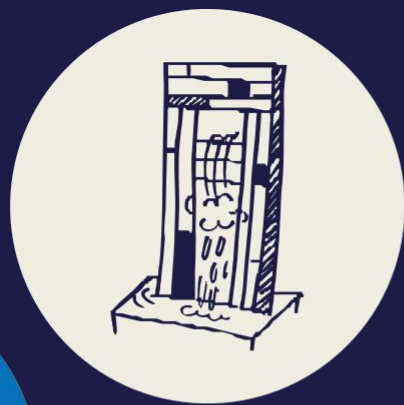


HAMILTON CITY COUNCIL SUBMISSION

Charging our Future – Draft Long Term Electric Vehicle Charging Strategy for New Zealand (March 2023)

Ministry of Transport



16 May 2023



**Hamilton
City Council**
Te kaunihera o Kirikiriroa

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this submission is aligned to the priorities '**A city that's easy to live in**' and '**A green city**'.

Council Approval and Reference

This submission was approved by the Chair of Hamilton City Council's Infrastructure and Transport Committee on 16 May 2023.

Hamilton City Council Reference D-4661994 - Submission # 735.

Key Messages

1. INTRODUCTION

2. Hamilton City Council supports the overall direction and intent of the March 2023 **Draft Long Term Electric Vehicle Charging Strategy for New Zealand**.
3. For over 18 months, Hamilton City Council has been active at the national level and instrumental in driving regional collaboration on Electric Vehicle Supply Equipment (EVSE) network development.
4. The Waikato Regional EV Infrastructure Working Group was established with the intent to build a more strategic, collaborative, and consistent approach towards EVSE network development across the region - to support both Councils and EVSE providers to move forward with confidence.
5. Through networking and developing a shared toolkit, this work reduces duplication of effort and resource for Councils, and increases consistency in expectation setting, messaging, and process for providers, as well as providing experience and better outcomes for EV users across the Waikato Region.
6. Hamilton City Council actively participates in the 'Big 5' EV forum run by Waka Kotahi. This is a place for the five metropolitan cities to learn from each other, collaborate, share information and work and to contribute to relevant Waka Kotahi projects such as drafting EVSE guidance.
7. Our involvement, learnings, and experiences as part of these groups and in recently setting up a trial of 10 EV charging stations at a number of our key visitor destinations and other facilities in Hamilton, inform the comments in this submission.
8. We welcome discussions with the Ministry of Transport about the regional work and planned future activity. Waka Kotahi has representation on the Group and has expressed that there may be interest in sharing our approach nationally.

9. VISION AND SCOPE

10. We support the Vision of the Draft Strategy as being both concise and thorough and focused on the key requirements for a fit-for-purpose and user focused EVSE network.
11. We support the three components of the Scope but note that the commitment to an equitable transition for all New Zealanders to EV use is not strongly reflected in the body of the Draft Strategy. Some suggestions are made as to where this could be enhanced.

12. KEY THOUGHTS

13. **Roles and Responsibilities of the Different Players:** This conversation is missing from the Draft Strategy and is seen as fundamental to successful buy-in and delivery of it. There are sections that imply Councils may be expected to provide infrastructure, which for some doesn't sit comfortably as a core service of a Council. It is not clear what the Government expects its role to be or that of Waka Kotahi, commercial EVSE suppliers or the energy distributors. Clarity in this space would support clearer direction-setting, terms of engagement and boundaries of operation.
14. **Diversity in Need and Priorities:** Different Councils and their communities have different EVSE needs and priorities. This is acknowledged to a point, but we believe the Draft Strategy does not go far enough. The Draft Strategy also appears to have a strong focus on Direct Current (DC) and journey charging infrastructure. We believe there is value in Alternating Current (AC) charging and that a robust EVSE network balances both types of charging. More space within the Final Strategy, network development planning and EECA funding for accommodating different types of EVSE and approaches to network development would be welcome.

