Waikato Regional Council staff feedback on: Testing our thinking: Developing an enduring National Infrastructure Plan

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Section one: Why we need a National Infrastructure Plan	
	Comment
Q1: What are the most critical infrastructure challenges that the National Infrastructure Plan needs to address over the next 30 years?	We consider that there are many challenges that the plan needs to address, including, but not limited to: climate change, our sustainable energy and water infrastructure, better understanding the services we need, the design life of infrastructure associated with investment efficiency and how to better manage our workforce as well as how to enhance resilience in rural Māori communities and increase Māori involvement in infrastructure planning and transport adapting to cope with demographic changes. **We recommend** the government fully understands future service trends as a key piece of this work. We agree with the discussion document statement that: '*our infrastructure delivers services we depend on'* (page 15) and consider that a key challenge will be to understand in greater detail the services we need now and in the future. All infrastructure is designed to deliver a service and a lot can change in 30 years, considering the changing environment we live in. This means that the services we need now may not be needed in the future in the places where they are currently provided. This also means that some infrastructure we need now may be redundant in the future, while services not needed now will be needed in the future. **We recommend** the government fully considers the effects from climate change when developing the NIP. This includes a recognition that the infrastructure required to provide an acceptable level of service may cease to be economic when the effects of climate change reach a certain level. We consider that climate change is a key challenge that needs to be fully considered when developing the NIP. Climate change has a crucial impact in key services, including in flooding defence infrastructure, energy infrastructure, transport infrastructure, three waters, housing etc. We need future infrastructure that is resilient and efficient to provide for our communities.

	We recommend that the government enables infrastructure providers to deliver future proofed infrastructure that is fit for delivering the appropriate levels of service. Another key challenge is the design life of infrastructure associated with investment efficiency. Infrastructure is designed with a design life and this environment is changing. We need to build for the future instead of the past and this translates to investing in better quality from the get-go, to save in maintenance and retrofitting in the medium and long term. We should move away from the mindset of building budget infrastructure for saving immediate costs. For example, road providers tend to build budget roads that require constant maintenance; investing in better built roads would reduce maintenance costs in the medium and long term. Another issue is the scale of infrastructure we build as a country. Our thinking is usually short-sighted and does not consider future capacity needs. For example, it is not unusual to finish building a bridge to understand that the capacity is already fully surpassed. We need to unlock investment for building future-proofed infrastructure instead of just fixing short-term issues that will need upgrading moving forward. Investing in budget and short-sighted infrastructure is more costly in the long run than investing in future proofed infrastructure from the beginning. However, it may also be that the cost of building resilient infrastructure is prohibitive, and alternative adaptive responses are required. Another key challenge is maintaining workforce. Please see our answer for Q4 on how the National Infrastructure Pipeline (Pipeline) can help maintain the workforce in Aotearoa. Another key challenge includes enhancing resilience for people and infrastructure in rural areas. We also suggest increasing Māori involvement in infrastructure planning and ensuring equitable access to essential services like water and healthcare. Balancing economic growth with safeguarding environmental and cultural values important to iwi Māori is also crucial. **We recommend** these factors be reflected in the NIP to foster genuine participation and partnership with Māori communities. In terms of transport, a challenge is adapting to demographic changes e.g. ageing and an increasingly urban population. These two changes will have major implications for provision of transport infrastructure. The way in which people access essential services and activities will change and councils and other infrastructure providers will need to provide for better public transport, and urban development that supports walking i.e. better and wider footpaths. Increasing electricity supply to the right areas to service the EV bus fleet is important.

