Executive Summary

Submission on the Local Government (Auckland Council) (Transport Governance) Amendment Bill

7 November 2025

Overview

We support the intent of the Bill — to restore democratic accountability and community input into Auckland's transport governance — and welcome the transfer of road controlling authority (RCA) functions from Auckland Transport (AT) to Auckland Council (AC).

However, the Bill's implementation structure risks perpetuating centralised control rather than achieving the Government's objective of stronger local decision-making.

Our recommendations aim to ensure the transition process is independent, technically competent, and focused on genuine localism and effective management of Auckland's transport assets.

Key Recommendations

1. **Independent Transition Oversight**
    - The Transition Director and support team must be independent of AC and AT.
    - Their role should be to design the most effective internal structure for transport governance within AC, guided by professional judgement rather than institutional interests.
2. **Ministerial Approval of the Transition Plan**
    - The Transition Plan should be reviewed by AC's governing body but **approved by the Minister**, ensuring alignment with the Bill's localism intent and preventing dilution by existing bureaucratic structures.
3. **Remove Use of Road Classification Frameworks for Regulatory Allocation**
    - Road or street classification systems (such as the proposed ARCF or NZTA's ONF) are tools for *asset management*, not for allocating *regulatory authority*.
    - Embedding classification frameworks in law as a means to assign decision-making powers is conceptually flawed, administratively inefficient, and risks confusing governance with engineering.
    - The focus should instead be on designing clear, functional governance structures through the Transition Plan that enable competent, locally informed management of transport assets and services.
4. **Rural Representation and Network Planning**
    - Require the Auckland Regional Transport Committee (ARTC) to appoint a **Rural Subcommittee** for the design and planning of connected community networks in Rodney, Franklin, and the Islands local board areas.

5. **Empowering Local Boards**
    - Delete Schedule 4 and its “road classification” approach.
    - The Transition Plan must define Local Boards’ powers, functions, resourcing, and management controls for their local Road Transport Infrastructure Assets (RTIAs), informed by community-led Development Plans.

Expected Outcomes

Adopting these recommendations will:

- Ensure the Bill delivers real local accountability and subsidiarity in transport governance.
- Replace symbolic delegation with genuine operational capability and decision-making authority.
- Improve management efficiency, asset performance, and value for ratepayers through clear responsibility and local input.
- Strengthen alignment between local democratic structures and national asset management best practice.

Submission on the Local Government Auckland Council Transport Governance Amendment Bill

7 November 2025

Transport and Infrastructure Committee
Parliament Buildings
Wellington

Phone:04 817 9520
Ti.Legislation@parliament.govt.nz

Dear Select Committee

Background

Since 2023 Auckland Council (AC)'s Rodney Councillor Greg Sayers has facilitated occasional meetings between a group of professional community representatives and roading experts concerned about the state of Rodney's roads and Auckland Transport (AT)'s management staff responsible for delivery of the road corridor Maintenance and Repair programme and AT's Unsealed Road Improvement Programme (URIP)[1].

These positive meetings have shared thoughts and experiences on the management of AT's road corridor assets in Rodney, treatment methods, priorities and processes.

The group, including the local Business Association OneMahurangi (OM) as one of its number have made recommendations (including submissions to AT's) on improving management, reducing waste, improving the quality of work carried out, the funding of works, road condition measurement, treatment technologies, project priorities, and integration of the URIP with AT's ongoing remediation (cyclone Gabriellle clean up) and road maintenance activity (currently it remains a separate programme).

The group has supported successful efforts of the Mayor, Councillor and Local Board (LB) to increase the funding for the URIP as part of AC's Auckland Regional Land Transport Plan (ARLTP). Its roading experts have been responsible for doubling the width and halving the cost of the Matakana Link Road. Under OM's initiative and with MP

[1] Because the Rodney Local Board area is 40% of Auckland and has most of (80%) the unsealed roads in Auckland, the URIP mainly addresses needs in Rodney.

Chris Penk's support a Local Infrastructure Forum has led to local experts developing a positive working relationship with Watercare engineers to minimise disruption from its wastewater pipeline through the town centre.

The group continues to argue for key local roading projects (like the Hill Street intersection improvement), a cheaper, more efficient and effective motorway interchange design for the new Warkworth to Wellsford SH1, and for developing a vision for the transport network across Rodney needed to cope with the intended growth in population and the impact of developer driven subdivision formation over the next 30 years.

AC and AT have no plans for such development and have made no funding provision for roading or transport infrastructure development and expansion to cope with the growth. We hope the 30-year plan produced by the ARTC will correct that, guided by community led Development Plans for the District.

Our submission

We welcome the shift of RCA transport network responsibility from AT to AC provided by the Bill. AT's policies, priorities and activities increasing developed out of step with community expectations. Ratepayers and residents had no way to make AT accountable for its actions and outcomes and this Bill addresses that.

We support the ARTC's role in developing a 30-year Transport Plan integrated with Government transport policy direction.

We support the provision of a Transition Plan that shows how the responsibilities and activities of AT will transfer to AC and be carried out within AC. Preparation of that Plan should be done by qualified professional people independent of AC, with the support of AC and AT, and approved by the Minister.

We support the recognition in the Bill of the importance of local communities having a say in the way the road network, transport modes and services address their needs. The assignment of some regulatory responsibilities to Local Boards is needed and well intentioned, but the proposed method of implementation is flawed and should be replaced.

We submit that the Transition Plan should be required to provide for the best way to achieve the decision making at Local Board level necessary to drive best outcomes.

We would like the opportunity to present to the Committee and, in due course, to submit on and discuss organisational structure with the Transition team.

This submission addresses and explains the way in which we see the Bill can be substantially improved in achievement of its objectives:

1. Provide that the Transition Plan must set out the initial structure for the management of the Road Transport Infrastructure Assets (RTIAs) within AC and the Local Board areas - with the aim of most efficiently using resources to reduce waste and improve outcomes at less cost;
2. Provide that the Transition Director and support team be qualified professional persons independent of AC (so that they are not biased in their analysis of the transition arrangements and proposed structure within AC); and
3. Require the Transition Plan to be approved by the Minister and implemented by AC.

   This will allow the Transition Director to clarify and specify the appropriate delegation, financial and resource support provided to Local Boards to enable them to carry out decision-making for the management of their local transport infrastructure and services. We suggest different responsibilities are appropriate for Urban Local Boards and Rural Local Boards. Auckland's two Island LBs may be considered Rural LBs unless there is support for separate consideration.

   It also allows for the removal of the unnecessary and clumsy proposal for a new road and street classification as the basis for delegation of decision making responsibility to LBs (opposed by AC), since the delegation of the governance and management arrangements will be within the current powers of the Governing Body, the Transition Plan will be approved by the Minister, and AC will be required to implement it.

