators would diminish the competitiveness of the rail freight sector, and result in increased traffic congestion and negative impacts on safety and the environment.

Note: Issues of modal use for meeting New Zealand's freight task is dealt with separately by the Ministry and Transport Agency.³

- **Road User Charges (RUC) system:** Some RCAs suggested adjustments should be made to the current RUC system to ensure that all RUC charges are fed back to RCAs, to cover the costs of pavement wear. Separately, the Bus and Coach Association suggested that there is inequity in RUC collection from the bus sector, due to the variable loading patterns and design configurations between buses and trucks.

Note: While changes to the VDAM Rule could potentially impact on RUC rates, the RUC system is not within the scope of this review. The Ministry and Transport Agency provides information on the legislation governing the RUC system, and the bases for calculation.⁴

Sector themes

Road Transport Sector (companies and advocacy groups)

- The sector is supportive of increasing mass to allow the sector to access newer, safer, more efficient vehicles. However, the sector called for greater increases in mass, while retaining the current 1,500kg weight tolerance.

³ For example, see the National Freight Demand Study, at <http://www.transport.govt.nz/research/NationalFreightDemandsStudy/>.

⁴ For example, Road user charges (RUC) and petrol excise duty (PED) at <http://www.transport.govt.nz/land/roadusercharges/>; Road user charges at <https://www.nzta.govt.nz/vehicles/licensing-rego/road-user-charges/>.

Strongly supports the proposals objective to increase industry productivity with increased efficiencies leading to reduced trips and improved compliance and safety.

National Road Carriers

- Increased mass would result in a productivity gain for road transport operators, particularly for refrigerated loads, fuel and milk tankers.
- The proposed changes will see a positive environmental impact as freight is transported more efficiently by fewer trucks with better emission standards.
- Changes benefit businesses and simplify a complex tolerance system making compliance easier to manage.

We believe this review has missed an opportunity to future proof heavy vehicle dimensions and mass criteria.

Motor Industry Association (MIA)

Bus Sector

- Submissions from the bus sector supported the proposed increases to the width and height dimensions, noting that the New Zealand market for buses and coaches is small and isolated, and that the preferred proposals would enable access to buses and bus chassis built to international-standard dimension specifications. Without change, submitters stated there would be further reductions in the purchase options available, and that the proposed changes would result in reduced capital expenditure costs.

The proposals to increase maximum vehicle width and height are welcomed by the bus and coach industry, but their benefit will be minimal without increases to the mass limits for buses.

Bus and Coach Association

- These submissions also suggested that, as with vehicle dimensions, there should be greater consistency with mass limits used in overseas jurisdictions. The submissions called for increased mass limits, so that greater use could be made of the carrying capacity of imported buses and bus chassis.

- The Bus and Coach Association proposed a separate vehicle category within the Part A general access limits of the Rule, specific to buses and coaches, with the suggestion that the axle mass limit for a single dual-tyred rear axle should be increased from the current 8.2 tonnes, to 10 tonnes or more.

Community Advocacy Groups

Eight submissions were received from community and environmental advocacy groups, including the Cycling Action Network, Friends of the Earth⁵ and Living Streets Aotearoa.⁶ Issues raised included:

- The relationship between larger vehicles and other road users, such as pedestrians and cyclists, should be reviewed to ensure that the issues of safety and convenience are given adequate weight.
- Increased bus capacity would improve public transport and reduce congestion, thereby encouraging cycling as a transport option.
- Requirements for close proximity monitoring systems (CPMS) would avert blind-spot collisions between heavy vehicles and cyclists.

No increase in vehicle size should be introduced unless it can be clearly shown that previous increases in permitted vehicle dimensions resulted in a reduction in truck movements.

Cycling Action Network

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.

Living Streets Aotearoa

⁵ Friends of the Earth is a National voluntary research and environmental group, active since 1975.

⁶ Living Streets Aotearoa is a national walking and pedestrian organisation.

Individual submissions

Fifty-three separate submissions were received from individual submitters. Issues raised included:

- Heavy vehicles pose safety risks to other road users, wider and heavier vehicles may increase these safety risks for other motorists, cyclists and pedestrians. In addition, there could be an increased danger for vehicles overtaking due to less room for passing on narrow parts of certain roads and slower trucks.
- That the proposed changes only offered minor economic benefits, and that there was insufficient information on required infrastructure upgrades.

*The damage the trucks do to the roads is far more than cars.
Individual submitter*

- It was raised that pavement wear would escalate more quickly with the increased weight of heavy vehicles. In addition, there would be increased impacts on infrastructure, such as bridges.
- Submissions from Northland residents stated that their roads are not suitable for heavy vehicles, due to their impact, including noise, safety and road damage.

I am concerned that the amount of heavy vehicles using the road transport networks and arterial systems is currently too great. They place an unnecessary burden on other road users, cars, pedestrians and cyclists.

Individual submitter

Individual (form) submissions

Thirty-eight form submissions were received. Twenty-five of these used the Campaign for Better Transport's⁷ submission and the remaining 13 individuals used a separate form submission. These submissions stated that the status quo should be retained for mass, width and height. Concerns raised, apart from the out-of-scope modal competition issues (see above), included:

⁷ Campaign for Better Transport is a voluntary incorporated society.

- An increase in crash risk with the increase of width, noting that some roads in New Zealand are quite narrow and winding.
- That costs incurred by upgrading tunnels, bridges and other infrastructure would negate the anticipated benefits of increasing height. An additional concern raised in relation to the height proposal was the potential for an increase in truck roll-overs.

...due to the geography NZ roads are built to a lower standard and not suitable for heavier loads compared to many overseas countries.

Campaign for Better Transport

Local Government – Road Controlling Authorities

Twenty-four submissions were received from the local government sector, including regional and district councils, RCAs, and the RCA Forum. Issues raised included:

- The RCA Forum stated that the proposed mass increases would lead to a rise in maintenance costs, with no provision for local authorities to be reimbursed. The Forum stated that this would result in local authorities subsidising greater efficiency in the transport network.

The review will provide benefits to freight operators, economic growth both nationally and across the region.

Christchurch City Council

- Support for greater use of innovation and technology to improve the operation of the road network, to identify demand on the network, and to determine priorities for enforcement. In addition, local government is generally supportive of moves to update and modernise the vehicle fleet.

Heavier axle limits will result in increased costs of maintaining the roading network, as infrastructure deteriorates more quickly under heavier loads.

RCA Forum

- Heavier vehicles could create adverse road safety outcomes. It was stated that this could occur due to a loss of vehicle agility, and a greater risk of head-on crashes through unsafe passing.

...supports the ongoing improvements to the national vehicle fleet which support & contribute to a safe and efficient future transport system.

