Submission Analysis – Provision of Roads and Footpaths

Introduction
1. This report summarises submissions, and where appropriate provides recommendations, on the “Provision of Roads and Footpaths” discussion document of the Local Government Mandatory Performance Measures consultation.

Structure of this report
2. The report sets out submitters’ responses by the order of the questions in the discussion document with any relevant general comments made by submitters at the beginning. Recommendations on the individual performance measures are at the end of each section. Submitters’ comments are, where relevant, ordered by themes arising from the submissions.

Common abbreviations
3. A number of abbreviations are used in this report and are set out in the table below.

<table>
<thead>
<tr>
<th>Term</th>
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<tr>
<td>District Council</td>
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<td>City Council</td>
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<td>Regional Council</td>
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Overall number of submitters

Thirty-nine submitters commented on the roads and footpaths measures overall, including: Auckland CC and Auckland City Transport (Joint), CCS Disability Action/Waikato, Clutha DC, Dunedin CC, Far North DC, Hamilton CC, Hauraki DC, Hurunui DC, Kaipara DC, Marlborough DC, Matamata-Piako DC, Nelson CC, New Plymouth DC, Palmerston North CC, Porirua CC, Ruapehu DC, Selwyn DC, SOLGM, South Waikato DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waikato RC, Waimakariri DC, Waipa DC, Waitaki DC, Waitomo DC, Wellington CC, Whakatane DC, Whangarei DC, Anonymous # 6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.
KEY ASPECTS OF THE PROVISION OF ROADS AND FOOTPATHS

Q2a - Are these the key aspects on which members of the public need information in order to participate in discussions on the provision of roads and footpaths?

1. How safe are the local roads?
2. What is the overall condition of sealed roads in the local road network?
3. Is the sealed roads network being maintained adequately?
4. Are the footpaths that form part of the local road network being maintained adequately?
5. Does the local government organisation responsible for the service provide a timely response if there is a problem?

Submitters

Twenty-six submitters responded to this question including: Auckland CC and Auckland City Transport (Joint), Dunedin CC, Hamilton CC, Hauraki DC, Hurunui DC, Marlborough DC, Matamata-Piako DC, Nelson CC, New Plymouth DC, Porirua CC, Selwyn DC, South Waikato DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waikato RC, Waitomo DC, Wellington CC, Whakatane DC, Whangarei DC, Anonymous #7, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

4. The majority of submitters (twenty-three) agree or strongly agree that the key aspects identified are the right aspects to measure. Submitters included Auckland CC and Auckland City Transport (Joint), Dunedin CC, Hamilton CC, Hauraki DC, Hurunui DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Selwyn DC, South Waikato DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waikato RC, Waitomo DC, Wellington CC, Whakatane DC, Whangarei DC, Anonymous #12, Anonymous #13, and Anonymous #19.

5. Nelson CC commented that the measures would drive a significant “dumbing down” of performance reporting in Nelson, noting that it does not currently report on any of the measures. Anonymous #10 thought that some of the measures may not be meaningful as they only gave high-level views of performance.

6. Anonymous #7 argued that performance measure three (maintenance) and performance measure four (condition of footpaths) are not good outcomes for engaging with the community. The submitter commented that an outcome focus is the condition of the road, not what we do to manage it. Further, performance measure two (condition of the sealed road network) covers the outcome of performance measure three (maintenance), so performance measure three should be removed and performance measure four should be replaced with “condition of footpaths”.


7. Anonymous #10 noted that some of the measures give high-level views of performance and may not be meaningful at the level some customers look to have input on - often they see only their own patch and don't have a network wide view.

Q2b - Are there any others?

Submitters
Thirteen submitters responded to this question including: Auckland CC and Auckland City Transport (Joint), Dunedin CC, Hurunui DC, Far North DC, Kawerau DC, Marlborough DC, New Plymouth DC, Porirua CC, Southland DC, Whangarei DC, Anonymous #6, and Anonymous #12.

8. Tasman DC commented that walkways and shared paths should also require a level of service. Dunedin CC proposed measuring network efficiency, environmental protection and accessibility. Kawerau DC also suggested accessibility, for older people and the disabled.

9. A number of submitters commented that unsealed roads should be covered by the performance measures. Submitters included Marlborough DC, Hurunui DC, Far North DC, New Plymouth CC, Southland DC, Whangarei DC, and Anonymous #12. This is a recurring theme throughout the submissions on the roads and footpath performance measures. The submitters generally understood the difficulties associated with setting measures for unsealed roads but nevertheless considered that an attempt should be made to incorporate them.

Q2C - Do you have any other comments?

Submitters
Sixteen submitters responded to this question including: Auckland CC and Auckland City Transport (Joint), Dunedin CC, Hamilton CC, Hauraki DC, Matamata-Piako DC, Nelson CC, New Plymouth DC, Porirua CC, Ruapehu DC, Thames Coromandel DC, Waikato DC, Waikato RC, Waitomo DC, Wanganui DC, and Anonymous #19.

10. Auckland City Council and Auckland City Transport (Joint) commented that clarification of the context of the performance measures, and definition of critical elements, should be provided as information in support of the measures. A number of other submitters agreed that supporting information or guidance would be important. Submitters included Hauraki DC, Matamata-Piako DC, Porirua CC, Thames-Coromandel DC, Waikato DC, Waikato RC, Waitomo DC, and Anonymous #19.

11. Dunedin CC noted that it is difficult to choose high-level measures that are representative and relevant across both urban and rural local authorities. Ruapehu DC supported this point, further adding that comparability could be affected by climate, geology, industrial activity and demographics.