In an **APPENDIX 1** we provide a paper we have submitted to AT setting out our views on how the RTIAs of Rodney should be managed in a way that is more effective, reduces waste, provides better outcomes and integrates better with other infrastructure provision (especially for water). We earlier submitted to the AT Board (29 August 2023) along these lines.

Our submission is that the method proposed in the Bill to achieve the laudable localism decision-making accountability objectives of the Bill is better achieved by a considered specification of appropriate organsational structures through the Transition Plan that AC will be required to implement, and that the experience we have applied and recommendations made be part of that consideration by the Transition Team.

In an **APPENDIX 2** we include our support for NZTA's ONF Classification and the associated Asset Management Data Standards (AMDS). They have been designed to support a rational classification of RTIAs and the collection of valuable standardised data for RTIA management purposes, **not** for allocation of particular and separate regulatory responsibility.

We see conflicts, confusion, inconsistencies and classification abuses in pursuing the proposed approach to classification-based delegation. The Transition Team must

address the best way to achieve the objectives of the Bill. If the Transition Team decides use an asset classification framework to specify the assets for which LBs may have regulatory authority, our **APPENDIX 2** includes a draft suggestion for consideration using the ONF.

AC's submission

AC has made its own submission on the Bill, but their governance and administration structures have limited experience in transport asset management, which will need to be developed during transition.

So, AC has assumed that the way AT currently manages transport infrastructure provision will transit smoothly to AC's established centralised and hierarchically functional internal organisation structure, and that the Governing Body and CEO may decide how they want it.

AC has not thought outside its current organisational framework as to how best to empower regulatory decision-making at the Local Board level (that is an objective of Government, not of AC). With the right people managing the transition, that may become clear. With AC staff making the decisions, committed to their current positions, structure and culture, it will not.

Government has taken this initiative to show its commitment to local democracy and proposes a level of delegation of authority to local boards. We strongly support that but not AC's opposition to Government specification of delegation and wish to keep control over delegations.

We do not support AC or AT providing their own people to shape the legislation and the outcomes Government seeks from its policy objectives [para 27 of AC's submission] as this may well defeat achievement of desired outcomes and simply serve the established bureaucracy.

AC's offer to provide the Select Committee with "solutions or alternatives where they are needed to ensure workability and clarity of responsibility." [para 26 AC submission] appears intended to preserve existing centralised structures rather than support the Bill's localism intent

We have persistently argued since AC's inception that it is unfit-for-purpose for rural LB areas like Rodney (however well and appropriately it works for built up urban areas).

Accordingly we do not support AC being part of the basic transition team under the Transition Director. Clause 11 of Schedule 1 should specify that the person appointed as Director is independent of AC and the Director, and any support staff required to form the transition plan should also be independent of AC and have respected

community governance advisory backgrounds. (Of course AC officials should provide information and administrative support as necessary to support the transition team.)

We support AC's point about the Chief Executive having responsibility for employee roles [para 103 et al of AC's submission] and the suggestions for legislative inclusion in para 107. However, the Transition Director should independently determine the best structure for the management of transport infrastructure under AC and the CEO should be required to implement that. Flexibility for the Transition Director and CEO to work together is needed [Recommendation (i)].

The Transition Plan should not be able to be vetoed or amended to suit AC's GB as recommended by AC [page 54 possible wording of Clause 12 Schedule 1]. A requirement in Clause 12 should be that the Transition Plan must provide an organisation structure within AC that best serves the achievement of the legislation's objectives. It must also specify how the Local Boards are to be supported in the exercise of their new roles and how their decisions will be funded for implementation. (Giving them authority with no funding for implementation, or leaving AC with ability to withhold implementation funds, will just be a performative nullity.)

The Transition Plan must be approved by the Minister for AC's implementation. (This approach seemed natural at AC's amalgamation, but since then AC's organisation has accumulated a high level of institutional capture and resistance to any change that does not suit them and enhance their centralised power and control – as seen in their opposition to any proposal that they have not originated or that does not fit their current way of operating.)

Independence and Ministerial Oversight

The 2009 Royal Commission on Auckland Governance recognised that a unitary authority of Auckland Council's scale would require strong external accountability to remain "fit for purpose." It recommended the establishment of an independent *Services Performance Auditor* to evaluate the Council's performance over time. That insight remains valid: large, complex local authorities need independent oversight to avoid becoming self-referential.

To preserve confidence in the transition of transport functions, the Transition Director and support team must likewise be fully independent of Auckland Council and Auckland Transport. The Transition Plan should therefore be reviewed by the Council but **approved by the Minister**, ensuring that independent professional judgement—rather than institutional self-interest—guides the structure, delegation, and resourcing of transport governance.

AC's submission shows it seeks to maintain its urban centric (urban councillor dominated) power, authority and control , both by removing any Ministerial engagement

and approval, and by retaining its current rights to not delegate (as is mostly the case) regulatory or financial authority over Council provided services to local boards.

That said, for the reasons we set out below, we agree that the proposed new Road Classification Framework be dropped from the Bill. This is not the right way to specify Local Board authorities. (If Government persists with this approach, we show how the existing ONF may be used to define and specify relevant Local Board transport infrastructure authorities in a more relevant and nuanced way.)

With our long experience of AT's operation (and AC's), we **do** see definite added value in Parliament proscribing a decision-making and directive role for Auckland's diverse and unhappy communities and their local boards (i.e proper subsidiarity and localism) in the governance and management of Road Transport Infrastructure Assets (RTIA) and services in their areas.

(We set out below in our APPENDIX 1 how we think that should apply for rural local boards in AC and do not consider it should be left solely for AC to decide. We would be pleased to discuss our knowledge of the issues, problems and solutions with an independent Transition team.)

Management of RTIA in Local Board Areas

15 years of operation have demonstrated that Auckland Council is too big, too spread out and too diverse to have a centralised, functionalised, one-size-fits-all governance and management of Auckland's RTIAs and services.

Rodney (at 40% of Auckland's land area) and Franklin (at 20%) are predominantly rural, with connected coastal, rural and riverhead/rivermouth community settlements, with a few small urban areas. Both have only 5% of Auckland's population but have the bulk of the regions parks and reserves, are significant holiday destinations and provide the north and south transit regions into and out of Auckland city. Their roading interfaces across the boundaries of Kaipara in the north and Waikato in the south, requiring liaison with those Councils.

Rodney has 80% (650km) of Auckland's unsealed roads (effectively a subcategory of ONF's Rural Connectors and Rural Roads) It's Rural Connectors may be subcategorised into Primary Connectors (effectively arterial roads) and Secondary Connectors (for resilience and backup alternative routing). Key Rural Connectors and Rural Roads (sealed or unsealed) are Production Roads (required to carry heavy vehicle traffic to and from farms, forestry and businesses) with associated need for strength and priority.

