

Hamilton City Council Feedback

**Land Transport Rules Reform – Phase 2
Heavy Vehicle Productivity (25 February
2026 Discussion Document)**

NZ Transport Agency

30 March 2026

Strategic Context for this Feedback

Council has endorsed [The Mayor's Plan 2025 - 2028](#) to inform the projects and services it will deliver to ensure Hamilton has what it needs now and for the future – efficiently, responsibly, and sustainably. The seven guiding themes of The Mayor's Plan are:

- **Sensible, cost-effective infrastructure**
- **Grow with balance**
- **A central city to be proud of**
- **City places and services that work for people**
- **Open for business**
- **A transparent and efficient organisation**
- **Financial responsibility**

Council Approval and Status

This feedback was approved by the Chair and Deputy Chair of Hamilton City Council's City Delivery Committee on behalf of the Council on 30 March 2026. It does not, therefore, constitute a formally adopted Council position.

Feedback # 833

Key Messages

1. We **support** removing the requirement for heavy vehicle Rental Service Providers to hold an HPMV permit for combination repositioning, but only by providing explicit exemption details in VDAM.
2. We **do not support** 'OVERSIZE LOAD AHEAD' or 'OVERSIZE LOAD FOLLOWS' load pilot vehicle signs.
3. We **support** adding the proposed 'PREPARE TO STOP' load pilot vehicle sign to both VDAM and TCD. However, we submit that 'PULL OVER AND STOP' would be a more appropriate message on the pilot vehicle.
4. We **do not support** the proposal that all load pilot vehicle signs be enabled to be 'reverse colour'.
5. We **support** the retention of the current standard sign format for all load pilot vehicle signs, and 'reverse colour' be used only for the VMS equivalent, as is standard practice for traffic signs in New Zealand under the Traffic Control Devices Rule.
6. We **support** removing the requirement for a forward-facing load pilot sign for a rear load pilot vehicle
7. We **support** Class 1 driver licence holders to drive zero-emission vehicles with a gross laden weight of up to 7,500 kg. However, we question the logic of restricting this proposal to zero-emission vehicles.
8. We **support** overseas heavy vehicle licence holders to convert their licence by either sitting tests or undertaking approved courses.
9. We **support** Class 2 and 2L driver licence holders to drive electric public transport service buses with more than two axles and a gross laden weight of up to 22,000 kg. However, we again question the logic of restricting this proposal to electric public transport service buses.

Introduction

10. Hamilton City Council welcomes the opportunity to provide feedback on the NZ Transport Agency's **Land Transport Rules Reform Phase 2: Heavy Vehicle Productivity (25 February 2026 Discussion Document)**. Our support for the proposals outlined below is subject to clear implementation parameters, including cost transparency, alignment with network performance outcomes, and no transfer of unfunded obligations to local government.

Proposal 1: Rental Service Vehicle permit

11. We **support** removing the requirement for heavy vehicle Rental Service Providers to hold an HPMV permit for repositioning vehicle combinations, subject to a clear definition of operating conditions and enforcement parameters, by providing an explicit exemption in VDAM where the combinations:
 - Comply with proforma specifications;
 - Operate unladen (there are no goods being carried in addition to the rental stock);
 - Are not delivering for reward; and
 - Are being moved on the HPMV-approved road network.
12. This change would remove the need for exemptions to be purchased by Heavy Vehicle Rental Service Providers who often operate in time-critical environments, where empty trailers must be repositioned quickly to meet customer demand or maintain fleet balance across regions.