12. Hamilton CC, Wanganui DC, and Anonymous #19 noted the absence of a measure for customer satisfaction, in contrast to the water performance measures.
Recommendation on key aspects for provision of roads and footpaths

13. The vast majority of submitters support the key aspects outlined. However, a number of submitters have commented that the exclusion of unsealed roads has the potential to skew data, as there are vast differences between the proportion of sealed and unsealed roads in rural and urban areas. This is a common theme in submissions on all of the performance measures relating to roads and footpaths.

14. On balance, changes to the key aspects are not recommended. However, members are invited to address the question of whether (and how) unsealed roads could or should be included for measurement.
PROPOSED PERFORMANCE MEASURE ONE: ROAD SAFETY

OPTION ONE: “The annual change in the number of fatalities and serious injury crashes on the local road network”.

OPTION TWO: “The annual number of road deaths and serious injuries per million vehicle kilometres travelled on the local road network”.

Q3A – Which options is easier to understand?

Submitters

Twenty-eight submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hamilton CC, Hauraki DC, Hurunui DC, Marlborough DC, Matamata-Piako DC, Porirua CC, South Waikato DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waikato RC, Waimakariri DC, Waipa DC, Waitomo DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

15. All but three submitters agree or strongly agree that Option one is easier to understand. Only Whangarei DC, Anonymous #6, and Anonymous #8 disagree.

Q3B – Which option will give the better picture of a local government organisation's levels of service and enable members of the public to contribute to discussions on future levels of service?

Submitters

Twenty-six submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Dunedin CC, Hamilton CC, Hurunui DC, Hauraki DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, SOLGM, South Waikato DC, Southland DC, Thames-Coromandel DC, Waikato DC, Waikato RC, Waitomo DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

16. Submitters are split over which option will provide the better picture of service levels. Eleven submitters selected Option one as the best option. Submitters included: Auckland CC and Auckland City Transport (Joint), Dunedin CC, Hurunui DC, Hauraki DC, Matamata-Piako DC, SOLGM, Southland DC, Anonymous #6, Anonymous #7, and Anonymous #12. Southland DC supports Option one but comments that it would need to take into account “road factors” and whether an incident was network related or driver error.

17. Eight submitters selected Option two as the best option. Submitters included Porirua CC, South Waikato DC, Thames-Coromandel DC, Waikato DC, Waikato RC, Waitomo DC, Anonymous #10, and Anonymous #19. This support was because it compares the
number of crashes with vehicle kilometres travelled (VKT) on the local road network. The Auckland CC and Auckland City Transport (Joint) submission noted that if VKT was used, Option two would need to take account of the rural/urban split. South Waikato DC favoured a variation, “the annual number of road deaths and serious injuries on the local road network as a 5-year rolling average” but not proportioned to VKT.

18. Seven submitters thought neither Option was adequate. Submitters included Hamilton CC, Marlborough DC, New Plymouth DC, Whakatane DC, Whangarei DC, Anonymous #8 and Anonymous #13.

19. Hamilton CC proposed instead, “the number of injury crashes per 10,000 people compared to the local authority's peer group”, noting that the data for this measure is collected by the New Zealand Transport Agency. Whangarei DC proposed a measure based on the percentage of a council’s road network rated as high risk under the KiwiRAP Road Assessment Programme.

20. New Plymouth DC was concerned that performance on this measure could be affected by things outside the council’s control such as individual driver behaviour. Whakatane DC agreed.

3C – From your point of view, what are the good and bad points of each option?

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21. Submissions in favour of Option one were that it is:

- easy to communicate;
- easy to track and measure; and
- good for measuring local issues.

22. Submissions against Option one were that it:

- is not best practice to mix crashes, fatalities and injuries in the same measure;
- does not take into account factors outside a local authority’s control;
- should be measured over more than a year as casualties can vary significantly;
- is open to interpretation as crashes can be multi-injury;
- is too simplistic; and
- does not actually reflect real performance or safety.
23. Submissions in favour of Option two were that it:

- is more comparable as it is a trend per network measure;
- is good for comparing with other local authorities;
- is better for setting baselines and targets;
- is clearer and provides a better overall view;
- provides an indicator of whether injuries are increasing or decreasing; and
- is a strategic option that can be used for other planning purposes.

24. Submissions against Option two were that it:

- is not statistically robust to use VKT, especially for comparing rural and urban councils;
- is too technical a measure for the general public to understand;
- is difficult and expensive to measure;
- may not be an accurate representation as a ratio; and
- does not take into account factors beyond a local authority’s control.

Q3D - Would implementing the measure result in additional costs or other implementation issues for local government organisations? If so, what are they?

Submitters
Twenty-six submitters commented on this question, including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hamilton CC, Hurunui DC, Matamata-Piako DC, Nelson CC, New Plymouth DC, Porirua CC, Selwyn DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waipa DC, Waitomo DC, Wellington CC, Whakatane DC, Whangarei DC, Anonymous # 6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, and Anonymous #19.

25. Twelve submitters thought that there would be no additional costs associated with reporting on this measure. Submitters included Clutha DC, Dunedin CC, Hurunui DC, New Plymouth DC, Southland DC, Waikato DC, Waipa DC, Whakatane DC, Whangarei DC, Anonymous #8, Anonymous #10, and Anonymous #19.

26. Ten submitters thought that there would be costs associated with Option two. Submitters considered there would be costs involved with making VKT statistically appropriate. Submitters included Auckland City Council and Auckland City Transport (Joint), Hamilton CC, Matamata-Piako DC, Porirua CC, Selwyn DC, Waitomo DC, Anonymous # 6, Anonymous #7, and Anonymous #12.
Q3E – Do you have any other comments?

**Submitters**

Twenty-eight submitters commented on this question, including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hamilton CC, Hauraki DC, Kawerau DC, Matamata-Piako DC, New Plymouth DC, Palmerston North CC, Porirua CC, Ruapehu DC, Selwyn DC, SOLGM, South Waikato DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waikato RC, Waimakariri DC, Waipa DC, Waitaki DC, Waitomo DC, Whangarei DC, Anonymous #8, Anonymous #13, and Anonymous #19.