A centralised urban-centric approach can efficiently service built-up and dense urban areas of Auckland.

Auckland has 2 Rural Local Board areas (LBAs), 2 Island Local Boards (Waiheke and Aotea Great Barrier) and 18 Urban LBAs.

Rural Local Board Areas need a different structure for management of their RTIAs.

Overall, the regulatory authority delegation to LBs needs a more nuanced approach than the proposed legislation offers.

Changes needed to the Bill

Clarification on Delegated Authority

Auckland Council already holds the full statutory powers and responsibilities under existing legislation to support being a **Road Controlling Authority (RCA)**. These powers include the ability to delegate authority for the management, maintenance, and regulation of the transport network to committees, local boards, or other persons as provided for in the Local Government Act 2002 and related rules and regulations.

The **Transition Plan**, once approved by the Minister, should explicitly provide for these delegations — ensuring that AC's RCA functions can be locally exercised where appropriate. This reinforces the principle of subsidiarity without requiring new legislation or frameworks beyond those already available under statute.

Changes Suggested

Definitions: [Clause 12 – Section 37] Remove all definitions of roads and include a definition of the One Network Framework (ONF) of NZTA.

Remove the definition of the ARCF or Roading Framework.

Include a definition of Road Transport Infrastructure Asset (RTIA) *"Road transport infrastructure assets" means all physical assets, publicly-or privately-owned, that form part of the transport network on land and support the movement of people, vehicles, goods and services, including but not limited to roads and streets (sealed and unsealed), pavements, shoulders, kerbs and channels, footpaths and cycle-ways, bridges, culverts, tunnels, signage and traffic control devices, road lighting, formation, drainage and embankments, and the land (or rights-of-way) on which those assets are located."*

[Section 41C] – Add the ARTC shall appoint a rural subcommittee responsible for the design and planning of connected community networks across AC's rural Local Board areas, (Rodney, Franklin and Islands) as input to the 30 year transport Plan.

[Section 42C(g) – Add "…for all actions and projects identified in the plan."

[Sections 47C] – remove the words "as specified in Schedule 4" and " local roads and collector roads" and replace with "as specified in the Transition Plan" and "Road Transport Infrastructure Assets" respectively.

[Section 47C(3)] after the words "a local board must" add the words "…and must, be guided by community-based input and local Development Plans prepared by competent community representatives as to needs for roading infrastructure and services, and"[2]

Delete Schedule 4 and all references to Schedule 4, including deleting Subsection 47C(4)[3].

[47D(6)(a)] - remove the words "local roads and collector roads" and replace with "Road Transport Infrastructure Assets"

[Section 48] Delete and replace with "The Auckland Council must adopt the ONF of NZTA for classification of all its RTIAs.

[Schedule 1 New Part 3 Clause 11] Add a requirement that the transition director must be a competent professional independent of and not from either AC or AT.

Add a requirement that AC shall appoint transition support staff at the direction of the director to form a transition team to support the Transition Director in preparing the Transition Plan and those persons shall also be independent of AC and AT.

Add a requirement that the chief executive shall provide such information and administrative support as the Transition Director and team need to carry out his responsibilities.

[Schedule 1 New Part 3 Clause 12.] Add (1)(d) – the Local Boards' powers, functions, and responsibilities in relation to RTIA in Auckland, as well as the organisation structure, resourcing and management controls to support the exercise of those powers.

In Clause 12 (2) specify that the transition plan must be reviewed by the governing body of AC and approved by the Minister. (This responds to the possibility that if given sole authority AC's governing body will seek to structure the transition plan to frustrate the effectiveness of the Government's objectives for delegating local authority to LBs.)

[2] E.g. AC's rural settlement design guide team in Franklin (July 2025) identified typical rural community perspectives. This approach should drive road transport infrastructure development choices. https://infocouncil.aucklandcouncil.govt.nz/Open/2025/07/20250729_FCWCC_AGN_13242_AT_WEB.htm

[3] Schedule 4 is deleted and amendments to the Transition Plan ensure the Minister approves the delegations.

Draft of Proposed changes (to Proposed Bill)

Clause 12 – Section 37 amended (Interpretation)

Replace subsection (1) as follows:

(1) In section 37(1),

delete the definitions of *arterial road*, *city centre road*, *collector road*, *local road*, and *Auckland Roading Classification Framework or Roading Framework*;

insert, in their appropriate alphabetical order—

One Network Framework (ONF) means the nationally adopted roading and street classification framework maintained by the New Zealand Transport Agency (NZTA) for integrated land-transport system planning and reporting

Road Transport Infrastructure Asset (RTIA) means all physical assets, publicly or privately owned, that form part of the transport network on land and support the movement of people, vehicles, goods, and services, including but not limited to roads and streets (sealed and unsealed), pavements, shoulders, kerbs and channels, footpaths and cycle-ways, bridges, culverts, tunnels, signage and traffic-control devices, road lighting, formation, drainage and embankments, and the land (or rights-of-way) on which those assets are located.

Section 41C Subcommittees

Add new subsection (6):

(6) The ARTC **must appoint a Rural Subcommittee responsible for the design and planning of connected community networks across Auckland Council's rural Local Board areas (Rodney, Franklin, and the Islands); to inform preparation of the 30-year Transport Plan.**

Section 42C Content of plan

Amend paragraph (g):

(g) the likely sources of funding **for all actions and projects identified in the plan.**

Section 47C Powers of local boards in respect of transport matters

Replace text as indicated:

In section 47C—

(1) In 47C(1) Delete the words *"as specified in Schedule 4"* and replace with **"as specified in the Transition Plan"**.

(2) In 47C(1) Delete the words *"local roads and collector roads"* and replace with **"Road Transport Infrastructure Assets (RTIAs)"**.

(3) In subsection 47C(3), after the words "a local board must" add the words **"be guided by community-based input and local Development Plans prepared by competent community representatives as to needs for roading infrastructure and services, and"**

(4) Delete Subsection 47C(4).

(5) In 47D(6)(a) Delete the words *"local roads and collector roads"* and replace with **"Road Transport Infrastructure Assets (RTIAs)"**.

Section 48 Council must develop Auckland Roading Classification Framework

Delete section 48 entirely and substitute:

"Section 48 Council must adopt the One Network Framework"

Auckland Council must adopt the One Network Framework of NZTA for classification of all its Road Transport Infrastructure Assets (RTIAs).

Schedule 4 (Deleted)

Delete Schedule 4 and all references to Schedule 4 throughout the Bill.