Proposal 2: Add new specifications for load pilot vehicle signs

13. We **do not support** two of the proposed new load pilot vehicle signs for use:
- OVERSIZE LOAD AHEAD
 - OVERSIZE LOAD FOLLOWS
14. We believe the current suite of signs is fit for purpose from a general road user's perspective, namely:
- WIDE LOAD FOLLOWS or WIDE LOAD AHEAD
 - HOUSE FOLLOWS or HOUSE AHEAD
 - LONG LOAD FOLLOWS or LONG LOAD AHEAD
15. We don't believe the public will understand, or care, that 'Oversize' means 'Tall', 'Wide' and 'Long' are currently very clear and provided for, and have direct implications regarding the associated road constraints for other road users. It is not clear what problems road users currently have when 'Tall' loads are signed as 'Wide' or 'Long', even if they may not be specifically wide or long, but the message is clear that evasive action of some form, albeit just slowing down, may be required.
16. As noted in the consultation document, *"Current dimension specifications for signs limit available space, restricting the number of characters a sign can display and remain readable at a distance by approaching road users."* We note that design requirements have not been undertaken to ensure that the proposed wording for 'OVERSIZE LOAD AHEAD/FOLLOWS' is clearly legible to other road users. 'Oversize' is considerably longer than 'Wide' or 'Tall', so the signs will either need to be quite a bit larger, which will be problematic in a standard vehicle rooftop configuration, or the font will need to be reduced, which will adversely affect the conspicuity of the signs and therefore the safety of all road users.
17. We **support** adding the proposed 'PREPARE TO STOP' load pilot vehicle sign to both VDAM and TCD. We agree that, where the following load generally takes up the entire road width and all oncoming traffic needs to slow down and pull over to the side of the road to allow safe passage, the current 'DANGER SLOW DOWN' signs on the first pilot vehicles do not clearly signal a need for road users to eventually come to a complete stop.
18. However, we question if the text 'PREPARE TO STOP' is the correct message. 'Prepare to Stop' is currently used prior to traffic signals (sign W10-5.1 TDC Rule p.216), and, when seeing it, drivers are used to stopping at a subsequent limit line or a standing queue, not for a wide load approaching them at speed. We submit that 'PULL OVER AND STOP' would be a more appropriate message on the pilot vehicle if the following load is approaching, which would give drivers time to find an appropriate place to pull over and stop.
19. We **do not support** the proposal that all load pilot vehicle signs be enabled to be 'reverse colour'. The current static, retro-reflective sign design is the same format used for all warning signs on the road network and is familiar to road users for this reason. Incorporating fully reflective backgrounds, they align with the international Vienna convention and best practice and have been proven to provide road users with the best conspicuity at night.
20. The 'House Follows' example provided in the consultation document compares:
- An incorrectly designed static sign design (the word length for 'HOUSE' in the correct Transport Series C font is 714 mm long, yet the word 'House' in the first photo image, based on the vehicle width, is nearly 2m wide); with

- An incorrectly designed internally illuminated variable message (VMS) sign (VMS font is specified at Transport Series D, not the font shown).
21. VMS signs are ‘reverse colour’ according to the International Vienna convention, and are specifically designed with a larger font than standard retro-reflective material signs to ensure equivalent conspicuity when observed from a distance. The same conspicuity cannot be obtained just by ‘reverse colour’ on retro-reflective signs and keeping the fonts and layouts the same, as is being proposed.
 22. The consultation document states, *“These initial exemptions were limited to specific vehicles and were intended to assess their effectiveness in warning other road users”*, yet it does not detail the outcomes of the evaluation of these exemptions. The schedule for the subsequent four exemptions states *“Matt black, illuminated at night”* and *“Fluorescent yellow-green retro reflective, illuminated at night”* – if the materials are matt black and retro-reflective, it is not clear what the reference *“illuminated at night”* refers to?
 23. We submit that this proposal is not evidence-based and does not reflect the international Vienna convention, best practice traffic sign design or national consistency for the safety of the industry or road users. We **support** the retention of the current standard sign format for all load pilot vehicle signs, and ‘reverse colour’ be used only for the VMS equivalent, as is standard practice for traffic signs in New Zealand under the Traffic Control Devices Rule.

Proposal 3: Remove forward-facing signs for rear pilot vehicles

24. We **support** removing the requirement for a forward-facing load pilot sign for a rear load pilot vehicle. We agree that displaying the forward-facing ‘PILOT VEHICLE’ sign to oncoming traffic that has already passed the over-dimension vehicle does not serve any purpose to those drivers and should not be required.

