

15 September 2023

Ministry of Transport

Draft GPS on land transport 2024/25-2033/34: Bus and Coach Association feedback

Thank you for the opportunity to provide feedback on the Draft GPS on land transport 2024. While we have completed your online survey, we felt a document of this importance required feedback that the survey did not fully accommodate. Therefore our survey response refers to this document which we have emailed to GPS@transport.govt.nz.

This approach also better facilitates sharing BCA feedback with our members.

Introduction

The Bus and Coach Association (BCA) has been the authoritative voice of New Zealand's bus and coach industry since 1931. Our members deliver all Public Transport bus services in New Zealand, 98% of Ministry of Education school bus services and most tourism and charter coach services.

Our industry plays an increasingly vital and influential role as an enabler of economic growth as well as contributing to improving social and environmental outcomes. In doing this, our members employ over 13,000 staff and contribute more than \$1.8 billion annually to New Zealand's GDP.

We thank you for the opportunity to provide feedback on draft Government Policy Statement (GPS) on land transport 2024. This document supplements our online survey response.

We broadly agree with the Strategic Priorities set out in the GPS. However, it is hard to follow the intervention logic that leads the reader from a strategic context through prioritisation to investment decisions in the current draft.

We understand the time constraints in finalising the GPS with the incoming Minister of Transport. Even with willingness, some of our suggestions in this document might practically require implementation through the GPS on land transport 2027.

Our aspiration for a long-term Public Transport Strategy.

We note the absence of a long-term Public Transport Strategy for New Zealand. We understand the GPS cannot fully substitute for the lack of such a strategy. However, in the absence of such a strategy, a reader might reasonably look to the GPS for elements of such a strategy.

At the highest level, we think a Public Transport Strategy that the GPS references is required. Failing that, the GPS needs to paint a better picture of the medium to longer term environment in which prioritisation decisions are occurring.

This would include the fiscal, economic and environmental context as well as assumptions around the timing and impact of evolving technologies. Factors like autonomous drive vehicles, weather and other environmental impacts on transport infrastructure/networks and the rate of planned mode shift to public transport are all informative assumptions for resource allocation forecasts in the GPS.

We would expect to see this in the Strategic Context (page 17) section of the GPS. Instead, this section seeks to connect to other Government plans and policies. The future environment is uncertain but is not political. This section should set out the most likely scenario under which land transport services will operate over the next decade.

The absence of these assumptions undermines a reader's ability to understand the allocations detailed in Appendix 4 or the reasons behind the changes in Appendix 7.

Strategic Priorities should respond to the Strategic Context

An unclear or absent strategic context makes it hard for the reader to understand whether the strategic priorities are a risk/evidence-based response to the context or a leap of faith. Strategic priorities don't seem to be weighted in the GPS, yet the context should help the reader understand which priorities are more important and which are less so, or if all priorities are weighted equally.

We understand that it could be argued that the allocation of resources sends prioritisation signals however, while figure 3 provides a partial view for the ***Maintaining and operating the system*** priority, there is no such connection for other strategic priorities.

Specific suggestions for amendments

We recognise the above would result in quite a different GPS. Even if this feedback is accepted, the tight timeframes for publishing GPS 2024 may preclude such changes being made. Therefore, what follows are more tactical and easily implemented changes to the draft GPS.

Page 7, Figure 1 and through the Draft GPS: Clear and understandable priorities

The Government should write public facing documents with the public in mind. Around 40% of New Zealanders adults have literacy levels below Level 3. Level 3 is a "suitable minimum for coping with the demands of everyday life and work in a complex, advanced society".

The ***Increasing Resilience*** priority talks about anthropogenic hazards. Depending on what was intended this priority could be presented as,

"The transport system is better able to cope with natural and human generated hazards" or

"The transport system is better able to cope with natural and human generated pollution and environmental hazards".

This same lens could be applied across the draft GPS which contains several opportunities for simplification to increase public comprehension.

Page 8 Overview, Section 4, last paragraph

At this point in the political cycle, it seems inappropriate for the Draft GPS to include this statement,

"The Government expects to make further announcements about how it will provide additional funding for Cyclone Gabrielle recovery efforts, and advance other strategic priorities, in the coming months and future Budgets."

It is widely understood that all plans are subject to change because of external and other influences and that the Government will always need to re-prioritise to address unplanned events.

Page 8 Overview, Section 5, Ministerial expectations (and pages 57- 61)

The three dot-points on page 8 don't line up with the three major headings on pages 57-61.

Value for Money (VfM) is a core expectation for everything a government funds, so stating it as an expectation wastes the opportunity to highlight what is really important to the Minister. Alternatively, listing VfM as the top priority, in conjunction with the detailed expectations on pages 58-60 could be interpreted that the Minister does not consider VfM is being provided.

The second dot point adds nothing to the first dot point, being a core component of VfM.

The incoming Minister of Transport may have a different view on the content of the Ministerial expectations section. However, the Ministry of Transport might want to provide some less generic options for the new Minister to consider.

Transparency on Activity Class investment levels

For transparency, the GPS funding ranges should be shown in context with the current actual levels of expenditure in each activity class. Not providing current expenditure levels obscures whether the GPS proposes more, less, or the same level of investment in each activity class. Replication of Figure 3 on page 21 for each Activity Class would be one way of doing this.

The comparison on page 72 with GPS 2021 funding levels is insufficient, because the activity class ranges are so broad and the document gives no visibility of the actual year on year spend.

Investment delivered through the NLTF

We note the additional Crown top ups provided to the NLTF, and fully support the proposal for hypothecation of traffic infringements. These initiatives go some way to addressing the revenue problem, but the current funding model is unsustainable and inequitable. We therefore support and encourage priority on the Future of the Revenue System (FoRS) review.

Engagement with representative groups

We note on Page 11, the Draft GPS notes within the Minister's responsibilities:

"Before issuing a GPS, the Minister is required to have consulted Waka Kotahi, and have regard to the views of Local Government New Zealand (LGNZ) and representative groups of land transport users and providers."

The BCA is one of the most significant representative groups of land transport providers. We would appreciate a discussion on how the Ministry and/or the new Minister plans to have regard to our views outside of this public consultation process. We would welcome a discussion on any aspect of our submission.

Yours sincerely



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