	How we manage energy, and its associated infrastructure will be a key challenge moving forward. We consider that there should be a strong focus on how to manage the provisions for energy and the infrastructure needed to ensure the security of energy supply. We note that the Waikato River dam network is critical for helping Aotearoa to achieve security of energy supply. Therefore, **we seek** recognition of its significance in the NIP **and recommend** the government explores the need of more efficient tools to help manage this infrastructure.
Q2: How can te ao Māori perspectives and principles be used to strengthen the National Infrastructure Plan's approach to long-term infrastructure planning?	To better strengthen the NIP in the long term, **we recommend** the government ensures that services and infrastructure are linked to te ao Māori and better understands Te ao Māori perspectives and principles when considering services and when planning for the infrastructure needed to deliver services . Integrating te ao Māori into infrastructure planning means recognising concepts such as mana motuhake (self-determination), kaitiakitanga (guardianship), and whakapapa (genealogical connections). This should be reflected in policies that prioritise Māori consultation in all planning stages, ensuring infrastructure serves cultural and environmental needs alongside conventional utility. In addition, to better strengthen the NIP, **we suggest** exploring partnerships, including with the Federation of Māori Authorities (FOMA)[1] and forums such as the Iwi Chairs Forum [2] and the Tainui Waka Alliance Leaders Forum.
Section two: Long-term expectations	
Q3: What are the main sources of uncertainty in infrastructure planning, and how could they be addressed when considering new capital investments?	We consider that there are many sources of uncertainty and risk in considering long-term capital investment, including, but not limited to: population shifts, the political cycle, funding, climate change, fluctuating economic conditions and the operating environment. Addressing these uncertainties requires collaboration with communities and iwi partners to identify regional vulnerabilities, especially regarding cultural heritage and environmental resources. We consider that traditional Māori knowledge could provide unique insights into adapting to natural hazards and climate change impacts. The operating environment brings a great level of uncertainty considering the challenges of predicting if the infrastructure will still be needed within its designed life or if it will be needed as currently designed. There is a risk

[1] Home - foma.org.nz
[2] Ko Wai | Iwi Chairs Forum Secretariat Sharing The Vision of Kotahitanga

	that the environmental context has changed to a degree that the infrastructure no longer delivers the service that is needed, e.g. flooding defence infrastructure facing more severe events as a result of climate change. A good example of shifts in the operating environment are fire stations. In the past, the biggest concern was fires in houses due to coal burners, as a result we needed more fire stations within urban zones. Now fire trucks have a key role in helping with vehicle accidents in motorways, especially managing fuel leaks from vehicles and fire stations would be better placed in motorway intersections. Changes in the political cycle create uncertainty in the operating environment, with changes to parties' philosophies leading to changes in policy direction, which creates uncertainty for investment. Regardless of political preferences, the government should agree on a path to bring certainty for operators and investors. **We recommend** that the government should consider the current and future potential operating environments in the NIP, and it should be supported by a cross-party agreement that would ensure continuity and certainty. We also consider that to better face uncertainty we need to build infrastructure with flexibility, so if the environment remains the same, the infrastructure can operate within its parameters, but in case of adversity it can be upgraded or repurposed to create better efficiency. Flooding is a key issue in the Waikato region, and it is challenging to cater for flood protection and drainage infrastructure within a changing environment. **We recommend** the NIP provides support for regions to better manage resilience. WRC has some understanding of assets that are critical, and the risk associated with these assets, but our modelling work does not yet provide us with a clear impact assessment for when flooding occurs. WRC has an extensive programme of modelling underway that once concluded it will help with risk prioritisation. However, we also face different issues for managing our assets on private land. Therefore, we consider that it would be more efficient to have a more holistic approach in terms of managing infrastructure. There is also the issue of having infrastructure that supports a service that isn't going to exist into the future because of climate change and/or natural hazards. For example, providing water and transportation and communications infrastructure to a place that will be exited from in 30 years' time. We consider that there are economies of scale in respect of generating and collating the necessary information and therefore, **we recommend** central government