Wellington City Council

Mass Proposals

New Zealand has two main limits for vehicle mass – limits on the gross mass of a vehicle or combination; and mass limits for axles and axle sets. These limits are designed to protect pavements and bridges from excessive wear.

Proposal One: Maintain current axle mass and gross mass limits

Eighty-four submitters commented on this proposal, with 73 submissions in favour of retaining the status quo. All of the form submissions and many of the individual submitters supported this proposal. Many individual submitters supported the retention of the status quo on the basis that New Zealand roads are narrow and winding in many places, and therefore not suitable for heavier vehicles.

The current limits do not reflect current and evolving vehicle designs nor new technologies...

Imported Motor Vehicle Industry Association

However, some submitters, for example, the Imported Motor Vehicle Industry Association (IMVIA), noted that maintaining the status quo could prevent truck and bus operators from obtaining the latest vehicles from overseas that have higher mass limits, also newer safety and emissions technologies.

The proposal seems to be very light on analysing the risks it will bring. For example, the risks of accelerated roading wear and the costs of roading upgrades .

Individual submitter

Proposal Two: Revise Schedule 2 limits

Thirty-six submitters commented on this proposal, with 33 supporting the proposed mass increases.

Proposal 2 provides for a more accurate matching of axle mass limits to the impact that vehicles have on the roading infrastructure.

Traffic Institute of New Zealand (TRAFINZ)

Supporting

- **Better information on pavement wear:** Wellington City Council, the Traffic Institute of New Zealand (TRAFINZ), and Federated Farmers all stated that the proposal provides a better way of matching axle mass limits to the actual impact that vehicles have on the roading infrastructure, and provides safeguards for pavements.

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.

Road Transport Forum

Not supporting

- **Pavement wear:** Ruapehu District Council did not support the revised Schedule 2 limits, citing concern about damage to pavements due to additional mass.

Non-committal

- **Other factors:** The Road Transport Forum (RTF) stated it was difficult to comment on this proposal, ahead of more knowledge on the development of a New Zealand set of performance-based standards.

Proposal Three: Increase the general access gross mass limit, from 44,000kg to 45,000kg

Fifty submitters supported this proposal, and nine were opposed. Typical arguments put forward in support of the proposal included:

Supporting

- **Allows more capacity:** Fonterra supported an increase to 45,000kg, noting that the proposal allows the cooperative to maximise the capacity of its existing fleet.

Collectively these changes would allow a reduction in the number of tanker loads by an estimated 100 per day, the equivalent of 11170km or 1.5 to 2.0million km per annum.

Fonterra

I support the increase of gross mass from 44,000kgs to 45,000kgs for all combinations of over 16m wheelbase ...anything less than this will undermine much of the productivity gains HPMV has earned.

J Swap

- **Better safety/productivity:** The Automobile Association (AA) gave conditional support suggesting there may be some safety and productivity benefits while accommodating changes in vehicle design and technology, such as tare weight increases imposed by emissions equipment.

Again, IMVIA supports any initiative with the potential for improvements in productivity and safety with no risks or negative impacts.

IMVIA

Not supporting

Those who do not support the proposed increase to 45,000kg were divided into two groups: submitters seeking higher general access limits; and RCAs concerned that the increase in mass would result in greater damage to pavements.

- **Increase mass further:** A number of submitters, including the RTF and National Road Carriers (NRC), stated that an increase to 46,000kg with a 1,000kg weighing tolerance was required to ensure greater productivity gains without significantly damaging pavements. NRC stated that allowing an 8-axle truck and trailer combination to operate at 46,000kg would provide significant economic benefits with minimal capital outlay.

The RTF added that the current common industry practice of utilising a ‘tolerated’ 45,500kg limit has been born out of pressure from clients and a lack of adequate enforcement of weight limits. The RTF stated the proposal falls well short of industry aspirations and presenting it as a productivity gain is misleading.

- **Pavement wear:** The RCA Forum, along with some RCAs, stated that even a small increase in axle load causes an exponential increase in road pavement wear. The Forum also stated that increasing vehicle mass increases the forces acting on the pavement, including the shear force at the pavement surface during braking, accelerating and turning.

Proposal Four: Remove the permitting requirement from the operation of 50MAX

Forty-one submissions responded to this proposal, with 29 in support, and 12 opposed.

Supporting:

- **Operator efficiency:** The Log Transport Safety Council (LTSC) was supportive of removing 50MAX permits, citing reasons of increased productivity, enhancement of pro-forma designs, and a reduction in red tape. The RTF noted there is now a defined 50MAX network and this proposal provides real benefits for operators by allowing for the interchangeability of component vehicles within fleets.

If 50 Max becomes the future norm, why should it still have a permit?

Log Transport Safety Council

- **New technology:** The IMVIA agreed, adding that the use of permits as a compliance tool should be replaced with enhanced enforcement and technological solutions such as on-board weighing and telematics. John Petrie, of Express Transport Ltd, stated that if a heavy vehicle combination meets the correct dimensions, and is certified by an engineer, there should be no reason to require permitting.

Not supporting:

- **Increased pavement wear:** Submitters opposed to this proposal expressed concern that the risk of 50MAX vehicles travelling away from the 50MAX network would increase pavement loading. The Institute of Professional Engineers New Zealand (IPENZ) stated that technical papers have shown that certain load distributions adhering to the 50MAX rules can be comparatively detrimental to the road surface. Southland District Council stated that increased loads would generate increased costs on RCAs and their ratepayers, for very little benefit.

The proposal to remove the need to obtain permits for 50MAX vehicles, subject to conditions needs to be clarified.

Southland District Council.

Proposal Five: Increase axle mass limits for specific categories of vehicle

Forty submissions addressed this proposal, with 35 of these supporting the proposal in some form, and five not supporting the proposal.

Supporting:

- **Greater range of vehicle choice:** Several submitters, including from the bus sector and the AA, highlighted the possibility of increasing axle mass for buses to improve productivity, and to align more closely with international standards. Further to this, the AA stated that the proposal would enable the introduction of newer, cleaner and larger Euro VI buses. Mana Coach Services Ltd submitted that it is cost-prohibitive to re-engineer buses for the small New Zealand market.

The ability to procure standard buses from Europe will avoid the extra costs associated with procuring limited production "NZ special" vehicles.

Mana Coach Services Ltd

- **Add more specialised vehicles:** The Ready Mix Concrete Association (RMCA) submitted that the current permitting regime for buses should also be considered for concrete mixer trucks. The RMCA cited the potential productivity gain for concrete mixer trucks – a reduction from five to four truck trips for a residential house if the allowable axle mass for a twin-tyred tandem rear axle set was to be increased from 15,000kg to 18,000kg.

Not supporting:

- **Potentially increased pavement wear:** Whakatane District Council did not support this proposal, stating that tri- and quad-axle groups have created additional stress at intersections and industrial entranceways, meaning that sections of road currently chip-sealed require resurfacing with asphalt. The Council stated they were seeing this type of impact in a number of locations.