**External factors influence crash statistics**

27. A significant number of submitters commented that there were many factors that influenced crash statistics that were outside local authorities’ control. A common example was driver behaviour. Submitters considered that this reduced the effectiveness of the measures proposed (Auckland CC and Auckland City Transport (Joint), Clutha DC, Palmerston North CC, SOLGM, Thames-Coromandel DC, Waikato DC, Waikato RC, Waitomo DC, Waipa DC, Waitaki DC, Waitomo DC, Whangarei DC, and Anonymous #19).

28. SOLGM proposed that the measure could be refined so that it captured the number of crashes where road design or condition was identified as a contributing factor.

**Crashes cause multiple statistics**

29. Several submissions questioned the usefulness of Option one as a comparator because a single crash can cause multiple injuries or fatalities, skewing statistics (Auckland CC and Auckland City Transport (Joint), Selwyn DC, Southland DC, Waikato RC, and Anonymous #19).

**The Ministry of Transport’s Safer Journeys Strategy**

30. Waimakariri DC, Waitomo DC, and Whangarei DC noted that the measures proposed were not consistent with the New Zealand Road Safety Strategy 2010-2020, because they did not take a “whole-of-journey” approach to road safety.

**Alternative proposals**

31. As an alternative to the proposed performance measure, Hamilton CC suggested “the number of injury crashes per 10,000 people compared to the local authority’s peer group”, noting that data for this measure is produced by the New Zealand Transport Authority, and was published up until recently.

32. Kawerau DC submitted that the measure should be calculated based on a three year rolling average to even out anomalies that could skew data. Palmerston North CC supported a three year or five year rolling average. Waipa DC supported a five year average.

33. Matamata-Piako DC, Hauraki DC and South Waikato DC also supported a five year rolling average and suggested that Option one be altered to “the annual number of road deaths and serious injuries on the local road network as a five year calendar rolling average.”
34. SOLGM, supported by Ruapehu DC, submitted that “percentage change” would be a better comparator of road safety. An example could be a statement along the lines of, “the number of road deaths and serious injuries per million vehicle kilometres travelled on the local road network should reduce by ten per cent per annum”.

Other comments

35. The joint submissions from Auckland CC and Auckland City Transport noted that rural and urban trends may differ and the measures would be more useful if they took account of this. New Plymouth DC and Selwyn DC commented that it would be necessary to distinguish between State Highways and the local road network.

Recommendation on proposed performance measure one: road safety

36. There is no consensus among submitters about which option would operate as the best performance measure. Submitters in favour of Option one consider that it is easier to understand, communicate, track and measure, whereas Option two is too technical and is not statistically robust.

37. Submitters in favour of Option two contend that it is a better comparator as it reports on trends, and is better for setting baselines and targets. In contrast, Option one is too simplistic, and is open to interpretation because it mixes the concepts of fatalities and injuries in the same measure.

38. There is also significant concern among submitters about the potential for data to be skewed by factors outside the control of local authorities, such as driver behaviour.

39. Considering the division of opinion over the two options, the Department of Internal Affairs (the Department) invites members to reconsider the merits of both options, taking into account the views expressed in the submissions.
PROPOSED PERFORMANCE MEASURE TWO: CONDITION OF THE SEALED ROAD NETWORK

“The average quality of ride on a sealed local road network, as measured by the Smooth Travel Exposure Index”.

Q4A - Is the measure easy to understand?

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40. Seven submitters agreed or strongly agreed that this measure is easy to understand. Submitters included Kawerau DC, Matamata-Piako DC, South Waikato DC, Tasman DC, Whangarei DC, Anonymous #12, and Anonymous #13.

41. Fourteen submitters disagreed or strongly disagreed that the measure was easy to understand. Submitters included Clutha DC, Dunedin CC, Hurunui DC, Marlborough DC, New Plymouth DC, Selwyn DC, Southland DC, Thames-Coromandel DC, Waipa DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, and Anonymous #19.

42. Six submitters were neutral about the measure. Submitters included Auckland CC and Auckland City Transport (Joint), Porirua CC, Waikato DC, Waitomo DC, and Whakatane DC.

Q4B - Will the information provided by the performance measure help the public to assess a local government organisation's levels of service and to participate in discussions on future levels of service?

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43. Submitters were divided about whether this measure would help the public to assess a local government organisation's levels of service and to participate in discussions on future levels of service assist the public to assess and discuss levels of service.
Thirteen submitters agreed or strongly agreed that the measure would assist the public. Submitters included Auckland CC and Auckland City Transport (Joint), Hamilton CC, Hauraki DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, South Waikato DC, Waitomo DC, Whakatane DC, Whangarei DC, Anonymous #12, and Anonymous #13.

44. Fourteen submitters either disagreed or strongly disagreed that the performance measure would assist the public to assess and discuss levels of service. Submitters included Clutha DC, Dunedin CC, Hurunui DC, Marlborough DC, Selwyn DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waipa DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, and Anonymous #19.

45. Selwyn DC additionally commented that the use of a technical performance measure in this case is at odds with the views of the Office of the Auditor-General, that performance measures used to communicate council performance to the public need to be simple and easily understood.

46. Tasman DC considered that the performance measure in isolation would not assist the public, and argued that it would need to be considered as part of a maintenance programme, taking into account the level of funding available, and a council’s long term planning.

47. Waikato DC was neutral about whether the proposed measure would assist the public to assess and discuss service levels.

4C - Would implementing the measure result in additional costs or other implementation issues for local government organisations? If so, what are they?

