

2nd July 2021

The New Zealand Infrastructure Commission, Te Waihanga

**Auckland Council's submission on the Infrastructure Strategy Consultation Document
He Tūāpapa ki te Ora, Infrastructure for a Better Future.**

Thank you for providing Auckland Council with the opportunity to submit on Infrastructure Strategy Consultation Document He Tūāpapa ki te Ora, Infrastructure for a Better Future. Auckland Council's submission is attached.

This submission is endorsed by the Chair and Deputy Chair of the Planning Committee, the Deputy Mayor and a member of the Independent Māori Statutory Board with delegation on behalf of the Planning Committee.

The Whau, Henderson Massey, Ōrākei, Maungakiekie-Tāmaki, Ōtara-Papatoetoe, Papakura, Waitemātā and Albert-Eden Local Boards have provided comments on the consultation document, and these are appended at the end of council's submission.

The council would welcome the opportunity to be heard on its submission.

Please contact [REDACTED] Manager
Infrastructure Strategy, if you have any queries regarding Auckland Council's submission.

Yours sincerely,

[REDACTED]

Chair of the
Planning Committee

Deputy Chair of the
Planning Committee

Independent Māori
Statutory Board

Deputy Mayor

Auckland Council Submission

**The New Zealand Infrastructure Commission, Te Waihanga
Infrastructure Strategy Consultation Document *He Tūāpapa ki te Ora,
Infrastructure for a Better Future***

Submission to the New Zealand Infrastructure Commission, Te Waihanga, on the Infrastructure Strategy Consultation Document *He Tūāpapa ki te Ora, Infrastructure for a Better Future*.

1. Auckland Council (the council) welcomes the opportunity to make a submission to the New Zealand Infrastructure Commission, Te Waihanga, Infrastructure Strategy Consultation Document *He Tūāpapa ki te Ora, Infrastructure for a Better Future*.
2. It includes input from Council Controlled Organisations (CCOs) Watercare Services Limited and Auckland Transport.
2. The submission is organised by the council's key submission points and the 36 discussion questions set out in the consultation document.
3. This submission has been approved by the council's Planning Committee. The address for service is Auckland Council, Private Bag 92300, Auckland 1142.
4. The council has also sought the views of its local boards. Their views are included in Attachment A: Local Board Views.
5. Please direct any enquiries to [REDACTED], Manager Infrastructure Strategy, Auckland Plan Strategy, at [REDACTED]

The council's key submission points

7. The council supports the proposed overarching **commitment of the Infrastructure Strategy in ensuring that Te Tiriti o Waitangi** is at the centre of all infrastructure commitments and decisions in Aotearoa. The council recognises and supports the overall principle that Infrastructure should support and be guided by Oranga Tangata – the wellbeing of all people. This commitment should be reflected in the proposed 2050 infrastructure vision for New Zealand ensuring that partnership with Māori and Mātauranga Māori lead future infrastructure development and delivery and that the strategy meets its aspirations in delivering on the principles of Te Tiriti o Waitangi.
8. The council supports the work of the Te Ao Māori Testing Panel to support the Infrastructure Commission's delivery and implementation of the Infrastructure Strategy. Direct engagement with iwi Māori and Mataawaka groups must be delivered by the New Zealand Infrastructure Commission to understand the barriers that Māori are facing in unlocking Infrastructure opportunities. Auckland Council supports Te Ao Māori Testing Panel in its work with Te Arawhiti (Māori-Crown relations) to design and deliver an engagement approach that best delivers opportunities and outcomes for all Māori. This engagement approach must tailor approaches for Mana Whenua and Mataawaka groups respectively.

9. **There is a lack of natural environmental considerations at the vision and outcomes level, and then subsequently within proposed actions.** This is concerning as the natural environment was a top priority identified through public feedback and is the underpinning direction of recent central and upcoming (and local) government strategies and legislation. This includes within the Essential Freshwater package including concepts of te mana o te wai, Draft NPS Indigenous Biodiversity, Aotearoa New Zealand Biodiversity Strategy, Climate Change Response (Zero Carbon) Act 2019/ Ināia tonu nei: a low emissions future for Aotearoa, upcoming resource management system reforms among others associated with transport, housing, energy and waste. Infrastructure decisions/delivery is closely interconnected with the health and wellbeing of the natural environment, which New Zealanders see as critically important. Infrastructure has been a leading contributor to natural environment degradation and can lock in ongoing determinate impacts. However, when carefully considered, infrastructure can protect, restore and enhance our natural environment, reduce our effects on climate change and increase our resilience to its impacts. This should be integrated throughout the Infrastructure Strategy and must align with existing strategic, policy and legislative comments; suggestions are provided within our response to each question below.
10. The council supports the intention of the actions on climate change. We generally support the climate change action areas including incorporating emissions into our decision making. The government and Auckland Council have declared a climate emergency and we suggest this term more appropriately emphasises the urgency. The council feels that the opportunity for **emissions reductions achieved through where and how we grow is not adequately addressed**. This discussion document promotes the coordination of housing and infrastructure and, if done well, this could see significant reductions in emissions. This document should reflect the importance of compact urban form (the form of urban growth), generally resulting in shorter distances for infrastructure (and therefore less embodied energy) as well as supporting better use of existing infrastructure. This document could also better reflect the direction set out in Hīkina te Kohupara – Kia mauri ora ai te iwi, Transport Emissions: Pathways to Net Zero by 2050.
11. Climate change adaptation includes retreat. The council feels there is **insufficient attention paid in the document to the option of managed retreat**. There has been, and will continue to be, coastal and floodplain areas across New Zealand where the best option will be to manage the retreat of communities by removing buildings and infrastructure. While the document captures the concept of non-built solutions, as well as keeping all options open, managed retreat is a real issue for infrastructure providers, for which it has limited control to implement. Auckland Council has recently released [erosion susceptibility maps](#) which indicate the threat our coastal infrastructure and private property are facing over the next 30, 50 and 100 years. The extent of erosion, particularly into private property, shows the need for managed retreat to be considered as a real option. Many councils across New Zealand would face a similar situation.
12. **ZeroWaste and a circular economy will require regulation.** This includes regulation for the use of recycled materials in construction, efficient pricing of waste supported by

mandatory product and packaging stewardship to prevent dumping, and regulation to eliminate construction waste (including deconstruction).

13. There are “enabling actions” for infrastructure investments to undergo less control and time spent understanding the effects and benefits (i.e. S7.3 Develop a planning system that is more enabling for infrastructure) but in other sections, particularly with respect to understanding climate and improving our cost-benefit analysis to evaluate environment and social costs, there are actions to increase scrutiny, impact analysis and optioneering requirements. **The council suggests that the Commission expands further how actions that are potentially conflicting, will be resolved.**
14. **Local democracy must be maintained through legislative reform.** The council considers that with current legislative reform, there is a risk of eroding community engagement and allowance for local democracy. Infrastructure serves communities and therefore, the council considers local community voices and needs are an important part of infrastructure decision making.
15. That **environment and equity should be added as priorities.** The council note that investment prioritisation and project creation processes must value something quite different to what they do now to enable infrastructure to contribute to the environment and equity. This should be priority work for the Commission including in relation to new pricing mechanisms.
16. **Infrastructure financing and funding** – the council supports the criticality of infrastructure financing and funding as being at the heart of our success in Auckland and New Zealand to deliver on a 30-year Infrastructure Strategy. The council agrees with the difficulties identified with infrastructure financing and funding, the infrastructure deficit and the current gap in the ability to pay for the required infrastructure. The council has previously suggested new tools to address this such as:
 - providing a share of the GST collected in Auckland
 - returning some or all of the GST collected on Auckland Council rates (eliminating the inequity of a tax being set on a tax)
 - making properties used for Crown activities rateable
 - enable councils that are tourism centres to apply an accommodation levy or bed tax.

To aid infrastructure funding and financing we also strongly support a requirement to consider non-built solutions, such as demand management and compact urban form, against the costs and benefits of new infrastructure, to ensure we get the most from our existing infrastructure.
17. **Housing** – the council supports increasing housing capacity and affordability. The Commission suggested consistent national planning rules and targets, and centralisation of decision making to enable housing. The council suggests a top-down planning approach that focuses on delivering quantity, be balanced with providing high quality

urban environments. This is to avoid repeating the urban infrastructure and servicing problems that Auckland is currently dealing with.

18. The council agrees that a key area of focus should be on improving the **coordination of infrastructure and land use planning** as this is a significant issue, along with responding to ‘**out of sequence development**’, that infrastructure providers face. The council has a major role in this coordination and collaborates with other infrastructure providers, and in partnership with central government to achieve this. Improved system-wide coordination would result in better outcomes, that minimise disruption and which are fit-for-purpose and better integrated to the existing and future urban fabric.
19. In order to improve coordination across the infrastructure sector, the council supports the proposed recommendation of implementing **regional spatial planning**, where all the infrastructure elements needed for Auckland are planned for together and that these plans are not misaligned/ inconsistent with funding plans. Significant shifts to policy and regulatory levers have flow on impacts which must be considered and planned for.

Specific matters- discussion questions

Q1. What are your views on the proposed 2050 infrastructure vision for New Zealand?

20. The council supports an overarching vision for infrastructure.
21. The council supports the overarching commitment of the proposed Infrastructure Strategy in ensuring that Te Tiriti o Waitangi is at the centre of all infrastructure commitments and decisions in Aotearoa. We recognise and support the overall principle that Infrastructure should support and be guided by Oranga Tangata – the wellbeing of all people.
22. This commitment should be reflected in the proposed 2050 infrastructure vision for New Zealand ensuring that partnership with Māori and Mātauranga Māori lead future infrastructure development and delivery, and that the strategy meets its aspirations in delivering on the principles of Te Tiriti o Waitangi.
23. The council notes there is limited reference to the natural environment in the vision (places is human-centric language and could mean urbanised places). As previously outlined, an infrastructure vision must consider the role of infrastructure in contributing to positive environmental outcomes. It is noted that many national strategic and policy directives and Cabinet’s directions for resource management system reform use the concepts of te mana o te wai and/or te mana o te taiao to express that freshwater/ environmental health and wellbeing must be prioritised in decision making. The proposed Infrastructure Strategy vision should incorporate these concepts to improve alignment.

Q2. What are your views on the decision-making principles we’ve chosen? Are there others that should be included?

24. The council supports the decision-making outcomes and principles that the proposed Infrastructure Strategy is based on but affirm that commitments and decision-making principles to and for Maori should be made explicit and integrated through both the outcomes and principles within the document.
25. The council proposes that the Te Tiriti partnership, its deliverables, and outcomes as part of the Infrastructure Strategy are integrated and delivered as a separate principle to guide the document and its outcomes.
26. **Transformative** should be added as an outcome that guides infrastructure investment decisions. Infrastructure decisions should support communities and New Zealand to make essential transitions. This would balance the other outcomes, support the future-focussed decision-making principle, and better align with the proposed *Building a Better Future* action area.
27. The council supports the proposed principle of being '**Future-focused**' to ensure our infrastructure is adaptable and responds to changing circumstances. We also support the proposed principle of being '**Integrated**' to avoid siloed thinking and decision making. Thinking about the future can sometimes be seen as a nice to have and difficult due to the high levels of uncertainty associated with it. However, if applied well it can help make decisions when faced with rapid change and a diverse range of options through understanding current assumptions and future aspirations and values. This is important as we are in a period of rapidly changing technology, behaviours, environment and climate.
28. Infrastructure plays a significant role in natural environment and climate outcomes and the decisions we make can actively promote and restore natural environments, including the prioritisation of green infrastructure and nature-based solutions. Natural environment and climate outcomes must be considered at the highest strategic level to ensure they are adequately considered in subsequent action and priority areas. It is suggested reference to a circular economy may also be useful here as it applies to all infrastructure.
29. In principle, the council supports '**Evidence-based: Infrastructure decisions are based on robust and accurate information about costs, benefits, risks, and wider positive and negative impacts, including the quantifications of costs, benefits and risks wherever possible**'. The council supports that accurate information on cost be included at an early stage, as it is often overlooked, along with the funding and financing mechanisms. However, information on projects develops as it is progressed, meaning that associated decision-making should be iterative, acknowledging key gaps and how these are addressed as the project moves forward.
30. The traditional 'whole life costing' almost always favours large and centralised infrastructure investment, which in turn creates the risk of path dependency. When using cost benefit models, it is important to ensure that environmental and cultural

values are considered. For example, the intangible cultural and well-being value of water is difficult to monetise and include in conventional cost-benefit analyses.

31. There is a tension between traditional infrastructure assessment that leads to large and centralised (“economically efficient”) solutions and more distributed smaller investments that leave options open, as adapting to climate impacts becomes more urgent. Transforming to a more adaptive approach in which all options remain open essentially through smaller staged investments, can contribute to better infrastructure decisions.

Q3. Are there any other infrastructure issues, challenges or opportunities that we should consider?

Challenges

32. Engagement and partnership with Māori is a key opportunity for growth and a challenge that the infrastructure industry needs to recognise and develop with and from. Māori led and Mātauranga Māori solutions to the challenges that the infrastructure sector is facing need to be centre to any government response. We recognise that the proposed Infrastructure Strategy centres its response in better responding and partnering with Māori however this challenge is not followed through with actions. Refer to responses to questions 15-17.
33. There should be reference to challenges affecting natural environment values as these directly relate to how, where and what infrastructure should be delivered. This should include challenges in protecting and enhancing biodiversity values, also called the **‘biodiversity crisis’** with reference to the New Zealand Biodiversity Strategy and proposed NPS Indigenous Biodiversity and the challenges in protecting and enhancing freshwater values with reference to the NPS Freshwater Management 2020. The council considers that infrastructure projects should abide by national and regional/local rules for the protection of indigenous habitats, and in particular coastal habitats as impacts of infrastructure on the natural environment is an ongoing issue.
34. *“New Zealand’s infrastructure challenge is growing: (page 29)”* - funding infrastructure for large-scale greenfield and brownfield development led by private sector interests is a major issue for the council, including how private developers pay their fair share of infrastructure.
35. *“Climate change is the defining challenge of this century and demands a new approach to infrastructure (page 46)”* - In recognition of the climate change challenge Auckland Council has put in place Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan to ensure the challenges are managed through a planned process. New Zealand also declared a climate emergency in 2020 which more accurately reflects the nature of the threat we are facing, as highlighted in several places in the document. More reference could be made to the climate emergency in the document.
36. Two additional needs should be included. It is important to recognise:

- upholding local democracy and local decision-making (e.g. community engagement), and
- positive place-making outcomes and respecting the specific context when delivering infrastructure. One size does not fit all. Currently the 19 areas make no mention of these two critical needs.