Proposal Six: Amend tyre size categories for axle mass

Forty-one submissions received, with 32 in support, and nine opposed.

Supporting:

- **Proposed change reflects modern technology:** Several submitters supportive of this proposal noted the changes that have occurred in recent years in vehicle design; for example suspension design, with air suspension developed significantly since the original VDAM Rule was drafted in 2002.

With a range of new tyres available, our rules need to be amended to incorporate them in logical way.

Auckland Transport

- **Improves safety and productivity:** IMVIA and Auckland Transport supported the proposal, expressing their support for an initiative that potentially improves productivity without comprising safety.

Not supporting:

- **Potential for accelerated pavement wear:** The RCA Forum considered that allowing 'super single' tyres to carry more mass on drive or trailer axles is a poor option for pavement sustainability. The Far North District Council (FNDC) expressed concern that the 'super single' tyres could create early rutting-style failures in the sealed road network. TRAFINZ stated that current pavements were not designed to accommodate the proposed loading.

Proposal Seven: Reduce weighing tolerance from 1,500kg to 500kg

Sixty-four submissions were received on the proposal to reduce the weighing tolerance, from 1500kg to 500kg.⁸ Fifty-five submitters supported this proposal.

It should be noted that the discussion document intentionally linked the proposal to reduce weighing tolerance, with other proposals to increase axle mass and gross mass. This was to make it clear that a reduction in weighing tolerance would assist the capacity of the road network to accommodate increases to legal mass limits.

Supporting:

- **Allows better recovery of costs/update to modern weighing practices:** Councils supported a reduction in the weighing tolerance to 500 kg. For example, Christchurch City Council (CCC) and others stated the proposed reduction better reflects the level of accuracy of modern weighing techniques, compared to when the 1,500kg tolerance level was first introduced.

The increase in weights for 8 axle combinations to 45 tonne on first appraisal appears to be a benefit and commendable in that it removes the competitive advantage those in the industry that knowingly load to the tolerances over those that abide by the regulations.

National Road Carriers

Conditional position:

- The RTF and others stated that, while they did not support any reduction in weighing tolerances, which had become the operating standard, any reduction would need to be compensated by increases to legal mass limits.

The 500kg tolerance would only be supported with a more generous approach to vehicle mass limits.

Road Transport Forum

⁸ Note that this change requires an amendment to the Land Transport (Offences and Penalties) Regulations 1999.

- **Costs are recoverable:** Similarly, the Motor Traders Association (MTA) supported increased axle mass and gross mass provided these vehicles pay through the RUC system for any additional road damage that may be caused.

Operators predict that we will see a productivity loss due to the greater issue around managing weights in all the situations that they have to operate.

Road Transport Forum

Not supporting:

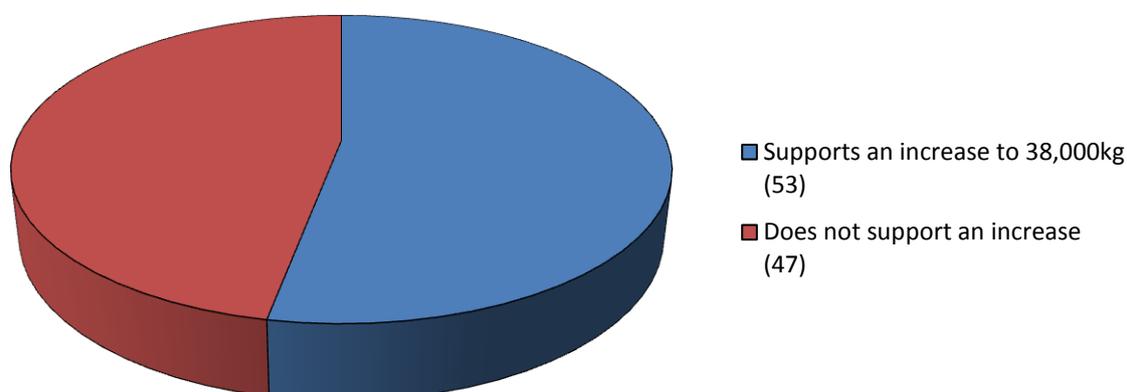
- **Difficulty in estimating loads:** Civil Contractors and other submitters in the transport industry did not support the reduction, stating that while technology is available to measure the weight of material in a front-end loader bucket, the cost of these electronic systems is often prohibitive and not suitable for the diverse types of equipment used.
- **Variable weights:** Civil Contractors and several other submitters from the road transport sector added that materials moved from earthworks and demolition sites are varied, and it is often difficult to estimate the density and weight of the materials. Demolition materials are particularly difficult and aggregates/soils are variable in geological makeup, density and moisture content.

Car Transporters: Increased gross mass limit for pro-forma Car Transporters

Under the VDAM Rule, car transporters have a gross combination mass limit of 36,000kg. An increase in the mass limit to 38,000kg for pro-forma car transporters would enable the sector to compensate for increases in length while maintaining the same payload, and allow for changes in the vehicle fleet.

One hundred submissions responded to this proposal, with 53 supporting an increase to the pro-forma car transporter gross mass limit (to 38,000kg, from 36,000kg), and 47 opposed to an increase. The majority of those opposed were individuals and form submitters opposed to any increase in mass limits.

Car Transporter options



Supporting:

- **Improves current system – streamlining – safety:** The Wellington City Council and TRAFINZ supported the 38,000kg limit, to improve safety on the basis that longer vehicles are generally safer to operate than standard vehicles. In addition, the proposal was seen to address an anomaly in the current rule. The MTA also supported this position, stating that a higher limit would result in safer, more efficient vehicles, and would encourage the introduction of newer pro-forma car transporters with the latest technologies.

Not supporting:

- **Safety:** Individual submitters expressed opposition to the proposed change, particularly form submissions that stated that the status quo allowed for existing levels of safety for all users to be maintained.

We are supportive of positive change to the VDAM legislation by removing the need for over length permits for pro-forma vehicles under 23m in length.

Dynes Transport Tapanui Ltd

The longer length of 23 metres associated with 38t compared to 20 metres for 36t will impact where transporters park up in urban areas, commonly in the middle of the road. The added 3 metres may create safety and access issues.

IPENZ Transportation Group

Other Mass Proposals

- The bus sector pushed for further increases in mass specifically for their sector. For example, Bus and Coach Association raised that the mass limit for a dual-tyred rear axle be increased from 8,200 to at least 10,000kg, while MTD Trucks advocated for a 12,000kg dual-tyred rear-axle limit for urban buses. Similarly, Greater Wellington Regional Council stated that two-axle urban buses should have a gross mass limit of 18,000kg.