	provides information concerning natural hazards and developing spatial plans to optimise the chances of having the appropriate infrastructure in the right place. For transport, the main uncertainty is the fluctuating availability of funding. Successive governments tend to have different priorities, and this is reflected in the Government Policy Statement (GPS) on land transport, and the National Land Transport Programme (NLTP). Local government finds it difficult to plan beyond the 3-year cycles when there is no guarantee of central government share being obtained. For example, many public transport trial services have not been funded for WRC in the latest NLTP, meaning some communities in the region cannot access public transport. **We recommend** having cross-party agreements, so infrastructure projects are continued through government changes. We also consider that better communication and coordination with stakeholders would be beneficial for addressing climate change and natural hazards adaptation. We envisage that there may be conflicts with adaptation planning due to potential financial implications, such as increases in property insurance. There is a risk that communities and infrastructure providers may become frustrated with the process as we are seeing happening in Nelson, where the use of proposed hazard maps by insurance companies is affecting insurance access for properties across the city.[3] Therefore, **we recommend** the government delivers national direction supporting local authorities to manage this issue.
Section three: Existing investment intentions	
Q4: How can the National Infrastructure Pipeline be used to better support infrastructure planning and delivery across New Zealand?	We see the benefits of the Pipeline for us as infrastructure owners to have more certainty that supply and capacity will be available, and to join up with others for economies of scale/joint procurement, e.g. across districts or regions. It will also assist better coordination between timing of infrastructure delivery demand, find priorities across projects, and sequencing for efficiency. The Infrastructure Commission can then provide insights such as patterns across time and budget of infrastructure projects, e.g. whether they are delivered on-time/early/late, and on budget/over/under. They can also see how many things can be delivered at once, and can also bring things together over sectors, e.g. all entities' water aspirations. Infrastructure providers can also see another entity who's recently done a similar project, and can get in touch to ask about lessons learned, etc. The Infrastructure Commission can show graphs over time by region and by sector and demand for workers etc.

[3] Hazard mapping has 'chilling effect' on Nelson property market | RNZ News

	The Pipeline can also provide better support for managing workforce. **We recommend** having a pipeline management work task for prioritising projects and placement of workforce. This could be achieved with better long-term planning around the timing of the projects and ensuring the workforce is contracted throughout longer periods of time across multiple projects. This will provide certainty for staff and prevent movements to other markets. Having gaps between projects promotes workforce movement, including movements to different countries. We consider that having certainty concerning continuity will help maintain skilled workforce in Aotearoa.
Section four: Changing the approach	
Q5: Are we focusing on the right problems, and are there others we should consider?	We understand that services change as society evolves and new challenges arise, such as displacements as a result of climate change and extreme events. Therefore, **we recommend** the government carefully assesses potential future shifts in services to then consider which infrastructure will be needed. We also need to build infrastructure with better quality, instead of constantly maintaining and rebuilding low-cost infrastructure. In addition, we need to think about how to repurpose the infrastructure we already have and make it more economically efficient. There should be a regulatory test for assessing the need for the infrastructure associated with a cost analysis. For example, we could have a tipping point for maintenance costs and beyond that the infrastructure would be deemed redundant. Another key problem is where to place infrastructure. For example, we must avoid placing vulnerable activities such as hospitals and housing in flood zones. On top of putting people and property at risk, the investment for retrofitting and managing retreat are not cost effective. Such activities in areas of risk should be avoided. **We recommend** having national direction to support councils to manage activities in natural hazard areas. Overall, New Zealand depends on industries that are potentially highly vulnerable to natural hazard events or chronic changes for foreign exchange i.e. industries that depend on stable weather e.g. agriculture, forestry and horticulture. This raises a problem from a risk perspective and is highly connected on how we plan for infrastructure. It is projected that climate change will cause the annual amount of rainfall and the number of days with extreme rainfall to increase in the west and south, and decrease in the north and east of both islands. The number of dry days is projected to increase in the North Island and in inland South Island.[4] Changing temperature