15. **Data and Information Sharing:** We strongly support all intentions within the Outcomes and Focus Areas of the Draft Strategy to gather, analyse, and openly share more quality and comprehensive information and data relating to EVSE and EV ownership, use patterns and quality projections of growth and trend expectations.
16. This information is greatly lacking and essential to support evidence-based planning and to ensure we grow a network that has the 'right infrastructure in the right place at the right time'. There needs to be visibility of the detail of existing and planned electricity networks and capacity. Our experience to date suggests this is a top priority if we are to be able to move forward at pace and with confidence, and that we are building a sound and sustainable network.
17. **A Commitment to all New Zealanders to Support an Equitable Transition:** The Final Strategy needs to ensure that it better supports the existing inequity of opportunity for those wanting to transition to EVs and do what we can to leverage the benefits of EVSE for marginalised communities, localities, and demographics e.g., those with accessibility challenges.
18. **OUTCOMES AND FOCUS AREAS**
19. **OUTCOME 1: Our National EV Charging System is Underpinned by Affordable, Reliable, Secure and Safe Power Supply and Infrastructure**
20. **Focus Area 1a: Minimising stress on the electricity network:** We agree with the importance of this Focus Area, ensuring we are forward thinking and proactively planning for and mitigating the impact of increasing EV adoption on the national (and local grids). This requires better information more freely shared, the lack of which is currently hindering best practice network design at the local government level.
21. **OUTCOME 2: All EV Users can Safely Access and use EV Charging When and Where Needed**
22. We see space within this Outcome (or perhaps within Outcome 3) for emphasising important best practice in terms of safety and accessibility considerations and suggest a third Focus Area or area of activity within an existing Focus Area relating to this.
23. In particular, a focus is needed on ensuring not just access but accessibility for all EV users. This could be supported by building principles of universal design, safety through environmental design and requirements to supply EVSE for mobility spaces into the Strategy to support good, equitable design of the network from the outset.
24. If targets are proposed for this Focus Area, these need to be based on strong evidence of what is best practice for the types of communities they are set for and have clarity around responsibility, monitoring and enforcement of achieving these.
25. We question whether incentives for greater commercial provision of EVSE should be included to support this Outcome, such as in large accommodation (e.g., hotels), retail and parking complexes.
26. **Focus Area 2a: Improving the equity of, and access to, safe residential/home charging:** We support further investigation to understand the different barriers and issues for access to residential EV charging.
27. We would also be pleased to see reviews carried out - based on evidence from such investigations - of current relevant regulations and guidance provided to local governments in terms of best practice policy and regulation relating to EVSE in residential developments.
28. **Focus Area 2b: Accommodating for geographic variation in charging needs and energy supply:** We particularly support the identified further actions *"Monitor the expansion of the public EV charging network in line with EV uptake forecast levels across regions to inform investment"* and *"Implement a consistent, practical planning and approval process for new EV chargers across councils"*.

