



Hamilton City Council – Staff Submission

**Land Transport Management (Time
of Use Charging) Amendment Bill**

**Parliament's Transport and Infrastructure
Select Committee**

23 April 2025



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 staff submission is aligned with all of Hamilton City Council's five priorities.

Council Approval and Reference

This staff submission was approved by Hamilton City Council's Chief Executive on 23 April 2025.

Submission # 797

It should be noted that the following submission is from staff at Hamilton City Council and does not, therefore, necessarily represent the views of the Council itself.

Introduction

1. Hamilton City Council staff welcome the opportunity to provide a submission to Parliament's Transport and Infrastructure Select Committee on the **Land Transport Management (Time of Use Charging) Amendment Bill**.

Key Messages and Recommendations

2. Hamilton City Council staff supports in principle 'Time of Use' schemes provided they improve traffic flows across entire networks, enhancing throughput of people and goods, overall reliability and productivity, but not the targeting of specific roads to reduce their volumes and travel times.
3. However, staff support of 'Time of Use' schemes is conditional on the mitigation of equity impacts and the essential provision of public transport, biking, and micromobility travel options e.g. on the launch date of London's original congestion zone an additional 300 buses were introduced, bus route changes were made to take advantage of higher traffic speeds and greater demand for public transport, and bus frequency increased.
4. Staff support the introduction of enabling legislation for Time of Use charging, subject to governance structure and process changes to provide adequate representation for local authorities.
5. Staff note that the Bill provides no local leadership ability for local authorities to decide the outcome of a scheme once initiated, nor change or terminate an established scheme, notwithstanding that economic and social impacts from a scheme will directly affect local authorities.
6. Staff support changes to the Bill to reflect an integrated, joint approach between the NZ Transport Agency (NZTA) and local authorities, which will be essential for social licence if a scheme is to be successful and will be critical for planning and overseeing a scheme.
7. Changes are needed to the Bill to allow for joint governance of the Scheme Board and to give impacted local authorities the ability to confirm key decisions ahead of Ministerial approval. Staff recommend that:
 - a. Local authorities can not only initiate a scheme, but also have the ability to request to the Minister for changes or termination of a scheme;
 - b. Joint governance between local authorities and NZTA, but an independent chair of the Scheme Board;
 - c. The Scheme Board has the ability to make changes to the area of pricing, within the scope of the Order in Council, rather than this sitting solely with NZTA;
 - d. Impacted local authorities confirm scheme proposals and proposals for public engagement; and
 - e. The Minister of Transport 'sets expectations for' changes to schemes through issuing Letters of Expectation, rather than 'directing' changes.

- 8.** Staff recommend that changes are needed to the Bill to enable the proposed investment agreement to explicitly allow for allocating revenue to key costs before any surplus net revenue is spent on wider regional initiatives or mitigations. Key costs would include:
 - a.** Local authority operational expenses;
 - b.** Complementary measures, such as additional public transport services and traffic calming, which are common across international schemes and an integral part of successful schemes as they enhance congestion reduction, build social licence and provide better travel options for users;
 - c.** Capital costs to implement the scheme; and
 - d.** Mitigations to address affordability and accessibility.
- 9.** Staff recommend using the RLTP to guide the allocation of any surplus revenue, rather than an ad hoc approach of a new investment agreement, and that allocation of surplus revenue:
 - a.** Includes provisions for initiatives that benefit those paying the charge, which is important for social licence;
 - b.** Allows flexibility beyond land transport activities (e.g. public realm upgrades and building social licence); and
 - c.** Aligns with regionally agreed priorities.
- 10.** Staff note that perceived fairness is a key factor in social licence and public acceptability of a Time of Use scheme and that all such international schemes have exemptions or mitigations. The current Bill limits exemptions to emergency vehicles only and removes the ability to address public concerns of fairness or impacts on vulnerable communities and disabled users. Staff recommend that the Bill extends exemptions to 'essential services' (i.e. maintenance and operations of the road corridor and utility service operations) rather than just 'emergency services', and provides conservative mitigations in limited circumstances that are simple to implement, understand and enforce, to address significant cost or fairness issues that may be identified locally.
- 11.** Staff recommend that local authorities are able to initiate a scheme immediately following the Act's Royal Assent instead of the legislation coming into force on the first anniversary of Royal Assent as currently proposed.
- 12.** Staff recommend provision for faster implementation of short-term trials.

Further Information and Hearings

13. Should Parliament's Transport and Infrastructure Select Committee require clarification of the submission from Hamilton City Council staff, 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.
14. Hamilton City Council representatives **do wish to speak** to Parliament's Transport and Infrastructure Select Committee at the hearings in support of this submission on the **Land Transport Management (Time of Use Charging) Amendment Bill**.

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

FURTHER INFORMATION

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