Submitters

Twenty-six submitters commented on this question, including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hurunui DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Palmerston North CC, Porirua CC, Ruapehu DC, SOLGM, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waipa DC, Waitomo DC, Whakatane DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

48. Ten submitters consider that there will be additional costs or implementation issues associated with this measure. Submitters included Clutha DC, Dunedin CC, Marlborough DC, Palmerston North CC, Ruapehu DC, SOLGM, Southland DC, Tasman DC, Thames-Coromandel DC, and Whakatane DC. The main reason identified by councils was that data for this measure was not currently collected annually. Whakatane DC commented that, as road roughness does not change rapidly, it would be appropriate to collect data on this measure every three years.

49. SOLGM noted that funding from central government plays the major role in determining the size of maintenance programmes, and changes to New Zealand Transport Authority funding will affect programmes of maintenance and renewals that will make themselves felt in programmes long-term.
50. Thirteen submitters considered that there would not be additional costs or implementation issues associated with compliance with this measure. Submitters included Auckland CC and Auckland City Transport (Joint), Hurunui DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Waikato DC, Waipa DC, Waitomo DC, Anonymous #6, Anonymous #7, Anonymous #10, and Anonymous #19. However, it is clear from a number of the submissions that this is based on an assumption that current biennial reporting would continue.

51. Three submitters neither agreed nor disagreed on the matter of cost, noting that their opinion would depend on whether data was collected annually.

Q4D - Do you have any other comments?

Submitters

Twenty-seven submitters provided comments on the measure, including: Auckland CC and Auckland City Transport (Joint), Dunedin CC, Far North DC, Hamilton CC, Hurunui DC, Kawerau DC, Marlborough DC, Nelson CC, New Plymouth DC, Ruapehu DC, Selwyn DC, SOLGM, Southland DC, Tasman DC, Thames-Coromandel DC, Waimakariri DC, Waipa DC, Waitaki DC, Waitomo DC, Whakatane DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #12, Anonymous #13, and Anonymous #19.

52. There are a number of strong themes in general comments on this measure. Several submitters express concern about the usefulness of the measure as a comparator if unsealed roads are excluded. A number of submitters reiterate that the measure would be difficult for the public to understand and propose alternative measures.

Unsealed roads should be measured

53. A number of rural councils commented that, due to the large proportion of unsealed roads in their district, the proposed measure is not useful. Submitters included Far North DC, Marlborough DC, Ruapehu DC, Southland DC, Thames-Coromandel DC, and Waitaki DC. This theme is picked up by New Plymouth DC, Selwyn DC, SOLGM and two Anonymous submitters.

54. New Plymouth DC suggested that a consequence of excluding unsealed roads from measurement could be that local authorities with a high percentage of unsealed roads may be incentivised to promote extra resources to sealed roads to achieve high performance, to the detriment of unsealed roads.

55. SOLGM also question why the measure has been limited to the condition of the sealed road network alone, noting that the condition of unsealed roads has at least as significant an influence on vehicle operating and maintenance costs as sealed roads. SOLGM argues that the condition of rural roads can be a/the significant risk factor in rural crashes.

Other factors influence road condition and measurement of it

56. Auckland CC and Auckland City Transport (Joint) argued that, for setting levels of service, the measure needs to be considered alongside many other considerations.
such as heavy vehicle volumes, concentration of traffic on major routes, age distribution of pavements, subgrade characteristics, and availability of pavement materials.

57. Waipa DC, Waitomo DC and Anonymous #19 commented that a deteriorating Smooth Travel Exposure Index (STE) may relate more to utility impacts such as trenches or service covers than renewal maintenance programmes.

58. Dunedin CC observed that measuring equipment is affected by the geography of the network (steep grades and or tight curves) and in urban networks, by slowing or stopping at intersections. Anonymous #12 observed that low traffic volume roads could be rough, and due to low traffic count, the results of the STE could be skewed.

The measure is difficult to understand

59. Several submitters reiterate that the measure is difficult to understand. Submitters included Auckland CC and Auckland City Transport (Joint), Dunedin CC, Hamilton CC, Nelson CC, New Plymouth DC, Ruapehu DC, SOLGM, Whakatane DC, Anonymous #13, and Anonymous #19. A number of alternative measures were proposed (see below).

Alternative measures

60. Auckland CC and Auckland City Transport (Joint) proposed that the description of the measure could be improved by changing it to “the average quality of the ride experienced on a sealed local road network, as measured by the Smooth Travel Exposure”.

61. Dunedin CC submitted that “the percentage change in STE” as a measure might get around the geographical issues. The Council added that an alternative for STE could be Surface Condition Index (SCI), which is calculated in the Road Assessment and Maintenance Management System (RAMM) for the New Zealand Transport Authority. SCI is based on road surface defects as measured in the annual RAMM rating, is easy to explain, and is not affected by the geographical issues that are a problem with STE.

62. A few submitters proposed the Pavement Integrity Index (PII) as an alternative measure. Submitters included Waitomo DC, Anonymous #6, and Anonymous #19.

63. Marlborough DC commented that it operates a vehicle mounted “National Association of Australian State Roading Authorities” roughness machine and proposed that a measure could be developed using that tool. Anonymous #12 supported this submission.

Recommendation on proposed performance measure two: condition of the sealed road network

64. A common theme in submissions is that the measure is too technical. Submitters are divided about whether this restricts its usefulness for the public. The Department notes that this concern could potentially be addressed by local authorities providing guidance material with their reports.

65. Submitters also express concern about the cost of compliance, especially if the measure is to be reported on annually (this is unclear from the measure itself but is
presumed). A number of submitters question the exclusion of unsealed roads from measurement.

66. The Department invites members to consider whether the cost of reporting on this measure annually is justified, whether it is appropriate to exclude unsealed roads from measurement, and whether there is another system of measurement that will allow them to be incorporated.