[4] EHINZ

	ranges affect growing conditions and increase the risk of invasive species incursions (including insect and weed pests). Therefore, some of our key activities are under threat from climate change. **We recommend** the government carefully assesses the economic risks of these activities in the long term and considers the most efficient types of infrastructure to invest in that would protect and support these activities in the future. The current focus on resilience, sustainable management, and reducing emissions aligns well with Māori needs, but greater emphasis is needed on addressing historical inequities in infrastructure distribution. We consider that increasing Māori decision-making roles is crucial.
Theme one: Capability to plan and build	
Investment management: Stability, consistency and future focus	
Q6: What changes would enable better infrastructure investment decisions by central and local government?	**We recommend** enabling regional councils to secure development contributions for their activities such as drainage and flood management, as well as public transport infrastructure when upgrades to infrastructure are needed to cater for the development. Our response to Q16 elaborates more on enabling regional councils to secure development contributions in some cases. We consider that a cross-party agreement on what services are needed is crucial to enable investments. Cross-party agreement would ensure that changes in government philosophies and policy direction won't hinder projects that have been planned for in the NIP. This should be aligned with long term Pipeline planning to efficiently deliver the infrastructure. In addition, the government needs to plan for services in a more efficient way. For example, climate models predict more droughts for parts of New Zealand,[5] as a result of climate change. So, if there is a need for freshwater, the government needs to consider where this is going to be needed, how much we will need and how can we be efficient about it. Potentially offshore desalinisation of water could be a solution for places that will potentially need additional sources of water, such as Auckland. This is a significantly different type of infrastructure from what we have had historically. Our world is changing, and we consider it more efficient to assess different scenarios

[5] EHINZ
Rainfall | Stats NZ

	instead of limiting ourselves to the status quo/business as usual. **We recommend** the government better explores efficiencies in how to determine the services that we will need in the future and deliver the infrastructure.
Q7: How should we think about balancing competing investment needs when there is not enough money to build everything?	As a minimum, the government should understand what services will be needed for the next 30 years and then look at standard prioritisation methods to analyse the priorities. This would help understanding where the priorities are and better targeting where and what types of infrastructure should be delivered. **We recommend** having partnerships between local and central government on agreed priorities for infrastructure delivery. This will be essential to better understand investments and priorities. **We also recommend** finding better ways for building uncertainty into the decision-making, including not just the financial aspects of the infrastructure but the broader nonmarket costs and benefits of the service. Competing needs can be balanced by recognising Māori environmental guardianship. Projects that contribute to environmental sustainability, cultural wellbeing, and resilience should be prioritised, respecting Māori rights and interests, and adhering to Treaty principles.
Workforce and project leadership: Building capability is essential	
Q8: How can we improve leadership in public infrastructure projects to make sure they're well planned and delivered? What's stopping us from doing this?	We consider it essential to account for future changes in climate and technologies to prevent maladaptation. The issues should be assessed within a broader spectrum, recognising that we are running behind schedule and that the infrastructure we have now may not be fit for the future. We also note the importance of considering all views in the process, especially the local communities that are closer to the issue – and are better placed to judge priorities considering their tolerances. Therefore, **we recommend** the government enables full public participation while developing the NIP. We see the potential of better coordination nationally to assist predictability in planning and delivering projects, including on how they will be funded. We highlight that local government funding is more constrained than central government funding. Therefore, in some instances, central government is more capable of delivering services than local government. We acknowledge that, if the share of funding contributed by local government decreases, its decision-making powers in respect of *what* investments are made also decreases.