Long term trends on the infrastructure horizon

37. This section (page 34) doesn't seem to recognise the issue that the delivery of infrastructure has led to ongoing environmental degradation, including of biodiversity and the health of freshwater and coastal ecosystems. There are a number of reforms on the horizon that address this degradation which will have a significant impact on infrastructure operation, planning and development. These include a new NPS for indigenous biodiversity and a Natural and Built Environments Act which is anticipated to introduce the concept of te mana o te taiao and requirements to set environmental natural limits, outcomes and targets. This section (i.e. page 36) should reference:
 - Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy (which includes existing commitments associated with making nature-based systems and green infrastructure common practice)
 - proposed NPS-Indigenous Biodiversity
 - NPS-Urban Development 2020
 - Essential Freshwater Package, namely NPS-Freshwater Management 2020
38. Biodiversity is also in decline which is in-part due to climate change but also from how and where we build. This is another long-term trend that could adversely impact on our economy and society and so we propose including a reference to the 'biodiversity crises' or 'degradation of biodiversity' as one of the long-term trends which could potentially impact infrastructure. Reference should be made to the use of green infrastructure or nature-based solutions as an infrastructure solution.
39. Council considers that nature-based solutions are using the natural functions of ecosystems and ecosystem services to act as essential infrastructure, for example restoring and using a stream for stormwater management, including naturalising/daylighting and riparian planting for hydrological and treatment purposes. The Te Auaunga Awa restoration project is an example of this approach where the stream is also considered "green infrastructure". Green infrastructure can also include smaller semi-natural constructed assets like rain gardens.

Unique features of infrastructure

40. Whilst it is important to recognise that infrastructure is long-lived, its footprint is even more so as people will tend to stay in or use those areas with good infrastructure even as the type of buildings change. The council recognises that where we build is important when we are thinking intergenerationally and with a long-term impact of climate change lens because we may be locking generations of people into those areas.

Q4. For the ‘Building a Better Future’ Action Area and the Needs:

• What do you agree with?

41. The council supports the proposed action area and needs “Supporting a zero-carbon economy and preparing for climate change”. However, we have made additional comment on specific aspects of this below.

• What do you disagree with?

42. The need to ‘prepare infrastructure for climate change’ seems to focus on protecting infrastructure rather than delivering infrastructure that is sensitive to environmental outcomes or effects on climate change. The description of the action should be amended to “Delivering infrastructure that protects and restores the natural environment, is sensitive to effects on climate change and is resilient to stresses, shocks and change.” This should be supported by ‘needs’ that promote the protection and restoration of the natural environment.

• Are there any gaps?

43. The council strongly supports a partnership approach with Māori to inform Infrastructure investment and to ensure infrastructure is resilient and meets the needs of all New Zealanders. Partnership will require relationships with all levels of iwi and draw upon the relevant technical and advisory skills within iwi and Māori communities to ensure infrastructure investment, development and delivery is led by and centred in a Te Ao Māori lens and perspective.
44. Environmental outcomes should be considered in the ‘building a better future’ action area. Given that the environment was identified as a top priority for infrastructure decision-making processes there needs to be an action area to embed environmental outcomes in infrastructure decision-making processes. The current action does not adequately respond to the quoted “what we’ve heard” survey results.
45. Following the inclusion of a natural environment focused ‘action area’ and ‘need’ (i.e. page 42-45), detailed comments should stem from this demonstrating what this looks like. For example, prioritising green infrastructure as standard practice (in-line with the Aotearoa New Zealand Biodiversity Strategy) and maximising ecological restoration opportunities in infrastructure delivery (i.e. planting, stream daylighting/restoration etc.).

Supporting a zero-carbon economy and preparing for climate change

Mitigation

46. The council does not feel emissions reduction has been adequately addressed. This consultation document promotes the coordination of housing and infrastructure and, if done well, this could see significant reductions in emissions. This document should reflect the importance of compact urban form, generally resulting in shorter distances for

infrastructure (and therefore less embodied energy) as well as better use of existing infrastructure where there is capacity in the existing infrastructure. This document should better reflect the direction set out in Hīkina te Kohupara – Kia mauri ora ai te iwi, Transport Emissions: Pathways to Net Zero by 2050.

47. The council notes that the proposed regional spatial planning recommendations provides an opportunity to bring together the broader outcomes of climate change, growth, biodiversity etc. and address them in a way that integrates land use and infrastructure.
48. Many infrastructure projects have both an embodied carbon footprint during the construction phase but also lock in long term operational emissions to run the infrastructure e.g., energy in a building or wastewater treatment plant. Infrastructure project assessment should include the capital and operational costs as well as contributing carbon in these areas. Infrastructure we deliver today will have an impact on the ability to achieve net-zero targets in the future. We support the assessment of carbon emissions and propose the use of “carbon TOTEX” (total expenditure) to understand life cycle impacts. We suggest PAS2080 or similar is used to standardise this.

Adaptation

49. The council considers when discussing resilience of infrastructure to the effects of climate change reference should be made to prioritising resilient infrastructural approaches, such as protecting and restoring natural environments as part of infrastructure delivery and incorporating green infrastructure.
50. The council recognises there is deep uncertainty with the future impacts of climate change especially over the longer-term horizon. This directly affects the council as asset planning can often have a life span up to 100 years. For example, Auckland Transport has identified which of their assets are at risk from the impacts of climate change for a range of scenarios (including rising sea levels, higher temperatures and more extreme weather events). Analysis shows this may impact over 1,000km (13%) of the AT network within the next 100 years.
51. The council recommends [dynamic adaptive pathways](#) approach is a requirement for infrastructure development planning and suggest it is named as the approach described in F1.2 to support flexibility when all of the information is not available today or the uncertainty is too high.
52. Both mitigation and adaptation can affect what, where and how we build. Mitigation for example may mean considering places for their carbon sequestration value and not building on those.
53. Adaptation may mean modifying existing or the build of new infrastructure to changing conditions – for example road surface and rail infrastructure materials modified to operate under higher temperatures or buildings integrating cooling and shading. The

council proposes changing the text to “Mitigating the effects of climate change and adapting to its impacts will affect what, and particularly, where and how we build.”

54. This section focuses on transport and waste as major contributors to greenhouse gases. It must be acknowledged however that preparing for climate change also requires increasing resilience of all infrastructure, in particular as a result of adverse weather conditions and increasing sea level rise – this applies to all infrastructure.
55. Regarding item ‘F1.6 Require local government to consider information from insurance markets to inform climate-risk-related planning policy’ a consistent approach must be developed to manage areas that can no longer be insured due to increased flooding or other risk.

Ensure the security and resilience of critical infrastructure

56. The council supports the proposed establishment of a definition of “critical national infrastructure” in F6.1 and F6.2. This definition should also specifically include water treatment plants, wastewater treatment plants, associated networks, and the sources of drinking water.
57. In relation to resilience, we recommend that the proposed Infrastructure Strategy substantially explore this topic. There should be a standardised definition of infrastructure risk and infrastructure resilience used within the proposed Strategy. This could build in the [NZTA resilient network](#) framework and/or the proposed definition for Auckland Council in our 2021 Infrastructure Strategy.
58. Many infrastructure providers assume a “high consequence, low probability” failure scenario that can lead to conservative, risk avoidance behaviours, so uptake of new methods and technologies to enhance resiliency can be slow.
59. A tangible, and pragmatic pathway to enable an increase of resiliency of New Zealand’s existing and future critical infrastructure should be provided within the proposed Infrastructure Strategy. Enhancing infrastructural resilience may increase financial costs and intensify greenhouse gas emissions in some instances. This is because at times, increasing infrastructure resilience can mean implementing options such as increasing the redundancy and duplication into existing and future systems. Encouraging and enabling the exploration of such options and alternatives should be a focus within the proposed Strategy.

Q5. How could we better encourage low-carbon transport journeys, such as public transport, walking, cycling, and the use of electric vehicles including electric bikes and micro-mobility devices?

60. The council considers urban form as a powerful enabler of emission reductions in established urban areas. It influences the distance people need to travel to access opportunities such as employment, education, shops, and services. It also affects how people travel by influencing the range and quality of transport options.

61. The Auckland Plan 2050, Auckland's 30-year spatial strategy, takes a quality compact approach to growth and development. The quality compact urban form approach is also a priority action area in Tāruke-ā-Tāwhiri Auckland's Climate Plan (Action B1) and an objective in the Auckland Unitary Plan (B2.2.1). This approach reduces trip distances and car dependence, and encourages the uptake of walking, cycling, and public transport.
62. Prioritising the use of public transport and the delivery of walking and cycling routes on main roads to facilitate all modes of transport is key to encouraging low carbon journeys.

Q6. How else can we use infrastructure to reduce waste to landfill?

Thinking about waste differently

63. The proposed Infrastructure Strategy identifies partnership with Māori as a key solution to creating and managing infrastructure investment, this partnership should extend to the development of pathways to better manage waste. Mātauranga Māori must inform the development and delivery of waste reduction programs and services. Te Ao Māori and Mātauranga Māori provide a holistic viewpoint that will ensure that environmental outcomes are managed and that the mauri of the taiao is restored. The proposed Infrastructure Strategy needs to draw upon the expertise of iwi māori in creating infrastructure that delivers outcomes in alignment with Mātauranga Māori.
64. Te Mahere Whakahaere me te Whakaiti Tukunga Para i Tamāki Makaurau – Auckland Waste Management and Minimisation Plan 2018 outlines a Zero Waste vision for Auckland by 2040 that considers care for people and the environment. Central to this is the waste hierarchy; that is, to reduce or avoid waste in the first instance. We would like to see the proposed Infrastructure Strategy give greater emphasis to solutions that will promote a circular economy and resource recovery. The council would welcome a greater focus on regulation and incentives for processes that sit high on the waste hierarchy. This will result in better 'whole of life' design of products, thereby reducing the need for waste disposal.

Circular economy

65. In line with the principle of circular economy there are many initiatives that can be undertaken at the central government level to encourage waste minimisation. These are listed below:
 - Effective pricing of waste, as identified in the document, is supported by the council as it aligns with our advocacy for a significant, progressive increase to the current waste levy and support for the expansion of the waste levy to apply across all classifications of landfill, however it must be acknowledged that this will likely encourage illegal dumping. A mandatory nation-wide product stewardship and waste tracking scheme will therefore be required to support this.

- Supporting product stewardship as an effective legislative tool to factor in end-of-life costs within the life-cycle of a product and enabling the necessary resource recovery or disposal infrastructure required.
- Strengthened waste legislation to transform the waste sector and help the transition to a more circular and resource-efficient economy at both a regional and national level.
- Changing construction methods and practices to achieve zero construction waste.
- Supporting a well-being based procurement approach.
- Creation or supporting information sharing platforms for reuse of construction waste.
- Supporting of a network of regional recycling facilities¹. Large-scale resource recovery infrastructure needs to be adaptive to changing markets and recovering high quality material and developing more local recycling processing capacity are two ways the council is working to address challenges.
- Addressing the lack of end-market options across New Zealand. The council notes that despite the recent investment of \$16.6 million through the government's Covid-19 Response and Recovery Fund, which enables the council to undertake a significant upgrade of the region's Materials Recovery Facility in Onehunga, there still remains a lack of end-market options.
- Research and development funding for innovative and/or reused materials.
- Recovered waste as a resource for use in infrastructure construction.
- Embrace and support innovative construction technologies and solution which focus on zero emission (such as green infrastructure).
- Incorporating maintenance lead design: focus on longevity, maintenance and decommissioning methods while addressing carbon emissions.

66. **Recovering waste as a resource for use in infrastructure construction** requires a provision for regulated use of recycled materials in the infrastructure construction industry. Development of relevant technical specifications and national standards is needed for re-use of recycled construction materials, e.g., crushed concrete aggregate, crushed glass, timber from residential demolitions, etc. This would also require a shift in specifiers approach, e.g. specifiers should consider specifying concretes which incorporate supplementary cementitious materials to reduce the carbon emission during concrete production.

67. The council has been advocating for a national approach to develop options for post-consumer packaging, in particular paper/cardboard². The council strongly recommends the proposed Infrastructure Strategy incorporate outcomes from recent work

¹ As in the Auckland Council revised Resource Recovery Network strategy (adopted 11th February 2021) include opening 23 facilities by 2031, compared with the proposed 12 in Auckland's Waste Management and Minimisation Plan 2018. This includes nine additional Community Recycling Centres (CRC) and two Resource Recovery Parks (RRP). Auckland Council is aiming for a Community Recycling Centre to be located within a 30-minute drive of all residents.

² <https://www.tvnz.co.nz/one-news/new-zealand/auckland-council-looks-options-disposing-paper-nation-drowning-in-waste>

commissioned by the Ministry for the Environment in 2020 on Aotearoa-New Zealand's paper/cardboard recycling and processing infrastructure.

68. **Construction and demolition waste** consistently figures as the largest source of waste in Auckland with around half of all waste generated in Auckland coming from this source. **Deconstruction hubs** will be critical to reducing construction and demolition waste and tools and incentives to encourage this kind of infrastructure is important. Construction and demolition waste diversion is dependent on logistics. There needs to be a balance between large plants that can gain economy of scale against localised facilities that are don't incur high transport costs or increase time.

Focus on the upper tiers of the waste hierarchy

69. The council is concerned the actions currently focus on the lower waste-hierarchy tiers (i.e. MRFs, landfills and waste-to-energy) and believes that resource recovery must be considered and invested in first, before gas capture in landfills; especially where funding from the Waste Levy provides the impetus to divert this waste from landfill. This is especially pertinent for methane emitting organic material (green waste, food scraps, timber, textiles, biosolids etc.) which have positive recovery options and co-benefits including enhancing the circular economy and creating green jobs.
70. Focus is needed on infrastructure that helps to design out waste, drive diversion and support resource recovery over disposal to landfill. For example, in the construction and demolition sector as one key industry sector with huge potential for circularity, where, with strong regulatory intervention from Government, waste can be:
- designed out of the procurement process through careful material selection (i.e., mandate recycled aggregate);
 - buildings are constructed of materials that can be deconstructed at end of life and used again;
 - high methane-emitting wastes such as plasterboard and timber are diverted from landfill; and
 - targets are mandated for recovery of materials – incentivising deconstruction over demolition.