Schedule 1 — New Part 3 (Transitional provisions)

Clause 11 Auckland Council must appoint transition director

Renumber current Clause 11 paragraph as Clause 11(1). After Clause 11(1) insert:

(2) The transition director **must be a person who is professionally competent and independent of, and not employed by, either Auckland Council or the transport CCO (formerly Auckland Transport).**

(3) Auckland Council **must appoint transition support staff at the direction of the transition director to form a transition team to assist in preparing the Transition Plan; those persons must also be independent of Auckland Council and the transport CCO.**

(4) The chief executive of Auckland Council **must provide such information and administrative support as the transition director or transition team reasonably require to carry out their responsibilities.**

Clause 12 Transition director must develop transition plan

Insert at the end of paragraph (c) "; and" and insert new paragraph (d):

(d) the Local Boards' powers, functions, and responsibilities in relation to Road Transport Infrastructure Assets in Auckland, as well as the organisational structure, resourcing, and management controls to support the exercise of those powers.

In Clause 12(2) replace "The transition plan must be approved by the governing body of the Auckland Council." with "The transition plan must be reviewed by the governing body of Auckland Council and approved by the Minister."

Submitted for Select Committee consideration by:

William Foster: B.E, MCom, CMEngNZ (Ret.), MInstD, Chair Northern Action Group Inc.
Glen Ashton: Rodney Community Voices Administrator.
Brian Mason: Chair Landowners and Contractors Association Inc.
Roger Williams: Retired Roading Design Engineer, FEngNZ, QSM.
Dave Stott: B.E(Civil), Chair OneMahurangi Business Association, Co-Chair One Mahurangi Transport and Infrastructure Forum, Board Member Matakana Coast Trail Trust.

This submission also has the support of the:
Warkworth Liaison Group
Mahurangi Community Planning Group

23 July 2024

An Alternative Operating Proposal for AT in Rodney

Table of Contents

An Alternative Operating Proposal for AT in Rodney

Summary

This paper proposes an alternative way for Auckland Transport (AT) to manage its road corridor activity in the Rodney local board area.

The paper argues that the alternative proposal can address observed problems with current arrangements and improve the efficiency, effectiveness and quality of the roading work in Rodney for which AT is responsible.

The alternative proposal embodies the benefits of an organisational approach which has been shown to work in the past. For reasons specific to the nature of Rodney this is seen as better than the arguably more modern, centralised, partnership, approach to work delivery adopted by AT for Auckland as a whole.

There are two main recommendations:

- Collect consistent data over time on the status of Rodney's unsealed roading assets;
- Adopt a District based control of AT's Rodney District/North Rural work.

About this Document

The paper addresses structural process issues. It does not imply or criticise the behaviour or performance of any individual working in and under the current operational management structure and system.

It does not address questions of appropriate roading treatment issues, which are the subject of some current disagreement and are a separate matter of engineering and economic decision making for policy and implementation[4].

The paper discusses perceived issues in Rodney with the current operational arrangements, which we consider will be addressed by the alternative proposal. These include:

[4] We consider there is currently a lack of reliable comparable empirical data on experiences to make sound policy or "rule of thumb" judgements on treatment methods. Comparisons appear to be isolated examples, trials, or anecdotal, or theoretical, or under environmentally different circumstances. Suffice to say it is long established practice that proper road base formation with good drainage provision and bitumen sealing provides the best way to treat unsealed roads to protect them from degradation through weather and use, and prevent water, and dust health and safety hazards.

- the partnership model (Collaborative Management Framework), with Downer New Zealand Ltd (Downers);
- lack of independent oversight of contractor work;
- uncertain application of maintenance standards;
- employee training and experience;
- planning and prioritisation;
- asset information and data shortcomings;
- poor local engagement; and
- ATs remoteness from the work face.

Our support for changes to improve performance and outcomes for Rodney is not new. We have consistently argued that the region-wide centralised silo management control structures adopted by AC and its CCOs have not been fit for purpose for Rodney[5].

The efforts of AT staff and the work being done by AT and Downers to address some of the perceived shortcomings particularly in the Unsealed Road Improvement Programme (URIP) are acknowledged and appreciated. Notwithstanding these efforts, our conclusion is that organisational changes are required to the management structure and controls to consistently achieve needed improvements and benefits and value for money.

The paper does not address the amount of funding for road corridor work, recognising that work to maintain, and improve Rodney's roads and to seal unsealed roads is constrained by resources available and thus works must be prioritised and managed within a funding envelope.[6]

Rodney is different:

Rodney's land area comprises 40% of the whole of Auckland council, with 20% of its roads (in km). Rodney is 95% rural, it has 76% of the region's unsealed roads and these make up 41% of all the roads in Rodney.

In contrast unsealed roads only make up 10% of the total road kilometres in the Auckland region and, excluding Rodney, only 3% of Auckland roads are unsealed.

---

[5] 2013-2020: NAG's Proposal to separate North Rodney from AC contained arguments about why it did not work for Rodney (e.g see https://nag.org.nz/AlternativeProposal24.06.16.pdf) ; 2023: issues for Mayoral discussions, (https://nag.org.nz/Active%20NAG%20issues%20for%20Mayor%20Jan2023.pdf , and presentation to AT Board; https://nag.org.nz/LCA%20AT%20Board%20presentation.pdf

[6] Because road maintenance and investment costs do not generate measurable direct revenues, CBAs for treatment options and spending and investment priorities are either cost comparisons or reflect assumptions about current and future benefits.

So unsealed roads are a big issue for Rodney ratepayers (about 5% of Auckland's ratepayers), but have not been a focus for the governance and management of Auckland's Transport services and investments since the amalgamation centralised provision.

Rodney has one of the largest catchment areas in Auckland. The impact of rainfall on roading and roading drainage is a significant factor in road maintenance and construction in the District as well as ecological damage to overland flow paths and the adjacent environment.

At the other extreme, long dry periods give rise to considerable health hazard from dusty roads which are actively used throughout the district to connect communities and transport farm produce to markets. This means effective basic road and drainage maintenance and sealing roads where possible is critical to minimise maintenance costs[7], and reduce ecological, safety and health risks and road user costs.

The Partnership

Downers is the contractor currently employed by AT under its Road Corridor Maintenance and Renewals (RCM) contract for the whole North Rural area (i.e. Rodney).

The contract is structured within a Collaborative Management Framework (CMF).

> *"The CMF is designed to better define roles and responsibilities for both AT and the contractor and allocate risk fairly. This will enable contractors to take greater responsibility, and by extension stewardship of the road network, over the duration of the contract."*[8]

AT also asserts, aspirationally, (without any supporting justification) that

> *"At the same time, it will enhance AT's competence and capacity in managing the RCM environment and driving a programme and mindset of continuous improvement."*

We see no evidence of this.