Dimensions Proposals

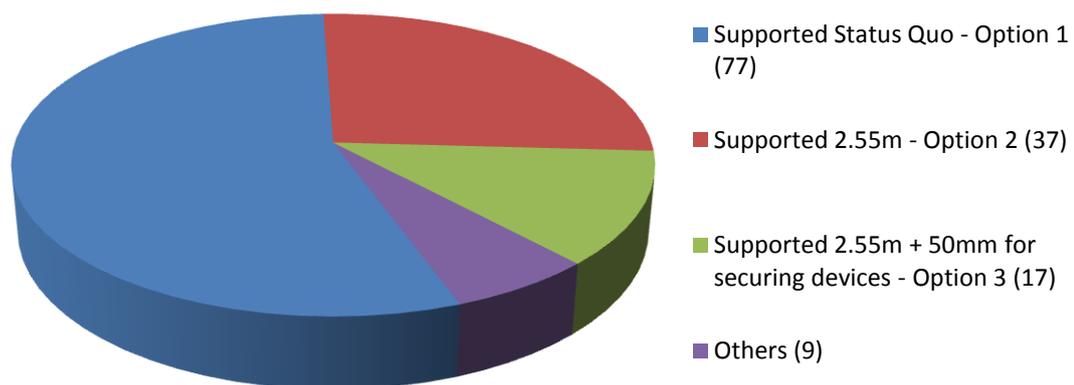
Width

Under the existing Rule, there is a general maximum width of 2.50m for all vehicles although some vehicles carrying particular loads are allowed a width of 2.70m. There are also a list of exceptions to the width limits including load-securing devices, such as ropes, lashings, straps, chains, and j-hook assemblies. These can extend an additional 25mm from either side of the vehicle.

This means there are effectively two standards for vehicles – 2.50m for a fully enclosed load; and 2.55m for an ‘open’ load, such as logs, requiring securing devices. The preferred option in the discussion document was Option 2, allowing vehicles to utilise the air space above 2.55m limit.

Width options were specifically addressed by 140 submitters. The majority of submitters supporting the status quo were individual and form submissions.

Support for Width Options



Supporting Option 2 (2.55m, inclusive of securing devices):

- **Productivity and safety:** The Insurance Council of New Zealand (ICNZ) stated that Option 2 promoted additional opportunities for increased productivity, as well as providing

a better choice of vehicle supply markets. ICNZ did not believe the move from 2.5m to 2.55m would increase vehicle crash rates significantly.

National Road Carriers, Fairfax Industries, and others supported Option 2 as it provides for operators using solid-wall vehicles the opportunity to load two standard-size (Chep) pallets side-by-side when loaded with jo-loaders or pallet jacks. As a result, as these submitters stated, the proposed change would improve the productivity of refrigerated hard-sided trailers by increasing the number of pallets that could be carried (for example, from 27 pallets to 30 pallets in a long trailer).

To allow logs and some freight to be loaded and be lower and safer and would not penalise some freight loads. Refrigerated freight can stack pallets side by side – e.g. 3 extra pallets in super quad 30 vs 27.

NZ Truck-Trailer Manufacturers Federation

- **Allows better access to overseas vehicles:** Z Energy noted the need to align with international standards, with the company largely reliant on overseas truck manufacturers, for its local fleet. Z Energy further stated this proposal enabled New Zealand to keep up with overseas developments in emissions, efficiency and safety technologies. This point was also mentioned by several submitters from the bus sector.

The RTF considered Option 2 to be a minimum approach, given that it adopts international standards, but that the Forum would support Option 3 (2.55m + 50mm for securing devices), as it gives vehicle designers more scope and does not change the load restraint conventions that drivers currently use.

- The Crane Association identified a need for New Zealand to be consistent with international standards, noting that 2.55m is the minimum width for new truck-mounted loader cranes (such as Hiabs).

This change in width will open up the New Zealand market to more international suppliers.

Greater Wellington Regional Council

- **Cost savings:** According to the Bus and Coach Association the cost of complying with current 2.5m width requirements ranges from \$25,000 to \$50,000 per vehicle, due to the reduced range of vehicle choice from overseas suppliers.

2.55m will allow the procurement of standard buses from Europe, thus avoiding the extra costs associated with procuring 'NZ special' buses. These cost savings will flow through to NZTA and regional councils... in terms of reduced procurement costs for urban bus operating contracts.

Mana Coach Services Ltd

Not supporting:

- **Safety risk:** The Auckland Harbour Bridge Alliance, IPENZ and the Cycling Action Network (CAN) cited increased risk to pedestrians and other road users as the main reason to maintain the status quo of 2.50m.
- **Infrastructure:** CAN stated that New Zealand roads (urban and highways) are quite narrow and current heavy vehicles do not have adequate camera systems or alarms to alert drivers of cyclists or pedestrians. In its submission, IPENZ stated that by increasing the width of vehicles further, safety margins were eroded and this raised the risk to other road users, including cyclists and pedestrians.

The RCA Forum and a number of local authorities were also opposed to increased width, citing costs and infrastructure damage as principal reasons – one aspect being that the proposed change would increase pavement degradation through heavy vehicles travelling closer to the edge of the road seal.

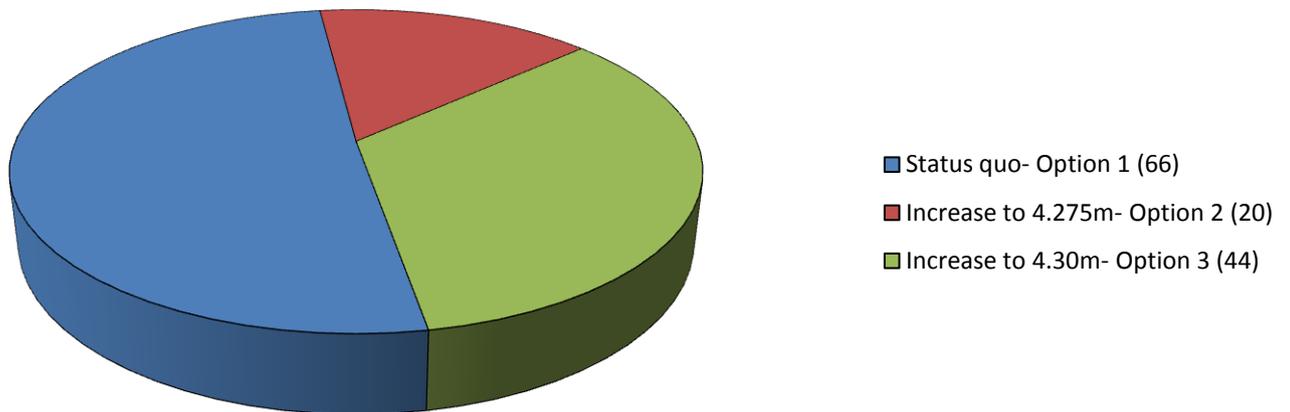
The RCA Forum went on to state that, for bridges with curved approaches, damage to the approaches and safety rails are already a significant cost for their local authority members. According to some RCA submissions, wider heavy vehicles will increase the incidence, severity and cost of damage to structures.