Scale of resource recovery

71. On page 50 of the consultation document, a statement is made that centralisation of waste facilities might contribute to better waste management. Centralisation is essential for certain large scale processing facilities to allow smaller regions or organisations to implement necessary complementary local infrastructure. However, enabling access to local infrastructure for local communities to minimise waste should not be overlooked. A strong local network of collection locations is essential for community behaviour change.

Waste to energy

72. The council suggests that, as well as capturing and using methane gas from decomposition, beneficial use of organic materials and its diversion from landfill should be prioritised.

73. It is important that any demand for electricity from waste materials does not diminish the investment in recovery of materials as a priority, including organic materials, and/or other forms of energy. Investing in last resort technologies and infrastructure such as incineration or landfill gas capture systems should not be given priority over investment in the diversion and recovery of energy and materials.
74. The council acknowledges the proposed Strategy's point on page 51 regarding reducing waste by "using energy-dense waste products as fuel for existing processes, for example by burning tyres to generate the heat to make cement". Regarding other waste-to-energy applications and infrastructure, the council supports national guidance recently published by the Ministry for the Environment³. We support the use of separated bio-based feedstocks to generate energy and useful by-products, particularly where other recycling or composting alternatives are not viable.
75. Further, as outlined in the council's submission to the Climate Change Commission, the council highlighted that if materials with non-renewable fossil-fuel content (such as plastic packaging, tyres, or textiles made from plastics) are used to generate energy, the waste sector's carbon emissions profile will increase.

Q7. What infrastructure issues could be included in the scope of a national energy strategy?

No comments.

Q8. Is there a role for renewable energy zones in achieving New Zealand's 2050 net-zero carbon emissions target?

No comments.

Q9. Of the recommendations and suggestions identified in the Ministry of Business, Innovation and Employment "accelerating electrification" document, which do you favour for inclusion in the Infrastructure Strategy and why?

76. Auckland Council has produced a [submission](#) on this document which identifies our preferred recommendations and suggestions in more detail.
77. The council notes many of the policies proposed in the discussion document have the potential to adversely affect communities that are involved in EIH Industries and supply fossil fuels and non-renewable electricity. It is important that the transition away from fossil fuels is just and that impacted communities benefit from the transition to renewable energy.

³ <https://www.mfe.govt.nz/sites/default/files/media/Waste/waste-to-energy-guide-for-new-zealand.pdf>

Q10. What steps could be taken to improve the collection and availability of data on existing infrastructure assets and improve data transparency in the infrastructure sector?

Data standardisation

78. The council generally supports standardisation of asset management data. A set of minimum standards mandated by central government policy, if developed sensibly with local government and large central government asset owners, would lead to a broad-based improvement in understanding the state of our assets, better planning, and better value for ratepayers and taxpayers. It would also potentially reduce the cost of infrastructure, for instance, by helping asset owners develop more sophisticated renewals programmes.
79. As an example, within the water industry, the proposed Infrastructure Strategy could advocate for the adoption of international water industry data standardisation, the collection of data through best practice and the implementation of connected data environments within organisations. This process has been developed previously (3Waters meta-data standards) but was not rolled out nationally.
80. The council suggests that maintenance and renewals of land transport assets, including bridges, retaining walls and road drainage should be based on a standardised asset-needs basis for all local road controlling authorities.
81. Data standardisation could drive improvements in asset management data, which, as mentioned in the consultation document, is important in generating value from new technologies – such as digital twins. Therefore, we consider that asset data standards should be prioritised ahead of the adoption of these new technologies.
82. The council notes there can be a significant cost in data standardisation so the development and roll out (i.e. data collection and data management system change) would need to be appropriately funded.

A central government role in infrastructure data

83. The council considers that there is an important role for central government to play in infrastructure data, both in regard to delivering efficiencies and managing open data.
84. A national approach to infrastructure data has the potential to produce efficiencies in mapping, data gathering, and modelling. For instance, aerial photography provides a good source of information, however translating this information to usable data is difficult. There are economies of scale if this were to be undertaken at national level.
85. The proposed Infrastructure Strategy makes several recommendations for infrastructure providers and other data holders with regards to open data and open data metadata standards. New Zealand is too small for there to be multiple systems of open data

hosting competing. This is what is likely to happen if there is no central service provided. Uptake is also likely to be slow unless a single provider is formed. These points also neglect the analytics and modelling which should be in place when large data sets are collected. The data and the modelling behind the data should both be transparent. The council recommends that the proposed Infrastructure Strategy creates specific actions with regards to these points, as shown below;

- a single open data portal is set up which is financed and supported by central government for infrastructure providers to use;
- this provider both develops and enforces through the service a set of common national infrastructure metadata standards;
- infrastructure providers are encouraged to upload spatially referenced infrastructure data to said provider;
- said service should allow for selecting sharing of data, by a provider (to other providers and the public) but the provider should maintain control of the data on the portal and the provider's data is shared; and
- the portal should also include modelling and analytics facilities for infrastructure providers. Example portals include DAFNI: Data & Analytics Facility for National Infrastructure and NISMOD: National Infrastructure Systems MODEL in the UK.

86. This allows for a single metadata and national modelling system to be provided for the entire country and may make it more likely smaller infrastructure providers use this sort of resource. This resource may also enable the development of digital twins for the public-sector assets, as models and data could be shared within the service between providers. A similar system may also be useful for building information for private infrastructure.

Potential use of machine learning and artificial intelligence

87. There is a risk that machine learning and artificial Intelligence are being developed using data sets and assumptions that include [hidden biases](#) which risk reinforcing current diversity and inclusion issues. The council proposes that F3.4 Design and launch artificial intelligence use-cases should be to 'investigate risks and opportunities to use artificial intelligence and machine learning'.

Implications for environmental management

88. The council acknowledges the significant links between infrastructure and environmental management. We recognise the potential for openly held and quality infrastructure data (for instance, data associated with water takes - availability, monitoring, etc.) to benefit the council's resource management activities. The availability of this data in one place could help infrastructure planning and management decisions. The data would also help to assess how well environmental outcomes are delivered as part of infrastructure delivery and operation and assist with the assessment (and consideration) of cumulative impacts.

89. Data collection and reporting on resource and waste flows is critical to plan waste minimisation services. Likewise, the Waste Assessments and Waste Management and Minimisation Plans that all territorial authorities are required to produce are useful tools to assist with infrastructure planning. The council supports the work the Ministry for the Environment is doing to develop better ways to capture and report on waste data, and we recognise the need for greater regulation to enable the capture of waste and resource flows outside public sector control. The State of Play 'Resource Recovery and Waste' discussion document and Ministry for the Environment infrastructure stock take provide valuable information for local authorities to plan. They also outline the gaps currently existing in the system. The proposed Infrastructure Strategy should take both these documents into account and provide reference.

Q11. What are the most important regulatory or legislative barriers to technology adoption for infrastructure providers that need to be addressed?

Procurement

90. The council agrees that procurement systems could be reshaped to support better infrastructure decision-making. However, it is considered that the uptake of new technology should not be the end goal of any changes. Instead, the procurement change necessary is towards longer-term consideration of investment outcomes, towards infrastructure solutions that offer adaptability to developing pressures and solutions (new technologies), and to the delivery of well-being targets. This is particularly important for infrastructure being a sector of long-term assets and would likely result in greater adoption of new technologies if the return-on-investment of adopting a new technology was considered over the whole life-span of an asset.

Regulation

91. The council acknowledges that the consultation draft notes the need for regulation to keep up with technology. The council would add that support also needs to be given for the implementation of changing technology/regulation. The council recommends that central government policy statements must be backed up by specific practice and guidance notes for practical use at the level of local government planners. This would help to overcome:
- The tendency within local councils to be mainly conservative when assessing new infrastructure technologies; and
 - The costs of testing and certification, for instance in the stormwater sector there are a number of innovative stormwater management devices that could provide cost-effective solutions. However, as there is no nation-wide framework for the testing and certification of these devices, this role falls on local government when funds are available.

Q12. How can we achieve greater adoption of building information modelling (BIM) by the building industry?

92. As suggested in the consultation document, adoption of BIM would likely require regulation and support (technological, upskilling and funding) for the implementation. This could be provided for example, through codes of practice.
93. As noted in response to question 10 with regard to digital twins, use of BIM is dependent on the quality of data inputs available. This would require nationally adopted data standards and agreed data platforms.

Q13. How should communities facing population decline change the way they provide and manage infrastructure services?

94. As a region, Auckland is facing pressures of significantly increasing growth, so this is not an area of focus for the council currently.
95. Population uncertainty is a challenge in infrastructure planning, and we note that even in Auckland, an increasing population is not certain. Given the acknowledgement of this uncertainty in the consultation document, we recommend that the phrase 'certain to grow' on page 65 is altered.

Q14. Does New Zealand need a Population Strategy that sets out a preferred population growth path, to reduce demand uncertainty and improve infrastructure planning?

96. The proposal to require local government planning to be tested against a low, medium and high population scenario has strong links to the requirements of the National Policy Statement: Urban Development. The council notes that this may add to workloads in some instances. However, we agree that population scenarios are useful and necessary for a city the size of Auckland to find the 'thresholds' where investments no longer make sense or require re-scoping. At a minimum, the three population scenarios should be required to be considered by infrastructure providers.
97. The population scenario point leads to a wider point around understanding uncertainty in infrastructure planning. Not only should the three demographic scenarios be tested, they should be used alongside other scenarios (such as climate change scenarios) to identify critical thresholds, policy and investment levers. These scenarios cannot be considered in isolation. This understanding would go a long way to managing infrastructure risks around uncertainty.

Q15. What steps can be taken to improve collaboration with Māori through the process of planning, designing and delivering infrastructure?

98. The council supports the work of the Te Ao Māori Testing Panel to support the Infrastructure Commissions' delivery and implementation of the proposed Infrastructure Strategy. This group provides the technical and Te Ao Māori rigor to ensure that the delivery and implementation of the proposed Infrastructure Strategy aligns with and is produced through a Te Ao Maori Lens and viewpoint.
99. Direct engagement with iwi Māori and Mataawaka groups must be delivered by the New Zealand Infrastructure Commission to understand the barriers that Māori are facing in unlocking Infrastructure opportunities. The council supports the Te Ao Māori Testing

Panel in its work with Te Arawhiti (Māori-Crown relations) to design and deliver an engagement approach that best delivers opportunities and outcomes for all Māori. This engagement approach must tailor approaches for Mana Whenua and Mataawaka groups respectively. The council would like the intention of partnership with Māori in the proposed Infrastructure Strategy to move the Te Ao Maori input to be more than an advisory role, and to develop an engagement approach that creates enduring decision-making structures.

100. The commission should partner with Māori to identify how infrastructure investment can support Māori social procurement opportunities among infrastructure activities, such as recycling, waste management, design and construction activities.
101. The commission should partner closely with Māori to address equity considerations in order to avoid or mitigate negative or unintended effects for Māori. An initial step is to develop a comprehensive understanding of the impacts of proposed infrastructure decisions on the cultural, economic and social wellbeing of Māori.
102. In partnership with iwi and hapū, the commission should consider how infrastructure decisions can make Māori communities more resilient to the effects of climate change, such as coastal inundation and more frequent extreme weather events.

Q16. What steps could be taken to unlock greater infrastructure investment by Māori?

103. The Māori economy is growing and requires engagement by the Infrastructure Commission to understand the levers and access issues that can be unlocked to drive Māori Investment and participation within the Infrastructure sector. Auckland Council recommends that The Infrastructure Commission works with and seeks feedback from the Māori Economic Delivery Advisory Board to understand the Māori economy and align the proposed Infrastructure Strategy with the five goals of the Māori Economic Development Strategy (He Kai Kei Aku Ringa).

Q17. What actions should be taken to increase the participation and leadership of Māori across the infrastructure system?

104. The council notes the proposed Infrastructure Strategy must provide for opportunities for Māori to partner in infrastructure investment and delivery and ensure that the ethos of the proposed Infrastructure Strategy in being led and centered by Te Tiriti o Waitangi is realised. This will require policy and legislative output by central government that ensures and creates opportunities for Māori to lead and partner to infrastructure investment and delivery opportunities.

Q18. For the ‘Enabling Competitive Cities and Regions’ Action Area and the Needs:

105. The content provided in the consultation document covers the vast topics of coordinating and accommodating population growth, and housing affordability. The topic also overlaps significantly with other national work programmes including resource management system reform, the implementation of the National Policy Statement on

Urban Development and three waters reform. On these topics, the council makes the following overall points:

- The council agrees that a key area of focus should be on the coordination of infrastructure and land use planning. The council continues to work in this space internally, with other infrastructure providers, and in partnership with central government. This coordination role is one where a national Infrastructure Strategy has significant potential to deliver benefits.
- The council urges caution around too much focus on planning mechanisms as a limiting factor for growth/housing affordability. We note that the existing planning framework enables significant growth and we are concerned that the prioritisation of growth above all other considerations in a future planning framework may lead to perverse outcomes for quality built environments or efficient infrastructure provision.
- The council recommends careful and close alignment with resource management system reform and other associated central government reform. Potential misalignment of national direction may slow implementation and result in sub-optimal outcomes.
- The council endorses a focus on quality design that supports the development of water sensitive communities

The council also provides the following notes regarding the details in the consultation document.

• **What do you agree with?**

Integrated infrastructure and land-use planning

106. The council supports the proposed principle of coordinated infrastructure and land use planning as a valuable function of the proposed Infrastructure Strategy. We make the following comments regarding the details of this section:

- Note that reference 64 quotes incorrect figures. This reference is to an MR Cagney report which incorrectly takes high-level information from Auckland Council's Future Urban Land Supply Strategy (FULSS) and manipulates it to give a 'cost per dwelling' figure. The cost information in the FULSS was not intended to be applied in this way as it can produce inaccurate and misleading estimations. All areas and sites are different, with different infrastructure requirements and costs. In addition, the FULSS specifically sets out that while the costs are by decade, they do not correspond to the dwelling numbers by decade, as the costs necessarily fall within different decades (i.e., lead infrastructure).