29. We suggest that this Focus Area acknowledges the importance of understanding the needs of EV users from their perspective. It should also consider the views and needs of those aspiring to make the switch to EVs and any concerns or barriers they face to doing so.
30. We believe it is good practice to consult the full range of interested and affected groups within communities on their preferences and aspirations in terms of EVSE network development in their area and those they use regularly.
31. If targets are to be set for 2025 that are the responsibility of Councils to achieve, the resources and planning to do would need to be built into 2024 - 34 Long Term Plans, and as such clarity on this would be required urgently.
32. We also want to see flexibility in the choice of the infrastructure if it is required e.g., the EECA Low Emissions Transport Fund has a focus on supporting DC chargers in the current rounds, whereas we emphasise that for some Councils and communities this is not the priority.
33. **OUTCOME 3: Aotearoa's EV Charging System is Underpinned by Integrated Planning and Standards Across Multiple Sectors**
34. **Focus Area 3a: Improving standardisation and interoperability:** We support improving standardisation and interoperability of EVSE for the purposes of an improved and consistent user experience. More emphasis on 'customer-focused' and 'user experience' would be welcome.
35. **Focus Area 3b: Optimising data capture and use:** Although we are very supportive of robust data collection, analysis and sharing of insights in relation to EV uptake and how EVSE is currently being rolled out, we would appreciate seeing more emphasis on national-led data enquiry, projections for EV ownership growth, locations of predicted growth and EVSE use patterns to support planning as we do not have the resources to commission this work at a local level.
36. **Focus Area 3c: Consideration of housing and urban development planning, where appropriate:** We support the intent to explore regulatory change in the housing and urban development sector to encourage charge-ready infrastructure or installed charge points in new builds. As with Auckland, Hamilton City Council is building similar requirements into its District Plan.
37. We encourage continued consideration of alignment of this work with other initiatives underway and the wider context of environmental and transport system goals e.g., goals to increase public transport use and reducing vehicle kilometres travelled (under the National Emissions Reduction Plan - which includes EVs), generate challenges associated with encouraging more carparks and associated vehicle use, despite them being EVs.
38. **OUTCOME 4: Aotearoa's EV Charging Market Functions Effectively, Can Adapt and Evolve over Time, and is Attractive to Users, Operators and Investors**
39. **Focus Area 4a: Accelerating commercial investment:** We support the intent to maximise a market-led rollout to build the EVSE network. This reflects our belief that, similar to petrol stations, a Council's role does not include EVSE provision and that this is better left to the commercial sector. While we may choose to support EVSE in our communities, our understanding of community needs and priorities for public funds within the transport system of Hamilton are likely to be different to that of commercial EVSE providers.
40. We support all further actions suggested within this Focus Area.
41. **Focus Area 4b: Enabling innovation in new technology and business models:** We support the intentions and further actions suggested within this Focus Area.
42. **OUTCOME 5: Our National EV Charging System Supports the Transition to, and use of, Low-Emissions Transport Modes Across the Wider Transport System**

43. We suggest work in relation to heavy vehicles and decarbonising other modes of transport remain cognisant and complimentary to developments in other types of energy sources, and should these be found to be a more effective and efficient options than electric power, that the Strategy be reviewed accordingly.
44. Supporting the use of other types of e-devices (bikes, scooters, mopeds) is missing. This is an area of demand for many communities that can support transition of drivers to other, more low-emission modes of travel and would sit well within this Strategy.
45. **Focus Area 5a: Progressing work on heavy vehicle charging (buses and trucks):** While Hamilton City Council is not actively looking into this area at this stage, the Council supports the intentions and further actions suggested within this Focus Area.
46. We encourage this Focus Area to be cognisant of the matters discussed in Focus Area 2b to ensure small and/or rural towns are well considered in regional and national network development.
47. **Focus Area 5b: Decarbonising other modes across the system and ensuring a coordinated investment approach:** While Hamilton City Council is not actively looking into this area at this stage, the Council supports the intentions and further actions suggested within this Focus Area.

