2/15/2017 bus lanes/evs

bus lanes/evs

Sent:Wednesday, 4 January 2017 9:25 a.m. **To:** Auckland Electric Vehicle Trial Bylaw

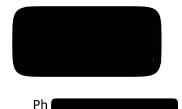
NO NO a resounding no...what next? Hybrids, taxis, vehicles with say five or more passengers. ?? Also, in years to come EVs may outnumber ordinary vehicles......

2/15/2017 EV Trial Bylaw

EV Trial Bylaw

Sent:Wednesday, 21 December 2016 11:33 a.m. To: Auckland Electric Vehicle Trial Bylaw

I do not yet own an electric vehicle, but I support the proposed bylaw to enable NZTA to assess the effect of EVs using the T2 lanes. I would support this bylaw becoming permanent. I believe EVs are good for the environment long-term and their adoption should be encouraged wherever possible.



2/15/2017 Electric Vehicles

Electric Vehicles

Sent: Wednesday, 4 January 2017 9:39 a.m. **To:** Auckland Electric Vehicle Trial Bylaw



I'm righting this in response to your post in the N Z Herald dated 4/1 2017 Concerning the Trial bylaw of Electric Vehicles for a period of 14 days from 6th March to the 20 March 2017

My opinion is that this trial is way to soon as there is not enough electric vehicles in the country YET

The only electric vehicles in this country are second hand imports, hopefully that will change in the near future.

The infrastructure of fast charge stations are increasing day by day, but are being abused by so called taxi driver operating under UBER these people are buying cheap imported Nissan leafs and running out at Auckland Airport

And standing by for pick up's. And not paying a dime for power As a long standing owner operator for well over 30 years shuttling to and to Auckland Airport I think this practice should from the stop. I am patiently waiting for these electric cars to Arrive in New Zealand . What information I have managed to obtain is that the first Fully electric cars to be delivered to Hyundai New Zealand (Ionic) then hopefully the rest of the motor triad industry will follow.

I truly think that the electric car trials should be deferred till later in the year my suggestion is that it to start at the beginning of the financial year on the 1st of May 2017 this will give potential buyers the opportunity to purchase new and reliable vehicles from reputed retailers Hope this input helps yours faithfully





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Submission on AEVT

Sent:Wednesday, 4 January 2017 9:56 a.m. **To:** Auckland Electric Vehicle Trial Bylaw

I would like to make the following points regarding the proposed electric vehicle trial:

- 1. If the trial is extended to bus and other lanes used by bicycles, that electric vehicles using these lanes are required to be fitted with electric vehicle warning sounds (Acoustic Vehicle Alerting Systems), so that cyclists are alerted to their presence, especially when EVs are approaching from the rear.
- 2. Resourcing to provide for additional enforcement and monitoring of pilot lanes to ensure that other (non-electric) vehicle owners are not further encouraged to use these lanes. There are already significant issues with non-compliance (cars using bus and priority lanes) on the network, and I foresee this only getting worse when drivers see EVs using these lanes.

Regards

2/15/2017 Very short trial

Very short trial

Sent:Wednesday, 4 January 2017 10:06 a.m. To: Auckland Électric Vehicle Trial Bylaw

Dear Sir/Madam,

It was exciting to see the announcement of a trial of electric vehicles being able to use priority bypass lanes. However I was dismayed to see that the trial was for such an incredibly short period of time.

The impact of such a short trial will be very small, both in effect on traffic flows (given that the number of EV's is still very small) and in signalling to the public the potential advantages of driving an EV.

Encouraging the use of EV's should be a priority. Giving these vehicles access to bypass lanes is a strong incentive.

I would like to submit that the trial should be for a minimum of 6 to 12 months. Ideally access to the priority bypass lanes should be indefinite so as to more strongly incentivise EV use.



2/15/2017 Electric vehicles trial

Electric vehicles trial

Sent:Wednesday, 4 January 2017 11:04 a.m. To: Auckland Electric Vehicle Trial Bylaw

Hi. I'm emailing to show my support for the NZTA electric vehicle trial that's happening in Auckland in March. This is a great initiative. However, I'm concerned that the trial is running for such a short period of time (only 2 weeks!) that it will be hard to get any useful data from it. I think it needs to run for at least 6 months.

I'm also concerned that this consultation is happening over the peak NZ holiday period when many Aucklanders are away on holiday so will miss the opportunity to submit!

