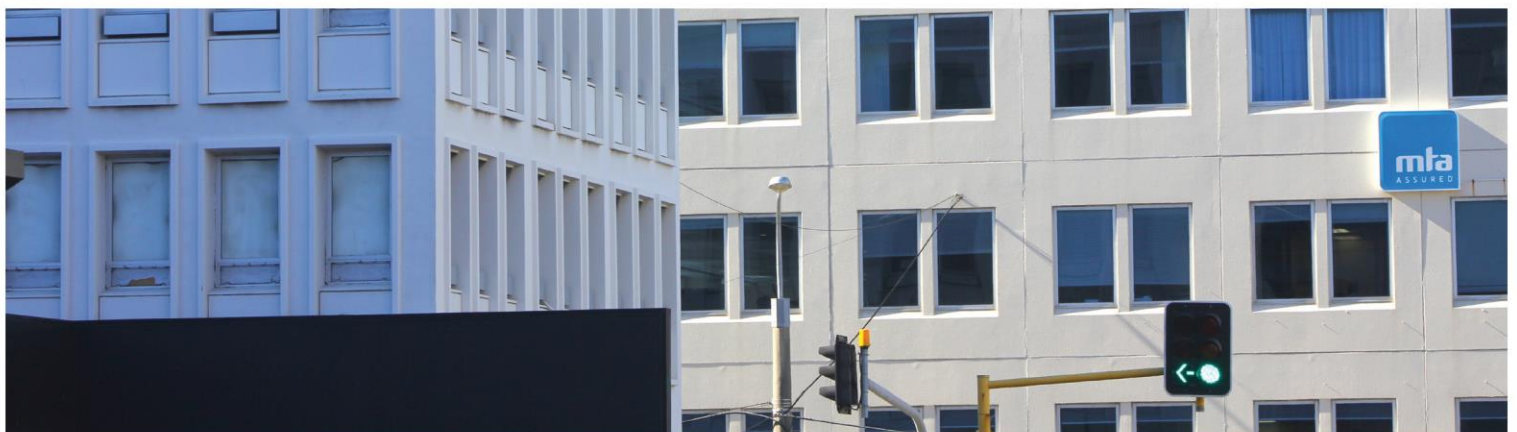




# Submission to Ministry of Transport On Vehicle Dimension and Mass Rule Discussion Document

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16 February 2016



Dear Sir / Madam

**Submission: Vehicle Dimension and Mass (VDAM) Rule Discussion Document.**

This submission is from:

Motor Trade Association (Inc)  
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The contact person in respect of this submission is:

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Thank you for the opportunity for MTA to provide comment on the Vehicle Dimension and Mass (VDAM) Rule Discussion Document regarding the views of and its effect on the automotive industry.

Yours sincerely



Graeme Swan  
**Sector Specialist - Repairer**

## Introduction

The Motor Trade Association (Inc) (MTA) was founded in 1917 and represents approximately 3,700 businesses within the automotive industry and its allied services. This includes around 145 members that are directly involved in the sales and servicing of heavy vehicles.

Members of our association also operate businesses including automotive repairers, collision repairers, service stations, vehicle importers and distributors and vehicle sales. Our members employ in excess of 40,000 staff.

We appreciate the opportunity to comment on the Vehicle Dimension and Mass Rule (VDAM) Discussion Document and have the following comments to make.

## General comments

MTA supports innovation in vehicle technology, design and usage within the New Zealand fleet in order to optimise safe and efficient vehicle movements.

MTA is pleased to see a commitment from the Ministry and the Transport Agency on better public services and their engagement with industry. This commitment should be encouraged and fostered, however MTA is concerned that the *Land Transport Rule: Vehicle Dimension and Mass (VDAM) 2002*, has now been in place for 13 years and it has been amended 11 times. Constant amendments lead to confusion for the industry, can send mixed messages, and are resource intensive as industry is required to submit on a stream of consultation papers.

MTA does not want to see any preferential treatment for new or used vehicles. This Rule should have the same implementation dates for all vehicles, regardless of vehicles previous history.

As modern vehicles are not likely to have just one of these features, it is most likely a combination of wider, taller, and heavier vehicles, greater consideration needs to be given to these additions in combination, not as singular items.