Introduction

48. Hamilton City Council welcomes the opportunity to make a submission to the Ministry of Transport's March 2023 **Charging our Future - Draft Long Term Electric Vehicle Charging Strategy for New Zealand**.
49. Although we support the overall direction and intent of the Draft Strategy, we do have some reservations and suggestions for prioritisation and refinement.
50. Our feedback is primarily structured under the Draft Strategy's five **Outcomes** and their constituent **Focus Areas**.
51. We note a number of inferences in the Draft Strategy on the need for collaboration, networking and shared systems and development of consistent approaches, standards and support frameworks and would like to draw the attention of the Ministry of Transport to such work that is currently underway.
52. Early in 2022, three Councils in the Waikato Region, who were experiencing pressure to take action on developing EV charging infrastructure in their areas, came together to pool their knowledge, learnings and experiences. Hamilton City Council has been instrumental in the establishment of the Waikato Regional EV Network Infrastructure Working Group (and associated Elected Member Steering Group), which was formed with a central goal to develop a 'Toolkit' of templates, resources, and guidance for Waikato Councils to use on their EV Supply Equipment (EVSE) journey.
53. The intention of this Group is to seek a more strategic, collaborative, and consistent approach towards developing the EVSE network across the Waikato – to support both Councils and EVSE providers to move forward with confidence.
54. Importantly, this work would result in reduced duplication of effort and resource use for participating Councils, consistency in expectation setting, messaging and process for providers and consistency in user experience and best practice outcomes for EV users across the Waikato Region. Since late 2022, membership of the Group has grown to include all councils and meetings are well attended and valued as demonstrated by strong participation and engagement.
55. To date, the following documents have been developed and are in final review (except principles which are final) and undergoing communications design before the toolkit is published:
 - Guiding strategic principles and priorities to support decision-making.
 - A comprehensive set of weighting criteria to assess EVSE proposals and procurement processes.
 - Generic EVSE policy template (based on the guiding principles).

- Licence to Occupy Agreement templates (two versions lite and comprehensive to cater to different needs and scales of activity or types of engagement).
 - Considerations for choosing EVSE sites/locations (insights into why and where to put in terms of network development as well as site specific/technical considerations).
 - Collated links and resources – useful articles, research, government policies and standards.
 - FAQs to support Councils at the beginning of their EVSE network development journey.
 - Glossary of Terms for EVSE and related activity to support consistency in terminology and understanding.
56. Hamilton City Council also actively participates in the 'Big 5' EV forum run by Waka Kotahi for the last 18 months, which is a place for the five metropolitan cities to network, learn from each other, share working drafts and approaches and to input into Waka Kotahi projects such as the EVSE guidance currently being drafted.
57. Our involvement, learnings, and experiences as part of these groups and in setting up a recent trial of 10 EV charging stations at a number of our key visitor destinations and other facilities in Hamilton inform the comments in this submission.
58. We would be very happy to talk to the Ministry of Transport about the regional work and planned future activity. Indeed, Waka Kotahi has representation on the Group and has expressed interest in sharing our approach nationally.

Vision and Scope

59. We support the Vision of the Draft Strategy as being both concise and thorough and focused on the key requirements for a fit-for-purpose and user focused EVSE network.
60. We support the three components of the Scope. However, we note that the commitment to an equitable transition for all New Zealanders to EV use is not strongly reflected in the body of the Draft Strategy. Some suggestions are made as to where this could be enhanced.

Key Thoughts

61. Hamilton City Council believes that a number of key conversations and important considerations are missing from the Draft Strategy. A brief outline of what these are follows, with more specific suggestions relating to these throughout the feedback contained under the relevant headings.
62. **What are the Roles and Responsibilities of the Different Players?**
63. In considering how best to respond to the growing interest in and use of EVs within our transport system, Hamilton City Council first took the time to ask what its role and responsibilities are in this space. Staff took this conversation to Council's Infrastructure and Transport Committee and asked them to determine where on a scale from promoter/supporter up to service provider they saw Council's role. The Committee chose the category of 'Active Facilitator' – proactively building an environment that encourages and supports increased EV infrastructure. This was also the popular choice for the other Waikato Councils.
64. This conversation is missing from the Draft Strategy. There are sections that imply a certain expectation that Councils will provide infrastructure, for some this doesn't sit comfortably as a core service of a Council. It is not clear what the Government expects its role to be or that of Waka Kotahi, commercial EVSE suppliers or the energy distributors. We believe clarity in this space would support clearer direction-setting, terms of engagement and boundaries of operation.
65. **Diversity in Need and Priorities**
66. This theme does come through in part in Outcome 2b, but from our experience working across regional and national forum, we believe it could do with more emphasis i.e., emphasis not only on that some geographical features (such as being rural or a seasonal holiday hotspot) will mean EVSE

network requirements are particular, but also on allowing for different community or Council priorities for local EVSE networks.