I think we need to look at any incentives that will encourage electric car usage including priority bypass lanes, cheap or free parking in the city and free charging stations.

I strongly urge you to extend the trial and then to make it a permanent fixture.

Many thanks



2/15/2017 EV Bylaw

EV Bylaw

Sent:Wednesday, 4 January 2017 1:34 p.m. To: Auckland Electric Vehicle Trial Bylaw

Hi

Whilst we do not have any feedback pertaining to this trial, as EV owners, we would appreciate being informed of any other work that NZTA is doing on this subject.

Our particular interest is the ability for EVs to use Tx and bus lanes – as is the case in California. We believe that this would incentivise the use of EVs – but with a consideration to review this allowance upon the numbers reaching a percentage of the fleet – e.g. 5 or 10%.

Submission - Against

Sent:Wednesday, 4 January 2017 7:27 p.m. To: Auckland Electric Vehicle Trial Bylaw

To whom it may concern,

I am writing to voice my opinion on allowing EVs to use priority lanes proceeding the trial.

My reasons are:

- 1. It may cause a sufficient impact to the public transport network to affect timetable punctuality, decreasing patronage
- 2. Cause confusion amongst road users who cannot distinguish between an EV and a non-EV, resulting in non-EVs using priority lanes, negatively impacting PT efficiency, and lots of fines (silver lining is more money to fix our traffic)
- 3. This technology I not financially accessible to all of society. The majority of New Zealanders cannot afford a new or 2nd hand EV (perhaps on unreasonable interest rates maybe!). Civil amenities /need to be accessible to all of society. For example the PT network, is much for affordable.

Yours sincerely,

EV's in bypass lanes in Auckland -trial for March

Sent:Thursday, 5 January 2017 8:12 a.m. To: Auckland Electric Vehicle Trial Bylaw Cc:
Good morning I picked up this off NZTA's website just before Christmas. It would be helpful to keep particularly aware of NZTA's plans and trials in regards to the use of T2, T3 and bus lanes in Auckland. I would appreciate an early opportunity to discuss both this and the broader issue of EVs I bus lanes with person leading this work.
Regards

Auckland Electric Vehicles Trial

Sent:Thursday, 5 January 2017 5:09 p.m. To: Auckland Electric Vehicle Trial Bylaw

Dear NZ Transport Agency,

This proposal is mixing two separate issues, congestion on NZ roads and the environmental impact of petrol and diesel powered vehicles. Letting electric vehicles use special lanes set to encourage multiple car occupancy somehow suggests electric vehicles reduce traffic congestion. However electric vehicles take up just as much road space as other cars and do nothing to address this issue.

Auckland transport's own web site describes the purpose of these special lanes as to "reduce congestion and speed up travel times by separating buses and vehicles with more than a single occupant." so why is there a proposal to now allow single occupancy vehicles in these lanes?

Managing the environmental impact of cars is important but please do not do so at the expense of road users trying to heed your message about reducing congestion.

All the best,



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Auckland Electric Vehicles Trial Bylaw

Sent:Monday, 9 January 2017 9:44 a.m.							
To: Auckland Electric Vehicle Trial Bylaw							
Hi,							
My name is							
TVIY Harrie 15							
I'm an							
I also drive an electric car							

Informal discussion within the community is strongly opposed to allowing electric vehicles in bus lanes. On reading the consultation documents, I see that this proposed trial is not about allowing that to happen. I've not been able, given the holiday period, to gather a consensus of our members around the proposed trial, but there is unlikely to be any objection given that the lanes involved seem to be entirely motorway on-ramps. We would be concerned, however, if the trial led to any erosion of the primary need to improve and prioritise public transport.

The government's stated intention last year to allow electric vehicles in bus lanes confuses several worthy objectives, and the success of this policy (bus lanes filled with electric cars) would negatively impact the far more important policy of faster travel times for buses.

We'll watch developments in this area with interest.



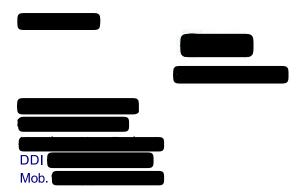
Register for up-dates

Sent:Tuesday, 10 January 2017 12:31 p.m. To: Auckland Electric Vehicle Trial Bylaw

Dear Sir / Dear Madam

Please keep me informed of up-dates on EV access to priority lanes.

Thanks in advance.