The 2012 Road Maintenance Task Force[9] noted that there was:

[7] "Metal Roads: Recommendations for Construction and Maintenance and Dust suppression. V4 15-5-23: Roger Williams, FENZ. ropeworth @gmail.com
[8] RFP Contract documentation Ref 410-22-079-RM
[9] https://www.nzta.govt.nz/assets/resources/rmtf-report/docs/report.pdf

> *"scope for aggregation and bundling of contracts to more effectively and efficiently deliver outcomes."* but that
>
> *"Larger contracts do not always deliver better value for money. The research report also acknowledges that there is a risk that further aggregation and bundling may reduce competition and 'hollow out' the structure of the industry. Care needs to be taken to manage the risks to healthy competition in the market. There is also significant scope to employ better delivery models to improve contractual relationships and incentive structures."*

This paper proposes a better delivery model alternative for AT's management of road maintenance in Rodney under the current contract.

The Experience

Lack of asset condition status data

The 2012 Road Maintenance Task Force noted that:

> *"While a large quantity of data is collected on assets and their management there are consistency and quality issues. This means the data is not always able to inform future decisions and asset management practices. Moreover it does not permit objective benchmarking of good practice performance. A step change in performance measurement and management and data collection is required to obtain best value for money and help ensure that levels of service and funding are appropriate."*

AT (and Downers) do not maintain a regular periodic measurement of the status and condition of unsealed roads in Rodney. It is therefore not possible to assess whether roading assets have deteriorated or improved over time; to prioritise roading works on the basis of comparison with approved standards; to assess the extent of work required to bring all unsealed roads up to an approved standard; or to consider the state of a road in reviewing its priority for road improvement works.

Reliance is instead placed on inspections by Downers, AT staff observations or customer complaints as a basis for scheduling repair works for substandard roads - in addition to regular scheduled maintenance. It is not known if the maintenance schedule is amended to reflect recent repair or improvement works.

Road gradient is recorded as one factor in assessing the priority of unsealed road improvement works, recognising the importance of shape and drainage and protective sealing to reduce water damage on steep roads.[10]

[10] q.v. Roger Williams Footnote 4.

There are many variances in road topology other than gradient, overhang batters, subsidence, base formation, carriage width, waterways, and bridges each requiring differing remedial action and cost. No two roads are alike.

In the absence of reliable quantitative asset status data, complaints about poor quality performance by the contractors or subcontractors is largely anecdotal and the extent to which instances of poor quality work receive attention is a matter between AT staff and the contractor under the partnership agreement- a process which is not visible outside the system.

While complaints are recorded and attended to, this reactive approach does not represent an efficient or methodical system for the management of road maintenance and improvement activity.

The URIP lists 907 roads or road sections across the 850km of AC's unsealed roads (650km of which are in Rodney).

Best Practice [11] is for AT to have a Pavement Condition Index (PCI) assessment for each item in that list.

The PCI is a composite of measurement of:

- the crown shape;
- gravel depth; and
- the IRI (International Roughness Index).

Independent of the issue of having a better system for management control of road corridor activity (which is the basis for this paper) a process for recording the status of unsealed road assets in Rodney is a prerequisite for the efficient and effective decision making of resource allocation, and the management of improvements.

A two year cycle of measurement (as for secondary sealed roads Smooth Travel Exposure (STE)[12] measurement seems appropriate.

While this work involves an additional cost, it should be more than recovered through the improvements in decision making on resource allocation.[13]

---

[11] Australian Road Research Board: "Unsealed Roads Manual – Guidelines to Good Practice" 3rd Edition (March 2009)

[12] https://www.nzta.govt.nz/assets/Road-Efficiency-Group/docs/practice-overviews/REG-practice-overview-smooth-travel-exposure.pdf

[13] Cost effectiveness depends on the cost factors and the system response – the extent to which asset management and treatments in response make good use of the data available to save costs. There is no empirical counterfactual to assess whether better (lower cost for the same outcome) outcomes can be achieved using no road condition data. But without methodical collection of condition data to show trends any assessment of performance is neither objective nor reliable.

Local Resource Control needed

Responsibility

The current model contracts out activity without authority, and responsibility but without a clear single job role holding final accountability. Responsibility for outcomes is diffused across all people involved in the partnership. There is no one single point of responsibility (and authority) for resource allocation decisions and the quality of outcomes.

The nature of the "trust" model in the partnership is that performance reporting on work done – performance and quality, including third party checks - is carried out by the contractor, with oversight from AT generally only in response to problems or concerns.

Quality Control: skills and training

No management information is published to confirm that work performed by the contractor/subcontractors is to the minimum required standard of quality or better.

Anecdotal evidence reports poor grading of roads, with bad shaping resulting in lost (expensive) gravel and premature road damage, blocked culverts from poorly maintained drainage or roadside vegetation, and work performed incorrectly with wasted materials or insufficient material requiring subsequent correction or early maintenance or repair.

Observers report unskilled or poorly trained workers, traffic management excesses are legend and there are frequent complaints of too many idle workers.

Generally, AT and Downers respond effectively to complaints and recent increases in provision of more crews and training have improved the skill base and reduced complaint levels, but under current arrangements Downers is responsible for its own workforce and training and succession plans and AT does not provide any monitoring and oversight of works to ensure quality in a systematic way.

There is no obligation under the contract for Downers to provide training for its staff or to ensure that all employees undertaking work have the necessary skills and experience before work commences. On-the-job training inherently includes the risk of contributing towards substandard work while employees learn the skills of work methods and machinery operation. AT winds up paying for both the training and the risk of lower quality outputs.

Clearly the perception is that self-monitoring and reporting does not provide incentives for work skills and behaviours that minimise costs and produce high quality work. This is because inefficiencies and waste associated with poor skill levels either result in substandard work which is not checked or fixed, or are simply recovered in invoicing.

In the absence of managers and workers carrying out the works who are personally known to local people, there is no social contract or peer group pressure on them to perform to local expectations or go the "extra mile" to redo unsatisfactory quality work. Some Downer staff may live in Rodney, and even live on the unsealed network and may be known to local people. This may be perceived by AT as the contractor wanting to take pride in their work, however, the worker still does not have any formal quality measures or independent quantitative feedback assessment of their workmanship.

The remoteness and anonymity of the work commissioning and oversight from the residents whose roads are affected encourages practices that don't support the most efficient or best quality outcomes. Contractors have every incentive to minimise their costs and no incentives to minimise invoiced charges. The smallest insight into human nature reveals that the simple "trust" model doesn't work and a "trust but verify" model is needed as a minimum.

Performance not independently tracked

The current AT model relies on the contractor (Downers) to design, manage and provide oversights and reporting of project works and their quality (the role we recommend an independent - or AT – Clerk of Works should carry out).

Since there is no formal independent measurement of contractor performance and quality or of "before and after" road condition under the "trust" model, there is no empiricial assessment of work quality in performance or outcomes over time.

This means that criticisms of work practices such as overcharging, poor materials selection, lack of competitive pricing, poor quality of delivery, and unsatisfactory road performance outcomes, cannot be properly critiqued or assessed.

