Office of the Mayor

CITY OF DUNEDIN
NEW ZEALAND

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Te Manatū Waka
Ministry of Transport

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Kia ora

CHARGING OUR FUTURE – ELECTRIC VEHICLE CHARGING STRATEGY

Dunedin City Council (DCC) welcomes the opportunity to provide feedback on the draft Electric Vehicle Charging Strategy: Charging Our Future.

1 DCC is responsible for land use and transport planning, and management of the local road network in Dunedin. Currently Dunedin City has six public fast chargers including one in Middlemarch. DCC recognise that there is a need to increase the availability of chargers in the city, particularly for those without access to off street charging.

2 DCC has been considering what is needed to increase the availability of chargers in the city and what council's role should be in relation to the private sector. In that context, the DCC welcomes increased government direction in this challenging and fast-evolving area.

3 DCC supports moves to enable the increased uptake of electric vehicles (EV) as part of the wider Emissions Reduction Plan implementation. DCC has a target for city wide emissions to be net carbon zero by 2030, and fleet electrification will play an important role in achieving this target. Dunedin City already has higher than average uptake of EVs, with approximately 4% of new cars registered in 2021/22 being fully electric and a further 13% hybrids.

4 DCC is supportive of the proposed vision that *Aotearoa's electric vehicle charging infrastructure support that transition to and use of low emissions transport by being accessible, affordable, convenient, secure and reliable.*

5 DCC however, considers the strategy would benefit from being more explicit on several key points, including:

a) How the strategy links to other initiatives such as the emission reduction plans to ensure both strategies are complimentary and that conflicts are avoided or managed.
b) What operating model should be adopted for EV charging, including the roles of Central and Local Government, and the commercial sector in the provision of EV charging infrastructure.

6 The DCC seeks guidance on how the Charging Our Future strategy relates to other transport plans and objectives, particularly the vehicle kilometres travelled (VKT) reduction plan and associated targets, and how trade-offs will be managed. Charging Our Future proposes increasing on road EV charging with no guidance on how this may impact the development of bus or cycle lanes, the ability for councils to manage parking resource, private property rights, or regulation around land use.

7 Without an explicit link to other important contributors to emissions reduction, Charging Our Future could increase the challenges for the DCC in managing competing demands and regulation of road space, particularly if it leads to increased public expectations about the provision of on-road EV chargers.

Outcome 1: Our national EV charging system is underpinned by affordable, reliable, secure, and safe power supply and infrastructure.

8 DCC supports having an EV charging system underpinned by affordable, reliable, secure and safe power supply and infrastructure. The focus on greater use of smart chargers and incentives to charge off peak will help maximise the efficiency of the existing electricity network.

9 DCC through its holding company Dunedin City Holdings owns Aurora Energy the network provider for most of Dunedin City.

Outcome 2: All EV users can safely access and use EV charging when and where needed.

10 DCC supports the intent to improve the equity of access to chargers for people in different housing types and across varied geographic areas.

11 We are currently working through the provision of EV charging infrastructure for electric buses with Otago Regional Council (ORC).

Focus Area 2a: Improving the equity of, and access to, safe residential/home charging.

12 Dunedin City has areas of the city with limited off-street parking and narrow roads. It has also enabled an increase in density under the Second Generation District Plan which will result in more housing without off-street parking.

13 DCC is currently facing a challenge with charging cords being run across footpaths to enable charging where there is no off-street parking. This is inconsistent with our Roading Bylaw and is a health and safety hazard. This is particularly challenging in some locations where there is already conflict between parked cars and other road users (e.g. narrow footpaths, cars parking on footpaths) meaning it is impractical to install on-street charging in these areas. Putting in on-street chargers may also conflict with future plans to improve walking and cycling infrastructure or improve bus services to deliver VKT reductions.

14 While DCC supports using targets to signal an acceptable ratio of chargers in areas where off-street charging isn't feasible, greater clarity is needed around how this can be delivered. DCC requests that the Ministry of Transport further considers and provides guidance on alternative approaches to charging for areas with limited off-street parking that does not place the onus on Councils to make trade-offs with other strategic transport goals. For example could a community or commercial charging hub or destination charging better provide for this demand?

15 Dunedin City has areas including around the University with a large numbers of renters. Dunedin supports the government developing a case for a 'right to charge' to ensure equitable access to electric vehicle charging for renters.

Focus area 2b: Accommodating for geographic variation in charging needs and energy supply

16 DCC has a large rural area with small townships and supports having targets to ensure our rural communities have access to EV chargers for residents and visitors. DCC would like to see greater flexibility in how this target is achieved. Providing chargers at municipal or community facilities may not always be the best place for these.

17 Often existing statutes or regulations influence what a council is able to do. For example where land is classed as a reserve there are limitations on what council can do.

18 DCC would support greater flexibility in the way the target for EV charging for communities with a population over 2000 is delivered, rather than specifying that it must be at municipal or community facilities. DCC recommends that the Ministry further explore the role existing fuel stations and commercial EV charging providers can play in meeting the needs of rural communities and travellers.