	We recommend better integration between organisations when assessing services and planning for infrastructure. It is important to understand the relationship between infrastructure providers. For example, the infrastructure regional councils provide often protects other infrastructure. WRC is responsible for flood protection under the Soil Conservation and Flood Protection Act 1941 and the Public Works Act 1981. WRC manages multi-million-dollar systems that protect communities, schools, roads, farms and other vital resource, keeping land draining freely in specific geographic areas where schemes have been agreed with communities. Our flood protection assets and systems include stopbanks, floodgates, pump stations, spillways and channels, all linked and managed by computer monitoring of river levels and flows. There are over 90 individual land drainage schemes in the Waikato region, each locally funded through targeted rating.[6] In addition, **we recommend** the NIP recognises the significance of inland ports. There are inland ports in the Waikato region and these ports provide for key services. The Ruakura Inland Port [7] is a project of national significance providing for logistics, industrial, commercial, retail, green space, and residential zones. In addition, there is the Horotiu freight hub[8] also located in the heart of New Zealand's fastest growing region. It provides for rail and road connections to New Zealand's two largest ports, the lower North Island, and three of the country's five largest cities. We consider that the integration and collaboration between ports across Aotearoa are essential for transport infrastructure efficiency. **We highlight** the significance of regional airports as key infrastructure, providing services for the regions and across Aotearoa, including when supporting international airports **and recommend** the NIP to recognise the role of regional airports and consider potential scenarios for future investments. For example, the Waikato airport just outside of Hamilton could function as a back-up airport to Auckland.

[6] Flood protection - asset management | Waikato Regional Council
[7] Ruakura Inland Port | Ruakura Superhub
[8] Work starts on Waikato Freight Hub | Port of Auckland

	We also consider that leadership can be improved by involving Māori leaders in project governance, ensuring infrastructure reflects cultural values. A lack of understanding of Māori perspectives is often a barrier, which can be mitigated by cultural competency training for project leaders. **We recommend** that instead of the default being to always build something new, consider optimising the use of what we already have e.g. road space, either by time (time of use charging), or mode (bus lanes, cycling infrastructure, reduced on-road parking spaces). This will defer some spending on big new roading projects, allowing that money to be spent elsewhere and infrastructure spending is not "boom and bust".
Q9: How can we build a more capable and diverse infrastructure workforce that draws on all of New Zealand's talent?	Please see our answer to Q4 around how the Pipeline could better support managing workforce in Aotearoa. In addition, we recommend having a better understanding around the services we will need in the future. This will help guide what skills will be needed for the future infrastructure workforce. **We recommend** the government provides better resourcing for workforce providers such as the building and construction industry training organisation (BCITO) as well as facilitating better planning around services and infrastructure. For example, we have known for years that New Zealand has an ageing population, and we haven't efficiently planned for our health system. We know that we need more health workers, but we are still not providing for sufficient training in this space. **We also recommend** that building a capable infrastructure workforce requires incorporating Māori talent and perspectives into training programmes. Promoting diversity in leadership roles and supporting career pathways for Māori in infrastructure will create a more inclusive environment.
Project costs: Escalation means less infrastructure services	
Q10: What approaches could be used to get better value from our infrastructure dollar? What's stopping us from doing this?	**We recommend** developing better national direction for managing development in areas that are not fit for development. Ideally the approach should be to avoid development in areas of risks and other areas not fit for development, such as peat soils, and this should be supported by spatial plans guiding where different forms of development would be appropriate. We are seeing high infrastructure costs on land we consider unsuitable for development, e.g. peat soils, flood-prone land. Better national direction could help directing funds for managing infrastructure where it makes more sense. For example, land subsidence is a key issue affecting the levels of performance from our infrastructure schemes. Peat soils are subsiding at difference rates across the region, impacting our assets' performance and resulting in the

