

Bus and Coach Association of New Zealand Submission on Auckland's Draft Regional Public Transport Plan 2023-2031

About the Bus and Coach Association of New Zealand

1. The Bus and Coach Association (BCA) has just celebrated its 92nd year as the voice of the road passenger transport industry, and currently consists of around 160 full members providing road transport services and around 75 associate members that are generally industry related suppliers.
2. BCA members deliver all Public Transport bus services in Aotearoa, 98% of the Ministry of Education school bus services and the vast majority of tour coach services. Our members employ over 13,000 people and provide critical road transport connections for New Zealanders to access employment, education and social opportunities; as well as providing tourists a safe, efficient and enjoyable way to move around New Zealand.

Our Submission

3. Thank you for the opportunity to provide a submission on Auckland Transport's (AT) draft Regional Public Transport Plan (RPTP). We have deliberately constrained our submission to the key strategic points we would like you to consider in finalising this draft.
4. We have taken this approach in part because this is a public consultation exercise whereas we see an important and ongoing relationship between AT and the BCA where we will be looking for ongoing opportunities to work with you on behalf of our members and in pursuit of our mission which is to **foster efficient, sustainable and profitable growth of road passenger transport for the mutual benefit of Association members and all New Zealanders.**

Feedback: Developing the Plan

5. We consider AT has done a great job of presenting this draft RPTP for public feedback. The material is well presented for multiple audiences, the timeline is clear and there are multiple ways of providing feedback.
6. We are happy to arrange a time to provide you a greater level of detail on feedback from our members or on the points we make in this submission should that be of value to you.
7. We have one concern we want to highlight regarding the timeline that sees the RPTP finalised in November 2023. We have concerns that the linkage the RPTP has to the RTLP and the Government Policy Statement on Land Transport could mean aspects of the RPTP may be out of date shortly after it is finalised.
8. While this is often the nature of these sort of plans, we encourage you to consider whether there is time to pause the finalisation of the RPTP to incorporate any impact that may result from the October election. This applies to the parts of the draft RPTP 2023-2031 that references current

Government policy. It would be unfortunate if these aspects remained in the final RPTP if they were no longer valid.

Vision and goals

9. The BCA strongly support the vision and goals of the draft RPTP 2023-2031. One of our key positions is that mode shift to greater use of public transport, walking and cycling will have greater social, environmental and economic benefits to all New Zealanders.
10. Where we are likely to have differing views is in some of the actions/change initiatives required to deliver on the five goals.

AT Position on key issues

11. The BCA recognises the constraints AT faces and the aspects of Auckland's transport system that AT doesn't control. The BCA broadly agrees with the positions set out within section 1.3, in particular the sustainability of the current funding model. While we won't always agree on the specific details, because we support the vision and goals in the draft RPTP 2023-2031, there will be many occasions where what we are advocating for will be aligned.
12. In these cases, we would like to work together. The draft RPTP 2023-2031 touches on some of these points such as the importance of driving being seen as an attractive career. The funding model is such that this is not possible to achieve this without the cooperation of all parties involved.

Actions associated with Goal 1: Services providing an excellent customer experience

13. Driver shortages. The BCA acknowledges the detrimental impact of recent driver shortages on Auckland. We also want to recognise the role of AT in sharing the increased costs required to lift wages to a more sustainable level. In conjunction with changes to immigration settings, this has enabled our members to largely address the immediate issue.
14. However, for Auckland to have the public transport network that it aspires to, more work will need to be done to support a sustainable workforce that can expand to meet the increased task. This will require further investment and collaboration between the various parties to improve working conditions, specifically through timetabling improvements to minimise split shifts and enable access to suitable rest facilities for breaks; and improved health and health and safety measures to protect drivers from anti-social behaviour.
15. The BCA considers the RPTP should include a strategic initiative/action focused on how drivers are valued, kept safe, appropriately remunerated, recruited and retained to match forecast demand. Should you agree, this is a piece of work we would like to work with you on further in 2024 and we think reflecting it as one of the actions under the final RPTP is appropriate.
16. This could be a medium-term focus and could easily sit under Goal 1. We think that without focusing on this, there is a risk of that customer experience could suffer again from supply-side shortages.

17. Increasing services including night services. We support making public transport available to more people for more of their journeys, but it will be important to work through technical impacts of increased hours of service provision, as well as staffing. An example might be the need to consider the impact on current overnight vehicle battery charging patterns and or the infrastructure/asset mix needed to support extended services. Another is the difficulty in staffing night shifts due to antisocial hours and the increased personal safety risk. We would like to work with you on scoping these impacts early, so our members are well positioned to respond.
18. Infrastructure improvements. We support infrastructure improvements to enhance bus journey times and improve comfort for passengers.