Height

Currently, the height limit for vehicles is 4.25m. Exceptions to this limit include load restraining devices such as ropes, straps, chains and covers, provided they do not exceed 25mm above the body or load of the vehicle (bringing the total height to 4.275m); and trolley bus poles when extended to collect electric power from overhead wires. The preferred option put forward in the discussion document was Option 3 – 4.30m, inclusive of securing devices.

Height dimension options were specifically addressed by 130 submitters. As with the width proposals, a majority of submitters supporting the height status quo (4.25m, plus 25mm for securing devices) were individual and form submissions.

Support for Height Options



Supporting Option 3 (4.3m, inclusive of securing devices):

- **Low risk of infrastructure damage:** Auckland Transport supported Option 3, stating that there was a low risk of bridge strikes, and that many vehicles already operated at a greater height than 4.3m.
- The IMVIA contended that future roading infrastructure should be designed with necessary improvements to accommodate the proposed new limit, and suggested that the government look at the maximum height limits of vehicles in source (overseas) jurisdictions. In the long term, IMVIA stated, New Zealand could look to harmonise with international standards – noting that most jurisdictions now have a 4.3m height limit.
- Kiwirail gave qualified support for increased height to 4.3m, with qualifiers that NZTA allow recovery of costs from third party asset owners, enforcement of legal requirements for councils, and a commitment from NZTA and local government to develop standardised bridge guidelines.
- The New Zealand Defence Force (NZDF) expressed similar concerns, suggesting that RCAs develop a special initiative to identify infrastructure susceptible to overhead strikes and take remedial action where necessary to reduce or remove such risks.
- **Productivity benefits:** The Car Distribution Group (fleet operator of car transporters) and the bus sector cited productivity benefits from the increased height limit.

As the vehicles we freight get taller (SUVs, Utility LCVs etc) the more height we have, the more efficient we become and less damage to freight as our loading tolerances improve.

Car Distribution Group

Operation of double deck buses enables fewer buses to be operated...benefits in requiring less road space, reduced fuel consumption and reduced fuel emissions.

Mana Coach Services Ltd

Supporting Option 2 (4.275m, inclusive of securing devices):

- **Standardises heavy vehicle fleet:** TRAFINZ, ICNZ, Fonterra and the RCA Forum supported Option 2. ICNZ supported the move to 4.275m as it believes an increase would raise road transport productivity. However, the ICNZ stated that an increase could cause more overhead strikes, and that bridge strikes cost motor insurers significant amounts from liability claims. TRAFINZ and Fonterra suggested that overhead structures would not be affected.

...Supports Option 2 on the basis that it standardises the vehicle fleet without any new impact on overhead structures.

Wellington City Council

Not supporting an increase in the height limit:

- **Possible damage to infrastructure:** The RCA Forum suggested there could be an issue of overhead strikes on tunnels, bridges and overpasses. Hamilton City Council (HCC) stated that the urban environment is subject to multiple height constraints such as over-bridges, trees, and traffic signals, and any increase in the maximum height allowance could cause more overhead strikes.

Similarly, Kaikoura District Council identified specific issues with road tunnels in its district, observing that no additional overdimension trucks or buses would be able to use tunnels due to height restrictions.

- **Analysis of options:** The AA did not support the removal of the status quo, claiming insufficient analysis had been undertaken into the number and location of overhead bridges that have clearances between the current and proposed height.

Permitting Proposals

Permitting is designed to ensure that, when otherwise ineligible vehicles use the road network, they do so safely with minimal impact to the roading infrastructure.

Permitting – divisible loads

- a) Should RCAs be allowed to grant permits for overweight divisible loads for non-HPMVs?
- b) If yes, are there any conditions RCAs should follow when considering such permits?

This section of the discussion document received 76 submissions, of which 37 were supportive of allowing RCAs to grant permits for overwidth divisible loads and 39, mostly from submissions, were opposed.

RCAs should be able to issue permits for increased weights but not be able to restrict class 1 vehicles to lower limits

Kiwi Fruit Logistics

Active risk assessment and recording all minor incidents would allow some analysis to regulatory bodies to ensure risks to other road users and asset owners are minimised.

Bay of Connections – Freight and Logistics Action Group

Supporting:

- IPENZ Transportation Group noted that local RCAs have the best knowledge of their networks, and that the issues they face are often quite different to those of the NZTA network.
- Some other submitters gave qualified support, with NZ Truck and Bus Manufacturers encouraging a common regulatory framework, considering that many vehicles travel through multiple RCA areas.
- The Bay of Plenty Freight and Logistics Action Group stated risks from permitting could be mitigated through active risk assessment and recording all minor incidents. The Group also stated there should be more use of mobile technology to complete reconnaissance, in return for greater returns to commercial operators.

- Palmerston North City Council was prepared to support the permitting of divisible loads subject to improved enforcement of 50MAX vehicles and their routes.

Permitting – indivisible loads

This proposal defines 10 loads as indivisible loads for permitting purposes. These are: transformer oil, building removals, platform trailers, construction equipment, load dividers, ballast, towing of disabled vehicles, fire fighting vehicles carrying water, slurry sealing and towing of trailers.

a) Should the items noted above be formally included as part of a definition of 'indivisible load'?

b) Should ancillary components of indivisible loads be allowed to be carried with an indivisible load?

This section contains two parts:

The first received 63 submissions, with 32 submitters agreeing that the items listed be formally included as part of a definition of indivisible load.

The second part received 61 submissions, of which 24 agreed with the proposal that ancillary components of indivisible loads be allowed to be carried with an indivisible load. Thirty-seven submitters did not support this proposal.

- The Crane Association stated the transport operator and the local RCA should have the power to determine what parts should be included based on a consistent approach. The Association further stated that there should be the ability to extend the list as and when cases are presented for other vehicles or components.

...allowing components such as ground engaging tools (different size bucket, rock breakers etc.) that are normally used as part of the indivisible equipment. This would reduce the number of vehicles required to transport such items.

NZDF

- Auckland Transport supported formalising the current list of 10 loads considered indivisible and thought no more exceptions should be added to the current list.

When applying for a permit the operator should be able to provide the permitting agency with a proposal outlining the pros and cons of each non-VDAM compliant load. It should then be up to permitting agency to decide what is or is not declared divisible.

Easytrucks

- Other submitters provided varied suggestions about what should be considered an indivisible load, including items such as ground engaging tools, ancillary components, associated building materials, construction, and earthmoving equipment.

