
Summary of feedback on draft investment assessment criteria for maintenance

1. We received 29 submissions representing feedback on behalf of 40 Approved Organisations plus 1 from the Transport Agency's Highway and Network operations group.
2. There is in many submissions a strong recognition that the criteria support the direction of the RMTF and the REG work programme.
3. There is also recognition from many submitters that there is no going back and that the sector has to adopt a new way of planning and funding maintenance.
4. For many of the submitters there are a number of issues which we have identified in the following high level themes:
 - A. Anxiety about the implementation of the ONRC framework and concepts
 - B. Concern over the number of elements within the draft framework that are yet to be resolved. Greater clarity on these elements would enable the submitters to test their comfort at the workability of the framework and its impact on them.
 - C. As a result of the above there is an overarching concern about AOs ability to achieve the aspirations of REG and the Transport Agency to have fit for purpose AMPs that reflect ONRC in time for the 2018-21 NLTP. Examples given include: the performance measures are yet to be locked down; the AMP assessment framework is unclear, baseline funding process is unclear, data needs have not been defined, etc.
 - D. Concern at the potential impact of the baseline funding approach. Submissions ranged from wanting the Agency to tell them the baseline amount before they do their AMP reviews to wanting a fully informed negotiation of the baseline and any funding above the baseline. There was also the issue of AOs focusing on the amounts of funding rather than what is the optimal programme that represents overall "best value for money".
 - E. Concern over lack of clarity regards the ONRC customer Levels of service (both in terms of definition and their settings) and how any differences to 'agreed' local levels of service will be accounted for.
 - F. Concern that ONRC is being proposed to be used as a benchmarking tool and will include the use of peer groups to validate the benchmarking.
 - G. Concern from some that ONRC and draft criteria will favour rural AOs, to the opposite view that ONRC favours urban AOs but doesn't easily accommodate the urban complexity.
 - H. Concern that the Transport Agency will impose an AMP methodology on AOs and ultimately be directive in its NLTP decisions. Related to this there were concerns raised over the use of the Treasury investor confidence rating model that was being "bench-top" tested by the Transport Agency on selected AMPs.
 - I. Concern over staff resources and capability both within the AOs and within the Transport Agency. The conversations between the AOs and the Transport Agency on the various aspects of maintenance programmes and the wider AMPs will need to be fairly sophisticated, and staff capability to have these conversations is critical to reaching successful outcomes (for all parties).
 - J. Concern about the capability of AOs to adapt their AMP to the business case principles.
 - K. There is a perceived lack of opportunity by some AOs of the chance to engage with the Transport Agency on the new proposals to embed ONRC. There is also a perception that REG

and the Transport Agency may have worked closely together but they have not adequately engaged with the sector over the same period.

- L. Concern over how to plan for future needs when using the ONRC approach as opposed to using historic trend forecasts to justify future needs.
- M. Concern over the tight timeframes for implementation and preparation of maintenance programmes for the next NLTP, and the pressure this will add to the AOs work programmes. Related to this there were one or two requests for longer timeframes to allow the sector time to transition the implementation of the ONRC work.
- N. Concern that any constrained funding for maintenance activity classes in the next GPS could compromise the direction and improvements from the implementation of ONRC.