Water sensitive cities

107. The council strongly supports that new housing development should mitigate impacts on water networks. Auckland has set potable water consumption targets for 2025, 2030 and 2050 and hope to out perform those targets. We aim to have water sensitive

communities which includes capturing what we can, decreasing runoff and supplementing our potable use with rainwater and other non-potable sources.

108. The council supports the need for a review into barriers to water sensitive design and note that gaps/contradictions can exist between strategic city shaping goals and on the ground practices, and between regional plans incentivising water sensitive urban design and a preference for traditional infrastructure approaches in policies and rules.

109. The council recommends that the scope of C2.6 should be broadened and strengthened:

- By adding the following to the existing direction "*Reduce the policy and practice barriers that exist to increasing the uptake and use of efficient water networks and improve water outcomes/Te Mana o te Wai*"
- By developing national planning standards around water sensitive urban design practices; and
- Through greater recognition of the wider benefits of water sensitive design and use of nature based solutions such as contribution to liveability, sustainability and resilience of urban development.

110. We note that Auckland is facing a legislation barrier to water sensitive development. Auckland is actively exploring alternative options for future drinking water supply for its customers. Options include the potential production of purified recycled water, and the use of desalinated seawater. Over time, this may include the recycling of wastewater from the large wastewater treatment plants at Māngere and Rosedale, as well as the smaller non-metropolitan wastewater treatment plants. Contemporary regulations and legislation, in effect, act as a barrier to explore the options of using purified recycled water or desalination for potable drinking water supplies. Watercare will be working actively with Taumata Arowai on this enabling policy work and consider that enabling a responsive planning system includes being responsive to future policy issues that enable new technologies.

• **What do you disagree with?**

Enable a responsive planning system

111. *The issue of limited housing supply:* the council acknowledges the unaffordability of housing in Auckland and supports increasing housing capacity and affordability. However, the council does not support focus in the consultation document on '*limited supply of opportunities to build new homes*'. Rather, we see that the high house prices are the result of [numerous factors](#), of which limited supply of opportunities to build new homes is one. All of these causes need to be explored in this proposed Infrastructure Strategy.

112. We agree we should enable a responsive planning system. In the case of Auckland and capacity for additional dwellings, a significant supply of opportunities to build new homes has been created through the Auckland Unitary Plan, however capacity continues to be assessed via implementation of the NPS UD (see below) and through future updates to

the Auckland Unitary Plan. The Auckland Plan 2050 sets out Auckland's capacity for growth, stating that the Auckland Unitary Plan enables capacity for approximately one million additional residential dwellings. This capacity is identified in both brownfield and greenfield locations, providing opportunities to build new homes both 'upwards' and 'outwards'. The latest construction data shows a very significant upsurge in consented (and built) new dwellings that are in good locations (within 1500m of centres and the Rapid Transit Network) and with higher density typologies than at any time per capita in New Zealand since 1973. For example, more attached than detached dwellings are being consented and built.

113. Current work to implement the NPS UD will address requirements to ensure that capacity is in locations that ensure multiple outcomes (i.e., around centres and Rapid Transit stations, which are highly accessible locations).
114. The issue of infrastructure financing and funding solutions needs to be considered further to ensure it does not become a limiting factor to the building of new homes.
115. We also offer the following comments regarding the points in C1.1
 - Section C1.1 proposes *Accelerating the implementation of the National Policy Statement on Urban Development (NPS-UD) requirements to upzone around rapid-transit and centres zones*. The NPS UD has set a challenging notification deadline of August 2022 for plan changes relating to the upzoning requirements. The council is on track to meet this deadline. This time is needed to develop a robust approach and evidence base that will support potentially widespread changes across Auckland. A robust approach should allow time to communicate with Auckland's communities about the potential nature and scale of change. Any acceleration of the requirements would not allow time for a robust approach and evidence base or community engagement.
 - Section C1.1 suggests *Clarifying definitions of 'environment' and 'amenity' to ensure that environmental protections are not applied to subjective amenity issues*. Auckland needs to be viewed holistically, incorporating more than just individual elements such as infrastructure and housing. Amenity is one part of this system and contributes to Auckland as a whole. The amenity discussion is broader than infrastructure and is not supported as a focus for the proposed Infrastructure Strategy.
116. C1.3 proposes *setting targets for housing development capacity and triggers for the release of additional development capacity to provide for future housing growth and that take precedence over subjective amenity barrier*. The council strongly disagrees with this option and notes the following:
 - It is not clear what triggers would be used. As Auckland currently has capacity for approximately one million additional residential dwellings, the release of yet more development capacity is [unlikely to have a significant impact on housing prices](#) in Auckland. The council expects work on housing affordability as part of the National Policy Statement on Urban Development may show that increasing

capacity from existing levels will not improve the affordability of new dwellings. Any proposed triggers should be linked to existing monitoring and review processes.

- Using land prices to guide the release of development capacity does not reflect the complex nature of cities and communities and is unlikely to deliver the outcomes set out in the Auckland Plan. Areas with high demand should, as a minimum, be linked to areas with high accessibility before releasing development capacity. If not considered together, additional development capacity may be enabled in inaccessible locations, creating further reliance on private vehicles.
- This action implies that zoning and development controls cascading from a Regional Policy Statement in a combined plan would be trumped by a growth target. Such an action would render all other outcomes in a Regional Policy Statement subservient to a growth target. We consider this undemocratic and unlikely to result in improved outcomes overall.

117. Section C1.3 proposes that the new *National Planning Framework incorporates additional direction on enabling intensification and private plan changes in addition to what is already in the NPS-UD*. Auckland Council disagrees with this action and notes Our Chief Economist Unit's work⁴ that looks in further detail at the impact on housing affordability of enabling more development capacity 'outwards' (beyond the Rural Urban Boundary). The report finds that "*converting farmland or lifestyle blocks outside the RUB into bulk-infrastructured residential sections similar to those inside the RUB would be unlikely to deliver land to the market substantially more cheaply*". The lack of certainty about growth in peri-urban areas that this action would amplify would result in significant uncertainty for infrastructure planning, which translates as additional cost (borne by the community) to provide infrastructure.

• **Are there any gaps?**

118. The council has identified gaps which can be broadly categorised as:

- A holistic view of who and what our infrastructure serves; and
- Issues of alignment with resource management system reform.

A holistic approach to infrastructure and the environment

119. The narrative of how we think about our environment is changing to one which recognises its value in generating a healthy and functioning economy and society. We propose changing the text for Proposed Action Area 2 to include 'environment' as well as 'people'.

120. In this vein, we recommend acknowledging the role of green spaces and urban forest in delivering high living standards and identify opportunities to better protect and enhance environmental values as part of resource management system reform. This is explicitly recognised in the Aotearoa New Zealand Biodiversity Strategy.

⁴ <https://www.aucklandcouncil.govt.nz/about-auckland-council/business-in-auckland/Reports/does-the-rub-impose-a-price-premium-on-land-inside-it-20-Feb-2020.pdf>

121. Additionally, the definition of connectivity should also include connection to the environment, e.g. rivers, streams, green spaces. For stormwater for instance, streams and rivers are part of the system, and where development is planned well, they offer environmental, recreation, well-being, transport and flood mitigation benefits through residents and visitors through their enhancements and particularly from the creation of blue-green networks.

Alignment with resource management system reform

122. We support a clear and coordinated approach to development in high-risk natural hazard areas. It is important that the proposed 'Infrastructure Strategy aligns with the future resource management system to reduce the risks from natural hazards and climate change by avoiding increased development in areas where there is current or future risk to life and property.

123. Additionally, we support the proposed Managed Retreat and Climate Change Adaptation Act as a feature of the resource management system and note the need for this legislation to enable councils' hazard management functions.

Q19. What cities or other areas might be appropriate for some form of congestion pricing and/or road tolling?

124. The consultation document specifically recommends progressing the implementation of congestion pricing in Auckland. The council has resolved to provide its in principle support congestion pricing in Auckland conditional upon:

- having public transport services and projects in place on an equitable basis to allow road users to switch to alternative modes where appropriate,
- the satisfactory mitigation of equity impacts, and as revenue and costs allow,
- the replacement of the Regional Fuel Tax.

The council does not have a view on what other cities or areas which might be appropriate for some form of congestion pricing and/or road tolling.

Q.20 What is the best way to address potential equity impacts arising from congestion pricing?

125. The council recognises the need to address equity issues *prior* to congestion pricing being introduced along with the need to have alternative modes (public transport and active modes) in place *before* congestion pricing is introduced to any corridor or area. The council wants further work to be undertaken to better understand the potential impact of congestion charging on vulnerable groups and how this could be mitigated, before making any final decisions are taken on congestion charging in Auckland.

126. The council supports a focus on ensuring that equity and mitigation issues are identified and that a potential congestion charging scheme should be structured to ensure that any one group, particularly those on lower incomes, are not unreasonably impacted. The

council also supports further work being undertaken to consider key questions such as the impact of congestion pricing schemes on different groups, what users should be potentially eligible for relief, what an appropriate level of relief might be, and the most effective and efficient measures for delivering that relief without undermining core objectives around mode shift, emissions reduction and reduced congestion. It remains particularly concerned about groups such as workers and single parents who are on low incomes and cannot reasonably change the way in which they travel through lack of access to quality public transport options, or other reasons such as need to access childcare facilities at peak travel times.

127. The council considers that congestion pricing should be seen as a demand management tool, and not a revenue generator. Its goal is smoothing traffic and reducing congestion, but in doing that, it generates revenue. It's critical that any revenues generated should be directed back toward creating transport equity. The council notes that parts of the region are already relatively well serviced by transport infrastructure and that revenue should be allocated to projects and services that serve areas that have poorer access to non-car alternatives, primarily cross-town, to compensate for social inequity. The council recommends that we should not introduce congestion pricing until we have a documented list of ready-to-go public transport projects that will be prioritised from revenues generated.

Q21. Is a 10-year lapse period for infrastructure corridor designations long enough? Is there a case for extending it to 30 years consistent with spatial planning?

128. The council supports a system making it easier to designate and build public infrastructure.
129. The council supports longer lapse times for key infrastructure projects to enable long term infrastructure funding and planning, particularly for linear infrastructure. The timeframes for lapse dates on Notices of Requirement and designations are insufficient for long term infrastructure planning and funding, particularly for linear infrastructure. A 15-year lapse period for full designations and up to 30 years for concept designations may be more appropriate.
130. In relation to proposed actions C4.1 and C4.3, the council recognises there is an opportunity to include guidance on the identification of infrastructure corridors which considers protection and enhancement of environmental values and options to increase resilience to anticipated impacts of climate change.

Q22. Should a multi-modal corridor protection fund be established? If so, what should the fund cover?

131. The council supports a multi-modal corridor protection fund being established and recommends that the proposed Infrastructure Strategy must enable the ability of infrastructure providers to easily, and much earlier, be able to designate for multi-modal corridor protection.

Q23. What infrastructure actions are required to achieve universal access to digital services?

132. The council supports taking a long-term approach in planning for digital infrastructure and ensuring everyone has equitable access. To realise the benefits of improved connectivity for all, infrastructure needs to be supported by interventions that increase digital literacy. Coverage for digital infrastructure in Auckland is generally good but there are many barriers for digital inclusion especially for those disadvantaged groups of Aucklanders (such as low-socio economic communities, people with disabilities, new migrants, seniors and people who lack core digital skills).
133. The council recognises that in terms of improving regional and international connections, New Zealand's natural features are one of the key reasons for overseas visitors to come to New Zealand. The council suggests there needs to be acknowledgement in this section that infrastructure plays a key role in providing access to these natural hot-spots and protecting these areas from visitor's impacts. Reference could be made to the identified tourism funding gap (page 102) and identified opportunity to address that gap (page 106).

Q24. For the 'Creating a Better System' Action Area and the Needs:

• What do you agree with?

134. The council is generally supportive of the *Creating a Better System* action area and supports the proposed priority of institutional and governance reform in order to effect greater integration and coordination across the infrastructure system.
135. The council is concerned that reform conversations can often quickly narrow into ones of structural change which means that other challenges are not addressed such as funding, capacity, or capability. Reform therefore needs to focus on outcomes first rather than institutions as improved integration and coordination can be achieved in non-structural ways such as through improved settings, tools, and incentives.
136. Given how interconnected the infrastructure system is with so many other systems it is also important that this is approached holistically and seeks balance between competing priorities rather than achieving perfection for infrastructure and at the same time causing significant distortion of these other systems for instance the resource management system.
137. The consultation document acknowledges the lack of skilled workforce in construction and project management and the notion of a project management academy is supported. However, the council recognises skill shortages also apply across all key touch points related to infrastructure builds, for instance consenting. There is the need to ensure diversified works programmes in place (both by type and location), as well as for robust training schemes and immigration policies to cater for this demand.

138. The council supports making non-built alternatives mandatory in every project selection process and this is also an approach the council is adopting for community investments.
139. The council supports the establishment of a national GIS database for mapping nationally important resources (built and natural), including corridors of nationally significant infrastructure.
140. The council supports an infrastructure pipeline for major infrastructure projects or programmes of work and supports having a set of criteria to assess which projects or programmes should be included in the pipeline. This will allow for better work planning between local and central government and managing resource capacity. An infrastructure programme approach is being successfully implemented by Watercare to enable certainty to the market and certainty of delivery.
141. The council notes that the published pipeline can also act as an accountability tool to monitor if critical infrastructure is being delivered.

• What do you disagree with?

142. The council notes concerns in relation to the proposed action S7.3 Develop a planning system that is more enabling for infrastructure, “Require the proposed Natural and Built Environment Act to recognise that the natural and built environments are different. Therefore, different environmental management rules should apply to each.” The council suggests that treating natural and built environments differently may conflict with the need for integrated outcomes identified throughout the proposed Infrastructure Strategy. Environmental outcomes and development outcomes need to be addressed in an integrated way. These cannot be separated from each other, as both interact and need to be delivered holistically, in legislation and in practice on the ground.