Permitting – crane booms

This proposal allows crane booms to be disassembled to be carried to the equivalent dimensions of a Category 1 overdimension vehicle (maximum width of 3.1m) and to a maximum height of 4.5m. The preferred option put forward in the discussion document is Option 2.

Option 1: Status quo – do not provide width or height exceptions for crane boom sections

Option 2: Provide exceptions for crane boom sections, up to 3.1m in width and 4.5m in height

This section of the discussion document received 72 submissions, with 39 in support of the status quo and 33 supportive of providing exceptions for crane boom sections (up to 3.1m width & 4.5m in height).

Supporting:

- The Toll Group submitted that providing exceptions would reduce the number of vehicles and drivers needed to accompany a crane without increasing the risk dramatically.
- The LTSC cited safety as a reason to introduce an exception, stating that the status quo is not pragmatic to industry operations; and that equipment globally is getting larger and more difficult to handle.
- LTSC further stated that retaining the status quo would unnecessarily increase the cost of compliance and increase the number of very large vehicles on the road.

Not supporting:

- The RCA Forum was not supportive of the preferred option, suggesting that the proposed change could increase the use of non-general access dimensions on the road. This in turn could lead to a higher crash risk than any possible mitigation from having fewer vehicle movements at general access widths and heights.

This strikes at the heart of the divisible and non-divisible rule. This rule aims to where possible keep loads within the legal vehicle dimensions and only allow indivisible items that cannot be reduced in size to exceed these limits subject to a range of precautions.

Auckland Transport

Permitting – HPMV bulk fleet permits

HPMV permits can currently be issued by the NZTA for up to five identical trailers associated with one prime mover. This system allows for reasonable assessment timeframes and manageable enforcement of permits. The proposal would allow operators to mix and match a set of pro-forma trailers published by the NZTA. At present there are pro-forma designs for 50MAX vehicles and over-length HPMV vehicles.

As a transport operator, do you think this proposal offers significant benefits to your business?

Most submissions on this proposal (23 of 26) agreed that HPMV bulk permits would provide benefits to business.

- Easytrucks advocated for having permits for exceptions – a fleet that has multiple units of the same permit category should be able to permit the concept as opposed to each specific vehicle. So long as the vehicle(s) used are compliant with the permit conditions there should be no reason for individual permits.
- Toll Group supported bulk permits suggesting they reduce compliance costs and encouraged the uptake of HPMV by making it easier to deploy a HPMV type vehicle to a task without the need to permit each individual unit.

Allows change-outs in the event of mechanical failure, allows for exchanges at the interisland ferry terminal, and allows for a replacement tractor unit to be purchased without the remainder of the combination being "parked up" waiting for a new permit.

Crane Association

Other submitters suggested enhancements to the current permitting system, including:

- More flexibility to incorporate newer vehicle combinations (J Swap, Southfuel).
- Automatic approvals for routes that have been approved for a particular combination (Dynes Transport Tapanui Ltd).
- Allowing identified prime movers to be mixed and matched with a set of pro-forma trailers published by NZTA (Fonterra).
- A single process approach through one national agency replacing all RCAs (NZDF).

Other issue raised by submitters:

- **Mandatory tracking of trucks:** Several RCAs proposed compulsory tracking of all operators through GPS to ensure they stayed on permitted routes, and avoided damaging off-route roading infrastructure.

Overdimension Loads

Management of overdimension loads

The standard maximum width under the Rule (with some exceptions) for general access is 2.50m, although there are other dimensions limits, such as for forward and rear overhangs. The Rule allows, with conditions, the transport of indivisible loads of widths greater than 2.5m and other dimensions exceeding those allowed for general access.

This section raised five issues:

- 1. Clarifying the role of operator for overweight and overdimension permits (29 submissions received).**
- 2. The use of flags to signal the edge of wide loads (19 submissions).**
- 3. Tractors between 2.5m and 3.0m wide should be required to use a warning light or hazard panels signifying width (28 submissions).**
- 4. Pilots to use sound warnings to warn oncoming vehicles of an approaching overdimension load, (27 submissions).**
- 5. Pilots should be allowed/be required to be positioned on the road in line with the outer extremity of an overwidth load, (25 submissions).**

- The Heavy Haulage Association (HHA) supported clarification of ‘operator’ on overweight and overdimension permits. The HHA stated that their members had experience of infringement notices being issued to load pilots accompanying a load for matters that are conditions on the permit. The HHA suggested clarifying the issue so that permit holders, and not load pilots, are responsible for complying with the conditions of the permit.
- The RTF supported retention of flags for Category 1 loads. This is important for the RTF due to the possible increases in standard vehicle widths. The RTF were comfortable with the current width frameworks for loads to be transported – but suggested that a range of mitigation techniques that enhance the current safety management system should balance safety risks.
- The AA supported using LED warning lights to signify the width of tractors between 2.5m and 3.1m wide, and permitting pilot vehicles to sound warnings to oncoming vehicles, although it was unsure of the practical safety benefits of this proposal. The HHA stated that load pilots already use horns and other sound warnings to attract the attention of oncoming drivers, when other warning devices (signs and flashing lights) have not had the desired effect.

Management of overdimension loads – other questions

If there were to be a maximum width for transporting houses, what should that width be and why?

- Greig Running’s House Relocators Ltd and Intertruck stated the status quo of 11.0m should be retained, as all classrooms are about 8.0m wide, and Housing NZ properties are about 9.0m wide. Greig Running’s House Relocators added that pre-built houses are built to an 11.0m wide standard and there is a current shortage of these types of properties.

- Intertruck suggested that risks to on-coming traffic could be better managed by pilots, and enforcing a width restriction would be detrimental to a broad spectrum of industries.
- The FNDC and CCC stated that a five metre maximum width would give the approaching vehicle shoulder space to avoid the load and lessen the damage to infrastructure caused by house moving companies. FNDC and Northland Regional Transport Committee also stated that 59 percent of their network was less than five metres wide, meaning there was a high risk to other road users from loads wider than five metres.
- The NZDF suggested a different approach for overdimension loads, to be managed on a case-by-case basis. The NZDF stated that RCAs should be able to consider applications on their own merits based on the loads and the routes being travelled, and then specify the conditions to be adopted (permissible width, route, speed, number of pilots).

Should there be a speed limit for very wide vehicles, if yes what should that be?

This question attracted 60 responses, with 52 supporting a special speed limit.

- There was general support for a speed limit for very wide vehicles. However, there was limited agreement about an appropriate limit. The CCC and ICNZ supported a 45kmh limit, stating that this could provide a greater safety margin. The FNDC suggested a compromise speed of 50kmh or 55 kmh, as a lower speed limit could potentially cause long queues, frustration and unsafe passing. Six submitters supported a 70kmh speed limit, without further explanation.
- Auckland Transport stated there should be some form of speed control based on visibility and speed of approaching vehicles, and pilot spacing – with reduced visibility triggering a slower speed limit. Auckland Transport also suggested there should be implementation of technology (such as GPS) to record and enforce speeds for the entire journey.
- The HCC and HHA suggested that speed limits be dependent on the route taken – visibility, geometry, infrastructure (e.g. central wire rope barriers). The HHA stated that most of the risk could be effectively managed through better training, documentation and route selection for oversize loads.