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Submission Auckland Electric Vehicles Trial Bylaw 2017

Sent:Tuesday, 10 January 2017 12:41 p.m. To: Auckland Electric Vehicle Trial Bylaw

Hi There

I am keen to support the government program to encourage up-take of EVs. From various media releases, I had expected that access to the Northern Busway would be granted to EVs.

Is this in question, or incorrectly reported?

Can you please advise of the expected outcomes of the trial (what are you looking for) and how these would influence the future actions when enabling legislation is passed later this year.

Thanks in advance.

All the best

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Submission on: Auckland Electric Vehicles Trial Bylaw

Sent: Tuesday, 10 January 2017 12:57 p.m. To: Auckland Electric Vehicle Trial Bylaw Attachments: NOM - Electric Cars in Bus~1.doc (102 KB)

Submission on: Auckland Electric Vehicles Trial Bylaw

This is a personal submission, though I belong to several groups which may have made a formal submission if your period for submissions had been outside the holiday period when there are no scheduled meetings.

Submission:

I support reasonable measures to encourage the uptake of electric vehicles on New Zealand Roads.

Accordingly I support the proposed trial use by electric cars of the existing priority lanes (for freight trucks and light vehicles with three or more occupants) on six motorway on-ramps, though I wonder if two weeks is long enough for a meaningful trial.

However, I want to make it very clear that I am totally opposed to any extension of this trial to include bus priority lanes, and in particular the Northern Busway which NZTA controls. Rather than list my reasons here, I attach a Notice of Motion adopted on by the am a member), which includes a number of cogent reasons for rejecting any thought of using such lanes for vehicles other than buses. The was also concerned about the possibility of negative impacts on public transport and adopted a similar resolution in May 2016.

I also note that there may be confusion if electric cars are not in some way marked as such to clearly distinguish them from other light vehicles. While I am sure that enforcement staff will be trained to tell them apart from other cars (including hybrids such as my own) - ordinary members of the public may easily mistake an eligible vehicle for "just another car" and opt to follow it into the priority lane. I am not sure how to resolve this: very few private owners of an expensive new car are likely to be willing to have it marked with a prominent sign (whether painted on or bolted to the roof).

If there are any hearings on this matter, I wish to be able to make an oral submission.



Call to Oppose Electric Cars in Bus Lanes

In accordance with Standing Orders, please place the following Notice of Motion on the agenda for the I meeting being held on I

Recommendation/s

- That the report be received. a)
- b) That the notes:
 - the Government's recently stated intention of allowing electric cars to use bus lanes as one of a set of initiatives to increase the uptake and use of such vehicles.
 - that Bus Priority Lanes and the Northern Busway have made a significant contribution to increasing public transport patronage over the last 14 years.
 - that Auckland Transport intends to improve existing bus priority lanes and significantly increase the number of them over the next few years.
 - allowing even small numbers of cars to use the bus lanes or the busway would undermine their effectiveness by impeding buses, leading to increased passenger journey times and reducing bus drivers' ability to keep to schedule.
 - allowing cars to use the bus lanes or the busway would undermine their enforcement
 - that the final decision on allowing electric cars into bus lanes is the perogative of the relevant operator in the Auckland Region the on-road bus priority lanes are operated by Auckland Transport and the Northern Busway is operated by the Northern Motorway Alliance, a subsidiary of NZTA.
- urges Auckland Transport and the New Zealand Transport Agency to protect the That the integrity of existing and future Bus Lanes by resisting efforts to allow their use by electric cars.
- That this resolution be copied to the Mayor and Councillors and other Local Boards.

Background

On 5th May the Minister of Transport announced a slew of measures designed to increase the uptake of electric cars (as opposed to hybrid-electric vehicles) in New Zealand. This included the proposal to allow electric cars to use bus lanes, although the final decision in each case would apparently be delegated to the relevant Regional Council. In the case of Auckland that means the decision would be made by Auckland Transport (which controls our on-road bus priority lanes) and the New Zealand Transport Agency (NZTA, which operates the Northern Busway through its subsidiary agency the Northern Motorway Alliance).

Auckland currently has 23 roads with bus priority lanes – most are part-time, operating for several hours each day during the rush hour, usually inbound in the mornings and outbound in the evenings. Auckland Transport has plans to add some 17 kilometres of new bus lanes in each of the next two years – some of this is by "connecting up the dots" (making existing lanes longer, or filling gaps) but mainly by creating completely new bus lanes (at the moment most are on the isthmus).

