

17 December 2025

NZ Transport Agency Waka Kotahi (NZTA)  
Email: rules@nzta.govt.nz

Teena koutou katoa,

Waikato District Council (Council) welcomes the opportunity to provide feedback on the amendment of rules for heavy vehicles – *Proposal 1: Removal of 44T-50 MAX Permits and Proposal 2: Removal of H Plates*, as part of the Heavy Vehicle Productivity Phase 1.

Our submission, informed by the operational experience of our Assets and Infrastructure – Transport team, highlights the following key matters:

### **Removal of 50MAX Permits**

Council supports the efficient movement of freight as a reduction in the number of trucks on our roads will lead to a reduction in vehicle operating costs, emissions, travel time and improved safety. While Council acknowledges that 50MAX vehicles can carry heavier loads without increasing road wear when operated correctly, Council does not support removing the requirements for 50MAX vehicles to have a permit to operate.

Permits currently provide an important compliance and safety check for 50MAX vehicles. While removing permits may reduce administrative burden and costs for operators, Council has concerns that removing 50MAX permits may heighten the risk of non-compliance with 50MAX regulations such as meeting required dimensions and safety standards and travelling only on the approved 50MAX network. This may lead to heavy vehicles travelling on unsuitable routes, particularly weight-restricted bridges within our network resulting in accelerated deterioration of our roading assets. In addition, if 50MAX permits are removed, enforcement will be the only way to check that operators continue to comply with 50MAX regulations.

If 50MAX permits are removed, Council considers that several implementation and compliance matters should be considered, such as:

- A need for enhanced enforcement capabilities, particularly in remote, rural areas,
- Changes to the Offences and Penalties Regulations to ensure that penalties and infringement fees provide sufficient deterrent to non-compliance with 50MAX regulations,
- Improving the clarity of the approved 50MAX network maps to better illustrate routes that are available for 50MAX vehicles.

## **Removal of H Plates**

Removing the requirement to display H Plates on High Productivity Motor Vehicles (HPMV) will significantly reduce the ability to visually identify these vehicles on our network. This creates enforcement challenges, as officers and Road Controlling Authorities (RCAs) will have limited means to confirm compliance with approved routes, increasing the risk of HPMVs travelling on unsuitable roads and weight-restricted bridges. Removing the requirements may also complicate operational responses during detours, where contractors and Police need to divert or hold back traffic to protect vulnerable infrastructure.

If the requirement to display H Plates on HPMV is removed, there may be an opportunity to leverage technology such as telematics and electronic Road User Charges (eRUC) to provide real-time visibility of HPMV movements and support both compliance and enforcement practices. However, the consultation documents provide little clarity on how these technologies or alternative compliance measures will be implemented, leaving uncertainty around enforcement capability and network protection under the proposed changes.

In summary, while Council supports the intent of these proposals to improve freight productivity, Council considers that the proposed changes outlined in the consultation documents do not sufficiently consider and manage the risks to the road network. Council emphasises the need for robust compliance, enforcement, and infrastructure considerations to avoid the accelerated deterioration of roading assets. Ensuring the safety and resilience of communities must remain a priority, alongside balancing public safety with economic productivity of freight networks. We look forward to continued engagement on these matters.

Should you have any queries regarding the content of this submission, please contact Transport Manager, Aram Goes, [aram.goes@waikatodc.govt.nz](mailto:aram.goes@waikatodc.govt.nz).

Ngaa mihi,



Craig Hobbs  
**Chief Executive**

## Heavy Vehicle Productivity Phase 1 – Relevant questionnaire responses

### Online submission: NZTA consultation Heavy Vehicle Productivity Phase 1

<https://www.nzta.govt.nz/about-us/public-consultation-hub/current-consultations/heavy-vehicle-productivity-phase-1>

#### Proposal 1: Removal of 44T-50MAX Permits

##### Should we remove the requirement for 50MAX vehicles to have a permit to operate?

- No

#### What are possible positive impacts of removing 50MAX permits?

Council is supportive of the efficient movement of freight and recognises that 50MAX permits enable heavy vehicle operators to carry heavier loads without causing more road wear per tonne of freight than 44 tonne truck and trailer combinations if loaded correctly with the correct dimensions.

Council recognises the benefits of more efficient movement of freight as a reduction in the number of trucks on our roads will lead to a reduction in vehicle operating costs, emissions, travel time, and improved safety. However, this must be balanced with effective regulations to ensure that heavier vehicles continue to operate safely and travel only on parts of the network that are appropriate.

While removing 50MAX permits will lead to a minor reduction in the cost and administration time involved in applying for permits for heavy vehicle operators, it is important to ensure that operators continue to comply with the relevant 50MAX proforma designs and safety standards, and operate only on the approved 50MAX network to ensure the safe and efficient use of the network.

#### What are possible negative impacts of removing 50MAX permits?

Council understands that the current 50MAX permitting process requires operators to provide a 50MAX proforma design of their vehicles and registration numbers and ensure that their vehicles meet safety performance standards.