	need for more reactive work programmes. As a result, we are considering more nature-based solutions to manage soil moisture and to minimise carbon sequestration. **We also recommend** the government better explores nature-based solutions as an alternative for hard infrastructure where possible. **We recommend** having a centralised strategic approach for planning for services and infrastructure. We consider that a more strategic approach for planning would be more beneficial than a sector-by-sector approach. This could ensure better communication, collaboration and prioritisation of infrastructure needed while having a more far-reaching view of the future. We also believe that more funding would help sectors to better consider tenders and not having to compromise on quality by being budget-constrained to land on the lowest cost bid to deliver the infrastructure. Further, a more high-level strategic approach could consider the most efficient way to deliver a service. For example, in terms of transport the service is to move people and freight from A to B. The infrastructure choice will determine whether you use roads, rail or ports or all of them in some extent. A strategy would guide determining the most efficient pathway to deliver the service. We consider that efficient is not necessarily connected to the cost of the infrastructure, i.e. the cheapest option for delivery. The quality of the infrastructure will reflect on the levels of service we require and the overall costs of the life cycle. We need to move away from the mindset of building things as cheaply as possible and then having to spend 60-70% of our infrastructure budget on maintenance. We consider that the overall costs with building cheap and extra maintenance outweighs the costs for building with quality in the first place. **We recommend** the government investigates the long-term costs of electrified rail versus the costs of building and maintaining roads. Shifting freight to rail would substantially reduce the wear on roads and that would result in less investment on maintenance of roads. We understand that the tax revenue from heavy vehicles is not sufficient to cover the costs with maintenance. Therefore, this is subsidised by light vehicles and excise tax. We note that excise tax will diminish as we electrify the fleet. We also recommend better focus on compact urban form instead of greenfield development, as compact urban form reduces the distance between A and B. We understand that we need roads, but we consider that these should be better designed; built with better quality and not placed in places with risks of landslips, erosion, etc.

	We recommend having cross-party agreement to reduce the risk of whole projects being discontinued because of political changes on government. We note the enormous waste in transport planning work when scoping and pre-implementation work is undertaken to meet requirements under a Government Policy Statement (GPS) and the following GPS from a new government changes the funding allocation in the NLTP. This means that all that initial work is lost, and therefore, the government's approach is not productive nor efficient. We understand that in some cases, projects are future-proofed and have a large a scope, but small (low cost) incremental changes could be made over time e.g. in public transport.
Theme 2: Taking care of what we've got	
Asset management: Managing what we already have is the biggest task	
Q11: What strategies would encourage a better long-term view of asset management and how could asset management planning be improved? What's stopping us from doing this?	We agree with the discussion document's points on what's stopping us from better asset management planning. In the Waikato region, the Future Proof Strategy[9] is a 30-year growth management and implementation plan for the Hamilton, Waipā, Waikato and Matamata-Piako sub-region. However, currently we see a disconnect between the work the growth partnership undertakes as directed under the NPS-UD (i.e. developing Future Development Strategies which include a list of critical enabling infrastructure), and the work each partner undertakes to review state and priority of asset investment. It would be more efficient having a mechanism that drives both these areas of work together in a coordinated way. Therefore, **we recommend** the NIP provides for a mechanism for better communication and integration between the different tiers of government. WRC is a member of the Upper North Island Strategic Alliance (UNISA),[10] a forum with the purpose to better coordinate collaborative investment and planning to tackle increasing pressure on housing, infrastructure, natural resources, skilled labour and transport system. Strategic and inter-regional forums such as these encourage long-term and integrated approaches to infrastructure need and investment. Further, we consider that there will be circumstances where, following community dynamic adaptive planning approaches, supporting infrastructure becomes redundant. In such instances infrastructure may need to be

[9] Our strategic direction | Future Proof

[10] Upper North Island Strategic Alliance | Hamilton City Council),

	repurposed. In such situations, a strategic approach such as the Waikato Regional Sustainable Infrastructure Decision-making Framework (SIDF)[11]is relevant. We also consider that effective asset management involves incorporating kaitiakitanga principles, focusing on the long-term stewardship of infrastructure. Engaging with iwi in monitoring and managing assets ensures culturally significant sites and resources are preserved. In addition, we consider that a major concern is the ongoing investment in only one type of transport i.e. cars. To be resilient, the transport system must be able to adapt to uncertainty and change. **We recommend** the government explores other forms of transport. This is crucial to reduce investment in road maintenance while reducing our emissions.
Resilience: Preparing for greater disruption	
Q12: How can we improve the way we understand and manage risks to infrastructure? What's stopping us from doing this?	We highlight that several local government authorities are working with communities to produce long-term adaptation strategies and plans to manage the impacts of natural hazards and climate change risk. These strategies and plans often identify exposure of local infrastructure and assess the risk appetite for communities and asset owners based on different natural hazard scenarios. The country's infrastructure strategy should have regard to the information coming out of long-term adaptation planning, both for its insights on infrastructure exposure and because it records communities' expectations around access, infrastructure provision and thresholds for managed retreat. In the Waikato region, there are currently four ongoing district council-led adaptation plans: a) Thames Coromandel District Council – Shoreline Management Pathways b) Hauraki District Council – Wharekawa Coast 2120 and Hauraki Plains Adaptation Plan c) Waikato District Council – Waikato District Resilience Project.
Decarbonisation: A different kind of challenge	