It also means that recorded instances of concerns or complaints regarding costs and performance on different projects must be reviewed on a one-off basis, and no general learnings can be gained or changes adopted that benefit improved outcomes.

On sealed road works, Downers may employ independent consultants for quality control monitoring and review. We don't know the criteria for such selection. The problem here is that unless evaluators are employed directly by the client (AT) and have "on the spot" authority to correct poor work their relationship with the main contractor (Downers) compromises their effectiveness.

There does not appear to be any methodical or consistent approach to the potential use of local people who have authority over the project delivery, know the area well and can usefully combine local knowledge of roads, quarries and material costs, knowledge of treatment methods, and what has worked and what hasn't, to produce best outcomes for least cost.

Without any methodical performance, cost and outcomes reporting, any examples offered where cost variations, and poor or inadequate performance or results show waste in resource allocation are at best anecdotal and encourage a response of case-by-case explanation. This sidesteps the underlying issue of whether the current approach to Rodney road management is getting the best outcome for the resources being used.

Our contention is that the "trust" model is not working as well as its proponents and beneficiaries claim, and that the key changes recommended in this paper are essential to protect against resource waste and bad outcomes.

Integration needed: Coordination is not enough

AT is largely responsible for roadside drainage throughout Rodney unlike in urban areas where Healthy Waters is assigned roadside drainage responsibilities.

The extent of Rodney's catchment area means extensive engagement with Healthy Waters, for overland flows and stream and river planting and management, as well as with Watercare for infrastructure provision, both of whom have their own project prioritisation and management control systems separate from each other.

Roadside mowing and spraying may also be carried out by Community Facilities. AC's silo and functional management controls means considerable coordination between agencies is necessary to achieve an integrated approach to work delivery. This desirable integration is frequently not achieved as no person has the responsibility on behalf of their agency to reallocate resources as required to minimise overall costs and maximise outcomes across the District.

From the outset, the Rodney roading situation is sufficiently different from the rest of Auckland, except for parts of Franklin, to suggest that a District based management control approach would produce better outcomes and less waste. Instead AT has included Rodney in its "one size fits all" centralised silo functional management approach, and contracted out all work, an approach which is widely perceived as not delivering "value for money".

Failure to efficiently manage local roads in Rodney, and poor integration of road/drainage/water management responsibilities – which are split across AT (Downer), Healthy Waters, and Community Facilities (now Green by Nature) – a lack of funding and poor or missing local control and accountability, have all led to a perceived deterioration in Rodney's roads against national standards (exacerbated by high rainfall) – though current management information provides no empirical basis to confirm or refute that. A single road corridor maintenance contractor, responsible for quality control of work paid for by AT, with self-monitoring and reporting and inadequate AT oversight are contributing factors.

The issue of responsibility for stormwater management across different land use types (and urban and rural areas in particular) has never really been successfully addressed since the Royal Commission discussed the issue in 2009. Currently it remains split between different silos of AC and land use management plans with overland flow paths for water have not been developed and adopted regionally.

Flood management schemes proposed have not been implemented, housing developments have been built on lands subject to flooding, and natural waterways (from drains to rivers) have not been kept clear. With its focus on urban public services AT has failed to address this concern and work with other groups, particularly in rural AC. Poor road drainage has impacted road quality and overland water flows.

For the present, coordination meetings are the only means available to work for a common understanding of local needs and conditions, planning, problems, priorities and activity. While goodwill is currently present, it falls short of what is needed when agreements are not universal.

Lack of integration of investment and service activities across all AC's silos has been discussed, and AT's providing a single point of management for the District will improve the needed integration.

Planning and Priorities

With separate budgets and separate managers responsible for scheduled maintenance (typically done on a rotational basis), improvement activities (done on a priority basis), and repair activities (done on a demand basis) there is scope for more efficient resource use through better planning, scheduling and executing road corridor work under a local manager as a single point of responsibility, and overall budgeting flexibility (viz Budgets).

Exploration with AT staff of the way in which data in the RAMM system is used to help prioritise the URIP has surfaced local concerns about the evaluation methodology programmed into the system.

Support for RAMM is contracted out by NZTA, AT has no control over it, and documentation is missing. Useful data (like Heavy Vehicle numbers) is added manually and road categories are adjusted manually to alter results. As noted there is no road condition data. Local residents have expressed concerns about the need to reflect the importance of community connections in road improvement priorities.

Local liaison meetings will hopefully help address these issues and resolve them and have shown the benefit of a local perspective and constructive positive engagement with AT.

Establishing a local area manager would provide a point to consolidate local input and help coordinate maintenance scheduling and improvement, repair and construction

works for the District and with other agencies. A local Clerks of Works would also improve community confidence and add local points of input to the management of road works (currently only available through AT's remote centralised complaints reporting system).

There is a perception prevalent in AT that the pursuit of "Value Engineering" and techniques which reduce the time and costs of works have rendered the concept of (and need for) a Clerk of Works redundant in favour of the model which places the responsibility for quality squarely with the contractor. The reality is that this is a false economy.[14]

Best practices for roading maintenance contracts typically **do** involve having a Clerk of Works or Site Inspector. Their role is crucial in ensuring proper use of labour and materials during construction and maintenance of buildings, roads, pipelines, and other works. They act as representatives of the employer or client, overseeing the work carried out by contractors.[15]

Reporting

AT, like AC is perceived as remote from road users. Lack of a local point of responsibility to deal with complaints and concerns reinforces that view. Monthly public reporting is directed to the local board, engagement generally lacks interaction (recent efforts of our ward Councillor have sought to address that for the URIP) not directed to the interests of Rodney road users, and lacks any reporting of performance against targets.

Budgets:

The management difficulty in both prioritisation and choice of treatment appears to arise from the management controls applied to several budgets in AT which fund the different aspects of road corridor maintenance and improvements.

It is unclear if that has recently changed but AT appears to have separate management budgets for:

- Unsealed Road Maintenance ;
- Unsealed Road metalling (renewal);
- Culvert renewal;
- The URIP; and
- Storm/cyclone recovery/restoration.

[14] See for example, this 2019 comment by the CEO of the UK ICWCI. https://corporate.jctltd.co.uk/the-role-of-the-clerk-of-works/ which explains how cost constraints have reduced the use of COWs but that this is a false economy.

[15] Institute of Clerks of Works and Construction Inspectorate of Great Britain Incorporated". https://www.icwci.org/

Commitment authorities for commissioning contract work appear to be budget related and local management do not appear to have any authority to transfer funds between (approved)[16] budgets but appear to have some discretion to charge project costs to particular budgets, or to reallocate renewals budgets across AT roading types. (e.g. from the sealed renewals budget into unsealed roading) or vary priorities with some discretion.

In addition, AT maintains a separate set of projects where priorities and treatments are at the discretion of the Rodney Local Board (RLB), funded from the Rodney Targeted Transport Rate (RTTR).