67. The Draft Strategy appears to have a strong focus on Direct Current (DC) and journey charging infrastructure. For us, as a city with high ability for off-street residential charging and being bounded by state highways that bypass the city, where EV users on a journey are likely to be supported by DC charging hubs to the north and south of the city - this is not our priority.
68. Hamilton City Council is particularly interested in how to support visitors coming to spend time at our attractions, events and facilities and using Alternating Current (AC) to do so. Other Councils will have different priorities for the EVSE networks in their areas e.g., using infrastructure placement to 'enliven' marginalised communities. We believe there is value in AC charging and that a robust EVSE network balances both types of charging. More space within the Final Strategy, network development planning and EECA funding for accommodating different types of EVSE and approaches to network development would be welcome.
69. We also suggest that there are different ways the development of EVSE networks may contribute to supporting better outcomes for communities beyond simply ensuring people can get access across the country in their EV with confidence. We would like to see some broader and more innovative discussion on this.
70. **Data and Information Sharing**
71. We strongly support all intentions within the Outcomes and Focus Areas of the Draft Strategy to gather, analyse and openly share more quality and comprehensive information and data relating to EVSE and EV ownership and use patterns and quality projections of growth and trend expectations.
72. This information is greatly lacking and essential to support evidence-based planning and to ensure we grow a network that has the 'right infrastructure in the right place at the right time'.
73. Focus Area 3b raises this need, however we would like to suggest the data that is useful for Councils to understand community use patterns and if and how needs are being met are quite different to that of other players in the network. We hope consideration will be given to this as data collection and sharing systems develop.
74. Another aspect relating to information that Hamilton City Council would like to emphasise as a priority is visibility of the detail of existing and planned electricity networks and capacity. This is noted as a further action under Focus Area 1a. Our experience to date suggests this is a top priority if we are to be able to move forward at pace and with confidence, and that we are building a sound and sustainable network.
75. **A Commitment to all New Zealanders to Support an Equitable Transition**
76. EVs are inherently (due to their relative expensiveness) not available to all New Zealanders. How to ensure we at least do not exacerbate existing inequity of opportunity for those wanting to transition to EVs and do what we can to leverage the benefits of EVSE for marginalised communities, localities, and demographics (e.g., those with accessibility challenges) is a common discussion at the Waikato Regional EV Infrastructure Working Group.
77. Hamilton City Council would like to see this commitment more thoroughly embedded throughout the Final Strategy and more thought given as to how national network development might better support this scope statement, including what the obligations of the market may be in terms of equitable outcomes.

Outcome 1: Our national EV Charging System is Underpinned by Affordable, Reliable, Secure and Safe Power Supply and Infrastructure

Focus Area 1a: Minimising stress on the electricity network

- 78. Hamilton City Council agrees with the importance of this Focus Area, ensuring that we are forward thinking and proactively planning for and mitigating the impact increasing EV adoption will have on the national (and local grids), which is essential. However, to do this we need better information and that is currently hindering best practice network design at the local government level.
- 79. In our experience, the lack of visibility of existing and proposed electricity networks, connection points and capacity has been a barrier to moving quickly on planning and delivering EV charging infrastructure.
- 80. Improved visibility of such information could support more conversations on, and potentially incentivise, proactive investment in initiatives such as solar powered micro-grids to augment spaces where grid capacity is low. Better information creates greater confidence for local government to take action to drive our own innovative approaches in this and other progressive areas.
- 81. As a result, we suggest a second Focus Area relating to visibility of the electricity network and encourage the prioritisation of the suggested further action: *Publish detailed electricity network capacity data so public and private infrastructure planners can see where constraints are to encourage efficient investment.*
- 82. It makes sense to encourage EV users to charge during off-peak times but may be worth considering if this has any implications for disadvantaging some users in terms of an equity lens i.e., are the off-peak times the main times certain demographics may be needing to charge and therefore being penalised?