Permits are a useful check to ensure heavy vehicles are built and used safely. Removing the permitting process could reduce the likelihood that operators will confirm that they are meeting the required dimensions and safety standards or travelling on roads/structures that are able to support the increased load.

While the proposed changes specify that operators will still need to meet the requirements of their approved proforma designs and operate only on the approved 50MAX network, removing the permitting process will result in enforcement being the only way to check that operators continue to comply with the 50MAX conditions.

Council currently has very limited information on enforcement in our network and how well operators are complying with the current permitting regulations. While Council recognises that moving to a high compliance/high trust model is beneficial by reducing costs and administrative burden, there is limited information provided in the consultation documents pertaining to the level of compliance with the current 50MAX regulations.

As a Road Controlling Authority (RCA) with a number of bridges on our network unsuitable for 50MAX vehicles, Council is concerned that removing the permitting requirements for 50MAX vehicles could reduce compliance with the approved 50MAX routes, leading to heavy vehicles travelling on structures within our network that are weight restricted which will lead to accelerated deterioration of structural elements of Council's bridges. Strengthening or replacing these structures will have a cost implication for Council as the RCA and the New Zealand Transport Agency (NZTA) as a co-funder.

While the consultation document states that 50MAX vehicles enable heavy vehicle operators to carry heavier loads without causing more road wear per tonne of freight, Council notes that this generally applies to roads with high-quality pavements. On rural unsealed or roads with poor pavement quality, 50MAX vehicles are likely to have increased damaging effects on the road infrastructure leading to increased maintenance costs or shortened asset lives.

If 50MAX permits are removed, there may be difficulties for RCAs/contractors/Police to divert or hold traffic back when there is a detour in place that is unsuitable for 50MAX vehicles.

### **How could any possible negative impacts of removing 50MAX permits be mitigated?**

To limit the negative impacts of operators travelling on routes that are unsuitable for 50MAX vehicles, it is important that the approved 50MAX network is suitable and accurate. This is likely to require additional work for RCAs in the short-term following implementation of the proposed changes to identify the approved routes to ensure they can be included by reference in the Rule as described in the consultation documents.

With more 50MAX vehicles on the road, there may also be an increased desire from operators to extend the approved network to routes where we currently have structures with restrictions. Strengthening or replacing these structures will have a cost implication for Council as the RCA and NZTA as a co-funder. Mitigation could include strengthening or replacing bridges, and route improvements funded through Council rates, the National Land Transport Fund (NLTF) and alternative user-based frameworks such as Heavy Vehicle Impact Fees.

### **If 50MAX permits are removed, are there any other implementation or compliance matters to consider?**

As discussed in the consultation document, if 50MAX permits are removed, the offences and penalties for breaking critical permit conditions will no longer apply. A lower infringement fee and penalty will apply instead. The consultation document notes that there may be a risk the

lower penalties may not provide sufficient deterrent. The consultation document then states that changes to the offences and penalties regulations may be needed to address this risk. We reiterate that removing 50MAX permits will result in enforcement being the only way to check that operators continue to comply with the 50MAX conditions.

To ensure that enforcement remains an effective method of ensuring compliance if the permitting process is removed, Council is supportive in principle of changes to the Offences and Penalties Regulations. Council considers that the penalties and infringement fees should be such that they provide a sufficient deterrent to non-compliance with the 50MAX regulations.

Council notes that in the current permitting regime, the risk of losing a permit may incentivise compliance with dimension, safety, and access requirements. If 50MAX permits are removed, in addition to the penalties and infringement fees there may be need to consider alternative methods of disincentivising non-compliance with the dimension, safety and access requirements.

Council understands that there are currently difficulties that arise from enforcing heavy vehicle regulations in the remote, rural areas of our network due to the non-availability of, and distances from, weigh sites. If enforcement is going to be the only way to ensure operators continue to comply with 50MAX regulations, there may be need to enhance enforcement capabilities.

Council considers that there is also an opportunity to improve the clarity of the 50MAX network maps which will be beneficial to operators and RCAs under the current permitting regime and in the proposed future removal of 50MAX permits regime. The current 50MAX network map provided on the New Zealand Transport Agency website shows the locations of structures that are unsuitable for 50MAX vehicles. However, the structures may be located large distances from the nearest intersection with no/limited opportunities for operators to turn around near the structure. It is also unclear how well the locations of the structures are being incorporated into the routes that heavy vehicle operators travel.

Council recognises that the road leading up to the structures can't always be posted as restricted on the maps because the 50MAX vehicles could be accessing a site near the structure, however, an option to improve clarity could be to include another level of classification in the maps referring to routes that have limited access but are not restricted. We envisage that this classification would extend along the road from the restricted structure to the nearest intersection with a suitable alternative route. This will indicate sections of road that are suitable for 50MAX vehicles for local trips but are not suitable as a through route due to the presence of a restricted structure.