To complicate the funding and budget setting Project 12 of the Regional Fuel Tax (RFT) scheme had funds earmarked for road sealing, and the ARLTP which sets projected funding for Land Transport activity in Auckland does not make clear how much of the funds in any particular category (other than the URIP) are available for Rodney roading work. Funding levels will not be fully resolved this year until September when the NZTA finalises its response to the GPS on Land Transport.

These budgets are set Auckland wide, though some 85% is said to apply to Rodney, so it is never clear what the budgets for control of Rodney District work are. Management information is collected on a project basis and aggregated in categories of activities that do not separate out work by District, so there is no overall reporting by AT of work done in Rodney and costs against approved budgets.

It is also unclear whether separate budgets are set for Capital Expenditure (Capex) work, or whether Capex work comes out of these budgets on a project-by-project basis, and whether the scheduling of projects depends on whether NZTA provides a funding subsidy (again to a budget or on a justified project basis). NZTA subsidies of 51% for defined Work Categories (WC) supplement AT funding, but this should not be used to determine project work priorities (which should be based on need and engineering and economic evaluations of what work is to be done).

Roading projects are like Washington's Axe. It can have three new heads and two new handles but is still Washington's Axe. It still functions as intended and may have a better head and stronger handles. The decision as to whether the replacements are maintenance, repairs or improvements and operating costs or a capital cost is just an accounting treatment decision. The decision to replace the broken head with a better sharper one that lasts longer is made to improve the axe's performance and life. It still does the same job. It does not matter how the costs of the work are subsequently

[16] We do not know who has the authority to approve or change road corridor budget controls (including levels) each year or during a year.

classified. It is needed and used and does not sit idle because head replacements are capital and there is no budget, while the handle maintenance budget has funding.

Within the overall quantum of AT's annual budgets, decisions to either capitalise all of Rodney's annual roading costs or to expense them would equate to a rounding error. Accounting treatments should not be a factor in operational project decision making.

The result of the current arrangements is that there is no one overall budget for Rodney Road Corridor Construction, Maintenance, Renewals and Improvements. If priorities are agreed and work scheduled accordingly, the level of funding, even if it varies during the year, should simply provide a moving line under which improvement projects listed will not proceed until additional funding becomes available.[17]

Establishment of a single budget for the control of spending on unsealed roading works in the Rodney/North Rural District, whether maintenance, repair or improvement (including sealing) will allow a local manager with overall responsibility and authority to allocate resources within (and by variation to) plans, policies and priorities, and call upon AT planning design and administration support as required to deliver the best outcomes. This may be separated into sub-budgets for management controls if necessary, with the local manager retaining authority to transfer funds between these.

Oversight and supervision of contract performance by a Clerk of Works with authority to approve or deny payment will help ensure work is performed efficiently and to the required standards.

Partnering and management style

The principle of subsidiarity[18] applies to getting work done as well as to organisational structures. Delegating decision-making to the lowest level and holding individuals personally accountable gets the best out of people. Partnering and teams work well between people and in groups that internalise that relationship personally.

AT's partnership contract approach where the parties are independent impersonal contractual entities incentivised to maximise their own benefit from the relationship and where individuals are anonymised and have their own personal motivations is flawed. This is because the checks and balances for performance and accountability - which are inherently present in interpersonal relationships - are either not present, or have to be externally expressed by use of extensive and expensive third parties working for (and at the cost of) the client (and not the contractor!).

[17] This assumes there is sufficient funding for basic maintenance and operations.

[18] The principle of subsidiarity states that every issue should be decided at the lowest level that involves all those who are affected.

Clear authorities and understandings where everybody knows what everybody else's drivers are and how they can work together to achieve them allows quick dispute resolution – something essential so that disagreements are eliminated and a good outcome for everyone achieved expeditiously.

The Alternative Proposal

We have two main recommendations:

- Collect consistent data over time on the status of Rodney's unsealed roading assets;
- Adopt a District based control of AT's Rodney District/North Rural work.

1. For the collection of consistent data on the status of Rodney's unsealed roads we envisage:
    a. the establishment of a Pavement Condition Index (PCI) for unsealed road status; with
    b. measurement of each road section in the URIP progressively over a two year cycle; and
    c. Asset status reporting in the same way the STE status measure is used for sealed roads.

    AT may choose to apply this asset status measurement to all AC's unsealed roads, but our concern is that Rodney's unsealed roads are assessed to assist the programming and prioritisation of road maintenance and improvement works in the URIP.

2. For the implementation of a District based control of AT's roading activity we envisage:
    a. a local area manager and one or more local Clerks of Works[19] (based in the District) for project oversight and control of work performed by Downers and

[19] **Clerk of Works Concept**

A Clerk of Works (COW) is someone who oversees a project (roading in this case) and ensures the work is executed in line with expectations and established industry standards. Responsibilities include inspections, documentation, reporting, problem resolution, and ensuring compliance - if necessary by requiring re-performance of the work.

Before commencement of the work the clerk of works needs to be satisfied with the proposed arrangements for the delivery of resources required and the work to be done and may be involved in decisions on the planning and scheduling of the work and any related works. The clerk has responsibility for integration and coordination of the work with other parties having any interaction with the work and has some authority to reallocate resources when necessary to ensure the best intended outcome. This requires involvement from the early stages of planning the work through to final completion. A high level of interaction with any contract staff carrying out the work is required.

Under the current partnership model with AT, COW responsibilities lie with the contractor, who is incentivised to minimise costs and maximise charging, rather than to produce high quality outcomes.

its subcontractors (two COWs would be preferable as local knowledge of roads and their condition is different between the north and south parts of Rodney);

b. an annual plan/programme of intended scheduled and project work and outcomes agreed with the local board; and,
c. a single funding pool (budget) for Rodney road corridor activity, with the local manager having flexibility for re-allocation across activities on a "best use of resources for best outcomes" basis independent of – but of course dependent on – the source of funds, and independent of the final accounting classification of the activity.
d. Monthly reporting through the local board on performance against the programme and standard roading network metrics (traffic, accidents, road condition status, km of road sealed, drains culverts cleared, crossings, signage etc.)

The Rodney community has people with significant roading knowledge and experience. This is not being harnessed effectively by AT and can be used in conjunction with the local board to contribute to planning and prioritisation of work.

A local Transport Steering Group, with AT and local and relevant AC representatives would be one way for AT to engage with the Rodney community and relevant AC divisions in the planning and scheduling of works, particularly on infrastructure investments for growth, and before engaging through other groups like the Supporting Growth Alliance to undertake more detailed work.

Prepared for submission by:

William Foster
Glen Ashton
Brian Mason
Roger Williams
Dave Stott

APPENDIX 2:

Allocation of Road Transport Infrastructure Asset (RTIA) governance responsibility using Asset Classification

Separate Road Classification framework not needed

NZTA has put a lot of effort into its One Network Framework (ONF)[20] and associated Asset Management Data Standards (AMDS)[21] for the collection of information.