Actions associated with Goal 2: Enhancing the environment and tackling the climate emergency

19. The BCA strongly supports this goal but want to ensure an evidence-based approach is taken. To best minimise the impacts of transport on the environment, the primary focus should be on encouraging modeshift to active and shared modes.
20. Reducing emissions and embodied carbon. The BCA supports AT's desire to decarbonise the public transport fleet. Decarbonising the public transport fleet must consider not just tail pipe emissions, but also the whole of life environmental cost associated with the manufacture and disposal of vehicles and batteries. We note that the plan includes that embodied emissions are reduced by 50% by 2031, however it only seems to refer to infrastructure and doesn't seem to be factored into any proposed actions relating to the bus fleet.
21. The BCA is concerned that the desire for a swift move to zero emission vehicles, combined with the short contract cycles and heavy procurement weighting to cost, will see modern high-quality, low-emission vehicles made obsolete too soon. They risk being replaced by low-cost, shorter lifespan buses that are fully depreciated over the 9-year contract period, due to uncertainty about vehicle usage post contract. Climate change is a global problem and ignoring emissions generated offshore in the manufacturing of vehicles or the cost of disposal is not an appropriate way to tackle the climate emergency.
22. We would like to work with AT to develop procurement processes that support the deployment of responsibly manufactured high-quality zero emissions vehicles with a 20-year life in the New Zealand fleet, thus reducing embodied carbon.
23. We recommend that to give the final version of the RPTP longevity, you amend some of the actions that support the goal. An example is this, "All buses to be low-emission by 2035 – to align with Government's mandate" which sits under the title of, "What we plan to achieve by 2031", even though the target date stated is 2035. This could have the same intent but be more enduring if it was presented as, "Continued transition of public transport buses to a low emissions fleet in line with Government policy".

Actions associated with Goal 3: Safe and accessible transport for everyone

24. The BCA strongly supports this goal and by everyone, we take that to include our members' staff.
25. The surge in incidents of antisocial behaviour targeting drivers and passengers has and will continue to impact both driver retention and patronage levels if not addressed. We support the on-going safety actions outlined in the draft RPTP 2023-2031 and think there is further work we can do together regarding safety on-board buses for the benefits of our drivers and passengers. You may wish to consider including a specific action in the final RPTP that aims to address this.
26. We acknowledge that AT alone is unlikely to be able to resolve this issue, but you can play a leadership role in uniting stakeholders to devise effective solutions. We would offer you our full support at both a national and regional level on this matter.

Actions associated with Goal 4: Integrating public transport into a growing Auckland

27. We suggest correction of the typo on page 28 by dropping the word, "Transport" in the heading. This created us some initial confusion on why you sought to integrate public transport into a growing AT.
28. We support improved integration between modes, and urban form that supports shared and active modes. We encourage early consultation with bus operators on planned service changes and infrastructure changes to ensure continued efficient services.
29. We suggest AT consider developing strategically located rest and charging facilities. Operators should continue to provide facilities for management, bus stabling and maintenance, at locations that best suit them. This approach would enable more efficient service delivery with the planned increased hours of operation and improved driver conditions, while the more agile private sector manages property as it sees fit, recognising that operators use depots to provide other services, i.e. servicing Ministry of Education routes and charter services which benefits AT by splitting infrastructure overheads.

Actions associated with Goal 5: Funding and delivering public transport transparently

30. The BCA strongly supports your plan to, "enhance and compliment the services we provide through greater collaboration with operators and private providers". We are available to help you in achieving this, and strongly believe that the expertise held within our sector can benefit Auckland Transport in delivering improved and more efficient services.
31. The best way to improve farebox recovery is to increase patronage and make service design improvements to better match passenger demand, however, there are also efficiency opportunities within how contracts with transport providers are structured. We would welcome a discussion on improved partnering, (including greater transparency), and the types of contractual arrangements that could better deliver against AT's objectives.

Summary

32. In summary, the BCA:

- a. Appreciates the work AT has done to date that has resulted in the draft RPTP 2023-2031,
- b. Strongly supports the vision and goals included in the draft RPTP 2023-2031,
- c. Urges AT, if at all possible, to delay finalising the RPTP so that it is consistent with any incoming government's Land Transport policies,
- d. Recommends AT continues working with the BCA and our members to better understand the challenges and opportunities that service delivery changes bring, to ensure choices are workable and represent good value for money to the rate payer, and
- e. Recommends the following changes to the draft RPTP 2023-2031:
 - i. Including a Driver workforce initiative under one of the RPTP's goals with a medium-term focus to signal commitment in this area,
 - ii. Reducing the focus on tailpipe emissions and signal you are thinking about emissions on a whole of assets lifecycle basis, and
 - iii. Amending actions like "All buses to be low-emission by 2035 – to align with Government's mandate" such that the final RPTP is more enduring.

33. We are happy to arrange a time to provide you a greater level of detail on feedback from our members or on the points we make in this submission should that be of value to you.

Submitted on behalf of the Bus and Coach Association (NZ) Inc by:



Delaney Myers
Chief Executive