**Please outline any specific impacts for you or your organisation if 50MAX permits were removed.**

Council considers that removing the permitting requirements for 50MAX vehicles may result in more 50MAX vehicles on our network. Council supports the efficient movement of freight and recognises that 50MAX vehicles enable operators to carry heavier loads without causing more road wear per tonne of freight than 44 tonne truck and trailer combinations if loaded correctly with the correct dimensions. However, the removal of 50MAX permits could increase the risk of vehicles not complying with the regulations and causing more wear on our roads. As stated earlier, the removal of 50MAX permits could reduce compliance with the approved 50MAX routes, leading to heavy vehicles travelling on structures within our network that are weight restricted.

**Do you support the use of 50MAX proforma documents as outlined in the Consultation Document?**

- Yes

**Should 50MAX drivers be required to hold and immediately present relevant 50MAX proformas to enforcement officers on request?**

- Yes

**Do you agree with the proposed content for 50MAX proformas, as outlined in the Consultation Document?**

- Yes

**If 50MAX proformas become required, are there any other implementation or compliance matters to consider? Please describe and use examples.**

Council considers that penalty costs for operators not carrying 50MAX proformas would need to be included in Land Transport (Offences and Penalties) Regulations 1999. Council imagines this would be in addition to any offences, penalties or fees that would apply for not complying with any of the other relevant rules such as meeting the requirements of the 50MAX proforma designs and operating only on the approved 50MAX network.

**Please outline any specific impacts for you or your organisation if 50MAX proformas become required.**

Not applicable as Council is not an operator or enforcer of 50MAX vehicles.

**Do you support the use of the approved 50MAX network map on the NZTA website, as outlined in the Consultation Document?**

- Yes

**If the approved 50MAX network is incorporated by reference in the Land Transport Rule: Vehicle Dimensions and Mass 2016, are there any other implementation or compliance matters to consider? Please describe and use examples.**

Council is supportive of incorporating the 50MAX network by reference in the Land Transport Rule as this may increase the visibility and use of the 50MAX network maps and help mitigate the risk of operators travelling on routes unsuitable for 50MAX vehicles.

As described in our previous statements, Council considers that there is an opportunity to improve the clarity of the 50MAX network maps. The current 50MAX network map provided on the New Zealand Transport Agency website generally shows the locations of structures that are unsuitable for 50MAX vehicles. However, the structures may be located large distances from the nearest intersection with no/limited opportunities for operators to turn around near the structure.

It is also unclear how well the locations of the structures are being incorporated into the routes that heavy vehicle operators travel. Council recognises that the road leading up to the structures can't always be posted as restricted on the maps because the 50MAX vehicles could be accessing a site near the structure, however, an option to improve clarity could be to include another level of classification in the maps referring to routes that have limited access but are not restricted. We envisage that this classification would extend along the road from the restricted structure to the nearest intersection with a suitable alternative route. This will indicate sections of road that are suitable for 50MAX vehicles for local trips but are not suitable as a through route due to the presence of a restricted structure.

It is important that the 50MAX network maps are updated regularly to ensure accuracy and suitability. This is likely to require additional work for RCAs in the short-term following implementation of the proposed changes to identify the approved routes to ensure they can be included by reference in the Rule as described in the consultation documents.

### **Proposal 2: Remove H Plates**

#### **Should “H Plates” continue to be a requirement for display on High Productivity Motor Vehicles?**

- Yes

#### **What are possible negative impacts of removing the requirement to display H Plates on High Productivity Motor Vehicles?**

Removing the requirement to display H Plates on High Productivity Motor Vehicles (HPMV) will make it more difficult to identify HPMV travelling on our network, resulting in more difficulties for enforcement when travelling on unapproved routes.

If H Plates are removed, there may also be difficulties for RCAs/contractors/Police to divert or hold traffic back when there is a detour in place that is unsuitable for HPMVs.

#### **How could any possible negative impacts of removing the requirement to display H Plates on High Productivity Motor Vehicles be mitigated?**

There is an opportunity to take advantage of technologies to improve the information on where HPMV are travelling on our network and enforcement through the use of telematics

and/or eRUC, however, the consultation documents make no reference to how regulation/enforcement is anticipated to improve following the proposed changes.

**If the requirement to display H Plates on High Productivity Motor Vehicles was removed, are there any other implementation or compliance matters to consider? Please describe and use examples.**

If H Plates are removed, there may also be difficulties for RCAs/contractors/Police to divert or hold traffic back when there is a detour in place that is unsuitable for HPMVs.

**Please outline any specific impacts for you or your organisation if the requirement to display H Plates on High Productivity Motor Vehicles was removed?**

Council/ enforcement officers will be unable to identify the HPMV vehicles which may lead to our weight-restricted bridges being exposed to higher than suitable loads, resulting in bridge distress. Council will have to invest to keep up with maintenance and renewal.