• Are there any gaps?

143. The council notes that the consultation document rightly mentions that a number of extensive reforms are underway, particularly resource management system reform, reform of the health and disability system and three waters reform. The council has concerns that given their different aims, aspects of these could increase fragmentation. Three waters reform for instance proposes to remove the planning and delivery of three waters infrastructure from the processes which currently integrate its delivery with land use planning and the planning and delivery of other key infrastructure such as transport.
144. The council suggests The Review into the Future for Local Government is an appropriate vehicle to understand the role of local government after the reforms, but it will not be sufficient to address this matter given that local government is one part of the infrastructure system.
145. The council considers that infrastructure decisions have played a role in environmental degradation and contributed to climate change. Creating a better system must consider the need to improve infrastructure decision-making from an environmental and climate change perspective.

146. The council recommends that there could be a direction in the proposed Infrastructure Strategy that prioritises environmental outcomes in line with ‘Te mana o te Wai’ and ‘Te mana o te Taiao’ principles in the NPS-Freshwater Management and The Aotearoa New Zealand Biodiversity Strategy 2020 respectively.

147. The council suggests that the National Policy Statement on Urban Development could be added to the list of policy reviews and reforms provided on page 36. As this NPS will significantly centralise current local government planning functions and powers hence will also have “... long-term impacts on how infrastructure is consented, delivered, owned and governed ...”.

Q25. Does New Zealand have the right institutional settings for the provision of infrastructure?

148. The council agrees that there would be real benefit in aligning the institutional settings across the infrastructure sector. Many providers are governed by different legislative aims, accountabilities, funding models, and drivers. There would be benefit in the review of these aspects to ensure that they achieve the alignment in outcomes that are sought. This would likely be more beneficial than an initial focus on consolidation of institutions.

149. The council notes that culture change is needed across the sector to support any wider clarification and alignment of institutional settings to address engrained siloed approaches.

Q26. How can local and central government better coordinate themselves to manage, plan and implement infrastructure?

150. In the same way as councils must develop long term investment and funding plans, the council would support moves by central government to give greater clarity about its priorities and funding approach. Such an approach would support an expansion of models such as the Auckland Transport Alignment Plan (ATAP) to align central and local government priorities and investment, or an expansion of the use and scope of government policy statements.

151. The council has requested this approach to setting priorities be considered in the formation of the new Water Services Entities.

152. This would be enhanced further with council and crown jointly developing regional spatial strategies as part of the resource management system, however, as the RM Reform Panel noted these would be most effective if they served as the platform for developing implementation agreements. City Deals are an example of such a model currently in use in Scotland and Australia.

153. New bulk infrastructure is always stepwise (“lumpy”) and can’t match the “smooth curve” of population change. Consenting and construction of new bulk infrastructure can be slow and therefore, the council encourages new development be focused in areas of existing infrastructure. The council supports the employment of binding spatial planning

requirements to reduce the incidence of out-of-sequence development that is not consistent with strategic staged development plans within a region. Such spatial planning should also concentrate growth that adjoins areas of existing infrastructure, and not enable growth to occur in locations isolated from existing infrastructure.

Q27. What principles could be used to guide how infrastructure providers are structured, governed and regulated?

154. The council would support the following principles:

- Subsidiarity – decisions should in general be made by the closest competent body to the communities affected
- Integrated – linked decisions over a system or connected systems should be integrated by either being made by the same institution or being made according to common principles, plans, and with appropriate feedback loops
- Aligned – all three aspects (structure, governance and regulation) needs to reinforce common aims across the system (aligned to the needs of other connected systems), as noted tools such as regional spatial strategies could assist with this.

155. As infrastructure can take many years to complete, and so fall across election cycles, there is a need to maintain funding and decision making continuity to deliver long-term outcomes. Having strong governance structures as well as independent economic and operational regulators such as Taumata Arowai, support public accountability across political cycles.

156. Better provision needs to be made in systems and tools which support infrastructure financing and funding, planning, designing, constructing, monitoring, maintaining and decommissioning phases to provide clear hierarchy of considerations and decision-making (including related escalations). A clearer hierarchy in this regard should ensure appropriate support in the delivery of integrated infrastructure outcomes exists which would also help resolve conflict between considerations and decision makings in the way which best gives effect to the infrastructure outcomes sought.

Q28. What steps could local and central government take to make better use of existing funding and financing tools to enable the delivery of infrastructure?

157. The council generally uses existing funding and financing tools to the greatest extend possible, with the key constraints being what is acceptable to our community and our credit rating agencies. The exception is the Infrastructure Funding and Financing (IFF) Act where we are actively exploring areas to utilise this tool.

158. The council is currently reviewing development contributions (DCs) policy to begin to charge for infrastructure that will be completed beyond the 10 year time horizon.

159. There are incremental steps that councils could take to make better use of existing these tools to enable the delivery infrastructure which include:

- Moving toward greater use of targeted rates rather than DCs may also carry benefits for councils. First, councils can borrow against them because they are rates revenue. Second, there is greater certainty about when they will be generated. This provides certainty on timing for beginning construction and when capacity will come on-stream.
- Targeted levies working with central government are just another way of doing this, to ensure development contributes more towards the costs of infrastructure that underpin the value uplift raw land receives as it receives infrastructure. We note that funding mechanisms must be announced before the infrastructure is announced to pre-empt announcement effects on land values. This ensures that those that benefits from land value uplift pay their fair share.
- Ongoing improvement of prioritisation of investment across asset types to meet central strategic priorities (rather than just within activities).
- Based on the experiences within Auckland, focusing available financing and funding towards priority growth locations.
- A focus on operating expenditure, as many of the solutions proposed in the strategy are related to better use of existing assets, which is an efficient use of opex, but may still result in an increased cost (i.e. more trains and more buses on the transport network). Discussion about long term operating costs and how to fund these could be better discussed through the strategy.
- Utilising CBA processes as proposed in the strategy, taking a life cycle view of costs.

Q29. Are existing infrastructure funding and financing arrangements suitable for responding to infrastructure provision challenges? If not, what options could be considered?

160. The council suggests there is clear and significant infrastructure financing and funding gap for Auckland and has previously called for new tools to address this, such as:
- providing a share of the GST collected in Auckland
 - returning some or all of the GST collected on Auckland Council rates (eliminating the inequity of a tax being set on a tax)
 - making properties used for Crown activities rateable
 - enable councils that are tourism centres to apply an accommodation levy or bed tax
161. The council is supportive of the funding and financing actions S2.1 to S2.5 in the consultation document and suggest that the financing and funding issue could be further expanded on in the strategy.
162. Climate change mitigation and adaptation is complex and must be supported by additional funding mechanisms. The council believes dedicated central government funding to assist with core public infrastructure climate adaptation and mitigation should be considered.

163. Moving to a bulk infrastructure funding model for transport with longer funding cycles would help improve efficiencies. Improvements to securing partnership funding such as the streamlining of the business case process, which is currently time consuming, would also be beneficial.
164. The current funding approach for land transport is based on specific categories called activity classes. This approach does not align with an outcomes approach to investment. The council sees benefit in adopting an approach where land transport funding is unlocked according to the full range of outcomes and benefits.
165. We note that major infrastructure tends to be the focus of discussion however the issue exists for all growth infrastructure. A significant portion of growth infrastructure is made up of numerous smaller projects that can cumulatively require more investment than major projects.
166. The council is concerned about enabling further out-of-sequence growth and/or proposals outside the areas that have already been identified for urban growth. Auckland's new greenfield areas were assessed against comprehensive criteria and subject to extensive community and land owner engagement.

Q30. Should local authorities be required to fund depreciation as part of maintaining balanced budgets on a forecast basis?

167. The council's viewpoint is that long-term operating sustainability relies on a position where annual operating expenses should be and are covered by operating revenues in that same year. The operating expenses should cover all the cost of operating for the year and depreciation, which by definition is a measure of the usage of an asset in the year, should therefore be included as part of the total operating costs in the year. Any increasing to operating costs that are not supported by an increase in operating revenues will put pressure on the overall operating position.
168. Prior to the creation of Auckland Council, legacy councils on average funded around 63% of depreciation from their operating revenues. The council set a policy in 2012 to move to full funding depreciation by 2025. Due to the effects of COVID-19, the council has agreed to delay achieving this target by three years which means the achieving the goal of long-term balanced budget from 2028.
169. Therefore we recommend local authorities look into fully funding depreciation as part of maintain long-term balanced budgets.
170. Current legislation is generally fit for purpose. Requiring full funding of depreciation supports good long-term prudent financial management, but it is important to retain the flexibility to depart from it from time to time, if it is considered prudent to do so (the current COVID-19 situation being a case in point). Relaxing this constraint might enable councils to increase their use of borrowing to fund asset replacement, but this could

become unsustainable over time and doesn't actually help for those councils that are already close to the borrowing limits.

Q31. What options are there to better manage and utilise existing infrastructure assets?

171. The council strongly supports the recommendation of better managing and utilising existing infrastructure assets. As covered above, demand management investments such as congestion pricing and water efficiency are key mechanisms to achieve this. These are spend-to-save investments when considering the whole of life costs (particularly when the cost of carbon is included).
172. As previously noted, the council recognises that supporting a quality compact urban form and by incentivising growth in areas with existing infrastructure, benefits of more efficient provision of infrastructure can be realised.
173. The council supports the need for a standardised approach to assess condition, capture/report asset data and sharing information across organisations where the type of infrastructure is similar and/or complementary (education and social services). As an example, in Auckland, we are actively collaborating with Ministry of Education in providing shared facilities, but we do not have a coordinated programme of work outside of new school developments. The council recognises opportunities exist to work jointly on more shared facilities through existing school redevelopment/upgrades.
174. The council acknowledges that sharing GIS information more widely has merit for network planning. Publishing condition data requires consistent approach and understanding to enable meaningful analysis.
175. The council notes there has been a significant volume of infrastructure created over the last 100 years. A majority of this has contributed greenhouse gas emissions and had a climate impact. When considering new infrastructure, there is a carbon reduction hierarchy (pg. 11 [Infrastructure Carbon Review](#)) that can be used to focus attention on the greatest wins. The first step of this is to consider whether the objectives can be achieved by building nothing additional at all. This has the potential to save up to 100% of the carbon.
176. The council recommends using the carbon and waste reduction hierarchies when assessing the use of existing infrastructure and when planning new infrastructure at a national and local level to achieve emission reductions.

Q32. Are there benefits in centralising central government asset management functions? If so, which areas and organisations should this apply to?

177. The council suggest that a potential consequence of centralisation is that a concentration of skills and capabilities at a central level, would in effect, “dilute” such capabilities at regional and local levels. The council notes that steps to retain asset management talent will need to be implemented at the regional and local levels. This dilution could also be a consequence of some of the current reform proposals.

178. The council believes there is a case for central government developing minimum asset management requirements and for enforcing those across local government and large central government asset owners. As with data standardisation and a number of the other actions in the proposed Infrastructure Strategy, this may require support with capacity building and guidance development.

Q33. What could be done taken to improve the procurement and delivery of infrastructure projects?

179. The council supports the need to increase capacity and capability to procure and deliver infrastructure but note careful consideration needs to be given of place and local context. Some of the challenges facing each infrastructure sector are unique where professional bodies (national/international) could provide leadership more effectively (i.e. Water New Zealand for water-related projects). There is a trade-off between centralisation and efficiency that will need to be carefully considered.
180. The council agrees that the water sector requires CBA guidance. This guidance manual would make transparent the evaluation methods and parameters for valuing relevant economic, environmental and adaptability/flexibility benefits. The manual should enable appropriately scaled appraisals of both simple and complex projects. In line with practices in the electricity transmission sector, it should be used as part of the investment test for new and improved water infrastructure to ensure that it delivers benefits that exceed its cost. This method should therefore result in appropriate consideration (benefits assessment) of non-built solutions, using pricing mechanisms, demand management, or standards and rating tools can help us to better use the infrastructure assets we have in a more sustainable way, as noted on page 48, “Infrastructure can unlock a low-carbon economy”.
181. The council suggest there could be further discussion around the lack of knowledge of experience in delivering infrastructure projects. There is a need to upskill across the board in infrastructure planning, integration to spatial planning, and infrastructure decision making and link to policy development and then fundamentally, the need to understand how Infrastructure financing and funding relates to choices and decision making that this results in.

Enterprise procurement model supported by well-being targets will improve procurement and delivery

182. Watercare, an Auckland Council Controlled Organisation (CCO), has implemented an enterprise procurement model which focuses on bringing in contractors such as designers and construction, at the start of a project to ensure it is scoped in a workable, safe and efficient manner. Specifically, this is a 10-year agreement based on a 20-year programme of work. The Enterprise model has as a core principle, programme management, ahead of project management. Aligning this with well-being targets also bringing in matters such as carbon, waste, iwi engagement, etc, at the start of the project. This model can be used for large infrastructure or bundles of smaller projects.

Infrastructure decisions should be transparent and subject to post-implementation review

183. The post-implementation review needs to include an assessment on how well environmental and climate change outcomes have been delivered as part of infrastructure delivery. This requires specifying environmental outcomes in infrastructure business cases.

Improve project procurement and delivery

184. Environmental outcomes and climate change considerations should form a key part of infrastructure procurement processes to be able to deliver on legislative environmental and climate change directions and should be referenced in the identified actions.

Q34. Do you see merit in having a central government agency procure and deliver infrastructure projects? If so, which types of projects should it cover?

185. The council does not see benefit in a central government agency delivering infrastructure at a local level. Infrastructure is best delivered locally by people with local knowledge.
186. There is however a question of capability. Many councils in New Zealand serve very small populations, often with large geographies. This makes it both expensive to provide infrastructure, and hard to find the skills needed to procure and manage large scale infrastructure projects. One solution may be to incentivise councils to work together in procuring infrastructure work, allowing them to share procurement, engineering and other skills, and potentially even grouping projects across councils so as to offer a more attractive proposition to other or overseas-based infrastructure construction firms to bid for work.
187. While procuring and delivering resource recovery/waste infrastructure is not a central government responsibility, the council does see merit in having a central agency to help facilitate the assessment and/or establishment of large-scale resource recovery (potentially including national solutions for onshore processing of recyclables), product stewardship and/or waste infrastructure options. For example, the council has supported recent national efforts, facilitated by the Ministry for the Environment, such as representation on a National Resource Recovery Taskforce, and establishing a working group to co-design the national container return scheme for beverage containers.
188. There are roles for central and regional based entities in project delivery, depending for instance whether projects are nationally critical or cross regional boundaries.
189. For water planning, alignment with large scale catchment/watershed boundaries will enable integrated land-water resource management, as well as enable more meaningful collaboration with iwi.

