THE NEW ZEALAND
AUTOMOBILE
ASSOCIATION
INCORPORATED

342-352 Lambton Quay
Wellington
New Zealand
PO Box 1
Wellington
New Zealand

T. +64 4 931 9999
F. +64 4 931 9960

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Vehicle Dimensions & Mass Rule
Rules Team
NZ Transport Agency
Private Bag 6995
WELLINGTON 6141
Email: rules@nzta.govt.nz

Dear Sir/Madam

Vehicle Dimensions & Mass 2016 (Rule 41001)

Introduction

The New Zealand Automobile Association (NZAA) welcomes the opportunity to provide comment on the Vehicle Dimensions & Mass 2016 (VDAM) Rule amendment.

The NZAA is an incorporated society with 1.5 million Members. It represents the interests of road users who collectively pay over $2 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. The NZAA's advocacy and policy work mainly focuses on protecting the freedom of choice and rights of motorists, keeping the cost of motoring fair and reasonable, and enhancing the safety of all road users.

Conditional support

The NZAA is generally supportive of the proposals in the draft Rule, with specific comments on the relevant proposals for which we have feedback provided below.

However, the NZAA's support for the amendments are conditional upon the requirement that trucks and trailers built to the new dimension limits are required to be fitted with side and rear under-run barriers (with exemptions for certain truck classes if deemed appropriate e.g. logging trucks, refuse trucks).

Ideally however, we would also support under-run barriers being retrospectively imposed for applicable trucks under a certain age, subject to further research and a benefit:cost analysis.

Under-run barriers help vulnerable road users (pedestrians, cyclists and motorcyclists) from going underneath a truck or trailer, and have been made mandatory in Europe for all vehicles over 3,500kg and trailers over 1,020kg. Under-run barriers can also reduce the severity of crashes involving cars, by ensuring frontal airbag activation which is triggered by the bumper impacting with the under-run barrier, without which the front of the car may slide under the truck and compromise the safety of occupants. With side and rear under-run barriers, not only is a car unlikely to slide under the truck/trailer, but the airbags will also activate, significantly improving the outcome for vehicle occupants.

A preliminary analysis by the NZAA of a sample of 100 fatal crashes involving trucks in the five years from 2010-2014 (out of a total of 241) indicated approximately 9% of fatalities involved someone going under the side of a truck and subsequently being run over. All but one of the fatalities involved vulnerable road users (a mix of pedestrians, cyclists and motorcyclists). While further detailed analysis is needed, the perfunctory details recorded suggest that side under-run barriers were not fitted. In addition, we identified another 17% of fatal truck crashes involving side or rear-impact in which absence of barriers may have also contributed to the crash outcome, although further detailed analysis would be required to verify this. This analysis excludes serious crashes involving other vehicles running into the side or rear of trucks, in which the severity may have been reduced by the presence of under-run barriers (e.g. through frontal airbag activation).

From the NZAA's cursory analysis, it would suggest that perhaps 9% of fatalities involving trucks resulted from a road user going under a truck, and possibly the number is even higher. The NZAA believes the mandatory fitment of under-run barriers to eligible new trucks and trailers will improve safety, and thus should be a conditional requirement of any changes to vehicle dimension rules so that these safety benefits can be realised.

Mass: General Access

Proposal 1:

1A. Increase the gross mass limit for 7-axle combinations with a minimum wheelbase of 16.8m from 44,000kg to 45,000kg

1B. Increase the gross mass limit for 8-axle combinations with a minimum wheelbase of 17.4m from 44,000kg to 46,000kg

The NZAA supports these incremental increases which should improve freight efficiency, and mean the same freight task could be performed by fewer truck movements than under the status quo.

Proposal 4: Replace the existing weighing tolerances with a weighing tolerance of 500 kg (axles and gross mass) and 1,000 kg (axle sets and groups) for all heavy vehicles

While supportive of the intent to raise gross mass for 7-axle combinations by 1000kg while at the same time reducing gross mass tolerance by 1000kg, the NZAA is unsure if these weigh tolerances are practically achievable, especially for loads that gain weight in transit in wet weather e.g. aggregate, sand etc.

Dimensions:

Proposal 8: Extend maximum allowable width to 2.55m, inclusive of load securing devices

Proposal 9:

9A. Allow close proximity monitoring devices

9B. Constrain mirror width to current limits

9C. Allow up to 25mm on either side of a vehicle for aerodynamic tabs

The NZAA supports the increase in width as this aligns NZ vehicle dimensions with international standards. We also support allowing 50mm either side for close proximity monitoring devices to enhance the safety of vulnerable road users, and the other new associated exemptions.

Proposal 10:

10A. Extend maximum allowable height to 4.30m, inclusive of load securing devices

10B. Allow operators with suitable technology to temporarily exceed the height limit when raising the vehicle to clear obstacles

The NZAA conditionally supports the height increase to be introduced at a future date subject to a height assessment of all structures on the road network (including allowing for long vehicles and road undulations either side of the structure), and the posting of limited clearances in advance of the amendment.

Yours sincerely

Mark Stockdale
Principal Advisor – Regulations