Outcome 2: All EV Users can Safely Access and use EV Charging When and Where Needed

- 83. This Outcome appears to be the one best placed to support the scope commitment for an equitable transition to EVs for all New Zealanders. However, it is missing a link to the users/communities having the opportunity to say where and when they want and need EVSE.
- 84. We would like to see consideration of how strategic network planning can support other important community outcomes, such as leveraging EVSE placement to bring economic benefits to or 'enlivening' potentially marginalised communities.
- 85. There is also little comment (if any) on the need for cultural considerations and engagement when determining best practice and the appropriateness of locations.
- 86. We see space within this Outcome (or perhaps within Outcome 3) for emphasising important best practice in terms of safety and accessibility considerations and suggest a third Focus Area or area of activity within an existing Focus Area relating to this.
- 87. In particular, a focus on ensuring not just access but **accessibility** for all EV users. This could be supported by building principles of universal design and requirements to supply EVSE for mobility spaces into the Strategy to support good, equitable design of the network from the outset.
- 88. Hamilton City Council has been working with other Councils in the Waikato Region to compile a list of considerations for ensuring safe and accessible charging options for EV users when they are not charging at home. This list identifies a range of considerations such as those relating to EVSE site and location choices (safety through environmental design, appropriate lighting, and reception), consideration of universal design and accessibility needs for those with limited or assisted mobility, and physical placement choices that facilitate the best use/access to the infrastructure for example.

89. This Outcome hints at/suggests targets but is not explicit about whose responsibility it is to achieve them. Please refer to our comments in the 'Introduction' section in relation to the need to understand the role of different actors in developing the public EVSE network at different levels (national, regional, and local).
90. We also question whether incentives for greater commercial provision of EVSE should be included to support this Outcome, such as within large accommodation (e.g., hotels), retail and parking complexes.

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

91. We support further investigation to understand the different barriers and issues for access to residential EV charging.
92. We would also be pleased to see reviews carried out - based on evidence from such investigations - of current relevant regulations and guidance provided to local governments in terms of best practice policy and regulation relating to EVSE in residential developments. Hamilton City Council has recently revised its District Plan rules in relation to this to ensure minimum provision of EVSE in future developments.

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

93. As part of the work Hamilton City Council has been driving within the Waikato Region, the great diversity of needs and priorities for each district and communities within each of these has been a very salient and important consideration.
94. As such, we see this Focus Area - and the acknowledgment of differing needs and capabilities behind it - as a priority when considering a national Strategy and planning. The needs of Hamiltonians and the support EV users need from Hamilton City Council are very different to those of Wellingtonians or Coromandel holidaymakers.
95. This Focus Area highlights the need for good information, data, and evidence-based planning to support development of the 'right infrastructure in the right place at the right time'. Refer to previous 'Key Thoughts' section comments. We particularly support the identified further action: *Monitor the expansion of the public EV charging network in line with EV uptake forecast levels across regions to inform investment.*
96. In relation to the further action: *Implement a consistent, practical planning and approval process for new EV chargers across councils.* We support this as it is similar to work that is well progressed within the Waikato Regional EV Infrastructure Network Working Group that we are finding valuable. We have developed a Toolkit for all Councils within the Waikato Region to access that offers support in planning, weighting criteria for considering infrastructure proposals, policy, and contractual templates - all supported by overarching guiding strategic principles and priorities. We would be glad to share this work to inform development of any national approach rather than 'reinventing the wheel'.
97. We suggest that this Focus Area acknowledges the importance of understanding the needs of (existing and potential future) EV users from their perspective. Also, that communities are consulted on their preferences and aspirations in terms of the EVSE network development in their areas and those they use regularly.
98. Regarding the proposed targets, we would want to see more detail on these, including whose responsibility it is to meet the targets/provide the infrastructure, how many chargers constitutes 'public charging at municipal or community facilities', and what support is available to deliver these. Any targets would benefit from careful analysis of need and definitions e.g., what defines 'limited off-street parking'?

