



**Chairman
National Committee**
C/- 23 Scoular Street
Maryhill
DUNEDIN 9011

24 July 2009

Vehicle Dimensions and Mass Amendment
Rules Team
NZ Transport Agency
PO Box 5084
Wellington 6145

Dear Sir/Madam

IPENZ Transportation Group Submission on Land Transport Rule : Vehicle Dimensions and Mass Amendment [(No 2) 2009] (Rule 41001/5)

The IPENZ Transportation Group ("IPENZ TG") welcomes the opportunity to provide a submission on the yellow draft of Land Transport Rule : Vehicle Dimensions and Mass Amendment [(No 2) 2009] Rule 41001/5. The IPENZ TG consists of over 1,000 transportation and traffic engineering and planning professionals working in central government, local government, academia, and the private sector. The IPENZ TG represents a segment of considerable expertise in the fields of traffic and transportation and has a significant interest in managing the effects of transportation on society. This submission has been prepared by the National Committee of the IPENZ TG and recognises that this submission may not necessarily represent the position of every member of the Group or their views given the diversity of members.

There are a number of comments we wish to make and these are covered in the attached submission.

The IPENZ Transportation Group is happy to discuss any of the comments contained in the submission and any queries can be directed to the Chairman of the IPENZ Transportation Group, Bruce Conaghan, Senior Traffic Engineer, Dunedin City Council (C (03) 474 3706 / E-mail bruce.conaghan@dcc.govt.nz).

Yours sincerely

Bruce Conaghan
**Chairman
National Committee
IPENZ Transportation Group**



***Submission to the Rules Team, New Zealand
Transport Agency, on the yellow draft of :***

**Land Transport Rule: Vehicle
Dimensions and Mass Amendment [(No
2)] (Rule 41001/5)**

Prepared by:

IPENZ Transportation Group

July 2009

Introduction

The IPENZ Transportation Group (“IPENZ TG”) welcomes the opportunity to provide a submission on the yellow draft of Land Transport Rule : Vehicle Dimensions and Mass Amendment [(No 2) 2009] (Rule 40110/5). The IPENZ TG consists of over 1,000 transportation and traffic engineering and planning professionals working in central government, local government, academia, and the private sector. The IPENZ TG represents a segment of considerable expertise in the fields of traffic and transportation and has a significant interest in managing the effects of transportation on society. This submission has been prepared by the National Committee of the IPENZ TG and recognizes that this submission may not necessarily represent the position of every member of the Group or their views given the diversity of members.

Overall, the IPENZ TG supports infrastructure related initiatives that aim to increase productivity in New Zealand and the proposed Rule change does seek to provide an opportunity to achieve this for the freight industry. Comments on the draft Rule are confined to those proposals that the IPENZ TG members think require further definition or consideration and are discussed in more detail below.

Controlling Adverse Effects of Heavy Vehicles

While not specifically addressed in the Draft Rule, the IPENZ TG has concerns over the ability, or lack of, road controlling authorities to protect their roading infrastructure from excessive damage and other environmental impacts created by heavy vehicles. The current provisions of the Resource Management Act, the Transport Act, the Heavy Motor Vehicle Regulations, and the Land Transport Act do not provide a clear and obvious solution to the problems being experienced by road controlling authorities. In this regard, some definition around the term “extraordinary damage” must be provided in the Definitions of the draft Rule.

Ensuring Compliance with the Rule

The IPENZ TG would want to see a very high level of compliance with both truck weight standards and also adherence by larger trucks only to approved selected routes. In this regard, a requirement of the draft Rule must be that all vehicles with heavier loads as proposed in the draft Rule **must** have GPS based ‘black boxes’, or similar such devices, that can accommodate time, distance, and location recording to enable monitoring and enforcement by the NZ Police.