Q35. What could be done to improve the productivity of the construction sector and reduce the cost of delivering infrastructure?

190. The council recommends that there is an urgent need to shift from the current short-term “project by project” focus to a collaborative planning and delivery programme focus. This will also require long-term contracts and to plan to improve production, reduce costs, reduce carbon emissions, and to improve wellbeing and safety.
191. The council suggest that in addition to a pipeline of projects and programmes of work, consideration be given to timing of project delivery and the use of local/central government projects being used as a vehicle for smoothing out the peaks and troughs of the construction cycle.

Move away from paying price rises as a matter of course

192. Central and local government often run a procurement process, where the purchaser takes on all the price and timeframe risk (e.g. by automatically paying construction firms for any price increases through the process). This does not encourage the private sector to manage their own price risks and innovate. The council considers that those with the best knowledge are best placed to take on risk, and the construction sector who deals with suppliers regularly and would for example know if building prices are about to rise, is best positioned. It is considered that with less/no free price rise allowances, businesses will need to be more proactive in determining fixed price contracts and this will require them to know their pressure points much better and to innovate when pricing changes.
193. The council recognises that when there is no consequence to poor planning and/or management on the part of construction firms, there is no incentive to do a better job. This arrangement encourages the worst outcomes for ratepayers and taxpayers rather than the best.

Bulk up contracts

194. New Zealand is a small infrastructure market, and few projects are of the scale to bring overseas competition. This lack of competition discourages innovation and price competitiveness.
195. The council considers one way to overcome this is to bulk projects up into packages that make them larger dollar values and thus more attractive to a range of possible international players. However, bulking up needs to be carefully balanced against a need to make it possible for smaller players to still have a chance at winning a meaningfully sized contract, rather than only in a sub-contractor role.

Consenting barriers

196. The council acknowledges the value and necessity of infrastructure to our communities and environment. A careful balance needs to be struck in our regulatory frameworks between enabling the development, operation, and maintenance of this infrastructure and the management and protection of the environment in which they are located. When this balance is not reached, there is potential for delays and costs to be added to

our infrastructure planning. It would be valuable for resource management system reform to guide this balance in the infrastructure space.

Q36. What components of the infrastructure system could have been improved to deliver effective stimulus spending during the Covid-19 pandemic?

197. The council notes the time taken for central government to move from funding announcements (NZ Upgrade Programme, Shovel Ready and The Housing Acceleration Fund) to the establishment of criteria and projects now underway. Due to this delay, the chance to accelerate recovery through job creation through infrastructure and putting in place infrastructure that will stimulate flow-on effects, has reduced.

Attachment A: Local Board Feedback

Urgent Decision Memo

10 June 2021

To: Carol McKenzie-Rex, Local Area Manager, Franklin, Manurewa and Papakura Local Boards

cc: Papakura Local Board Chair and Members

From: Lee Manaia – Local Board Advisor

Subject: **Urgent decision - Papakura Local Board feedback the New Zealand Infrastructure Commission's *He Tūāpapa ki te Ora: Infrastructure for a Better Future* consultation document**

Purpose

To endorse the Papakura Local Board's feedback on the New Zealand Infrastructure Commission's *He Tūāpapa ki te Ora: Infrastructure for a Better Future* consultation document.

Reasons for the urgency:

- The Auckland Council's submission was circulated to elected members during the week beginning 11 June 2021.
- Local board feedback is required by 5pm Thursday 17 June 2021.
- Submission on the New Zealand Infrastructure Commission's *He Tūāpapa ki te Ora: Infrastructure for a Better Future* consultation document close on Thursday, 24 June 2021.
- The next scheduled meeting of the Papakura Local Board is 4.30pm on Wednesday 23 June 2021.

Decision sought from the chair and deputy chair (or any person acting in these roles)

That the Papakura Local Board:

- a) provides the following feedback (in blue text) on the New Zealand Infrastructure Commission's *He Tūāpapa ki te Ora: Infrastructure for a Better Future* consultation document:
1. Institutional and Governance reform
 - 1.1 In terms of the three waters reform programme, the Papakura Local Board believes some level of accountability to the local level is required.
 - 1.2 The board would be concerned if Auckland ratepayers were having to pay for infrastructure in areas that are not in the Auckland region.
 - 1.3 The board believes the Auckland region operates in a reasonably integrated and co-ordinated way.

2. Getting the price right

Congestion pricing

2.1 The Papakura Local Board re-iterates its feedback provided on the congestion pricing issue:

- i) The Papakura Local Board acknowledges that congestion pricing is likely to:
 - be effective in encouraging public transport use
 - encourage driver behaviour to avoid peak times thereby levelling the peak demand
 - encourage the use of other transport modes.
- ii) The price of housing forces these people to live in the outer suburbs which are not serviced well by public transport routes. As a consequence, they are forced to travel to their work using their own vehicles.
- iii) Any scheme will need to be equitable for all users and not disadvantage those people:
 - in low and limited income brackets
 - that have limited access to reliable public transport
 - that have no access to alternative transport options.
- iv) The Papakura Local Board supports in principle exploring a congestion pricing scheme provided it replaces the regional fuel tax to fund infrastructure and public transport improvements.
- v) The board believe congestion pricing should coincide with the completion of the City Rail Link.
- vi) The board believes congestion pricing schemes could be used to build new linking roads, similar to the Tauranga bypass example.
- vii) The board believe other methods of toll gathering should be investigated to avoid the expense of infrastructure installation.
- viii) The board believe revenue gathered should be shared across the region and to those that don't have access to alternative transport options.
- ix) In the Local Board Plan 2020 outcome 4 the board advocates for monitoring and improving our air quality. The board requests the government require the appropriate authorities to monitor the improvements in air quality resulting from a congestion pricing scheme.
- xi) The primary purpose of the congestion charge should be well articulated so that everyone understands how the revenue gathered will be used.

- xii) The board welcomes investigations into timing and geographic ring fencing to ensure that low-income workers who have no alternative are not impacted by the congestion pricing scheme.
- xiii) Consideration will need to be given for a route to ensure tourists are not adversely impacted by the congestion pricing scheme.

On-street parking charges

- 2.2 The board believes the matter of *increasing coverage of on-street parking charges to make the best use of our urban spaces* should be dealt with at the local level as in some places this could negatively impact on local businesses.

Water metering

- 2.3 The board believes there should be an accountability requirement to the local level for water service providers including water metering.

Waste disposal charges reflecting true cost of disposal

- 2.4 The board feels there is a balance to be achieved between encouraging waste minimisation and the ability for people to dispose of waste to reduce illegal dumping.
- 2.5 In the Papakura Local Board Plan 2020 the board is advocating for a resource recovery centre in the south.

3. Supporting housing supply

Developing consistent national planning rules

- 3.1 The Papakura Local Board believes planning rules should focus on planning for good community outcomes that provide for:
 - road widths that allow for on street parking and for two vehicles to comfortably pass each other
 - on-site parking
 - visitor parking
 - public transport offerings in new developments
 - shared off-road pedestrian/cycle pathways to encourage modal change
 - communal garden plots with a shed for tools so people can grow food
- 3.3 The Urban Ngahere initiative in the Papakura Local Board Plan 2020 is a programme of work that will explore options to increase the tree canopy in the Papakura area. The local board has received advice that it only has 13 percent tree coverage in their area. This is reducing daily with the significant development occurring in the area. Developers appear to have a scorched earth approach in general. The newly developed sites outdoor areas are not necessarily suitable for trees to be planted.

Implementing regional spatial planning

- 3.4 Auckland Council has undertaken structure plans which included planning with Auckland Transport, NZTA (Supporting Growth team), Watercare, and government agencies. Structure plans are publicly consulted on. Unfortunately, they are guide for development and the private plan change process can undermine the structure plan decisions.
- 3.5 The board believes that through the private plan change process development has the potential to occur in an adhoc way which is not in line with the Council roll out of land for release for development so that Council can keep pace with the required infrastructure.
- 3.6 The board believes developers submitting private plan changes that are not in line with the Council structure plans should be charged extra.
- 3.7 The board believes the demand for housing and government legislative changes are creating pressures on the Council planning systems. The board fears that if developers are allowed to develop in an adhoc way there will not be good outcomes for the community as a whole. If government is driving the release of land, then a central government funding mechanism should follow to support councils to develop the required infrastructure.
- 3.8 The board is conscious of the conundrum of retaining elite soils for food production versus the requirement for land for development. Consideration must be given to protect these soils.
- 3.9 The board also believes the planning rules should provide for a buffer between rural and residential zoned areas to help manage the interface.
- 3.10 The board believes green space is crucial as cities intensify. The thresholds for the walking distances to neighbourhood parks needs to be reduced so that more people can walk to a closer park/green space.
- 3.11 The board believes the design of the dwellings is important so neighbourhoods don't feel like a concrete jungles.
- 3.12 In terms of funding the joined up planning, in the Auckland Council case, the board believes that where joined up planning has been undertaken, any changes required as a result of central government decisions should be funded by central government.

Merging regional and district plans into combined plans

- 3.13 The board understands that Auckland Council is a unitary authority and therefore would not be affected.
- 3.14 The board believes the amalgamation of the eight Auckland territorial local authorities has improved a combined approached to planning for infrastructure and growth.
- 3.15 The board believes that any changes to the planning rules must also balance the protection of the environment.

Identifying where planning restrictions are having a large impact on housing supply

- 3.16** The board believes this is something Auckland Council is already doing. The local authorities must be part of any conversations.

Creating targets for new housing development opportunities

- 3.17** The board believes that any central government direction that impacts on local authorities should come with the relevant funding mechanisms.

4. Supporting a zero-carbon economy and preparing for climate changes

Electrification of transport / greater use of public transport / active travel (walking, cycling and micro-mobility)

- 4.1** The Papakura Local Board supports the electrification of public transport and has advocated for the decarbonising of public transport in its local board plan.
- 4.2** The board trusts that central government is ensuring the integrity of the electricity network in order to sustain the move to electrification of transport.
- 4.3** The board supports greater use of public transport and is currently working with Auckland Transport with a trial of on demand bus option replacing a bus route.
- 4.4** The board is a strong advocate for connecting local pathways, off-road shared pathways to encourage active travel. The board would welcome any government funding to support local projects that connect pathways.

Cost-effective solutions must be found to decarbonise heating used in industrial processes

- 4.5** The board supports funding cost effective solutions to decarbonise heating used in industrial processes. The board believes that it is crucial for industry to be part of the problem solving process to move to clean energy and deal with their emissions.

Planning system enabling infrastructure necessary for climate-change mitigation and adaptation

- 4.6** The board supports planning rule changes that encourage green buildings.

5. A digital future

A move towards better data collection and transparency, along with open data for infrastructure sectors requires greater thought to enable a greater understanding of New Zealand's existing infrastructure performance, costs and impacts, as well as our future infrastructure requirements.

- 5.1** The board supports a move towards better data collection and transparency provided the appropriate cyber-security risks are addressed.

Response to Questions (*members did not provide feedback on all questions*)

No.	Question	Papakura Local Board feedback
Q1	What are your views on the proposed 2050 infrastructure vision for New Zealand?	The Papakura Local Board is supportive of the proposed Infrastructure Vision 2050.
Q3	Are there any other infrastructure issues, challenges or opportunities that we should consider? (Page 35 - 41)	The board queries whether: <ol style="list-style-type: none"> 1. The electricity network will be able to sustain the move to electrification of transport. 2. The charging stations are accessible and available across the country to support the change to electric vehicles.
Q6	How else can we use infrastructure to reduce waste to landfill?	The Papakura Local Board Plan 2020 contains an advocacy point for stronger product stewardship legislation. The local board would support initiatives that encouraged recycling or a resource recovery centre for unused items within the building/construction industry.
Q14	Does New Zealand need a Population Strategy that sets out a preferred population growth path, to reduce demand uncertainty and improve infrastructure planning?	The Papakura Local Board queries whether there are relocation opportunities for migrants to other areas of the country rather than the main cities.
Q16	What steps could be taken to unlock greater infrastructure investment by Māori?	The board believes it is about relationships and brokering the conversation. Is it Te Puni Kōkiri / Ministry of Māori Affairs who should lead this with each individual iwi?
Q21	Is a 10-year lapse period for infrastructure corridor designations long enough? Is there a case for extending it to 30 years consistent with spatial planning?	The local board believes the 10-year lapse period should be extended to 30 years to be consistent with spatial planning.
Q22	Should a multi-modal corridor protection fund be established? If so, what should the fund cover?	The board believes a multi-modal corridor protection fund should be established. It should cover the development of off-road shared pathways that create or enhance connections into town centres and other pathways.

No.	Question	Papakura Local Board feedback
Q26	How can local and central government better coordinate themselves to manage, plan and implement infrastructure?	The board believes when looking at the areas where population growth is occurring funding needs to flow from central government for local government to be able to respond to growth.
Q27	What principles could be used to guide how infrastructure providers are structured, governed and regulated?	The board believes there must be accountability to the local level and provision for the local voice to be heard.
Q30	Should local authorities be required to fund depreciation as part of maintaining balanced budgets on a forecast basis?	The board believes, in principle, local authorities should be required to fund depreciation. If they don't there won't be any budget for replacing the asset. However, there are challenges for those local authorities with a smaller rating base to keep rates at an affordable level.
Q32	Are there benefits in centralising central government asset management functions? If so, which areas and organisations should this apply to?	<p>The board believes centralising asset management functions would potentially become a cumbersome bureaucratic system for local communities to interact with.</p> <p>However the board can also see the potential benefit of centralising asset management to one place for decision making and the ability to assess against assets across the country.</p>
Q33	What could be done to improve the procurement and delivery of infrastructure projects?	The Papakura Local Board Plan 2020 contains advocacy points around employing local and growing local procurement.
Q34	Do you see merit in having a central government agency procure and deliver infrastructure projects? If so, which types of projects should it cover?	<p>The board believes that while centralising procurement potentially delivers economies of scale, the larger the organisation the greater risk of:</p> <ul style="list-style-type: none"> • compromising effectiveness and efficiencies • complacency • less competitive • less care for the local community and local voice.
Q36	What components of the infrastructure system could have been improved to deliver effective stimulus spending during the Covid-19 pandemic?	The local board believes any project the government enters into should have a requirement to employ a percentage of local people including the offering of apprenticeships for the trades.