99. Also, we would like to note that if targets are to be set for 2025 that are the responsibility of Councils to achieve, the resources and planning to do would need to be built into 2024 - 34 Long Term Plans, and as such clarity on this would be required urgently.
100. We would also want to see flexibility in the choice of the infrastructure if it is required. For example, the EECA Low Emissions Transport Fund has a focus on supporting DC chargers in the current rounds, whereas Hamilton City Council's focus is currently on AC charging for users coming from out of town to spend time at our visitor destinations, recreation, and shopping facilities.
101. An important part of the conversation exploring roles and responsibilities in developing the EVSE network involves asking "*what obligation is there for commercial EVSE providers to ensure equity of access and opportunity to participate in the network?*". It would be good to see this question taken into consideration within future Strategy iterations.
102. For example, as part of the Waikato Regional collaboration, we have been considering including conditions in agreements that, in exchange for the opportunity to access public land, a provider may also be required to install EVSE in a location that, while perhaps not a priority from a commercial sense, is a priority for the Council from a community outcomes perspective.

Outcome 3: Aotearoa's EV Charging System is Underpinned by Integrated Planning and Standards Across Multiple Sectors

Focus Area 3a: Improving standardisation and interoperability

103. We support improving standardisation and interoperability of EVSE for the purposes of an improved and consistent user experience. Indeed, this is another aim of the work we are carrying out with the Waikato Region. We are working on agreeing consistent approaches in terms of what Councils require from EVSE to encourage a seamless experience across our city and district boundaries, and to set consistent expectations across the region for those providers seeking to partner with us.
104. We have incorporated and expanded upon the relevant Standards New Zealand PAS Guidelines and look forward to seeing these updated with the latest advice.
105. Supporting EVSE providers to accommodate universal payment systems (e.g., bank/credit card/PayWave) instead of users having to download a multitude of apps for different providers would be a useful aspect of this work.
106. We note the first point in further actions for this Focus Area is "*promote... a customer-centred approach to EV charging*". We would like to see this point, along with a focus on user experience and community outcomes, emphasised more in the Final Strategy to balance what, has to date in our experience, been industry led EVSE network development.
107. In relation to the further action area: *Support local authorities to implement the required public charging infrastructure*. We welcome any support; however, we would want to understand how the '*required public charging infrastructure*' may be defined or determined and by whom.
108. In relation to the further action area: *Develop systems and support networks to share best-practice between local authorities, industry and central government to ensure guidance and regulations are feasible and proportionate*. This is exactly the kind of work Hamilton City Council has been instrumental in driving at a regional and national levels and with the involvement of Waka Kotahi. It has been invaluable for staff working in the EVSE space and we strongly encourage this action, especially in the early adoption phase of EV uptake.

Focus Area 3b: Optimising data capture and use

109. We are very supportive of robust data collection, analysis and sharing of insights in relation to how EVSE is being used.

110. **EVRoam** collects and shares useful information from an EV user perspective and to an extent supports planning by providing the current picture. The further actions note an option to investigate other information the market would want - we would like to see an investigation into other information Councils would benefit from. For example, and time (day or night) of use can give us insights into who is using the EVSE and for what e.g., shopping, commuting, average visitor stays at facilities.
111. Hamilton City Council would appreciate seeing more emphasis on national-led data enquiry, projections for EV ownership growth, locations of predicted growth and use patterns to support planning as we do not have the resources to commission this work at a local level.