If the current hours of travel for moving overdimension loads are revised – what hours do you consider appropriate?

This section received 17 submissions.

- The CCC stated that overdimension vehicles should not transport loads at peak travel times in cities, that there should be restrictions on night-time travel, and travel hours should be approved by the Traffic Management Plan. The FNDC and NRC cited

Australian rules that use daylight hours to improve the safety of the operation. Auckland Transport submitted that a table be provided of travel times for wide loads that require more road space and less traffic.

- McLeod Cranes and the HHA suggested retaining the current hours of travel, as the existing approach had worked well and while not perfect, it was easy for operators to comply with, and to be enforced. McLeod Cranes further commented that currently most loads are transported in off-peak hours, as operators have an incentive to transport loads in the most efficient way.
- Gordon Handy Machinery Ltd commented that zones for restricted travel are very confusing and difficult to understand. Also, that traffic patterns have changed in recent years, so in some places weekend restrictions have little relevance and exemptions have been incorporated into the Rule.

If the travel zones for overdimension vehicles are revised to ensure they reflect changing road use patterns, are there any specific changes you recommend?

This section received 15 submissions, with varied views on revising travel zones.

- Intertruck was supportive of retaining the existing travel zones, and supported extending the use of motorways in Auckland. Auckland Transport advocated for an approach that considers travel times, versus road use patterns. Auckland Transport stated that road users should look at traffic conditions, versus the time of day, and choose the route with the least impact and travel time.
- Tauranga Kiwifruit Logistics Ltd suggested that travel areas should be revised as traffic volumes have increased in some areas since the current rule was put in place, and that day travel for large loads should be limited to more remote areas with low traffic counts.
- The HHA made a detailed submission suggesting changes to the current travel zones to reflect increasing traffic flows in some parts of the country.

Do you have a preference as to signage on pilot vehicles warning oncoming vehicles?

This section received 52 submissions, with 40 submitters expressing a preference for signage on pilot vehicles, and 12 submitters not expressing a preference for signage.

- Tauranga Kiwifruit Logistics Ltd supported the status quo of retroreflective sheeting material. They suggested that there should be consistency of signage – that is, signs should be clearly visible at all times of the day and night as well as having a constant message.

- The NRC recommended a “Stop on Request” sign to allow a pilot vehicle to place oncoming traffic into safe locations as required and permit pilot vehicles to use mounted variable message boards. The LTSC submitted that pilots should be able to use audible sound warnings.
- NZ Truck and Bus Manufacturers stated it was difficult at times for on-coming traffic to recognise loads visually amongst all other flashing lights, so vehicles should be clearly visible to on-coming traffic.
- 3M New Zealand submitted that signage should conform to the current New Zealand Standard for Reflective Sheeting. 3M suggested the signage should comply with Class 1W, the highest level of reflectivity allowed for in the Standard.

Do you have a preference as to the positioning and extent of hazard panels, including reflective and illuminating signs/lights on overdimension load?

This section received 21 submissions, with 15 submitters expressing a preference for the positioning and extent of signs.

- Intertruck supported retaining the status quo, and allowing NZTA to approve additional signage when requested. Also, that operators should have the choice of supplying bigger panels and more lights if they require them.
- The HHA also supported retaining the status quo, but to accept new layouts, wording and sign types approved by NZTA, such as retro-reflective letters on a black background; and to use alternate wording such as ‘Prepare to Stop’.
- Toll Group and Tauranga Kiwifruit Logistics Ltd stated hazard panels should be on the widest part of the load rather than the front of the vehicle, and that changes should allow for adoption of LED lighting panels and LED strip lighting to illuminate loads. 3M New Zealand added it made sense to restrict the signage to fluorescent reflective sheeting), as such technology makes the hazard panels significantly more visible at dusk/dawn and in low light situations.

Do you support increasing the number of pilots for very wide vehicles to three pilots.

This section received 47 submissions, with 44 supporting an increase in the number of pilots.

- The HHA supported retaining the current number of pilots for wide loads, but with improved training and licensing regimes. The Association also requested more information in the pilot guide, specifying when three front pilots would be required.

- McLeod Cranes stated that operators should determine when to use three pilots, as this would not be necessary for all loads.
- Auckland Transport gave qualified support for increasing the number of pilots, but stated that could be developed that may be less expensive and potentially more effective. Auckland Transport recommended for further work to be undertaken in this area.

Another issue raised by submitters:

- **Pilot Training:** The HHA suggested that NZTA establish a process to upgrade the current load pilot licence regime with more training, license certification, and firmer renewal processes.

Final Comments

The Government is yet to consider advice on a proposed draft Rule. The Ministry of Transport and NZTA therefore cannot comment specifically on the matters raised in submissions to the discussion document. Some initial responses can, however, be made on the broad themes raised by submitters.

As is clear from the summary there is a range of views on whether the allowable mass of heavy vehicles should be increased, and if so by how much. Those who felt that mass should not be increased tended to have one or more of the following reasons for this; concern that increased mass will increase pavement damage (and who would pay for that); concern that the safety of other road users will be decreased; and that more emphasis should be given to alternative modes of freight transport, in particular rail and coastal shipping.

Some submitters suggested a more fundamental review of freight transport policy be undertaken as part of reviewing the VDAM Rule. While this is beyond the scope of the review, separately the Government has asked KiwiRail and NZTA to work together to look at ways of better integrating road and rail. The current National Land Transport Programme will also see significant investment in freight connections to and from major ports and airports, to major rail freight facilities and between regions to allow improved access to domestic and international markets.

The assessment of options for increasing mass uses a range of criteria beyond just productivity. The criteria include: safety; impact to infrastructure; community well-being; and improving the operation of the Rule generally. A component of the further analysis is looking at the appropriate balance for possible increases in general access compared with allowing greater mass limits under permit (and so allowing local RCAs to retain control over the parts of their own road network that can be accessed by the heaviest vehicles). The analysis is also looking at likely impacts on pavement wear and infrastructure such as bridges.

A key part of the further analysis is identifying opportunities that reduce the number of kilometres that vehicles need to travel in order to carry a given freight task. Having fewer kilometres travelled – in essence, less trucks on the road – is a major factor in improving safety for other road users.

Encouraging the uptake of vehicles with new safety and environmental technologies was generally supported with some specific technologies being recommended. In general the approach taken in the Rule will, where possible, encourage the uptake of technology improvements rather than making these mandatory.

