

24 April 2025

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

## Retail NZ submission: Land Transport Management (Time of Use Charging) Amendment Bill

### Overview

1. Retail NZ is a membership organisation that represents the views and interests of New Zealand's retail sector. We are the peak body representing retailers across Aotearoa, with our membership accounting for nearly 70% of all domestic retail turnover. New Zealand's retail sector comprises approximately 30,000 businesses and employs around 227,000 Kiwis.
2. Retail NZ consulted our membership in the preparation of this submission.
3. We conditionally support time of use charging if it can be shown to improve overall travel times.
4. However, any moves to limit traffic movements in our city centres must be considered carefully. There is a risk that consumers will find alternatives to travelling into the cities, potentially harming retail businesses and creating ghost towns instead of vibrant and attractive commercial centres.
5. Key to this is ensuring cost-effective, efficient and reliable public transport links that consumers are incentivised to use instead of private vehicles. Time of use charging cannot be imposed in the absence of reliable alternatives that cater to the needs of a range of consumer groups, including families, people with a disability and the elderly.
6. We note that the draft legislation exempts only emergency vehicles from paying the congestion charges. Retail NZ recommends that the exemption is extended to other businesses deemed to be providing essential services such as grocery and fuel retailers, and their suppliers.
7. Retail NZ also recommends there is a general exemption for freight companies delivering to retailers, particularly those delivering essential goods or short-life products, to improve productivity. Retail businesses typically receive a large number of deliveries each day. Increased costs on freight companies will have to be passed on to the retailer and ultimately the consumer, pushing prices up further.
8. Alternatively, if there is no support for this approach in the primary legislation, we recommend that the territorial authority/scheme board has the power to extend who is exempted from the scheme.

### Conclusion

Thank you for the opportunity to make a submission. Retail NZ supports the intent of the Land Transport Management (Time of Use Charging) Amendment Bill, but recommends that the needs of the retail sector are considered.

Retail NZ is happy to discuss any aspect of this submission further. We would like the opportunity to make an oral submission to the committee.

No part of this submission should be withheld under the OIA.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Carolyn Young'.

Carolyn Young  
Chief Executive  
Retail NZ  
[carolyn.young@retail.kiwi](mailto:carolyn.young@retail.kiwi)