Proposal 4: Enable Class 1 driver licence holders to drive heavier zero-emission vehicles

25. We **support** Class 1 driver licence holders to drive zero-emission vehicles with a gross laden weight of up to 7,500 kg, subject to clearly defined safety and vehicle standards.
26. However, we question the logic of restricting this proposal to zero-emission vehicles instead of all vehicles with appropriate and equivalent safety standards. The consultation document states that zero-emission vehicles are modern vehicles equipped with advanced systems in order to comply with international heavy vehicle standards. This also applies to all modern vehicles, whether they be zero-emission, low-emission, or powered by internal combustion engines. If it is considered safe for Class 1 driver license holders to drive modern zero-emission 7,500 kg vehicles, it seems logical that it would be safe for Class 1 driver license holders to drive any modern 7,500 kg vehicle. We recommend consideration be given to extending the 7,500 kg limit to all ‘modern vehicles’ where there is clear evidence they are equipped with advanced safety systems equivalent to zero-emission vehicles, instead of basing the changes on a vehicle’s motive power.
27. We would expect any adopted changes to be subject to a post-implementation review to ensure there is accountability once changes are implemented.

Proposal 5: Improve the overseas heavy vehicle licence conversion process

28. We **support** overseas heavy vehicle licence holders to convert their licence by either sitting tests or undertaking approved courses, provided that competency standards are maintained. This would:

- Remove the need for NZTA to administer the individual exemption process;
- Reduce costs for overseas heavy vehicle licence holders seeking to convert to a New Zealand licence;
- Reduce costs for commercial vehicle operators who pay for employees with an overseas heavy vehicle licence to convert to a New Zealand licence; and
- Improve efficiency within the commercial vehicle operator industry by reducing the time taken for overseas heavy licence holders to convert their licence and start working.

Proposal 6: Enable Class 2 and 2L licence holders to drive heavier electric buses

29. We **support** Class 2 and 2L driver licence holders to drive electric public transport service buses with more than two axles and a gross laden weight of up to 22,000 kg, provided appropriate safety and training expectations remain in place.

30. However, we again question the logic of restricting this proposal to electric public transport service buses. The consultation document states:

- The handling of these heavier buses remains unchanged from non-electric urban-use buses with a gross laden weight of up to 18,000 kg, which can be driven on a Class 2 driver licence;
- Enquiries were conducted by NZTA, New Zealand Police, and the Bus and Coach Association in early 2025 to determine if any crashes were caused by Class 2 licence holders driving the heavier electric buses following the approval of the initial Class exemption in 2023; and
- No crashes or minor collisions were identified where the holding of a Class 2 driver licence (and not Class 4) was considered a possible crash contributor.

31. We submit that if it is considered safe for Class 2 and 2L license holders to drive 22,000 kg electric public transport service buses, it seems logical that it would be safe for Class 2 and 2L license holders to drive any modern 22,000kg public transport service buses. If the proposal is based on electric buses being just as safe to operate as non-electric buses, it would be helpful to be clear about what that assessment is based on. We recommend that consideration be given to extending the 22,000 kg limit to all public transport service buses, perhaps based on vehicle age (i.e., equipped with advanced safety systems) rather than differentiated by motive power.

32. We would expect any adopted changes to be subject to a post-implementation review to ensure there is accountability once changes are implemented.

Further Information and Opportunity to Discuss our Feedback

- 33.** Should the NZ Transport Agency require clarification of the feedback from Hamilton City Council, or additional information, please contact **Glenn Bunting** (Urban Integration Principal, Transport – Plan, Strategy and Programming) on **021 962 829**, or email Glenn.Bunting@hcc.govt.nz in the first instance.
- 34.** Hamilton City Council representatives would welcome the opportunity to discuss the content of this feedback in more detail with the NZ Transport Agency.

Yours faithfully



Councillor Sarah Thomson
Chair of the City Delivery Committee

Yours faithfully



Councillor Mesh Macdonald
Deputy Chair of the City Delivery Committee

FURTHER INFORMATION

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