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Submission of Greater Wellington Regional Council ("Greater Wellington") to the Government Transport Sector Review Team

on the

Government Transport Sector Review

1. Introduction

Thank you for the opportunity to make this submission on the Government Transport Sector Review ("the Review").

Greater Wellington welcomes the Review and sees it as timely for the following reasons:

- It creates an opportunity for dialogue about how Government transport agencies can best take into account regional land transport strategies
- The government transport agencies have been operating more-or-less as they do now for more than a decade. It is both prudent and appropriate to consider whether these agencies are meeting contemporary expectations, and whether they will continue to do so.
- Current arrangements were in place before the New Zealand Transport Strategy (NZTS) was developed. The Review allows participants an opportunity to assess whether the sector has a sense of common purpose and is best arranged to implement the NZTS and related strategies.
- The Review also offers an opportunity to reflect on the recently implemented changes brought about by the enactment of the Land Transport Management Act 2003 and to consider whether there are outstanding issues which the government must address.

We note that a key concern of the review team is the extent to which integration is appropriate and necessary. In this context, it is worth Greater Wellington putting its stake in the ground.

2. Comments on Terms of Reference

We support the purpose, scope and general propositions outlined in the Terms of Reference.

With respect to the three issues that have been identified, we believe that they do not reflect the full extent of the partnership that is required between central and local government to give effect to the New Zealand Transport Strategy. Both central and local government have key roles in the management and provision of land transport and harbour management. A partnership relationship is essential for the preparation and delivery of regional land transport strategies and for effective management of harbour safety.

We believe that the review team should insert an additional assessment criterion as follows:

• Partnership: The government transport sector must maintain and develop partnerships with local government.

We assume that the review team will test a number of possible structural arrangements, including the status quo, against the assessment criteria to determine the most effective arrangements for the delivery of the Government's transport functions.

3. Comments based on our experience with the Government Transport Sector

Greater Wellington has had very little contact with the Civil Aviation Authority so this agency is excluded from the comments below.

In Greater Wellington's view, there is unnecessary duplication of some functions and scope for appropriate structural integration and alignment of organisational cultures/philosophies. In this context, Greater Wellington asks that the review team assess the following model for government sector agencies against its criteria:

Alternative to Status Quo

It is Greater Wellington's view that the policy development/analysis function is unnecessarily duplicated in the Ministry of Transport, the Land Transport Safety Authority and Maritime Safety Authority (MSA). There is considerable scope to establish a single, integrated, policy unit within the Ministry of Transport. Similarly the safety function, currently delivered by agencies such as LTSA and MSA could be integrated into a single national safety agency which would then focus on service provision. It is expected that structural integration of this nature would offer an opportunity to remove duplicated systems. For example, administration systems, information technology and HR.

This model can be represented diagrammatically as follows:

	Minister
Policy function Advise government and interpret policy outcomes	Enhanced Ministry of Transport
Funding agency Collect transport revenues and distribute funding	National transport funding agency
Service provision	
Local authorities	National Network provider National Safety Agency

By advancing this model as an alternative to the status quo, Greater Wellington hopes to address what it sees as a lack of integrated strategic planning within the government agencies. Strategy should be developed to provide clear direction on how to implement the Government's desired transport outcomes. While the Government has recently produced a national transport strategy (the NZTS), no national land transport strategy has ever been adopted despite the fact that there has been legislative provision for such a strategy for many years. A strengthened policy function within the Ministry may mitigate against such occurrences in the future.

We envisage that, by strengthening the Ministry's ability to provide advice and interpret policy outcomes, it will also be possible to remove the need for other transport agencies to report directly to the Minister. Instead, agencies could report to the Ministry, improving the clarity and quality of advice afforded to the government of the day.

Greater Wellington acknowledges that the separate governance arrangements that exist by having separate boards for the MSA, LTSA, Transit and Transfund have the advantages of providing a separation from direct political interference and providing single focused agencies concentrating on their core functions. To be effective, the board members of the proposed single national safety agency would need adequate skills and experience in their subject matter and not be simply political appointments.

While we believe that the allocation of funding should implement government policy it should remain free from political interference. For this reason, the proposed model retains an independent funding agency. The funding agency should concentrate on "funding" and

move away from the notion of "purchasing" outcomes. It should fund strategies that contain packages of measures, rather than funding individual projects.

In our experience, government transport agencies do not always pay sufficient attention to the needs and desires of local communities or to the impacts of their decisions on those communities. Included in the outcomes that can result, are significant cost increases. For example, Greater Wellington has been obliged to increase its budget for harbour management by \$400,000 to respond to a safety review initiated by the MSA.

Consultation is not always meaningful. An example, is the way in which the administration of pilotage provisions for harbours were changed during the reform of harbour legislation and the promulgation of rules. Failure to listen to the views of local authorities experienced in this matter resulted in an unclear and unworkable regime that has required several iterations to fix. In our view, this situation was avoidable if appropriate weight had been given to the views of practitioners.

A significant failure of our current system of management has been the ability to implement regional land transport strategies. While this is being addressed to some extent by changes brought about by the enactment of the Land Transport Management Act 2003, Greater Wellington wishes to see the review team critically evaluate whether the sector is best arranged to implement regional strategies.

The structural changes we have proposed will not achieve an improved focus on implementing strategies nor is this their function. For this reason the model Greater Wellington is proposing would need to be implemented with a corresponding focus in governance documents – such as the NZTS and Terms of Reference of any agency boards – on implementing regional strategies. It would also be appropriate to recognise the role local government plays in the delivery of transport outcomes by appointing representatives of local government to agency boards

The Status Quo retained

If as a consequence of the Review Team's assessment of possible alternative arrangements, the Status Quo is retained (or retained with few modifications), Greater Wellington would wish to see an alignment of Terms of Reference between agency boards to ensure that government agencies are on the same wave length and focused on the need to implement government policy effectively.

Greater Wellington would also wish to see a review of the membership of agency boards to ensure that each board has appropriate specialist expertise in the required field, and is able to act strategically and in partnership with other government agencies and stakeholders.

If the status quo is to remain, substantially unchanged, considerable benefit will be derived from a focus on cultural change within government agencies which sees an increased focus on the need to give effect to government policy, and regional strategies and programmes.