Outcome 3: Aotearoa's EV charging system is underpinned by integrated planning and standards across multiple sectors

19 DCC supports having greater standardisation and interoperability of EV charging infrastructure. Providing a consistent experience for customers without them needing to check charger compatibility and having different applications for a variety of providers will help encourage EV uptake.

20 DCC supports enabling data sharing where appropriate (e.g. EV charger and/or network providers) to support standardisation and improved customer experience. DCC also supports better planning and seeks further information on how this will be achieved in practice, such as a roadmap for improvement in standards over time.

21 SNZ PAS 6011:2021 and SNZ PAS 6010:2021 provide technical guidance around EV chargers and Waka Kotahi has been developing guidance to improve the consistency of road markings and signage. However, there is currently a gap in guidance for councils around planning and regulation of EV chargers. DCC would support increased guidance and support for councils, however this needs to be delivered with local government recognising that a one size fits all approach will not always work.

22 DCC is concerned that the strategy does not address existing regulatory challenges around on-street parking, including the following:

a) Enforcement officers do not have sufficient evidence to determine which vehicles are battery electric or plug in hybrids, so in some cases internal combustion engine cars are using EV charging spaces as free parking.
b) Whether people can be reasonably expected to pay for parking and charging and how.
c) Whether it is possible or appropriate to enforce if a vehicle is charging or not.
d) How to ensure fair access to chargers where parking is not time restricted (e.g. on-street chargers in residential areas).

e) How to manage EV charger encroachments where property owners wish to install EV chargers that impinge on the road reserve.

23 DCC would support the Ministry of Transport undertaking further work and providing guidance on:

a) How to plan for EV charging as part of new developments in a way that does not see responsibility for ongoing operation and maintenance transferred to council once the development is complete.
b) How best to regulate on-street EV chargers to ensure fair access.
c) How best to manage enforcement as described in 22a-e.

Outcome 4: Aotearoa's EV charging market functions effectively, can adapt and evolve over time, and is attractive to users, operators, and investors

24 Charging our Future does not explicitly discuss the operating model for how EV chargers will be delivered. It has a focus on accelerating commercial investment and an implicit assumption that the public sector will provide chargers where it is not commercial to do so. As we transition to a lower carbon transport system there is uncertainty about what the operating model for EV charging will be.

25 DCC would like to see further exploration and discussion about what the best operating model should be. There needs to be some explicit consideration of what role is appropriate for central and local government to play, as certainty of direction will maximise the efficiency and effectiveness with which local government can deliver anticipated outcomes under the strategy.

26 This should include whether or not local government should play a role as a provider of infrastructure, or if it should be left to the private sector, with a planning and regulatory role for local government to ensure equitable provision. For example, could sites be bundled or a quota used so less commercial charging sites are provided as part of a wider market offering provided by the commercial sector. The current model appears to privatise the profitable aspect of EV charging, and leaves ratepayers to cover the cost where it is not.

27 DCC requests that the Ministry of Transport consider different methods of procurement, licensing, leasing, or contracting provision of EV charging to maximise public benefits. DCC also submits that if local government is to have a role in providing EV chargers there will need to be resourcing available and support to increase capability and capacity for council to deliver this.

Focus area 4a. Accelerating commercial investment.

28 DCC supports government working with investors, charge point network operators/providers and other key parties to support investment in public charge points where this is in alignment with broader urban planning and has obligations to ensure public property is used in a manner that benefits the wider public.

29 DCC support government continuing to co-fund the demonstration of innovative charging technologies and working with industry to address barriers to uptake.

30 There is a need a ensure that lower socio-economic areas where uptake of EVs is slower do not get disadvantaged if it is less commercial. DCC supports the intent to ensure public funds

are targeted at areas where commercial investment is unable to fully deliver. However, greater clarity is needed about the source of these public funds. Is there an expectation that councils will be expected to provide charging infrastructure where it is not commercial, or will Government provide funding?

Outcome 5: Our national EV charging system supports the transition to, and use of, low emissions transport modes across the wider transport system

Focus area 5a. Progressing work on heavy vehicle charging (buses and trucks)

31 DCC encourages continued research and engagement with the sector to understand how an effective public charging network for heavy vehicles might look.

32 Heavy vehicle charging has some different considerations from light vehicle charging and it may not always be possible to incorporate into the same sites as light vehicles. Heavy vehicle charging needs to consider charger typology, network implications and access considerations (links to major freight routes, turning circles) and should be preceded by heavy charging demand verification/forecasting.

33 While there are a number of uncertainties and challenges around decarbonising heavy freight, DCC would like to see a greater emphasis on shifting freight to rail where possible. In addition to having a lower carbon emission by volume, shifting freight to rail can have other benefits to our cities, including improving safety and reducing the separation of our communities along major freight routes like State Highway 88.

Conclusion

34 The DCC thanks you for the opportunity to submit on the draft Electric Vehicle charging strategy: Charging Our Future.

Nāku noa, nā

Jules Radich
MAYOR OF DUNEDIN