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Submission on

Auckland Electric Vehicles - Phase Two Trial Bylaw 2017

CAN thanks NZ Transport Agency for the opportunity to make a submission on the proposed bylaw to allow a 12-month trial of access by electric vehicles to 11 priority bypass lanes (motorway onramps) in Auckland.

About CAN

CAN is New Zealand's national network of cycling advocates. We work with government, local authorities, businesses and the community on behalf of cyclists, for a better cycling environment.

CAN aims to:

- Promote the benefits of cycling
- Improve safety for cyclists
- Encourage the creation of a good cycling environment
- Promote cycle tourism
- Advocate for integrated cycle planning
- Increase the number of cyclists on our roads.

CAN was formed in 1997 as New Zealand's national network of cycling advocate groups. It is the national voice for everyday people on bicycles - recreational, commuter and touring. In 2015 we changed our name from Cycling Advocates' Network to Cycling Action Network.

CAN has affiliated groups and individual members throughout the country and links with overseas cycling organisations. National, regional and local government authorities, transportation consultancies, and cycle industry businesses are supporting organisations. CAN currently has more than 5,000 supporters. CAN works closely with the national advocacy organisation for pedestrians, Living Streets Aotearoa, and has strong links with organisations in the health, sport & recreation, transport, tourism and environmental sectors. CAN also works with Cycling NZ (largely responsible for competitive and recreational cycling).

General comments

CAN has read the submissions on the Phase 1 trial bylaw, considered the feedback (including the survey results) on the two-week trial earlier this year, and perused social media commentary on the issue. CAN strongly supports efforts to reduce New Zealand's transport-related greenhouse gas emissions and supports the introduction of electric vehicles.

However, CAN is strongly opposed to opening up access by electric vehicles to specified special vehicles lanes on state highways in Auckland. We understand that one of the lanes proposed is a bus only ramp. The other ten lanes that are proposed to be opened up allow access to T2 vehicles. are many more appropriate and equitable measures that the government should implement to encourage electric vehicle take-up should they be needed. However, CAN also queries whether such measures will be needed. It is clear, from the media release on 26 July 2017 from the Ministers of Transport and Energy and Resources, that uptake of electric vehicles in New Zealand is proceeding quite rapidly with the Government's 2017 electric vehicle registrations target achieved 5 months ahead of schedule.

NZTA has argued this is needed to incentivise electric vehicle take-up. However, the Norwegian evidence does not indicate this measure will be effective in incentivising uptake of electric vehicles.

Lack of robust evidence to support the effectiveness of this measure to incentivise uptake of electric vehicles

With regard to the survey CAN notes there was a very small response rate (68 respondents from a total of 978 who received information packs) and its findings can only be used with a significant degree of caution. Norwegian research shows that access to bus lanes was only a niche measure and powerful new incentives were needed. It also needs to be noted the Norwegian implementation of electric vehicle access to bus lanes took place eight years ago at a time when international agreements about reduction of greenhouse gas emissions were different from what they are now and when manufacturing of electric vehicles was very different.

It is doubtful that this measure will be effective in increasing uptake, Myklebust (2013) points out that while Norwegians have adopted electric vehicles at a higher rate than in most other countries, even with the incentive of access to bus lanes for several years from 2009, electric vehicles made up only about 0.5 % of Norway's cars.

Lack of equity

While the intention may not be to subsidise affluent commuters but that is, in effect, what will happen if electric vehicles are given access to special lanes. Already, New Zealanders are subsidising electric vehicles through the assistance that is given by councils and central government for the installation of public fast charging stations. The effects of incentivisation of electric vehicles on social equity need to be transparent.

Direct and indirect negative effects on active transport and public transport

A key aim of CAN is to achieve increased participation in cycling as part of increased use of active transport. To make Auckland's streets safer for cycling, there needs to be reduced numbers of vehicles whatever the type of engine. We acknowledge the air quality benefits of electric vehicles (in addition to the zero greenhouse gas emissions) but overall safety will be enhanced by fewer single occupant vehicles, regardless of type of engine. Recent growth in urban cycling in Auckland is unlikely to be maintained without slowing traffic growth (and vehicles speeds).

Currently, the most commonly used alternative to single occupant vehicles is public transport. Auckland's bus network however, is in need of dramatic improvement. Frequency of services is important but so, too, is reliability. Indeed, reliability is often regarded as more important than frequency. More special lanes are needed and bus movements on the existing ones should not be compromised by opening the lanes up to electric light vehicles. CAN does not have confidence that electric vehicle access to special access lanes will be enforced and the resources needed for enforcement could be utilised much more effectively elsewhere.

We note that Auckland Transport has confirmed that allowing electric vehicles would negatively affect bus lanes, which are seen as a priority due to the roll-out of the New Network. We understand that no other NZ local road controlling authority is supportive of electric vehicles in transit lanes.