Two of the greatest success stories are the Northern Busway and Dominion Road bus lanes. The Northern Busway is a segregated two-way road opened in 2008 with a frequency of 4 buses per hour (15 minutes between services). Within one month it had reduced peak traffic on the adjacent Northern Motorway by an estimated 500 cars per hour. As patronage grew, so did the frequency of service, which in turn made catching the buses even more attractive. There are now 80 buses per hour in the peak, carrying over 40% of people crossing the harbour bridge. Many of these passengers had never used public transport before. The busway will be extended further north over the next 3 years.

The Dominion Road bus priority lanes were introduced in 2002 and were somewhat controversial at the time – critics were convinced that taking one traffic lane for buses at rush hour would lead to monumental traffic jams. In fact, over the first five years bus patronage doubled to the extent that passengers in the morning peak slightly exceeded the number of people in cars. The journey time for buses and their passengers had been reduced by over 10 minutes. Meantime, having a single lane for cars (rather than two) actually increased the efficiency of the road so that slightly more vehicles were

accomodated and travel times were very similar. The flow of traffic was more even and consistent because constant lane changing by an impatient minority had been largely eliminated.

The Government's proposal has not been very well thought through – indeed there has been no consultation with the bodies charged with implementing it. Meantime, just before the annoucement here, Norway which famously allowed electric cars into bus lanes in Oslo and other cities has just canceled that privelege, precisely because private cars were damaging the effectiveness of their bus priority measures.

There are several ways in which this proposal would undermine the bus priority lans. Simply increasing the number of vehicles in the bus lanes will have an impact in itself, getting "under the feet" of buses - both those following and those ahead. Buses would completely lose the advantage of the bus-advance signals (small "B" signals which allow a bus to pre-empt cars in the traffic lanes and get through the intersection before the cars get a green phase) at key intersections whenever there was even one car ahead of them at the limit line. When buses halt at a bus stop there will be a temptation for any following car to "barge" their way into the orderly flow of cars to their right – effectively slowing all other users of the road. So a small number of road users would be advantaged to the detriment of all others - including cyclists who would have to share the bus lane with private cars as well as the buses.

Allowing electric cars in bus lanes would also severely undermine enforcement efforts. Unless they had a very prominent and unique colour scheme or large signs on their roof, distinguishing an electric car from an ordinary car would be problematic. Enforcement staff could be trained in this art – but the biggest problem would come from ordinary car drivers seeing what they take to be just another car using the busway and being tempted to follow suit. This is one of the key reasons why taxis have not been allowed in bus lanes despite concerted campaigning by the Taxi Federation.

The Northern Busway is unique in that the buses can travel at motorway speed, separated from oncoming buses by only a painted centre line. This works fine with trained drivers but might not work well with private drivers, including learners, who may be tempted to overtake. At peak times the buses are only 40-50 seconds appart so there is little room for error. There are also limited opportunities to enter and leave the busway, which was not designed for use by private cars.

Hopefully, it will not take too much persuasion to have this well-intentioned but poorly thought through proposal soundly rejected.

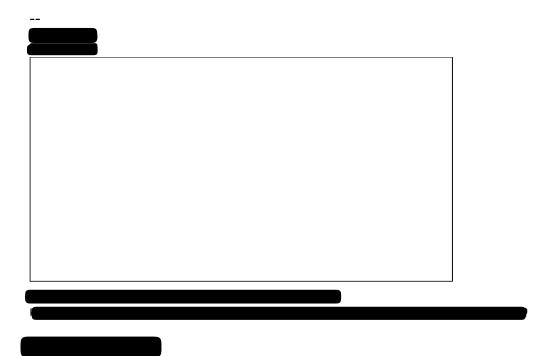
Signatory:

A (1	
l Author	

Auckland Electric Vehicles Trial Bylaw

Sent:Tuesday, 10 January 2017 5:03 p.m. To: Auckland Electric Vehicle Trial Bylaw

I support this 2 week trial and look for to the 1st July when hopefully this becomes permanent until an agreed level of EVs and PHEVs are travelling in these lanes.



