

**By email**

Committee Secretariat  
Transport and Infrastructure Committee  
Parliament Buildings  
Wellington  
[ti@parliament.govt.nz](mailto:ti@parliament.govt.nz)

Tēnā koutou

**Land Transport Management (Time of Use Charging) Amendment Bill 2025  
– Transport Special Interest Group (TSIG) Submission**

Attached is Transport Special Interest Group's (TSIG) submission on the Land Transport Management (Time of Use Charging) Amendment Bill 2025.

Thank you for the opportunity to make this submission. TSIG broadly supports the Bill.

We would welcome the opportunity to speak to this submission.

If you have questions about the content of this submission, please contact Dr Emmet McElhatton, Manager Policy, Metlink by email at [emmet.mcelhatton@gw.govt.nz](mailto:emmet.mcelhatton@gw.govt.nz)

Yours sincerely



Chris McLay  
Chief Executive Waikato Regional Council  
TSIG RCEO Sponsor  
[chris.mclay@waikatoregion.govt.nz](mailto:chris.mclay@waikatoregion.govt.nz)



## **Land Transport Management (Time of Use Charging) Amendment Bill 2025 – Transport Special Interest Group (TSIG) Submission to Transport and Infrastructure Select Committee**

### **Opening Statement**

Thank you for the opportunity to make this submission on the Land Transport Management (Time of Use Charging) Amendment Bill 2025 (the Bill).

The Transport Special Interest Group (TSIG) is a collective body for regional council and unitary authority officers' transport interests. Our members are responsible for regional transport planning, identifying regional transport investment priorities, and planning and provision of public transport services. TSIG is a key stakeholder for central government agencies in relation to issues affecting New Zealand's transport system.

TSIG broadly supports and welcomes the Bill and its establishment of a legal framework to introduce Time of Use Charging schemes.

TSIG has taken a strategic approach to our response which is reflected in the brevity of our comments below. In making this submission, TSIG acknowledges the desire of the Government to improve traffic flow and optimise the use of the road network in our major urban centres.

We will raise a few areas where we believe improvements can be made to the Bill to achieve the Government's goal of improving New Zealand's transport system by addressing congestion and enhancing network productivity. We request that the Transport and Infrastructure Select Committee (the Committee) considers amending the Bill to give effect to the policy change we will outline in the sections below.

TSIG welcomes the opportunity to speak to this submission to the Committee.

### **1. Scheme Costs, revenue and Investment agreements**

TSIG considers that an essential factor for the public support of any time of use charging scheme will be transparency around the allocation of scheme revenue and ability to understand any tangible benefits, for example additional public transport services, a scheme provides for local residents.

TSIG submits that the Bill does not explicitly provide for some essential scheme costs - including local authority costs and the costs of additional public transport services - and that these should be prioritised for funding from scheme revenue.

TSIG submits that once the costs of the scheme outlined above have been covered by scheme revenue (section 65S(1) of the Bill), the balance of the revenue should be invested in line with regional statutory documents like the relevant regions Regional Land Transport Plan (RLTP) and Regional Public Transport Plan (RPTP).





This would mean that projects important to the whole region, just not those important to the scheme are considered for funding.

We recommend that the Bill should be amended to ensure:

- that balance of scheme revenue should be assigned to projects that have been identified as being of high priority to the region through the relevant regional statutory documents (RLTP and RPTP) rather than relying on a new ad hoc agreement to guide investment decisions.

TSIG submits that this is reflected in the investment agreements (section 65X (1) and (2) of the Bill) and these agreements should be consistent with the relevant regions' RLTP and RPTP.

## **2. Scheme Boards**

The scheme boards provisions (section 65(U), (V) and (W) of the Bill) creates a highly centralised governance and decision-making regime. While a local authority (which includes regional councils) has the ability to initiate a scheme, it does not have the ability to decide on the final form of the scheme or change or terminate a scheme once initiated.

The draft Bill powers lie solely with the Minister of Transport, who also has the power to initiate a scheme (or direct NZTA to do so) if the relevant local authorities fail to do so (section 65C(2)).

In addition, NZTA representative(s) hold a 50 percent share of voting rights on the scheme board, as well as being designated as chair of the board, and having the casting vote (new section 65V(2), (4), (5)).

Together, these provisions limit the ability of local authorities, and ultimately their communities, to have a say in how a scheme might be shaped in their cities, and may prove counterproductive in terms of gaining social license for the scheme and in ensuring that a scheme is adequately informed by local expertise and community context.

To allow for more local voice in how schemes are developed and implemented, TSIG recommends that the Bill should be amended to ensure:

- Impacted local authorities must endorse final scheme proposals, including those initiated by a Minister, as well as changes and terminations of a scheme before these are submitted to the Minister for final approval
- Local authorities can request to the Minister that a scheme be changed or terminated.
- Impacted local authorities endorse the proposed scheme for public consultation, before the scheme board undertakes consultation.
- Joint decision making for the scheme board – for example consensus decision making or an independent chair (rather than an NZTA representative).



As Public Transport Authorities are responsible for planning and managing the public transport network, where there is no unitary authority taking lead, it is essential that regional councils are represented on the scheme board alongside territorial authorities.

This is because the implementation of any scheme will have immediate and direct effect on public transport operations, as evidenced by experience overseas, such as the London congestion charging scheme, where despite an extensive existing public transport network, 300 additional buses were required on day 1 of the scheme to cope with a surge in demand.

### **3. Exempt Vehicles**

TSIG agrees that emergency vehicles should be exempt from any time of use charging scheme (section 65P of the Bill).

However, TSIG notes that public transport services are currently not exempted from the scheme. We note that having public transport services paying the charge will result in increased costs, at a time when the Government is already seeking private share increases from Public Transport Authorities.

Any increase in operational costs will inevitably lead to a further increase in fares – which is counterproductive if part of the goal is to get more people using public transport to reduce congestion.

### **4. Additional comments on the Bill**

As stated in our opening comments, TSIG broadly supports and welcomes the Bill. We note our support for:

- Support the need to have legislation that enables Time of Use Charging.
- Support the purpose of the legislation.
- Support the enabling nature of the legislation.
- Support the level of detail required in the Order in Council, as this allows for flexibility of scheme design to adapt to local circumstances.
- Support the need for impact assessments which include the views of Māori and the impacts of a scheme on their interests.
- Support having differential charges for different vehicle types.
- Support exemptions for emergency vehicles.

### **Closing remarks**

TSIG believes that the amendments we have proposed to the Bill introduces will help ensure that the Bill will achieve the Government's desire to improve traffic flow and optimise the use of the road network in our major urban centres while ensuring local





stakeholders are able to have an equal voice in how schemes are implemented in their communities.