There were three options in the report:

a) *Not support EVs in any special vehicle lanes (e.g. bus lanes and transit lanes) based on initial conclusions that it is too risky and has the potential to undermine the rollout of the New Bus Network. Focus instead on other support measures for EVs such as priority parking for EVs in parking buildings and at park and ride sites, working with EV charging providers.*
b) *Not support EVs in bus lanes but supports the testing EVs in 'selected' T2 lanes (where lower bus frequencies exist), for one year once the necessary legislation and rules are in force, subject to additional funding from Central Government. This would require finding suitable corridors on AT's network and is considered a fall-back option where impacts and costs can be controlled by strictly limiting the extent of the testing.*

c) *Not support EVs in bus lanes but supports the testing of EVs in T2 and T3 lanes on roads managed by AT for one year once the necessary legislation and rules are in force, subject to additional funding from Central Government. This shows we are supporting the Minister and his policy and will test the policy proposals in robust way. This is the preferred option.*

However, we understand that Auckland Transport went with option c (especially compared to option b) in order to be seen to be open-minded and "save face" for the Minister.

Based on the same concerns about the need to promote use of active and public transport, CAN is not supportive of the proposed legislative changes to permit individual road controlling authorities to make bylaws allowing special access lanes in their area to be opened up to electric vehicles lanes. We assume these road controlling authorities will then also be responsible for administering the supply of stickers which is a further burden on local government (or NZTA, if not local government) and requiring the use of public resources.

Increased congestion in Auckland

These negative effects on active and public transport have implications for efforts to reduce severe congestion in Auckland. Giving priority to electric vehicles, the vast majority of which will be single occupant vehicles, will undermine efforts to reduce congestion. Decisions about use of road space must be made on the basis of an integrated assessment of efficient, effective and safe use, and not on the basis of a single objective (i.e. increasing electric vehicle use).

The need for bold measures to reduce transport-related greenhouse gas emissions

Even if the government's goal of 64,000 electric vehicles by the end of 2021 is exceeded, this will still be a very small portion of the New Zealand light vehicle fleet. More effective measures are urgently needed to reduce New Zealanders' transport-related greenhouse gas emissions.

CAN notes that many governments in Europe are moving to ban petrol and diesel vans and cars in an effort to address poor air quality and to reduce greenhouse gas emissions. This is a dramatic change from when Norway first allowed EVs to use bus lanes to incentivise purchase of electric vehicles.

If the New Zealand Transport Agency is serious about wanting to reduce use of petrol and diesel vehicles, it can implement more effective measures. One such measure would be to incentivise electric bikes which are now extremely popular in many countries. This would be far more equitable as it would allow low-income households and individuals to replace their cheaper, older cars with a zero emissions mode of transport. They would not be in a position to purchase an electric vehicle but much more realistically afford an e-bike.

Another measure would be to support local authorities to exclude vehicles from city centres. As Mykleburst (2013, p.6) argues:

> Giving EVs access to the bus lane is to give their drivers extra speed where others are slow, in a way giving them a type of range that makes up for the inconvenience of the limited autonomy for the EV. Another way of creating such range could be to close off city centers, for instance in Oslo, for all traffic except zero emission vehicles. That would create new "range" for EVs, a higher value compared to conventional vehicles. Such a measure could be limited only to private passenger vehicles, but could also include delivery vans and taxis, to spur faster introduction of EVs in more markets.

There is also the possibility that the special lanes will not be used to the extent to which they might be, which indicates that this measure is not as effective as expected. This reinforces our point that bold and effective measures are needed to reduce transport-related greenhouse gas emissions.

Another area to focus on is road freight vehicles which are also a major source of the traffic air pollutants and noise emissions in cities. We do not consider that having access to special lanes will bring about a significant increase in electric freight mobility; rather, it will benefit a few private and public sector electric vehicle owners. There is a raft of other measures that would more be more effective in incentivising electric freight mobility (see, for example, Taefi, et al., 2016).

Summary

In summary, incentives to use electric vehicles must not further discourage active transport and must not undermine efforts to increase use of public transport. It is disingenuous to extrapolate from such a small number of responses to a survey sent to electric vehicle users that access to special vehicle lanes is needed to increase electric vehicle use. Many other policy measures can be implemented to increase electric vehicle use that are more cost-effective. The New Zealand government needs bold policies to reduce New Zealand's transport greenhouse gas emissions that do not discourage other zero-emitting modes.

CAN recommends that NZTA not proceed any further with trials of access for electric vehicles to special lanes until there is a comprehensive and integrated assessment of the range of fiscal measures, legal, communication and organizational measures available to government to increase uptake of electric vehicles. Such an assessment should be undertaken with involvement of all stakeholders including CAN. The proposed trial and subsequent introduction of this measure are 'low hanging fruit' that will not have a significant impact and can only be temporary at best. They will have negative effects on those modes that are already contributing to reducing New Zealand's transport-related greenhouse gas emissions and which also have numerous other social and economic benefits for New Zealand such as the health benefits of cycling and walking.

Please do not hesitate to contact me if you would like further information or clarification in relation to the points raised.

We look forward to your feedback on this submission.

Yours sincerely

Will Allen
Chair, CAN

References

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Taefi, T. T., Kreutzfeldt, J., Held, T., & Fink, A. (2016). Supporting the adoption of electric vehicles in urban road freight transport – A multi-criteria analysis of policy measures in Germany. *Transportation Research Part A: Policy and Practice*, 91, 61-79.