Auckland Electric Vehicles Trial Bylaw

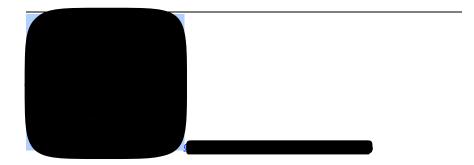
Sent:Wednesday, 11 January 2017 3:33 p.m.
To: Auckland Electric Vehicle Trial Bylaw
Cc:

I support this 2 week trial and look for to the 1st July when hopefully this becomes permanent until an agreed level of EVs and PHEVs are travelling in these lanes.



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Thank you for your co-operation."



Auckland Electric Vehicles Trial Bylaw 2017 proposal

Sent:Thursday, 12 January 2017 9:24 p.m. To: Auckland Electric Vehicle Trial Bylaw

The NZ Transport Agency is looking at the viability of allowing electric vehicles access to special vehicle lanes on the State highway network and is proposing an Auckland Electric Vehicles Trial Bylaw.

I am opposed to the trial and the bylaw to facilitate it.

In general, I support initiatives that encourage the uptake of electric vehicles in New Zealand, to help reduce greenhouse gas emissions by converting our transportation to solely renewable and environmentally clean fuels, but I believe the trial is being requested by the Government just to be seen to demonstrate some commitment to "Green" transportation while achieving nothing. This would cost central Government nothing while imposing costs of the trial, or any continuation of the scheme, on local Governments and ratepayers.

It does not address nor identify the issue correctly and is actually counter-productive to the Government's green aspirations.

It incentivises the continuation of the rising use of private cars, albeit electric. Urban re-design and transport infrastructure development call for a significant reduction in the use of private vehicles.

The development of better mass public transport including current use of priority bypass lanes should not in any way be compromised. If such lanes have sufficient capacity then trials should begin with allowing electric car share vehicles(https://at.govt.nz/projects-roadworks/electric-car-share-scheme), electric taxis, Uber Shuttle buses etc, long before any private vehicles.

This trial would send the wrong message to car-addicted householders in Auckland. Mindsets need to be changed.



2/15/2017 submission

submission

Sent:Friday, 13 January 2017 9:19 a.m. **To:** Auckland Electric Vehicle Trial Bylaw

Preferred access to and use of motorways should be encouraging more efficient use of these access ways. The present proposal to give preferred access to electric vehicles does nothing to improve this efficiency. Better to allow preferred access carrying 3+ people etc.

Electric vehicle use and vehicle congestion on roads are 2 mutually exclusive behaviours. It would pay not to confuse the 2 as the proposal if actioned will do.

Cheers

Auckland Electric Vehicles Trial Bylaw 2017

Sent:Friday, 13 January 2017 9:25 a.m. To: Auckland Electric Vehicle Trial Bylaw

To whom it may concern,

I do not agree with the proposed trial.

The purpose of transit lanes as I understand it is to encourage car pooling and use of public transit, not to benefit those wealthy enough to afford expensive electric cars.

Removing vehicles from the transit lane by encouraging car pooling and public transit use is a really important measure and helps to remove vehicles from the road.

This reduces greenhouse gas emissions in 2 ways.

- Reduces congestion, making driving for all more efficient and thereby reducing emissions
- Removes vehicles from the road, thereby reducing emissions

By allowing electric or hybrid vehicles to use the transit lanes the benefits of the transit lanes are removed and replace by a single benefit

1. Replacing some conventional vehicles with more efficient vehicles thereby reducing the emissions, by not all that much.

Possibly other effects will include added frustration from other drivers which could result in rash driving behaviour, reducing safety and/or increasing congestion.

I also cannot see what the NZTA expects to gain from such a short trial, and I would be interested to know what outcomes the NZTA will be measuring, if you could please let me know.

Yours Sincerely

Please focus on encouraging the use of public transport and ride share

Sent:Friday, 13 January 2017 2:05 p.m. To: Auckland Electric Vehicle Trial Bylaw

I oppose the bylaw allowing hybrid and electric vehicles to access priority bypass lanes. This bylaw will result in increased congestion and confusion.

Please, instead, focus on encouraging the use of public transport and ride share.

New Zealand Transport Agency (Auckland Electric Vehicles Trial) Bylaw 2017

Sent:Friday, 13 January 2017 4:51 p.m. To: Auckland Electric Vehicle Trial Bylaw

Hi,,

I wish to express my opposition to Electric cars being allowed to use priority lanes.

- 1. Does not reduce conjection.
- 2. Does not encourage more than one person per car.
- 3. Cause confusion
- 4. Privilege for the wealthy.

So we want to copy Norway and California?

