



TRAFINZ Submission on –

Consultation on the application of electricity legislation to secondary networks and publically accessible charging infrastructure for electric vehicles- July 2016

1 Introduction

- 1.1 TRAFINZ (The New Zealand Traffic Institute Inc) represents a wide grouping of NZ local authorities, covering the majority of the New Zealand population. Its membership includes regional councils, the major metropolitan cities and smaller provincial authorities as well as private sector and non-local government members.
- 1.2 TRAFINZ strongly supports the increasing use of electric vehicles on NZ roads and the need to have a clear legislative framework to achieve this.
- 1.3 TRAFINZ is aware of the submissions that have been made by other local authorities, in particular Auckland Transport and Christchurch City Council and fully supports their views.

2 Impacts on local roads

- 2.1 We expect that most of the publicly accessible charging infrastructure for electric vehicles will be located on property controlled and managed by a local City or District Council as the statutory road controlling authority. This will include roads and off street car parking places (such as park and rides situated near public transport services and parking buildings).
- 2.2 Charging infrastructure will include necessary parking for vehicles while charging and this may be in reserved on street spaces or adjacent spaces off street. The activity will therefore affect both pedestrian and vehicle traffic flow, and may also impact on cycle paths and other special vehicle lanes. These effects will continue for the entire lifecycle of the charging infrastructure, not just for the duration of any installation works. In order for charging infrastructure to be utilised effectively, electric vehicles will need to be able to safely access the adjacent car parks and wait for long enough to charge the vehicle. Only road controlling authorities can prohibit or restrict the stopping and parking of vehicles and enforce such restrictions.

Wellington City Council, for example, advises that:

“WCC has a Low Carbon Capital Plan which includes encouraging the uptake of EVs. In this regard we are looking at installing some fast charging stations on street but before we do so we will need to make sure they comply with the relevant WCC policies on size and placement of cabinets and allocation/legalisation of parking spaces. We will need to ensure public safety and accessibility and consider urban design, street cleaning and future maintenance etc.

So the bottom line must be that the road controlling authority must have full control over the design and placement of EV charging infrastructure on public land including roads and footpaths.”

- 2.3 There are safety concerns in relation to charging infrastructure that go beyond electrical safety; for instance trip hazards in relation to cables that may cross footpaths or cycle lanes and consideration for events such as car accidents impacting the charging infrastructure.
- 2.4 Some matters will be local, such as local traffic and land-use conditions and some matters will be special and particular arrangements to specific sites. Any national guidance will need to allow for both local and special matters to be dealt with.

TRAFINZ considers that road controlling authorities, collaborating closely with utility operators, are best placed to determine the location of charging infrastructure. Guidance should be provided at the national level, with appropriate mechanisms to determine local and special matters.

3 Response to Questions

- 3.1 TRAFINZ responds below to Questions 3, 4 and 5 in the Consultation Paper, these being the matters most directly relevant to its members.
- 3.2 ***Question 3. Do you think having a consistent approach to classifying charging infrastructure is necessary and/or beneficial? Do you think they should be classified differently for access rights and electrical safety purposes?***

TRAFINZ strongly supports having a consistent approach to classifying charging infrastructure to avoid possible confusion between the treatment and approval processes for sites in different Council areas and on the State Highway network.

3.3 Question 4. Do you think, for access right purposes, charging infrastructure should be categorised as works or electrical installations? Please explain why you consider it to be one or the other.

TRAFINZ strongly supports categorisation as ‘electrical installations’. This will allow Councils to retain full control of their location and apply its district planning and road controlling powers to ensure that road safety and parking matters are fully considered, in collaboration with the applicant. The alternative categorisation, as ‘works’ provides no effective control on location, as Councils powers to make conditions for works are effectively limited to temporary measures to be taken during construction.

3.1 Question 5. Do you think the provision of national information and guidance from the NZTA would be sufficient to clarify the access rights as they apply to charging infrastructure?

TRAFINZ supports information and general guidance being made available nationally through NZTA, with the proviso that such information advises that there will be specific local information available from regional or local road controlling authorities.

4 Summary

TRAFINZ appreciates the opportunity to make these submissions on behalf of our communities. We welcome involvement in this important area of transport policy development, and are pleased to comment further as requested.

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