PROPOSED PERFORMANCE MEASURE THREE: MAINTENANCE OF THE SEALED ROAD NETWORK

“Percentage of the sealed local road network that is resurfaced annually”.

Q5A – Is the measure easy to understand?

Submitters

Twenty-eight submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hurunui DC, Kawerau DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Ruapehu DC, Selwyn DC, South Waikato DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waimakariri DC, Waipa DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

67. Twenty submitters agree or strongly agree that this measure is easy to understand. Submitters included: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hurunui DC, Kawerau DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Ruapehu DC, Selwyn DC, South Waikato DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waimakariri DC, Waipa DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

68. Five submitters disagree that the measure is easy to understand. Submitters included Clutha DC, Ruapehu DC, Thames-Coromandel DC, Waikato DC, and Anonymous #19. Hurunui DC, Anonymous #6, and Anonymous #8 are neutral about the proposition.

Q5B - Will the information provided by the performance measure help the public to assess a local government organisation's levels of service and to participate in discussions on future levels of service?

Submitters

Twenty-four messages commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hurunui DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Selwyn DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waipa DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13 and Anonymous #19.
69. Seven submitters agree or strongly agree that this performance measure would assist the public to assess a local government organisations service levels and to participate in discussions on future service levels. Submitters included Dunedin CC, Matamata-Piako DC, Porirua CC, Tasman DC, Whangarei DC, Anonymous #10, and Anonymous #13. Porirua CC added, however, that the target value for reseal percentage must relate to the quantity of resurfacing required to meet asset plan renewals, with the exception of the maintenance aspect, which could be measured by annual percentage renewals.

70. Fifteen submitters disagree or strongly disagree that the measure will assist the public to assess and discuss service levels. Submitters Auckland CC and Auckland City Transport (Joint), Clutha DC, Marlborough DC, New Plymouth DC, Selwyn DC, Southland DC, Thames-Coromandel DC, Waikato DC, Waipa DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #12, and Anonymous #19.

71. Hurunui DC and Whakatane DC were neutral about the proposition.

Q5C - Would implementing the measure result in additional costs or other implementation issues for local government organisations? If so, what are they?

<table>
<thead>
<tr>
<th>Submitters</th>
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<tbody>
<tr>
<td>Seventeen submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Southland DC, Tasman DC, Waikato DC, Whakatane DC, Whangarei DC, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, and Anonymous #19.</td>
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72. Almost all submitters who submitted on this question agree that there will be no additional costs or implementation issues associated with this measure. Submitters included Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Southland DC, Waikato DC, Whakatane DC, Whangarei DC, Anonymous #8, Anonymous #10, Anonymous #12, and Anonymous #19.

73. Tasman DC commented that whether there was additional cost would depend on the level of reporting the measure was set at. Anonymous #7 considered there would be additional costs because the measure is not currently reported on.
Q5D - Do you have any other comments?

Submitters
Thirty-four submitters provided comments about this measure, including: Auckland CC and Auckland City Transport (Joint), CCS Disability Action/Waikato, Clutha DC, Dunedin CC, Hamilton CC, Hurunui DC, Kawerau DC, Marlborough DC, Matamata-Piako DC, Nelson CC, New Plymouth DC, Palmerston North CC, Ruapehu DC, Selwyn DC, SOLGM, South Waikato DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waimakariri DC, Waipa DC, Waitaki DC, Wellington CC, Whakatane DC, Whangarei DC, Anonymous # 6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

The measure does not a good indicator of actual maintenance.
74. A strong theme in submissions is that the proposed performance measure is simply a calculation or statistic. A majority of submitters argue that the measure will not provide a real or accurate picture of asset management. Submitters included: Auckland CC and Auckland City Transport (Joint), Clutha DC, Hamilton CC, Hurunui DC, Marlborough DC, Nelson CC, New Plymouth DC, Palmerston North CC, Ruapehu DC, Selwyn DC, SOLGM, South Waikato DC, Thames-Coromandel DC, Waikato DC, Waimakariri DC, Waipa DC, Waitaki DC, Wellington CC, Whakatane DC, Whangarei DC, Anonymous # 6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

75. SOLGM argues that a focus on outputs incentivises activity for the sake of activity i.e. the more road a council reseals, the better it will "look", regardless of the outcomes of the resealing. Similarly, Waitaki DC argues that the measure focuses on "doing work" whether or not that work is required.

76. Hamilton CC, SOLGM, and Southland DC propose that the measure is deleted altogether.

Other factors need to be taken into account
77. Hurunui DC argues that a maintenance measure needs to take account of interpretation of deterioration data, site selections, treatment selections and economic return. Waimakariri DC notes that resurfacing rates can vary depending on local geography, climate and traffic density.

78. Anonymous #12 notes that measure does not take into account any backlogs that a council needs to address, and Anonymous #13 submits that the measure does not take into account the "condition" of the sealed road network that has been resurfaced.

Consequences of using the proposed measure
79. Palmerston North CC comments that the New Zealand Transport Authority is currently encouraging councils to put less focus on resealing and into doing more of other forms of maintenance, as they are cheaper. Hence using resealing on its own as a KPI could
see councils resealing roads, rather than using the cheaper maintenance options. Nelson CC’s submission makes the same points.

80. Tasman DC advises that a consequence of this measure is that there could be an impact on low-volume sealed roads being returned to gravel roads as the costs of maintenance become unaffordable.

**Alternative measures proposed**

81. Palmerston North CC suggests using “condition rating” for the measure, which it argues is a more comprehensive measure of the volume of defects in the roading network. The Council notes that all authorities provide this data for New Zealand Transport Authority already.

82. Ruapehu DC recommends that the Department consider whether “total renewal activity across the network” is a measure that better represents best practice asset management. The measure could be expressed as the ratio of renewal (proactive works) to maintenance (reactive works).