A draft Rule is scheduled to be released in July 2016, for which there will also be the opportunity for public comment. Subject to final decisions, it is intended that the new Rule come into force by the end of 2016.

Appendix: List of Submitters

No.	Submitter
1	Stefan van Vliet
2	Rhys
3	Murray Bartlett
4	Vik Olliver
5	John Kirkland
6	George Varghese
7	Hinds Bus and Truck Ltd
8	Toll Group
9	Paul Clutterbuck
10	Lincoln Taylor
11	Telai Sefesi
12	George Jason Smith
13	Private
14	Tohora Enterprises Ltd
15	Gordon Handy Machinery
16	Aotearoa Haulage Ltd
17	J Swap Contractors & Weallans Bulk Transport Ltd
18	Easytrucks
19	Jacklines Ltd
20	Road Transport Association – Region 3 (CARTA)
21	Tranzliquid Logistics Ltd
22	Rail and Maritime Transport Union Inc.
23	The Car Dist. Group, A'land Vehicle Deliveries, N'wide Transport, Garden City Transport
24	NZ Groundspread Fertiliser Association
25	NZ Motor Caravan Association Inc.
26	Japanese Auto Spares
27	Gary Douglas Engineers Ltd
28	Robert MacIntosh
29	Niall Robertson
30	Private
31	Andrew Wills
32	Tauranga Kiwifruit Logistics Ltd
33	Rec. Vehicle and Caravan Manufacturers Association of New Zealand (RVCMANZ)
34	Kaikoura District Council
35	Dynes Transport Tapanui Ltd

36	Ross Henry Crook
37	Murray Twigg
38	Margot Trocchi
39	Bill Cassidy
40	Denise Bijoux
41	Kipi Wallbridge-Paea
42	Murray Warwick Ball
43	Wilkinson Transport Engineers / TSV Consultants
44	Citizens Environmental Advocacy Centre Inc.
45	Steven Wilson
46	Catherine Bircher
47	Environment Canterbury Regional Council
48	Edward Fletcher
49	Private
50	Barry Pinkney
51	Action Manufacturing
52	Isaac Broome
53	Private
54	Allan Goldsmith
55	Insurance Council of New Zealand
56	Jeffery Ronald Saunders
57	Steve Cornwall
58	Wellington City Council
59	Michael Lee
60	Peter Naber
61	Freight Logistics Action Group (Bay of Plenty)
62	W Devine
63	Bay of Connections – Freight and Logistics Action Group
64	Andrew Maciver
65	Citizens Environmental Advocacy Centre Inc.
66	Dr E W Gush
67	Farmlands Fuel Ltd
68	Dianne and Shaun Bellamy
69	J
70	New Zealand Defence Force (NZDF)
71	Jenny Kirk
72	NZ First
73	Susan McIntyre

74	Z Energy
75	Waitaki District Council
76	National Road Carriers
77	Mary McDonald
78	Christchurch City Council
79	Whanganui Bicycle Users Group
80	Taupo District Council
81	Gerard Hyland
82	Patrick Morgan
83	Far North District Council
84	Leith Duncan
85	Chris Pattison
86	Mary Wilson
87	Motor Traders Association (MTA)
88	Institute of Professional Engineers New Zealand (IPENZ)
89	MTD Trucks
90	Courtney Edmonds
91	Jazz Edmonds
92	Norah Huch
93	Scott Maclean
94	Tony Edmonds
95	Steven Rangi
96	Robert Kaye
97	Losa Liuaki
98	Tonga Liuaki
99	Lena Liuaki
100	Montiveti Liuaki
101	Bella Liuaki
102	Ula Liuaki
103	Steven Ridleah
104	Glenn Edmonds
105	Sheena Simpson
106	Karen Hills
107	Robert Simpson
108	Peter Simpson
109	Daniel Edmonds
110	Leighton Murphy
111	James Edmonds

112	Bryan Simpson
113	James Galbraith
114	Cole Galbraith
115	Anthony Hurst
116	Jennifer Northover
117	Matt Ross
118	Cycling Action Network
119	Private
120	The Campaign for Better Transport Inc.
121	Road Transport Association NZ (RTA)
122	Roberta Jones
123	Anthony Britton
124	Damian Dobbs
125	Helen Marsh
126	David Lourie
127	Brent Barrett
128	Civil Contractors NZ
129	Ross Galloway
130	Ross Clark
131	Living Streets Aotearoa
132	Angela Alison
133	McLeod Cranes Ltd/McLeod Hiabs Ltd
134	Greig Running's House Relocators Ltd
135	Private
136	Road Controlling Authorities Forum (NZ) Inc.
137	Intertruck Distributors NZ Ltd
138	Atlas Building Removals (2006) Ltd
139	NZ Express Transport 2006 Ltd
140	Whakatane District Council
141	Keiran MacLachlan
142	Milnes Transport, Waikaka Transport, Tulloch McNab Transport
143	J P Ware Transport Ltd
144	Ross Galloway
145	Fonterra
146	Business Central & Wellington Chamber of Commerce
147	Britton Housemovers
148	Motor Industry Association
149	Auckland Harbour Bridge Alliance (AHBA)

150	Progressive Foundations Ltd
151	Crane Association NZ
152	Donna Wynd
153	Penske Commercial Vehicles
154	Ruapehu District Council
155	Automobile Association
156	Southland District Council
157	NZ Ready Mix Concrete Association
158	TRAFINZ (The New Zealand Traffic Institute Inc.)
159	Mana Coach Services Ltd
160	Gleeson & Cox Transport
161	Log Transport Safety Council
162	David Moorhouse
163	TrailLite Caravans (1980) Ltd
164	KiwiRail
165	Fairfax Industries
166	Canterbury/West Coast NZTA office
167	3M New Zealand Ltd
168	Waikato District Council
169	Whanganui District Council
170	Cement and Concrete Association NZ
171	IPENZ Transportation Group
172	Hurunui District Council
173	NZ Heavy Haulage Association
174	Bus & Coach Association NZ
175	Palmerston North City Council
176	Road Transport Forum NZ
177	Rural Contractors
178	Dunedin City Council
179	Freight Logistics Action Group (Bay of Plenty)
180	Cable Price (NZ) Ltd
181	Allan Aitken
182	Friends of the Earth NZ
183	NZ Truck-Trailer Manufacturers Federation
184	Roland Hinton
185	MJ Cryns
186	Imported Motor Vehicle Industry Association (IMVIA)
187	Matamata-Piako District Council

188	Rangitikei District Council
189	Federated Farmers of New Zealand
190	Greater Wellington Regional Council
191	Rural Contractors NZ
192	Northland Regional Transport Committee
193	Waikato Regional Council
194	Auckland Transport
195	Hamilton City Council
196	Forest Owners Association
197	NZ Bus
198	Clive Matthew-Wilson