Background

1. The New Zealand Infrastructure Commission, Te Waihanga, is an autonomous Crown entity with an independent board, officially formed on 25 September 2019. The Commission seeks to lift infrastructure planning and delivery to a more strategic level and by doing so, improve New Zealanders' long term economic performance and social wellbeing.
2. A key function of the Commission is to produce a 30-year infrastructure strategy to replace the government's current 30-year plan. In addition, the Commission has progressively developed a pipeline of infrastructure projects which is published quarterly.
3. The Commission has released its consultation document *He Tūāpapa ki te Ora, Infrastructure for a Better Future* which sets out the approach that it proposes to take in developing its draft 30-year Infrastructure Strategy. This consultation is open for public submission from 12 May, with a closing date of 24 June.
4. Auckland Council has previously provided input to the Commission's Asset Owner Survey, which was a key input in informing their draft 30-year Infrastructure Strategy. This work identified infrastructure challenges and opportunities across different sectors. Some of the key themes identified included funding and financing challenges, asset management and procurement, natural hazards and climate change, and the challenges of moving to a low emissions economy.
5. This is the main and final opportunity for Auckland Council to input into the development of the Commission's draft 30-year Infrastructure Strategy. Following consultation, the Commission will finalise the 30-year Infrastructure Strategy and present it to the Minister for Infrastructure in September 2021.
6. The consultation document introduces the extent of New Zealand's infrastructure problems and highlights the key issue of historic underinvestment in infrastructure. It recognises there is a significant gap between the infrastructure needed and what can be afforded. It notes there are limits to spending and that building all infrastructure desired by communities is not a viable option.
7. The document recognises that better use must be made of existing infrastructure and extending its life along with new funding and financing to provide access to more capital for new infrastructure projects. It recognises that productivity improvements in infrastructure planning, construction and management are also needed.
8. The document highlights other key challenges such as climate change, a growing and ageing population, housing affordability, increasing construction cost pressures, technological / digital change and equity.
9. The consultation document sets out a proposed vision that "infrastructure lays the foundation for the people, places and businesses of Aotearoa New Zealand to thrive for generations" and guiding decision-making principles. The document also proposes three focus areas where change is needed:
 - **Building a better future**

This section talks about preparing infrastructure for climate change, transitioning to renewable energy, adapting to technological change, responding to demographic change, partnering with Māori and ensuring security and resilience of critical infrastructure.

- **Enabling competitive cities and regions**

This section talks about how infrastructure can contribute to the success of New Zealand cities by enabling more affordable housing, higher levels of productivity, improved inter-regional and international connectivity, better quality of life and urban environments that provide greater connectivity with employment, social services and recreation opportunities.

- **Creating a better system**

This section looks at how New Zealand's current systems and processes for planning, determining, delivering and operating infrastructure are being challenged, and can be improved. Four categories are discussed – governance and institutions; legislation, regulation and planning; funding and financing; and procurement and delivery.

10. The consultation document also identifies five areas that have potential to make the biggest difference to New Zealand's infrastructure system:
 - **Institutional and governance reform** - mentions better integration and coordination between local and central government infrastructure functions.
 - **Getting the price right** - mentions congestion pricing, water metering, waste disposal charges and including full cost of carbon in infrastructure business case appraisals.
 - **Supporting housing supply** - mentions options such as consistent national planning rules, regional spatial planning, merging regional and district plans, creating targets for new housing development in cities, setting housing requirements through national direction.
 - **Supporting zero-carbon economy and preparing for climate change** - mentions electrification of transport, greater use of public transport and active travel, improving energy efficiency of process heat, investment in energy sector to meet growing demand, and a planning system that enables infrastructure necessary for climate change adaptation and mitigation.
 - **A digital future** - mentions updating national digital strategy, better data collection and transparency to understand existing infrastructure performance, costs and impacts, as well as future requirements.
11. The consultation document proposes re-drawing of local and regional authority boundaries (particularly due to expanding labour markets and the ability of local government to provide/fund/maintain/operate social and economic infrastructure).
12. The consultation document proposes changes to local and central government roles and responsibilities, with more responsibility for councils in some areas (e.g. suggestion that councils could toll roads to manage congestion) and less in other areas (e.g. central government would have more control of housing and urban development outcomes).
13. A draft submission will be circulated to all elected members during the week beginning 11 June 2021. Unfortunately, there will only be a short turnaround time for feedback as submissions close on **24 June 2021**.
14. Feedback received from local boards is due on **17 June 2021**.

About Papakura Local Board

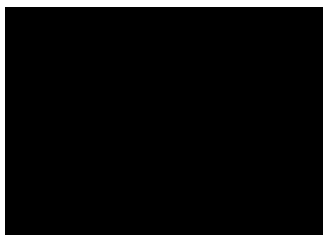
1. Papakura Local Board is one of 21 local boards which are part of the Auckland Council co-governance model. The board has responsibility for local decision making while the Governing Body has the regional decision making focus.
2. The board's population, as at the 2018 census, was 57,636. The population is ethnically diverse with 49.1% European, 26.8% Māori, 23.4% Asian and 16.9% Pacific peoples. Since the 2013 census there has been a significant growth in the Asian population. Papakura still has the largest Māori population per head of capita. The median age in Papakura is 32 years, with 23.6% of the population being aged between 0 and 14 years.

Authorisation of the urgent decision-making process



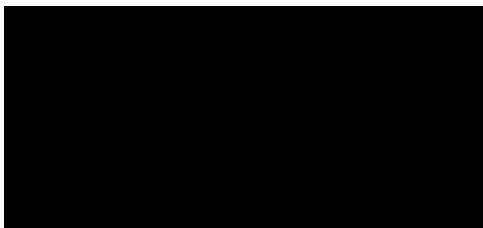
Signed by Carol McKenzie-Rex
Local Area Manager, Franklin, Manurewa and Papakura Local Boards

Date: 17 June 2021



Chairperson, Papakura Local Board

Date: 17 June 2021



Deputy Chairperson, Papakura Local Board

Date: 17 June 2021

Waitematā Local Board Submission

**The New Zealand Infrastructure Commission, Te Waihanga
Infrastructure Strategy Consultation Document *He Tūāpapa ki te Ora,
Infrastructure for a Better Future.***

Submission to the New Zealand Infrastructure Commission, Te Waihanga, on the Infrastructure Strategy Consultation Document *He Tūāpapa ki te Ora, Infrastructure for a Better Future*.

General Feedback

1. The cost of borrowing is currently low, so we can borrow to fund infrastructure. Inflation (outside of housing costs, which could be addressed through legislation) is also currently low, so we could issue green bonds or utilise quantitative easing to fund infrastructure. To address the crises of climate and health, we should be bold in our vision for the future of NZ's infrastructure, and not afraid to spend money to get it done, especially given the number of funding options open to us.
2. We need to ensure the benefits of infrastructure are experienced by all groups in society. This includes the jobs involved in building/maintaining infrastructure, as well as the benefits for users of the infrastructure. Everything should be looked at through a gender, ethnicity, and disability lens.
3. We need to design our cities to better address climate, health, and community needs. This means a large investment in walkable cities, giving a lot of our transport space over to active transport modes, and investing in community spaces.
4. We need to maintain and restore our natural infrastructure, including preserving the water quality of our rivers and waterways, and with a view to increasing biodiversity.
5. We need to develop coastal retreat and climate change adaptation plans in consultation with communities and implement them before investing in infrastructure that may consequently be at risk.
6. Where possible, iwi and hapū should be resourced to deliver local infrastructure that benefits communities at a local level.

Feedback by Infrastructure Area

Transport

7. Public transport needs to be easier, cheaper and more convenient than using private cars/ride shares for the same journey.
8. Active modes should have dedicated space on all our city streets, and NOT at the expense of pedestrians. Cycling and other active modes need to be made safer, including by building extensive separated cycle lanes through all cities, and to allow separated cycling options for inter-city travel. In the short term more of the existing street space could be reallocated for active modes.
9. We support non-built transport solutions to be considered first, however, this shouldn't be used as an excuse to delay physical transport projects that are needed to solve our climate and health crises.
10. We need a huge investment in rail, in order to:

- a. improve reliability of existing services,
 - b. vastly increase the percentage of freight transported by rail
 - c. allow for fast and convenient inter-city travel to reduce our reliance on domestic flights.
11. We support congestion charging as a short-term means of encouraging a shift to active transport modes and public transport. However, equity concerns for low-income households (who often live far from convenient public transport routes) need to be addressed in the policies for congestion charging and through other measures.
12. We support more investment in shipping for freight movements and more electric ferries for commuter movements.

Housing

13. We need to look at solutions beyond our current technique of (slowly) building housing and hoping the people who buy them aren't investors. This could include limiting home ownership, higher taxes on multiple properties, etc, so that it no longer becomes profitable (or possible) to own multiple houses. This will increase home ownership and reduce the cost of home ownership and the cost of renting. Limiting the reallocation of residential housing into quasi-hotels via Airbnbs would be useful to readdress.
14. We support facilitating different housing ownership finance models including co-housing and papakainga housing.
15. Innovative solutions to housing costs such as: public agencies buying urban land extensively to provide affordable housing for rent or lease, establishing an alternative provider of building materials to break up the existing duopoly, reducing regulatory controls on kitset housing, need to be developed.
16. New housing projects should not be on greenfield lands. City limits need to be set, and we need to focus on "density done well." Apartments can be warmer, safer, and more community-focused than stand-alone housing, but we need to change the way we do apartments to increase their size, liveability, and community connections. Windows, insulation, acoustic buffering, natural light and cross-ventilation and some safe access to outdoor recreational space should come as standard.
17. We question the consultation document's assumption that 'developing in areas that are close to jobs' is a way to improve transport. Evidence suggests that people will often live in one suburb and commute to another for work, even if jobs are available locally. People tend to change jobs throughout their career, and they consider a job's pay, status, and career progression opportunities as well as commute time. In a household where two people work, it is unlikely that both people will find and maintain jobs locally over the medium term. As an example, increasing the number of technology jobs in West Auckland is more likely to encourage people from the city centre to commute out west for work, rather than getting West Aucklanders to work locally. Therefore, density and easy, convenient public transport/active modes, should be prioritised over investment in 'local job infrastructure'. However, there is an

opportunity in building more residential property in areas currently zoned commercial and vice versa.

18. Having said that, we support the document's general recommendation for Transit Oriented Development.

Digital/Telecommunications

19. We need to ensure that we are self-sufficient in technology infrastructure. As COVID has taught us, emergencies happen, and we need to make sure New Zealand can still have a robust telecommunications system, regardless of any overseas outages. In particular, our reliance on overseas data storage and financial services is a risk.
20. Investments in NZ's digital infrastructure is an opportunity to address our trade imbalance in digital and financial services and increase the number of jobs in this field. Given that any local digital infrastructure is likely to be powered by a greater percentage of renewable energy than overseas equivalents (within the caveats set out in our 'Energy' feedback below), this is likely to also result in reduced carbon emissions.

Energy

21. We need a plan to quickly transition to 100% renewable energy for electricity generation, that is robust enough to deal with drought and other natural events. This can include looking at ways to improve current delays to achieving our 2030 100% renewable target but can also be achieved through encouraging reduced electricity use.
22. If we transition to electric vehicles, but as a result are not able to transition to 100% renewable energy, we need to question our assumptions around whether electric cars will significantly reduce our carbon emissions. We need to focus our transport objectives on active modes and public transport for personal transport, and rail for freight. We should encourage switching to electric vehicles only in the (minority of) cases where rail, active modes & public transport are not appropriate.
23. The opportunity of taxing inefficient and short guarantee appliances higher so as to make more energy efficient ones relatively affordable/ profitable may be worth considering.

Maintenance/Depreciation

24. Local governments need to be better funded. Funding primarily through rates leaves Councils and Local Authorities having to make trade-offs between competing priorities, and the current state of the nation's water infrastructure is an example of the consequences of having to trade-off in this way. Value Uplift levies, bed taxes, returning GST to Councils, high targeted rates on vacant land and buildings and much higher penalty charges for environmental pollution and degradation, should be examined for urgent implementation.

Waste

25. We need to improve our waste minimization and recycling infrastructure to reduce our reliance on landfills. We support increased user costs of disposing waste to

landfill, but this needs to be countered with increased availability of alternative end-of-life routes, including product stewardship/making companies responsible for the waste their products generate and refundable deposits on containers and other recyclable products. This will ensure the increased charges don't come at an equity cost for low-wage households, or result in illegal dumping. We support creative thinking to reduce food waste, plastic waste and construction waste so that materials can be reused or resourced. It may be that some products that are hard to reuse or recycle may have to be redesigned.

Water

26. More work needs to be done on reducing water use, to ensure that our fresh water sources are able to meet our needs long into the future. Auckland's reduction in water use during the current drought is proof that significant reductions in water use are possible through changing behaviours. However, the cost of water use was a contributor to the failure of new plantings in our urban forest strategy, the death of street trees, and issues for farmers. A continued focus on forms of growth which have not led to increased prosperity for people must be questioned.
27. We need to encourage the use of more water efficient devices, focusing on where the largest reductions in residential and commercial water use can occur. Sufficient investment in the maintenance and replacement of pipes, and means of identifying localized leaks, needs to be part of this investment.
28. We support the documents recommendation that new housing developments mitigate their impact on water networks.

20 Feedback on Te Waihanga New Zealand Infrastructure Commission's consultation document He Tūāpapa ki te Ora, Infrastructure for a Better Future, Aotearoa New Zealand Infrastructure Strategy

Emma Reed – Local Board Advisor, was in attendance to speak to this report.