A requirement for AC or the ARTC to provide an alternative Auckland Road Classification Framework (ARCF) is unnecessary. It will simply waste resources in duplication, analysis, data collection and reporting. It will defeat the purposes of standardisation of transport infrastructure data, promote confusion amongst RAMM users and amplify differences between AC and the rest of the country - which will use the ONF.

No argument or rationale has been provided anywhere for why AC needs a separate road classification framework and even AC has opposed it in its submission. It will do nothing to help achieve the policy objectives of this Bill.

The new framework appears to be proposed mainly as a way to divide decision-making between the Governing Body and Local Boards (local/collector roads vs arterial/city-centre roads), not because ONF/AMDS are inadequate. (Support for this interpretation can be seen in the ONF which provides a functional distinction between rural and urban streets, and allows for all RTIAs that must be managed, including city hubs and civic spaces.)

The policy objective is as stated in the explanatory note: *"A greater role in transport decision making by local boards will support the policy objective of strengthening local democratic accountability and ensure appropriate local expertise and community engagement."*

Using a new road classification is a crude and inefficient way of achieving that. We have persistently advocated for more true subsidiarity and localism and integrated management of resources and services at the local board level. Allocating some regulatory responsibility to local boards for only some roads - with staff support from

[20] https://nzta.govt.nz/assets/Roads-and-Rail/onf/docs/ONF-detailed-design-document-v1.1-september-2025.pdf

[21] https://www.nzta.govt.nz/roads-and-rail/asset-management-data-standard/development/data-standard-releases#data-standard-release-version-1-4

people who do not work for the local board - will create conflicts and confusion over projects, priorities, funding and delivery of the local RTIAs that local boards **should** manage but AC or the GB **want to** instead. This is neither an efficient nor effective implementation of the "local knows local" understanding.

The best implementation of localism in the management of local RTIAs is as we set out in our proposal for improved governance and management of RTIAs in Rodney.

If the Committee is determined to pursue the use of a classification of RTIAs to delineate regulatory responsibilities, this distinction is easily made using the existing ONF and simply classifying all AC roads to the desired allocation of responsibilities between AC's GB and local boards. As any decision will be arbitrary, it may be made in legislation (if you want maximum delegation) or left to AC (which will minimise delegation).

We support the ONF. ATs progressive shift to its use from the urban centric ONRC (what they call a roads and streets framework) they have persisted in using should be pursued more rigorously.

ONF properly recognises the function and place of roads in the District network rather than ONRC's focus on traffic volumes (which has largely been used for prioritisation of AT's URIP. We can recognise the importance of production roads in our rural areas and the value of key rural roads as "connectors" of our communities rather than as "collectors" - i.e places people can build along (ribbon development) and get access to/from as they do within subdivisions. For Rodney's connected communities and commercial success we need a subcategory of "primary" and "secondary" connectors - to ensure diversity and resilience in extreme weather events- and rural roads which are vital for "production" need to have their necessary priority recognised for maintenance and improvement.

With 650km of unsealed roads the distinction between unsealed and sealed roads is an important sub-classification for us, as priorities for sealing (and a proper road subbase) need to reflect function more than just volume.

Using the ONF to allocate regulatory responsibility

In principle the use of this method is a **bad decision**.

If definitions of roading assets are provided in legislation, AC will be tempted to distort the ARCF to suit its intentions regarding delegation of authority to LBs. Even if the ONF classification system is used (better but still bad) AC may arbitrarily manipulate classification of roads or road segments to retain control over them when it disagrees with LB decisions.

Each road segment and asset location is recorded in RAMM using the current classification system[22]. Local AT management have their own records for project management purposes and it is not unknown for AT to arbitrarily change the classification of a road for prioritisation or project management purposes. This legislation will encourage them to extend that practice to the exercise of decision-making control.

Using the ONF instead of ARCF

The legislation does not aim to delegate non-roading RTIA governance and management responsibilities to Local Boards (e.g. airports, harbours, wharves, rail)

The legislation aims to assign Schedule 4 responsibilities to local boards for roads defined as “Local Roads” and “Collector roads”.

These are defined in Section 48 as:

A **local road** is a road that collects and distributes traffic to and from properties within a specific area;

A **collector road** is a road that distributes traffic between local roads and arterial roads; and

An **arterial road** is a road that:

- is intended to predominantly carry through traffic;
- or carries traffic between town centres within Auckland; or
- is used to carry freight to and from State highways; or
- carries a significant volume of passenger transport and includes special vehicle lanes (as defined in clause 1.6 of the Land Transport (Road User) Rule 2004);

The ONF has classification frameworks for rural and urban roads.

State Highways are the responsibility of NZTA.

[22] AT has preferred the older ONRC as its urban centric and traffic volume based. Re-classification of all AC RTIAs under the ONF should be required.

13

ONF Street Families

Introduction

The ONF Street Families bring together the movement and place function elements to determine an overall classification for the road or street.

There are two street families – urban and rural (figures 3 and 4). Differentiating between urban and rural recognises that the level of people and goods movement as well as the factors that determine place are different in each context.

Note: The level of on-street activity in P3 and P4 in the rural matrix is at a much lower level than a P3 or P4 street in the urban context.

Figure 3 - Urban Street Family

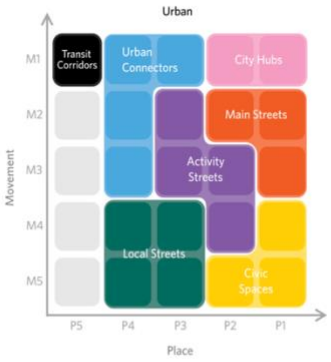

Figure 4 - Rural Street Family

So, using ONF Classifications, a reasonable classification of Governing Body/Local Board regulatory responsibilities for Schedule 4 purposes is that **Transit Corridors** and **Urban Connectors** that are not State Highways are regarded as "arterial roads" and remain AC/GB responsibilities.

All other roads with Urban Street classifications (**Local Streets, Civic Spaces, Activity Streets, Main Streets,** and **City Hubs)** look reasonably like "Local Roads or Local collectors" and thus become an Urban Local Board responsibility. To avoid conflicts Urban Local Boards can be required to liaise with AC before exercising their authority over **Civic Spaces** and **City Hubs**. Urban Local Boards have no responsibility for Rural Streets.

For Rural Streets (so defined in the ONF by their adjacent use) AC could retain responsibility for **Interregional Connectors** (other than State Highways) and the Rural Local Board would be responsible for the rest (**Peri-urban Roads, Rural Connectors, Rural Roads and Stopping Places**).

This structure effectively replaces the "local Roads or local collectors" proposal in the Bill for Schedule 4 purposes.