83. Selwyn DC proposes that an alternative measure could be the average life of pavement seals, based on the amount resealed each year, which it argues is potentially a better indicator of commitment to maintaining asset performance and associated investment levels.

84. Waimakariri DC suggests that an alternative measure could be to use the PII, which is a measure of the condition of the road pavement, and so is a measure of how well the network is being maintained.

85. Whangarei DC comments that a proposed measure could be “the average reseal length completed over the last 5 years” as annual achievements can be heavily influenced by bitumen price.

86. Anonymous #19 submits that a more relevant measure is the “percentage of the network that is sealed at the end of its useful life” or “the percentage of the network which is beyond its useful life based on RAMM treatment selections or similar”.

**Other comments**

87. CCS Disability Action/Waikato comments that failure to mill the edges of re-applied road seal directly adjacent to kerb ramps at crossing points creates trip hazards for pedestrians, and potential ‘tip-overs’ for those using wheeled mobility aids such as walkers, wheelchairs and mobility scooters. The group submits that the measure could be expanded to include a requirement for local government to withhold payment to roading contractors until all seal adjacent to kerb ramps has been checked to be compliant for smoothness. Frequency of the times that this requirement is invoked could be reported on as it would reflect the local authority’s monitoring of both contractors and compliance with contract requirements.

88. Whakatane DC submits that a road network has a resurfacing lifecycle that is relevant to its design specifications and to its level of use. Meeting the optimal resurfacing requirements is the ideal level of service, but at a cost that needs to be negotiated with the community. Any reduction of investment below that optimal requirement would
result in the deterioration of the parts of the network that are not resurfaced according to their ideal schedule. A sustained reduction over time will result in an increasing proportion of the network becoming deteriorated.

**Recommendation on proposed performance measure three: maintenance of the sealed road network**

89. Most submitters do not believe this measure will be useful for the public, even though it is easy to understand.

90. Significantly, the large majority of submitters do not think that the measure proposed will provide an actual indication of maintenance. This is because the measure reports a simple calculation that has limited meaning without further context and is therefore not useful for comparison purposes.

91. A number of submitters comment that the measure introduces unwanted incentives and conflicts with New Zealand Transport Authority priorities.

92. It is recommended that members consider whether the proposed performance measure achieves its purpose, and whether it can be modified to produce a more accurate and comparable measure of road maintenance.
PROPOSED PERFORMANCE MEASURE FOUR: CONDITION OF FOOTPATHS WITHIN THE LOCAL ROAD NETWORK

“Percentage of a local footpath network that is part of a local road network that falls within a local government organisation’s level of service standard for the condition of footpaths”.

Q6A - Is the measure easy to understand?

Submitters

Twenty-four submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hurunui DC, Kawerau DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waipa DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

93. Four submitters agree or strongly agree that this measure is easy to understand. Submitters included: Dunedin CC, Whakatane DC, Anonymous #8, and Anonymous #13.

94. Eighteen submitters disagree or strongly disagree that the measure is easy to understand. Submitters included Auckland CC and Auckland City Transport (Joint), Clutha DC, Hurunui DC, Kawerau DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waipa DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #12, and Anonymous #19. New Plymouth DC added that it is important that the public understands what footpaths are included in the measure (e.g. the distinction between the local road network and State Highways).

95. Four submitters were neutral on whether the measure was easy to understand. Submitters included: Auckland CC and Auckland City Transport (Joint), Anonymous #3, Anonymous #5, and Anonymous #6.
Q6B - Will the information provided by the performance measure help the public to assess a local government organisation’s levels of service and to participate in discussions on future levels of service?

**Submitters**

Twenty-three submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hurunui DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waipa DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

96. Five submitters agree or strongly agree that the information from the proposed performance measure would assist the public to assess and discuss service levels. Submitters included: Auckland CC and Auckland City Transport (Joint), Whakatane DC, Anonymous #10 and Anonymous #13.

97. Seventeen submitters disagree or strongly disagree that the performance measure would provide useful information. Submitters included: Clutha DC, Hurunui DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waipa DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #12, and Anonymous #19.

98. Dunedin CC is neutral about whether the information from the proposed performance measure would be useful to the public.

Q6C - Would implementing the measure result in additional costs or other implementation issues for local government organisations? If so, what are they?

**Submitters**

Twenty-three submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hamilton CC, Hurunui DC, Kawerau DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Palmerston North CC, Porirua CC, Southland DC, Thames-Coromandel DC, Waikato DC, Wanganui DC, Whakatane DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, and Anonymous #19.

99. Eighteen submitters thought that there would be additional costs or implementation issues associated with this measure. Submitters included: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hamilton CC, Kawerau DC, Matamata-Piako DC, New Plymouth DC, Palmerston North CC, Porirua CC, Southland DC, Thames-Coromandel DC, Waikato DC, Wanganui DC, Whakatane DC, Anonymous #6, Anonymous #12, and Anonymous #19.
Submissions indicate that a number of councils do not currently measure the condition of footpaths, and consider that it would be an expensive exercise to commence doing so. Of those that do measure footpath condition, not all do so annually, so an annual requirement for reporting would increase cost.

Anonymous #8 and Anonymous #10 disagreed that there would be additional costs or implementation issues associated with this measure. Anonymous #8 noted the proviso that there could be an increase in audit costs however.

Q6D - Do you have any other comments?