Focus Area 3c: Consideration of housing and urban development planning, where appropriate

112. We support the intent to explore regulatory change in the housing and urban development sector to encourage charge-ready infrastructure or installed charge points in new builds. As with Auckland, Hamilton City Council is building similar requirements into its District Plan.
113. In relation to the further action area: *Provide guidance material for local councils, landowners and developers (e.g., in regard to 'licences to occupy' granted to charging providers to place charging on council land)*. Again, Hamilton City Council has been progressing this work within the Waikato Region to encourage consistency in approach and support regional collaboration.
114. We encourage continued consideration of alignment of this work with other initiatives underway and the wider context of environmental and transport system goals. For example, goals to increase public transport use and reducing vehicle kilometres travelled (under the National Emissions Reduction Plan - which includes EVs), generate challenges associated with encouraging more carparks and associated vehicle use, despite them being EVs.

Outcome 4: Aotearoa's EV Charging Market Functions Effectively, Can Adapt and Evolve over Time, and is Attractive to Users, Operators and Investors

Focus Area 4a: Accelerating commercial investment

115. We support the intent to maximise a market-led rollout to build the EVSE network. This reflects our belief that, similar to petrol stations, a Council's role does not include EVSE provision and that this is better left to the commercial sector. While we may choose to support EVSE in our communities, our understanding of community needs and priorities for public funds within the transport system of Hamilton are likely to be different to that of commercial EVSE providers.
116. Relevant to this point is the focus on high-speed journey charging. This seems to be consistently the dominant type of charger supported by EECA and places the priority on EV users travelling longer distances not supporting EV familiarisation and use within communities. As previously noted, AC and not DC chargers are more applicable to Hamilton City Council EVSE plans at this stage.
117. We suggest more of a balance in the encouragement to the market and in the support provided by EECA to reflect the diversity of need in different communities and localities for different types of charging infrastructure. Also, to recognise the value of AC chargers to communities and users beyond just the speed convenience of DC charging.
118. We support the Commerce Commission's review into any barriers to creating new connections in a timely and cost-effective manner and suggest this actively seek to identify and protect against potential anti-competitive behaviour as more and more electricity distributor also develop EVSE offerings.
119. All further actions under this Focus area are supported and encouraged by Hamilton City Council.

120. Again, ensuring robust data and open sharing of information between the public and private sectors where appropriate will be important to support effective and efficient delivery.

Focus Area 4b: Enabling innovation in new technology and business models

121. Hamilton City Council supports the intentions and further actions suggested within this Focus Area.

Outcome 5: Our National EV Charging System Supports the Transition to, and use of, Low-Emissions Transport Modes Across the Wider Transport System

122. We suggest work in relation to heavy vehicles and decarbonising other modes of transport remain cognisant and complimentary to developments in other types of energy sources, and should these be found to be a more effective and efficient options than electric power, the Strategy be reviewed accordingly.
123. Supporting the use of other types of e-devices (bikes, scooters, mopeds) is missing. This is an area of demand for many communities that can support transition of drivers to other, more low-emission modes of travel and would sit well within this Strategy.

Focus Area 5a: Progressing work on heavy vehicle charging (buses and trucks)

124. While Hamilton City Council is not actively looking into this area at this stage, the Council supports the intentions and further actions suggested within this Focus Area. We encourage this Focus Area to be cognisant of the matters discussed in Focus Area 2b to ensure small and/or rural towns are well considered in regional and national network development.

Focus Area 5b: Decarbonising other modes across the system and ensuring a coordinated investment approach

125. While Hamilton City Council is not actively looking into this area at this stage, the Council supports the intentions and further actions suggested within this Focus Area.

Further Information and Opportunity to Discuss our Submission

126. Should the Ministry of Transport require clarification of the submission from Hamilton City Council, or additional information, please contact **Glenn Bunting** (Urban Transport Policy and Planning Manager - City Transportation) on **021 962 829**, email glenn.bunting@hcc.govt.nz in the first instance.
127. Hamilton City Council representatives would welcome the opportunity to discuss the content of this submission in more detail with the Ministry of Transport.

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

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