

31 July 2026

Local Government Data Team
Ministry for Regulation
Ministry for Cities, Environment, Regions and Transport (MCERT)

Submitted via email to: LGdata@mcert.govt.nz

Tēnā koutou ,

Submission on draft guidance to Regulations for groups of activities for councils' planning and reporting

Rangitikei District Council (RDC or Council) is thankful for the opportunity to provide feedback on the draft guidance for the Regulations for groups of activities for councils' planning and reporting.

General comments:

RDC would like to indicate that the timing of these regulations is critical. Councils throughout the country have already commenced preparation of their Long Term Plans for 2027-2037. Groups of activities are relevant to councils' financial statements, activity statements and performance frameworks (i.e. our levels of service measures and targets).

These changes are already poorly timed as they create additional work for councils at a time where local government is facing large scale change. Significant or late changes to the proposed groups of activities may result in increased costs and complexity for councils as they update planning, reporting and financial systems to give effect to the new requirements. Councils therefore require certainty on the final activity groupings and supporting guidance as early as possible.

Please find our comments and suggested amendments below for your consideration.

1. Feedback on the draft guidance

a) Are there any activities missing from the list that should be added?

In Group 1 (adaptation and emergency management), Council suggests adding:

- training of staff and volunteers for emergency management response and recovery; and

- assisting other local authorities in their response or recovery to local emergencies.

b) Are there activities that you think have been mis-grouped/belong in another group from where they've been allocated?

Council is unsure about the inclusion of water services strategies as one of the activities within Group 3 (governance, planning and reporting) since the requirement to develop and adopt such strategies is a requirement of the Local Government (Water Services) Act 2025.

Council suggests the following changes:

- Shifting LGOIMA functions from Group 5 (public regulatory services) to Group 3 (governance, planning and reporting). This activity is more closely aligned with the latter group. The LGOIMA function is primarily focused on access to information and the conduct of meetings which fits most appropriately with Group 3 (governance, planning and reporting).
- Shifting abandoned vehicles and parking enforcement from Group 6 (roading and transport) to Group 5 (public regulatory services). Regulatory services is the group where most smaller councils currently lead this activity from as they have an enforcement officer or team that carries out a range of enforcement functions including bylaw enforcement, District Plan enforcement, and parking enforcement. These are generally primarily regulatory functions as opposed to infrastructure delivery activities.
- Shifting cemeteries from Group 2 (community and recreational facilities) to Group 4 (parks and reserves). Cemeteries are better aligned with councils' parks and reserves activities. Their maintenance and management is generally delivered by the same teams (especially for smaller councils) and splitting out the cost of managing cemeteries from parks and reserves would be difficult.
- Shifting playgrounds from Group 2 (community and recreational facilities) to Group 4 (parks and reserves). Playground activities are managed very closely with wider parks and reserves activities. This aligns with guidance material that buildings on parks and reserves should be managed under this activity.
- Enabling public toilets to be managed from one primary group of activities (rather than splitting across two). Council requests the primary activity for public toilets is Group 2 (community and recreational facilities). It will be unworkable for Council to separate public toilets into the two groups as outlined in the draft guidance. Currently the maintenance (including cleaning, consumables, and other maintenance) is funded via the same budget and uses the same team. Council would either have to implement separate recording of work done at each such facility, including cleaning and maintenance, or make an assumption about these costs and allocate that. Council suggests that public toilets will normally be in

group 2 (community and recreational facilities), but if a Council wishes to report those on reserve land separately in Group 5 (parks and reserves) they may do so, but this is not a requirement. This approach aligns with the primary function premises outlined in the guidance document.

- That communications activities are provided for under Group 3 (governance, planning and reporting). Council notes that marketing and communications activities are included on page 2 under Group 3 (governance, planning and reporting), however, in the index of activities, their groups are listed under Group 8 (other). Council suggests that communications activities are provided for under Group 3 (governance, planning and reporting) and more clarity is provided around the definition of marketing activities (i.e. as to whether they are focused on council-specific marketing or tourism marketing).

c) Is there further information that DIA could provide that would be helpful?

Currently the Local Government (Financial Reporting and Prudence) Regulations 2014 requires the Annual Report to include information about each group of activities for the year before the Long Term Plan. The implementation of the new groups will make that difficult to achieve for reporting in 2027/28 because there will be incomplete comparable data for 2026/27. Council would like clarification on this.

Council suggests early clarification on any mandatory performance measures to be associated with these groups of activities so that they are included in the preparation of the 2027-2037 Long Term Plans, noting that work is already underway on these plans across the country.

Further guidance, including specific examples on the concept of primary function.

d) Any other comments?

No further comments

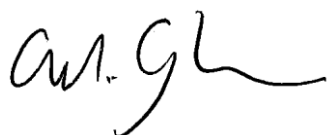
2. Reporting on recovery costs

Should costs associated with the disposal of debris during emergency recovery be recorded against the 'adaptation and emergency management' category or as part of 'waste management'?

Council considers that costs associated with the disposal of debris during emergency recovery should be recorded against Group 1 (adaptation and emergency management). This means the full costs of recovery are disclosed. Council considers that is a valid exception from the expectation that Group 7 (waste management and minimisation) will include costs from unplanned activity such as that arising from fly-tipping and other random dumping or remediating an exposed historic landfill.

Thank you for the opportunity to provide feedback on the draft guidance material.

Ngā mihi,

A handwritten signature in black ink, appearing to read 'Carol Gordon' in a cursive style.

Carol Gordon
Chief Executive