Why then are we refusing to copying the use of public transport as experienced by many Mew Zealanders when they travel overseas?

Let's up the public transport. This would give residents and visitors options

This bylaw indicates to me that it not Aucklanders who do not "want to get out of their cars" rather it is New Zealand Transport who holds stead fast to that view.

Surely the Northern Busway is a good example. If there was more parking many many more people would use it. Anyone after 7.30 forget it. How stupid is that!!!

Regards,

Electric Vehicle Auckland Trial Bylaw Consultation Sent: Monday, 23 January 2017 4:07 p.m. To: Auckland Electric Vehicle Trial Bylaw; Cc: Attachments: Signed - Submission to NZT~1.pdf (697 KB) Please find attached the submission to the consultation for the EV trial in Auckland. If you have any further queries or questions please let me know **Thanks** Phone Mobile

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Submission to New Zealand Transport Agency

Auckland Electric Vehicles Trial Bylaw 2017

20 January 2017

Introduction

This is Auckland Transport's (AT's) submission in relation to the proposed New Zealand Transport Agency (Auckland Electric Vehicles Trial) Bylaw 2017. AT appreciates this opportunity to comment on the proposed new Bylaw.

AT's address for service is: Auckland Transport, Private Bag 92250, Auckland 1142. Please direct any inquiries about this submission to have a large and a large a

The proposed Bylaw enables Electric Vehicles (EVs) to use specified priority motorway on-ramp lanes:

- T2 and Truck lane adjacent to onramp at McKenzie Road to South Western Motorway (Mangere/Manuaku)
- T2 lane adjacent to onramp from Rimu Road to South Western Motorway (Mangere)
- T2 and Truck Lane adjacent to onramp from SEART to South Eastern Highway (Mt Wellington, Sylvia Park)
- T2 and Truck lane adjacent to onramp from Mt Wellington interchange to Southern Motorway
- T2 and Truck land Adjacent to the onramp eastbound from Lincoln Road, to SH16 North Western Motorway (Henderson)
- Truck lane adjacent to onramp from Grafton Road onramp to North Western Motorway .

We recognised that the proposed bylaw proposes to enable EVs in specified priority motorway onramp lanes for the duration of the trial (6 to 20 March 2017). AT understands the trial will help inform NZTA's understanding of the impact and viability of allowing EVs into special vehicle lanes. However, we note that the period of the trial will not provide any definitive conclusions on the effectiveness on driver behaviour change.

Specific Comments

1. Information to road users

AT is interested in what information will be provided to road users. While the FAQs available with the proposed bylaw explain that an information pack will be sent to all EV drivers registered in Auckland, these is no reference to information being provided to non-EV road users.

AT submits it is important that there is general awareness and understanding of the EV trial by all road users in order to minimise impacts on the surrounding road network (including other NZTA lanes and also ATs special vehicle lanes) during the trial. AT believes there is a significant risk that:

a) Given the publicity around future legislative change to allow EVs in bus lanes, EV drivers will see EVs using the specified lanes may incorrectly believe they can now use bus lanes or Transit Lanes on AT's network. AT has already experienced EVs unlawfully using special vehicle lanes

- on its network in the incorrect belief the legislation has already amended, so AT is keen to ensure further confusion is minimised as much as possible; and
- b) Other (non EV) road users will see single occupant vehicles using these specified transit lanes and incorrectly believe the lane is open to all users. This has the potential to impact on public transport which relies on these lanes.

Therefore AT recommends an information campaign educates all road users on the trial and its limitations.

2. Use of stickers

AT notes that the FAQs advise that NZTA will be providing a sticker to all EV vehicles who wish to participate in the trial. However AT notes the bylaw imposes no requirement to display the sticker, or stiprulates the location the sticker should be displayed.

AT submits the bylaw should be amended to require EVs to display the sticker in a specified place before being permitted to use the specified lanes during the trial.

Display of the sticker in the specified place will provide a visual identifier to other road users that the vehcile is an EV permitted to use the lanes. Display of the sticker will also support the assessment of the trial by providing a means to distinguish legitimate users from illegitimate users.

3. Monitoring and Evaluation

AT is interested in learning how NZTA will be assessing the trial including the impacts on other legitimate users of these lanes, the impacts on other special vehicle lanes (not included in trial) and the impacts on the surrounding road network.