[11] Sustainable Infrastructure Decision-making Framework (SIDF) | Waikato Regional Council

Q13: How can we lower carbon emissions from providing and using infrastructure? What's stopping us from doing this?	We consider that there is a great opportunity here to better manage our transport emissions. Transport is the second biggest source of emissions nationally; 90% of transport emissions are due to land transport. The current government's preference for infrastructure that causes emissions i.e. larger roads with more vehicles, and the move away from transport modes that would reduce emissions (electrified rail, public transport, walking and cycling), is counterproductive. There is a lack of long-term planning and funding availability with changes in policy direction from central government on a 3-6 yearly cycle. **We recommend** more broad thinking and considering transport options to reduce emissions, such as electrified rail, public transport, walking and cycling. We recommend cross-party agreement to ensure continuity throughout government changes. Please see our answer to Q10, where we highlight the costs and benefits of electrified rail vs maintaining roads. We also consider that the government should use all policy levers to incentivise investments for decarbonising our infrastructure. For example, regional strategies and policy direction around the country could also provide for lowering carbon emissions. In the Waikato region, Change 1 to the Waikato Regional Policy Statement[12] includes in its objectives provisions for supporting reductions in greenhouse gas emissions and that strategic planning for growth and development are resilient to the current and future effects of climate change. The outcomes from Proposed Waikato Regional Plan Change 1[13] in relation to water quality will be a key factor in considering infrastructure options based on environmental impacts. Through our Sustainable Infrastructure and Decision Making (SIDF)[14] process we are learning more about the stance that the Department of Conservation and iwi may take in this regard, and this will undoubtedly change WRC's approach to consenting. In addition, the Future Proof Future Development Strategy encourages compact and concentrated urban form, directed by an agreed settlement pattern around key growth areas. Again, we consider that compact urban form is key to reduce emissions. **We urge** central government to rethink its approach on prioritising greenfield development instead of compact urban form.

[12] Waikato Regional Policy Statement Change 1 - National Policy Statement on Urban Development 2020 and Future Proof Strategy update | Waikato Regional Council

[13] Proposed Waikato Regional Plan Change 1 | Waikato Regional Council

[14] Sustainable Infrastructure Decision-making Framework (SIDF) | Waikato Regional Council

	In addition, lowering carbon emissions from infrastructure requires incorporating Māori-led initiatives, such as sustainable land-use practices and renewable energy projects. Barriers include a lack of funding and support for community-driven solutions.
Theme 3: Getting the setting right	
Institutions: Setting the rules of the game	
Q14: Are any changes needed to our infrastructure institutions and systems and, if so, what would make the biggest difference?	The government should consider a longer-term view of transport and what it needs to achieve for regions, and New Zealand as a whole. At present, the GPS is the policy of the government in power at the time and is subject to short-term thinking. We suggest transport should have a National Policy Statement on land transport (under the RMA) where the long-term outcomes and aspirations of the nation are agreed. This would include consideration of all modes of transport, and it would be transparent as to what we are all trying to achieve. Funding could vary according to the economic situation of the time, but at least we would all be working towards the same outcomes and reducing wasteful spending on projects that come in and out of favour over decades. We consider that a key positive shift would be to stop subsidising fossil fuels and instead make it easier for people to electrify their homes and purchase electric vehicles. This would help meeting our emissions targets and reduce costs of living for New Zealanders. **We recommend** the government reinstates incentives for purchasing electric vehicles and provides incentives for solar rooftops. There is a great opportunity to change the electricity market with solar rooftops. **We recommend** the government investigates subsidising solar rooftops for households and businesses. This would provide an opportunity for cheaper energy during daytime, and this could help amortising other costs, such as construction costs and maintenance costs of generation. We have the opportunity to offer electricity almost for free versus perpetuating the use of fossil fuels. This is a more forward-thinking approach instead of perpetuating investments in fossil fuels which are going to be increasingly more expensive and more challenging to get in the future. There may be options for achieving scale, although it is acknowledged that the *ex post* evidence of the benefits of local government amalgamations is sparse. There are also alternative options, such as shared services, regional or