MTA would also like to draw the Ministry's and Transport Agency's attention to the importance of side underrun protection on heavy vehicles. As these vehicles get higher, wider and heavier we must take into account how they interact with other road users, but mainly light vehicles. In the unfortunate scenario of a light vehicle colliding with the side of a heavy vehicle, the lighter vehicle's safety systems, both front and side airbags, are not given the opportunity to deploy because the impact occurs on the vehicle pillars. With the addition of side underrun protection the point of impact will be lowered and the light vehicle's safety systems will be able to correctly deploy and increase the survivability of the collision for the vehicle occupants.

Has consideration been given to the pros and cons of underrun protection with regard to cyclists?

The government will need to commit to an education program to inform the public on the reasons behind these changes and the effect that they may have on other road users.

## **Submission**

### **1. Axle mass and gross mass**

MTA supports increased axle mass and gross mass provided these vehicles are paying for any additional road damage that they may cause through the RUC system.

Proposal 7 – MTA would suggest reducing the weighing tolerance from 1,500kg to 1,000kg. There appears to be industry concern that reducing the tolerance from 1,500kg to 500kg would adversely affect livestock and logging transporters as they need to take into account the additional weight of wet livestock & logs as well as mud etc. from the off-road terrain that they usually operate on. Reducing the tolerance from 1,500kg to 1,000kg would appear to be a reasonable compromise, giving vehicle operators some margin for error whilst still achieving a reduced tolerance.

### **2. Width**

MTA supports extending the maximum width to 2.55m as this would allow newer, safer, more efficient vehicles to be imported from overseas.

Particular attention will need to be paid to the swept path of these wider vehicles, and an education campaign will need to be undertaken to educate the motoring public about allowing extra space around turning vehicles.

Consideration will also need to be given to any proposals to introduce mandatory clearance distances when passing cyclists – wider vehicles may find themselves further across centre lines than previously experienced.

MTA does query whether the Ministry or the Transport Agency have taken into account the impact that any increase in width will have on the importation and operation of 5<sup>th</sup> wheel motorhomes from the USA?

### **3. Height**

MTA supports option 3, extending the height limit to 4.30m as it provides a consistency for all types of vehicles.

MTA would also like to draw the Ministry's attention to the increased possibility of overhead strikes once the vehicle has left the main highways. These possible strikes would most likely take place when vehicles are being operated in and around urban areas such as older petrol stations forecourts, building verandas, and entry in to vehicle testing stations and workshops.

### **4. Car transporter gross mass**

MTA supports Option 2 to increase the gross limits for pro-forma car transporters to 38,000kg.

Option 2 is a much safer, more efficient option as it would allow newer pro-forma car transporters to maintain the same level of payload as the current standard car transporters while utilising newer vehicle technology. The use of 38,000kg pro-forma car transporters will

not only benefit the vehicle operator but also the vehicle distributors and dealers for whom they deliver vehicles.

MTA would support the NZ Transport Agency issuing exemptions to pro-forma car transporters so they can be operated at 38,00kg ahead of the VDAM Rule implementation. This would allow efficiency gains for the industry and improve the safety of the car transporter fleet.

MTA believes that this increase in the gross limit to 38,000kg should only apply to car transporters. Other trailers and combinations would need to be assessed on a case by case basis.

## **5. Permitting**

MTA has no specific comments on the permitting section as it generally does not affect our members. MTA does however support the general idea of reduced operator costs and improved productivity.

## **6. Management of over dimension loads**

MTA has no specific comments on the over dimension loads section as it generally does not affect our members. MTA does however support the general idea of increasing safety for both operators and other road users.

## **7. Minor amendments**

### **a. Using overweight/over dimension vehicles in emergencies**

MTA supports the notion that RCAs would have the discretion to allow vehicles to be used without permits or beyond existing permit conditions during emergencies.

MTA would suggest some clarification is required as to what constitutes an emergency so it is clear to all parties before any such emergency should strike.

### **b. Allowing temporary increase in vehicle height for ground clearance**

MTA supports the notion that vehicles be allowed to temporarily raise their height to clear obstacles, this is with the proviso that it is a factory fitted option and not an aftermarket fitment.

### **c. Requirement for certain plot signs to be frangible**

MTA has no comment on this particular amendment.

### **d. Pilot vehicle tyre size**

MTA supports the deletion of the requirement for Class 2 pilot vehicles to have a wheel rim diameter not exceeding 17 inches.

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