Submitters
Thirty-three submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, CCS Disability Action/Waikato, Dunedin CC, Hamilton CC, Hurunui DC, Marlborough DC, Matamata-Piako DC, Nelson CC, New Plymouth DC, Palmerston North CC, Porirua CC, Ruapehu DC, Selwyn DC, SOLGM, South Waikato DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waikato DC, Waimakariri DC, Waipa DC, Waitaki DC, Wellington CC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

Comparability between local authorities

The main theme addressed in submissions on this measure is that building the measure around local authorities’ own service standards prevents comparability between authorities. Thirteen submissions address the concern that, as councils do not have the same service standards or descriptors, consistency of data for comparison purposes will be hard to achieve. Submitters included Auckland CC and Auckland City Transport (Joint), Clutha DC, Matamata-Piako DC, Porirua CC, Selwyn DC, SOLGM, Southland DC, Tasman DC, Thames-Coromandel DC, Waimakariri DC, Waipa DC, Waitaki DC, Wellington CC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

Condition versus performance and safety

Auckland CC and Auckland City Transport (Joint) comment that the measure is focused on road condition, when the point of the measure is to report on convenience and safety. Waitaki DC agrees that the measure incorrectly focuses on asset condition, rather than asset performance.

Waipa DC questions whether the condition of a footpath is important, or whether the focus should be on whether the community is satisfied with the level of maintenance of the footpath. Anonymous #7 submits that people are not interested in the physical condition of a footpath, rather they are interested in whether it is free from hazards.

Customer satisfaction

Ten submitters propose that the measure is replaced with a customer satisfaction measure, such as a survey or complaints assessment. Submitters included Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hamilton CC, Nelson CC, SOLGM, South Waikato DC, Anonymous #12, and Anonymous #19.
Further definition

106. Some submitters have highlighted that further definition of the measure is required. Auckland CC and Auckland City Transport (Joint) commented that the measure needs to clarify the scope for footpaths next to roadways and those in public parks. Tasman DC questions whether the measure includes footpaths on both sides of the road or just one. Anonymous #12 notes that the performance measure does not define the type of footpath to be measured.

Alternative measures

107. A number of alternative performance measures have been suggested by submitters. Auckland CC and Auckland City Transport (Joint) suggest rewording the measure to “the percentage of local footpath network that meets local levels of service standards”.

108. Selwyn DC submits that “the amount of resealing or renewal of existing footpaths carried out annually” is used as a measure. The Council notes that, using the average life of footpath/seals could be an indicator of commitment to maintaining asset performance and associated investment levels.

109. SOLGM comments that alternatives to the proposed performance measure could be to isolate one or more of the key levels of service for footpaths – for example a measure of customer satisfaction or a measure of footpath safety (such as number of reported accidents on local footpaths).

110. New Plymouth DC note that the measure excludes other non-vehicle access corridors such as pathways and cycleways that are of equal importance. Similarly, Waitaki DC and Selwyn DC note that councils are also responsible for footpaths alongside State Highways and through reserves that form part of a linked local footpath network beyond the immediate road reserve. Therefore, Selwyn DC proposes an alternative performance measure such as “the percentage of a local footpath network alongside and connecting to roads that falls within a local government organisation’s level of service standard for the condition of footpaths”.

111. Whangarei DC submits that an alternative measure could be to use the RAMM condition rating for footpaths, noting that there would be additional costs because not every council uses the measure. Anonymous #12 suggests that an alternative measure could be “the total cost of maintenance per km including resurfacing costs”.

Other comments

112. South Waikato DC and Anonymous #19 both submitted that, as the condition of footpaths does not deteriorate rapidly, a three-yearly cycle of reporting on this measure would be sufficient.

113. CCS Disability Action/Waikato provided a comprehensive submission covering the following points:

- Footpath maintenance alone doesn’t address the issue of safe, accessible pedestrian routes. An appropriate measure of footpath performance would be measuring how many people are able to actually use pedestrian routes to key destinations, including the subset of pedestrians that use obvious aids such as a guide dog, wheelchair, walker or mobility scooter.
• A footpath meeting a service standard doesn’t take all the factors such as intersections, signalized pedestrian crossings and pedestrian refuges that combine to create an accessible pedestrian route into account.

• Safe road crossings are key to people’s ability to safely and independently access the facilities and services they need.

• Footpaths need to meet several key requirements for disabled and elderly people to use them easily and with confidence. These include:
  o a smooth surface;
  o a crossfall (sideways slope) no greater than 2%; and
  o no change in the level or crossfall when travelling across vehicle entrances to houses and businesses.

• A direct performance measure such as pedestrian counts that include the subset of people using aids such as a guide dog or wheelchair would indicate that the most vulnerable people within that community are able to access local facilities and services using pedestrian routes of which footpaths are only one component.

• The proposed measure, doesn't guarantee an accessible pedestrian route. It is essential that publically funded infrastructure meets the requirements of all community members, including those living with impairments.

**Recommendation on proposed performance measure four: condition of footpaths within the local road network**

114. More than half of the submitters who submitted on this question consider that the proposed performance measure is not easy to understand and will not assist the public to assess and discuss levels of service. This appears to be because there are definitional issues around the scope of footpaths that are included in the measure.

115. The majority of submitters also consider that there would be additional costs or implementation measures associated with the measure, generally because the data required to report on the measure is not currently collected, or is not collected frequently enough to report annually.

116. The main negative theme in submissions is that the performance measure has limited value because it requires local authorities to report against their own level of service standard, and as councils have different approaches to measurement, it will not be possible to compare local authorities performance. In order to standardise the approach to reporting on this measure, so that there is comparability, a number of submitters propose using a customer satisfaction measure for this key aspect.

117. Considering submitters concerns about the approach to measuring this aspect, it is recommended that members consider whether comparability is a priority, and whether the additional costs identified by submitters justify the current approach to this measure.

**PROPOSED PERFORMANCE MEASURE FIVE: RESPONSE TO SERVICE REQUESTS**

“Percentage of customer service requests responded to within a specified timeframe”.
Q7A - Is the measure easy to understand?