	subregional scale council-controlled organisations like the water services entities. These could perform a role in helping councils achieve their strategic goals, delivering a range of services to residents and visitors. We also consider it worth investigating if Waka Kotahi would be better placed to also manage rail. This would enable better trade-offs, i.e. choosing the best transport mode for an area. Perhaps a public electrified rail service, shifting more freight to rail would promote more private operators to consider rail. We also consider that changes should include embedding Māori rights within infrastructure governance frameworks, allowing iwi to participate actively in decision-making. Strengthening these roles would ensure better cultural alignment and outcomes.
Network pricing: How we price infrastructure services impacts what we think we need	
Q15: How can best practice network pricing be used to provide better infrastructure outcomes?	We consider it essential to better understand what the policy objective is in respect of infrastructure investment, i.e. if the goal is to create equity outcomes or to regulate network operators, providing for a user pays system. If the goal is to achieve equity of access, the user pays system might prevent some people from accessing the services that the infrastructure provides. Alternatively, public funding of services or subsidies for lower income users may be appropriate. We also consider that network pricing should reflect the community needs, particularly in rural areas with significant Māori populations. Subsidising essential infrastructure services in these areas would ensure affordability and accessibility.
Regulation: Charting a more enabling path	
Q16: What regulatory settings need to change to enable better infrastructure outcomes?	**We recommend** the government reviews the circumstances in which development contributions may be charged, including the potential to enable regional councils to charge development contributions in applications that requires them to upgrade infrastructure as a result of development. We understand that development contributions were implemented for developers to help bear the costs of the infrastructure needed to cater for the development and these are currently business as usual for territorial authorities. We consider that in some occurrences it may be appropriate for regional councils to be able to charge development contributions. For example, when land drainage schemes need upgrading because of increased impervious surfaces and drains aren't sufficient to cope with larger storm events. The same applies for flooding infrastructure, while the first-best option may be to not allow development in places subject to flooding hazards, when infrastructure needs

	upgrading because of the new development, regional council development contributions may be appropriate. In addition, we also consider that regional councils should be able to secure development contributions for expanded public transport services in new development areas. **We recommend** developing a regulatory test to assess the need and operational effectiveness of infrastructure when investing in renewal of infrastructure. The test should assess whether the infrastructure it is still useful or not, and if it is worth keeping and maintaining. The test should consider if the infrastructure is still the most efficient tool to provide the service it was designed for. The test should also assess options for repurposing, moving or decommissioning the infrastructure. We also consider that the regulatory settings need adjustments to incorporate Māori perspectives into planning and compliance processes. Streamlining consent processes for iwi-led projects would enable more effective and timely infrastructure delivery.
Section five: What happens next?	
Q17: . Do you have any additional comments or suggestions that you would like us to consider as we develop the National Infrastructure Plan?	We consider that to develop a robust National Infrastructure Plan, it is crucial to establish clear avenues for iwi collaboration in all infrastructure stages, from planning to delivery. Engaging iwi as equal partners will ensure infrastructure supports both economic growth and cultural sustainability.