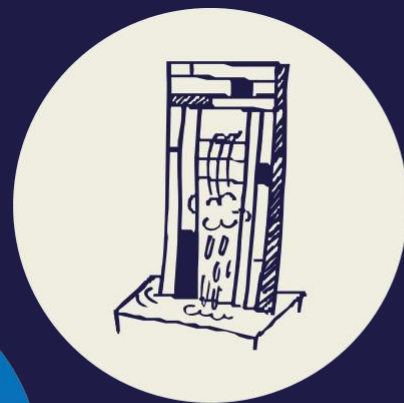


# HAMILTON CITY COUNCIL SUBMISSION

## Proposed Changes to the Parking Requirements in the Land Transport (Road User) Rule 2004

Ministry of Transport



19 July 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 priority **A city that's easy to live in**.

## Council Approval and Reference

This submission was approved by the Chair of Hamilton City Council's Infrastructure and Transport Committee on 19 July 2023.

Hamilton City Council Reference D-4805980 - Submission # 741.

## Key Messages and Recommendations

1. Overall Hamilton City Council is supportive of the Ministry of Transport's **Proposed Changes to the Parking Requirements in the Land Transport (Road User) Rule 2004**.
2. However, we are unclear on how enforcement officers will know if an Electric Vehicle (EV) has completed its charging and is just sitting in the space plugged in, which would be an offence under the proposal.
3. Hamilton City Council also recommends that Road Controlling Authorities be provided with the ability to prioritise (and therefore promote) EV specific parking by allowing for 'EV only' parking signs for EVs to park where no chargers have been provided.

## Introduction

4. Hamilton City Council welcomes the opportunity to make a submission to the Ministry of Transport's **Proposed Changes to the Parking Requirements in the Land Transport (Road User) Rule 2004**.
5. Overall Hamilton City Council is supportive of the Proposed Changes to the Parking Requirements in the Land Transport (Road User) Rule 2004.
6. However, we are unclear on how enforcement officers will know if an Electric Vehicle (EV) has completed its charging and is just sitting in the space plugged in, which would be an offence under the proposal.
7. Hamilton City Council also recommends the Traffic Control Devices Rule allow not only for EV charging parking signs as it does now, but also provides for 'EV only' parking signs (using the EV letters as used for transit and bus lanes) for EVs to park where no chargers have been provided.

## Proposal 1. Parking on Motorways

8. Hamilton City Council supports the proposal to add the term "stand" (i.e., referring to a vehicle idling) to the current requirement not to stop or park on a motorway.
9. We agree this change would be a minor clarification of the requirement, to make this parking requirement consistent with other similar ones.
10. The change does not affect Hamilton City Council as there are no motorways in the City.

## Proposal 2. Parking in Clearways and No Stopping Areas

11. Hamilton City Council supports the proposal to add a requirement that vehicles must not stop, stand, or park on a clearway or no stopping area, to match up with an existing offence for parking in a clearway.
12. We agree that this is a minor change to clarify the requirement not to park in a clearway, and to improve consistency with existing offences.
13. This change will not affect Hamilton City Council as parking in clearways and no stopping areas is recognised by the public as an offence, albeit there has been no specific requirement in the Road User Rule.

## Proposal 3. Parking in EV Charging Spaces Without Charging

14. Hamilton City Council supports the proposal **in principle** to clarify in the Road User Rule that EV charging spaces must only be used for charging. We note that the R6-1C.1&2/ 1T.1-2C-3 sign definition in the Land Transport Rule: Traffic Control Devices (2004) is already quite clear in this regard with its definition “*A parking place with a charging station, reserved for electric vehicles to charge their batteries.*”
15. However, we are unclear on how enforcement officers will know if an EV has completed its charging and is just sitting in the space plugged in, which would be an offence under the proposal.
16. We believe the proposal would be simpler to enforce if the proposal was clarified as “connected to the charger.” However, this would not preclude EVs connecting to the charger without activating it, thereby still using the space as a free parking space and precluding other EV owners that need the charging facility from using it.
17. An alternative technology-based solution could include requiring the charging provider to notify the enforcement authority when the charging has been completed or is not being used.
18. We acknowledge that time restrictions for EV parking generate parking turnover, and are also an alternative to limit free parking for EVs not requiring charging. This is available now of course.
19. The proposal reinforces that the current parking signs are only for charging EVs, highlighting that Road Controlling Authorities don’t currently have the ability to prioritise (and therefore promote) EV specific parking. We recommend the Traffic Control Devices Rule allow not only for EV charging parking signs, but also provides for ‘EV only’ parking signs (using the EV letters as used for transit and bus lanes) for EVs to park where no chargers have been provided.
20. This change will affect Hamilton City Council as it is unclear how enforcement against the specific change proposed will be undertaken.
21. We do not think this change would sufficiently clarify the use of EV charging stations. Parking in correctly signed EV charging spaces without charging is clearly contrary to the Traffic Control Devices Rule, but specifically requiring the vehicle to be charging while it parked there in the Road User Rule means, once the charging has been completed, it becomes an offence for the vehicle to continue to park there. We suggest this is why the Road User Rule is written the way it is at the moment.

## Proposal 4. Parking Trailers on the Roadway

22. Hamilton City Council supports the proposal to reduce the amount of time a person can park their trailer on the roadway from seven days to five days.
23. We agree that this will make enforcement easier for those situations where this behaviour has negative impacts, and that people who need to park their trailer for a longer period will still be able to seek permission from the Road Controlling Authority.
24. This change will not affect Hamilton City Council as parking trailers on the roadway has not been a significant issue from an enforcement perspective to date.

## Further Information and Opportunity to Discuss our Submission

25. 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](mailto:glenn.bunting@hcc.govt.nz) in the first instance.
26. **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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