Submitters

Twenty-three submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hurunui DC, Kawerau DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, South Waikato DC, Southland DC, Tasman DC, Thames-Coromandel DC, Waipa DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

118. Nineteen submitters agree or strongly agree that this measure is easy to understand. Submitters included: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hurunui DC, Kawerau DC, Matamata-Piako DC, Porirua CC, South Waikato DC, Southland DC, Tasman DC, Waipa DC, Whakatane DC, Whangarei DC, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

119. New Plymouth DC disagree and Thames-Coromandel strongly disagree that the measure is easy to understand.

120. Anonymous #6 and Anonymous #7 are neutral about the proposition.

Q7B - Will the information provided by the performance measure help the public to assess a local government organisation's levels of service and to participate in discussions on future levels of service?

Submitters

Twenty-one submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hurunui DC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Southland DC, Tasman DC, Thames-Coromandel DC, Waipa DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, Anonymous #13, and Anonymous #19.

121. Twelve submitters agree or strongly agree that the information from the proposed performance measure would be useful to the public. Submitters included: Auckland CC and Auckland City Transport (Joint), Dunedin CC, Hurunui DC, Matamata-Piako DC, Porirua CC, Southland DC, Tasman DC, Anonymous #8, Anonymous #10, Anonymous #12, and Anonymous #13.

122. New Plymouth DC disagree, and Thames Coromandel DC strongly disagree with the proposition.

123. Seven submitters are neutral about whether information from the proposed performance measure would be useful to the public. Submitters included: Clutha DC, Waipa DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #7, and Anonymous #19.
Q7C - Would implementing the measure result in additional costs or other implementation issues for local government organisations? If so, what are they?

Submitters

Eighteen submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), Clutha DC, Dunedin CC, Hamilton CC, Matamata-Piako DC, New Plymouth DC, Porirua CC, Southland DC, Tasman DC, Whakatane DC, Whangarei DC, Anonymous #6, Anonymous #7, Anonymous #8, Anonymous #10, Anonymous #12, and Anonymous #19.

124. Five submitters think that there will be additional costs to implement this measure. Submitters included: Dunedin CC, Hamilton CC, Anonymous #6, Anonymous #7, and Anonymous #10. Anonymous #6 advises that there would be cost associated with building new fields into its current service request system. Anonymous #10 also noted that its systems would require upgrading. Anonymous #7 considers that there would be additional costs during times of high workload, such as during and after floods and slips.

125. Twelve submitters disagree that there would be additional costs. Submitters included: Auckland CC and Auckland City Transport (Joint), Clutha DC, Hurunui DC, Kawerau DC, Marlborough DC, Matamata-Piako DC, New Plymouth DC, Palmerston North CC, Porirua CC, Southland DC, Thames-Coromandel DC, Waikato DC, Wanganui DC, Whakatane DC, Anonymous #8, and Anonymous #12.

126. Anonymous #19 is neutral about the question, noting that there could be costs depending on whether a council is collecting the data now or not.

Q7D - Do you have any other comments?

Submitters

Twenty-five submitters commented on this question including: Auckland CC and Auckland City Transport (Joint), CCS Disability Action/Waikato, Dunedin CC, Hamilton CC, Matamata-Piako DC, Nelson CC, New Plymouth DC, Palmerston North CC, Porirua CC, Ruapehu DC, SOLGM, Southland DC, Thames-Coromandel DC, Waimakariri DC, Waipa DC, Waitaki DC, Wellington CC, Whakatane DC, Whangarei DC, Anonymous #7, Anonymous #8, Anonymous #12, Anonymous #13, and Anonymous #19.

Further definition required

127. Six submitters commented that what qualifies as a “response” needs to be clarified. Auckland CC and Auckland City Transport (Joint) advise that Auckland CC has a two phased approach, which is in line with best practice and comprises. First, a rapid response team (addressing anything that can be done straight away) and second, an interim response team (via which customer is informed that investigation is underway). New Plymouth DC, Palmerston North DC, Porirua DC, Waimakariri DC, and
Anonymous #19 agree that the word “response” is open to interpretation and needs to be defined.

Comparability

128. Thames-Coromandel DC note that different components of response activity have different response times (e.g. potholes, signs, drainage) so it is difficult to see how national consistency could be achieved.

129. Waimakariri DC questions whether there should be a “standard” specified response time, i.e. “within 5 working days”, because one council could report 100 per cent of requests responded to within 20 working days when only 50 per cent have been responded to within five days. Anonymous #7 agrees that there should be a standard timeframe established for responses. Following this theme, Waimakariri DC comments that response times between rural and urban councils may well differ, and response times in rural areas may well be slower given the vast geographic distances some rural Councils have to cover.

130. Southland DC and Anonymous #19 agree that levels of service for response times may vary between councils.

Consistency with other measures

131. Hamilton CC, SOLGM and Anonymous #19 question why the Department has adopted a different responsiveness measure for roads and footpaths compared to the three waters.

Alternative measures

132. CCS Disability Action/Waikato submits that there should be an assessment of risk included in the measure. An alternative measure proposed is “the percentage of service requests assessed for risk, prioritised and responded to within the specified time appropriate for the level of risk”.

133. Whangarei DC suggests that the objective would be better represented by reporting the 95th percentile response time achieved by each territorial local authority.

Other comments

134. Whakatane DC comments that it is the time taken to resolve an issue that is of primary concern to the community. The Council considers that the essence of this measure is not about the initial response time (“scheduling” of the issue) but more about communication with those who raised the request, so that they may be assured that a council is following up their concern. In this respect the Council has reservations about how useful the proposed measure will be in terms of informing discussions on levels of service.
Recommendation on proposed performance measure five: response to service request

135. Considering that guidelines can be prepared to support the definitional requirements of this measure, and the majority of submitters agree that the measure would be useful and not costly to report on, no changes to the proposed performance measure are recommended.