It is likely that AT will have relevant information to assist in the evaluation of the trial (such as impacts on public transport users) so would be interested in collaborating or sharing information to provide for a robust assessment of this trial.

Approved by:	Signature:	Date:	
		23/	1/2017

BCA Submission on Auckland Electric Vehicles Trial Bylaw

To:	Auckland Electric Ve	•			
Attachments	::FINAL BCA Submiss	sion Auckl~1.pdf (14	Ю КВ)		
Hi there,					
Please find a	attached the	submission on t	he Auckland Elec	ctric Vehicles	Trial Bylaw.
Kind regards),				
e-mail:		DDI:	fax:		

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3rd Floor, 79 Boulcott Street, PO Box 9336, Wellington 6141, New Zealand P +64 4 499 7334 F +64 4 499 7353 E info@busandcoach.co.nz



13 January 2017

New Zealand Transport Agency AEVTbylaw@nzta.govt.nz

SUBMISSION ON THE AUCKLAND ELECTRIC VEHICLES TRIAL BYLAW

The BCA welcomes the opportunity to provide feedback on the Auckland Electric Vehicles Trial Bylaw. The proposed Bylaw and trial, and more importantly the objectives of the trial, are of significant interest to the bus and coach industry. As a key user of special vehicle lanes we are disappointed with the limited opportunity for engagement on this Bylaw and the fact the majority of the consultation period has fallen during the Christmas holidays.

On principle the BCA is opposed to allowing electric vehicles (EVs) to access special purpose vehicle lanes, including bus lanes. The purpose of bus lanes and transit lanes is to reduce congestion and increase the efficiency and attractiveness of public transport services. Allowing EVs to access these lanes will achieve none of these outcomes, and over time can be expected to significantly detract from them.

Overseas experience of allowing EVs to access bus lanes, most notably the experience in Norway, has demonstrated that such a policy can be expected to result in major impacts on public transport service efficiency over time. This seems to be supported by the New Zealand Transport Agency's (NZTA) own advice on the matter, noted in a March 2015 briefing to the Minister. "The NZ Transport Agency has also advised that the four main corridors with bus lanes in Auckland are expected to be congested within 1-3 years".

The NZTA website states "This trial will help inform the design and roll out of long term electric vehicle access to special vehicle lanes". As a result we oppose the Auckland Electric Vehicles Trial Bylaw.

In addition to our general opposition to the Bylaw, we would like to provide feedback on specific aspects of the Bylaw.

Choice of Trial Locations

The choice of six priority bypass lanes to trial EV access is predicated on minimising the impact of the trial. However, we understand buses are likely to use priority bypass lanes and may therefore be impacted by the proposed trial. We are concerned about these impacts, especially given the timing of the trial (see below).

Timing of the Trial

The BCA is concerned the timing of the trial coincides with a notoriously busy period for Auckland's roads and public transport services. The period of the trial is commonly known as "March Madness" when all school students, university students, and workers are all using transport networks at the same time – for the first time each year. Even slight disruptions to public transport routes should be avoided during this time.

Objectives of the Trial

The NZTA website states the trial will help inform the design and roll out of long term EV access to special vehicle lanes. There is no indication of how the trial will inform the design and roll out. A limited trial with the current fleet is unlikely to demonstrate the impact of allowing EVs in special vehicle lanes over the longer-term. The long term impacts could be significant, especially if the government is successful in encouraging the uptake of EVs and/or the price of EVs comes down to be equal with or even lower than the price of internal combustion engines as is widely predicted.

Enforcement and Identification of Electric Vehicles

The NZTA website states that EVs will be identified using a sticker. If this is the case the BCA suggests stickers be used that are of a similar size and legibility as L plates for learner drivers and H plates for High Productivity Motor Vehicles. The additional ambiguity caused by the policy of allowing EVs in special purpose lanes is likely to create greater enforcement issues. Any measures that can reduce this ambiguity will help enforcement.

More broadly, the BCA has significant concerns about the enforcement of an increasingly ambiguous set of regulations for special purpose lanes. There are existing issues of single occupancy vehicles using T2/T3 lanes, and cars using bus lanes. Adding further ambiguity with the inclusion of EVs to the permitted users will only make enforcement more difficult and undermine the purpose of the lanes.

Ongoing Engagement

Should the proposed trial go ahead the bus and coach industry expects to be informed and engaged on the results and implications for any future roll out of EV access to special vehicle lanes.

Yours sincerely,