Resolution number AE/2021/86

MOVED by Member J Maskill, seconded by Member W McKenzie:

That the Albert-Eden Local Board:

- a) generally support the Auckland Council submission.**
- b) strongly support the following views:**
 - i. that the New Zealand Infrastructure Commission needs to strengthen environmental considerations especially biodiversity and healthy water**
 - ii. that the New Zealand Infrastructure Commission needs to strengthen reduction of emissions and commitment to compact urban form**
 - iii. that properties used for Crown activities should be made rateable**
 - iv. that a balance needs to be found between a focus on delivering quantity of housing and affordability with providing high quality urban environments.**
- c) support that infrastructure planning processes should integrate costs of associated negative environmental costs and the cost of greenhouse gas emissions instead of externalising these to the natural environment.**
- d) support that all infrastructure should generate net environmental benefits and reductions in greenhouse gas emissions.**
- e) note that whatever the mechanism, infrastructure requires appropriate levels of funding from central government and local government tax revenue.**
- f) support that high quality, intensified urban environments need to include access, within walking distance, to green spaces and trees to safeguard well-being and that planning of urban infrastructure should include planning for such access, including allocating developer contributions to provide these.**
- g) note that Albert-Eden has approximately 24 blocks per square kilometre compared with the suggested walkability measure of 100 blocks per square kilometre, approximately 150 blocks per square kilometre in Stonefields and approximately 200 blocks per square kilometre in Hobsonville.**
- h) request that Open Space Development Contributions collected in the Albert-Eden Local Board area are able to be spent in Albert-Eden to purchase properties when they become available to both meet the identified shortfall in Neighbourhood Parks and increase blocks per square kilometre to around 40 by 2050.**
- i) welcome brown-field development in the Albert-Eden Local Board area whilst noting:**
 - i. much of the existing infrastructure needs to be upgraded to accommodate present and future demands as much of it is ageing and being stretched beyond its original capacity**
 - ii. the upgrading aspect of future infrastructure planning must be included in overall planning and prioritised, especially as part of implementing greater intensification for more compact urban form.**

- j) request consideration is given to the Swedish model of a ban on new landfill and waste to energy incineration.
- k) thank Emma Reed – Local Board Advisor, for her attendance to speak to the report.

CARRIED

Memo

16 June 2021

To: Isobel Jennings, Advisor Infrastructure Strategy, Auckland Plan Strategy and Research, Chief Planning Office

cc: Adam Milina – Local Area Manager, Henderson-Massey, Waitakere Ranges and Whau

From: Mary Binney – Senior Local Board Advisor

Subject: Feedback from the Whau Local Board for inclusion Auckland Council’s submission on Te Waihangā New Zealand Infrastructure Commission’s consultation document He Tūāpapa ki te Ora, Infrastructure for a Better Future, Aotearoa New Zealand Infrastructure Strategy

Purpose

1. To provide feedback from the Whau Local Board to be appended to Auckland Council’s submission on Te Waihangā New Zealand Infrastructure Commission’s consultation document He Tūāpapa ki te Ora, Infrastructure for a Better Future, Aotearoa New Zealand Infrastructure Strategy.

Context

1. The New Zealand Infrastructure Commission, Te Waihangā, is an autonomous Crown entity with an independent board, officially formed on 25 September 2019. The Commission seeks to lift infrastructure planning and delivery to a more strategic level and by doing so, improve New Zealanders’ long term economic performance and social wellbeing.
2. A key function of the Commission is to produce a 30-year infrastructure strategy to replace the government’s current 30-year plan. In addition, the Commission has progressively developed a pipeline of infrastructure projects which is published quarterly.
3. The Commission has released its consultation document He Tūāpapa ki te Ora, Infrastructure for a Better Future, which sets out the approach that it proposes to take in developing its draft 30-year Infrastructure Strategy.
4. A copy of a memo provided to local board members dated 20 May 2021 is appended as Attachment A. The full report is available on the Infrastructure Commission’s website: <https://infracom.govt.nz/strategy/have-your-say/>.
5. This consultation is open for public submission from 12 May 2021, with a closing date of 2 Jul 2021. Formal feedback received from local boards by 18 June 2021 will be appended to Auckland Council’s submission.
6. At its meeting of 28 April 2021, the Whau Local Board resolved (resolution number WH/2021/38) to delegate authority to the Chair and Deputy Chair to approve and submit the local board’s input into Auckland Council submissions on formal consultation from government departments, parliament, select committees and other councils.

Summary of the consultation document

7. The consultation document introduces the extent of New Zealand's infrastructure problems and highlights the key issue of historic underinvestment in infrastructure. It recognises there is a significant gap between the infrastructure needed and what can be afforded. It notes there are limits to spending and that building all infrastructure desired by communities is not a viable option.
8. The consultation document sets out a proposed vision that "infrastructure lays the foundation for the people, places and businesses of Aotearoa New Zealand to thrive for generations" and guiding decision-making principles. The document also proposes three focus areas where change is needed:
 - **Building a better future** - This section talks about preparing infrastructure for climate change, transitioning to renewable energy, adapting to technological change, responding to demographic change, partnering with Māori and ensuring security and resilience of critical infrastructure.
 - **Enabling competitive cities and regions** - This section talks about how infrastructure can contribute to the success of New Zealand cities by enabling more affordable housing, higher levels of productivity, improved inter-regional and international connectivity, better quality of life and urban environments that provide greater connectivity with employment, social services and recreation opportunities.
 - **Creating a better system** - This section looks at how New Zealand's current systems and processes for planning, determining, delivering and operating infrastructure are being challenged, and can be improved. Four categories are discussed – governance and institutions; legislation, regulation and planning; funding and financing; and procurement and delivery.
9. The consultation document also identifies five areas that have potential to make the biggest difference to New Zealand's infrastructure system:
 - Institutional and governance reform - mentions better integration and coordination between local and central government infrastructure functions.
 - Getting the price right - mentions congestion pricing, water metering, waste disposal charges and including full cost of carbon in infrastructure business case appraisals.
 - Supporting housing supply - mentions options such as consistent national planning rules, regional spatial planning, merging regional and district plans, creating targets for new housing development in cities, setting housing requirements through national direction.
 - Supporting zero-carbon economy and preparing for climate change - mentions electrification of transport, greater use of public transport and active travel, improving energy efficiency of process heat, investment in energy sector to meet growing demand, and a planning system that enables infrastructure necessary for climate change adaptation and mitigation.
 - A digital future - mentions updating national digital strategy, better data collection and transparency to understand existing infrastructure performance, costs and impacts, as well as future requirements.
10. The consultation document proposes re-drawing of local and regional authority boundaries (particularly due to expanding labour markets and the ability of local government to provide / fund / maintain / operate social and economic infrastructure).
11. The consultation document proposes changes to local and central government roles and responsibilities, with more responsibility for councils in some areas (e.g. suggestion that councils could toll roads to manage congestion) and less in other areas (e.g. central government would have more control of housing and urban development outcomes).


Feedback from the Whau Local Board

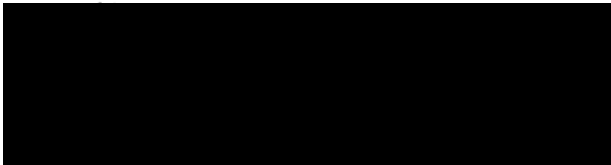
12. The Whau Local Board welcomes the opportunity to give feedback on Te Waihangā New Zealand Infrastructure Commission's consultation document He Tūāpapa ki te Ora, Infrastructure for a Better Future, Aotearoa New Zealand Infrastructure Strategy.
13. The local board is generally supportive of the recommendations of the discussion document, but also broadly agrees with the concerns expressed in the draft Auckland Council submission (as circulated to elected members dated 11 June 2021) around insufficient emphasis on natural environmental outcomes, zero-waste and the circular economy and equity, and also around lack of emphasis on the challenges posed by Auckland's future population growth and how this can be addressed in the context of infrastructure planning.
14. The Whau Local Board Plan 2020 has as outcomes 'Quality urban development and community facilities to meet the needs of our growing and changing population', 'Improved and expanded opportunities for walking, cycling and public transport' and 'Thriving town centres a strong local economy and neighbourhoods that are supportive and connected'.
15. The Whau Local Board acknowledges the infrastructure challenges faced by Aotearoa / New Zealand, and notes that these challenges are most acute in the areas experiencing intensive urban development and rapid population growth. The Whau Local Board area is one such area.
16. The Whau Local Board supports approaches that emphasise sustainability (including reduction in carbon emissions and increase in canopy cover), innovation, community empowerment, local economic growth, partnership with Māori and focus on high-quality, compact urban form rather than greenfields growth.
17. The Whau Local Board agrees, broadly, with the three focus areas where change is required, and with regard to the five areas that have potential to make the biggest difference to New Zealand's infrastructure system would make the following comments:
 - **Institutional and governance reform:** the local board supports this approach provided that there is a strong voice for local government (including Auckland's local boards), meaningful engagement with local communities and a joined-up approach to spatial planning. The board has some concerns with the approach to infrastructure development set out in the Urban Development Act 2020 around the ability of the Crown (specifically Kainga Ora) to develop infrastructure with minimal reference to local governance and the needs, views and preferences of local communities.
 - The local board is concerned, in particular, about the potential cost to local government of the ongoing operations and maintenance of infrastructure assets that will be vested in local government entities.
 - **Getting the price right:** the local board supports this approach provided that there are safeguards in place to ensure that the most deprived citizens are not the most heavily penalized. The board prefers where possible prioritizing mechanisms that reward positive change ahead of intensive or wide-spread user-charging, which will disproportionately impact those least able to afford it. Achieving the social and attitudinal shifts that will be necessary to get the public on board will require government to create and support opportunities for positive change as well as raising revenue through charging for infrastructure that people currently take for granted.
 - The local board also supports increased public education to help the public understand the true costs of properly funding, developing and maintaining infrastructure as it will be difficult to achieve social license for the proposed changes while people take essential infrastructure for granted and do not understand the extent of the challenges (particularly in respect of water infrastructure)
 - **Supporting housing supply:** the local board supports reforms to resource management and other policy levers to achieve an environmentally sensitive, low-carbon, quality, compact urban form. It is

essential that planning includes major shifts, particularly in Auckland, towards public transport and active modes and away from private vehicle reliance. This is currently not happening in Auckland.

- The local board is concerned to ensure that all residents have good access to public green space and that our urban areas have a high level of canopy cover (both in the interests of amenity but also health and emissions reduction). All New Zealanders should also have affordable access to high-speed broadband.
- The local board would urge both Local and Central Government to consider requiring that all new public buildings can achieve the Green Building Council's Homestar 6 rating, and that other environmentally sensitive innovations such as stormwater detention tanks.
- **Supporting zero-carbon economy and preparing for climate change:** the local board supports this approach, noting that it has been identified as a high priority for residents of the Whau Local Board area, but again, only with safeguards in place to ensure that the most deprived citizens are not the most heavily penalized.
- The local board is concerned to ensure that the business community is prepared for, and included in any discussions around, this area to ensure that the economic opportunities can be harnessed, new jobs created and costs to businesses (particularly small and medium-sized businesses) are minimized.
- The local board supports the creation of a regime of incentives to support businesses in their transition to a zero-carbon economy, noting that businesses can be leaders in this space if the right policy settings are in place to enable this transition without adversely impacting on economic growth, productivity and job creation.
- The local board strongly supports policies to encourage individuals and businesses to move away from private vehicle usage towards public and active transport, and views the development of Auckland's Rapid Transit Network (RTN) as essential to this. To this end, the local board notes current discussions between Auckland Council and central government around the development of a light rail link from the city centre to Mangere, but would urge central government to consider this in parallel to further development of the heavy rail network, which should be seen as increasingly important for freight. Re-consideration of the Southdown Loop (linking Avondale and Onehunga stations via an existing rail designation) should be a critical part of any discussions about light rail, as both these proposed lines would connect with Onehunga and be a game-changer for freight.
- **A digital future:** the local board supports this approach. The board also recommends more investment in innovative technology to pilot demand-side management tools for (for example) transport infrastructure to reduce both congestion and carbon emissions.
- The local board believes that this is another area where buy-in from the public sector is key; businesses can be leaders in transitioning Aotearoa / New Zealand to new ways of viewing infrastructure and promoting efficiency and emissions reduction.
- The local board believes that access to high-speed broadband for all New Zealanders is essential. COVID-19 showed us the potential of online interaction and web-based services to play a greater role in our economy, and in the lives of New Zealanders. However, it also demonstrated and accentuated the gap between those with access to high-speed broadband and the ability to work from home, and those without. The Whau Local Board area has a relatively high level of deprivation, and a diverse population with a large proportion of residents who have English as a second language. The relationship between digital access and deprivation needs to be addressed as we reassess our approach to infrastructure.

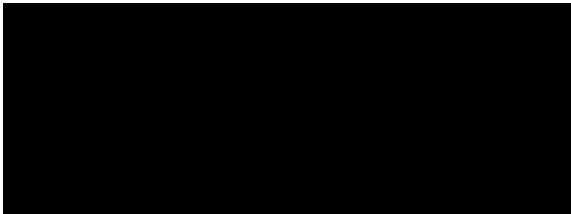
Next Steps

2. This feedback is expected for inclusion in Auckland Council's submission.
3. This feedback is formal, being signed off under delegation, but will be reported to the 28 July meeting of the Whau Local Board to ensure transparent decision-making.
4. If staff have questions about any of the above feedback, please contact the Senior Local Board Advisor –




Date: 16 June 2021

Chairperson, Whau Local Board



Date: 16 June 2021

Deputy Chairperson, Whau Local Board

Feedback on:

New Zealand Infrastructure Commission (Te Waihanga) proposal He Tūāpapa ki te ora, Infrastructure for a better future

18 June 2021

Context

1. The New Zealand Infrastructure Commission, Te Waihanga, is an autonomous Crown entity with an independent board, officially formed on 25 September 2019. The Commission seeks to lift infrastructure planning and delivery to a more strategic level and by doing so, improve New Zealanders' long term economic performance and social wellbeing.
2. A key function of the Commission is to produce a 30-year infrastructure strategy to replace the government's current 30-year plan.
3. The Commission has released its consultation document He Tūāpapa ki te Ora, Infrastructure for a Better Future which sets out the approach that it proposes to take in developing its draft 30-year Infrastructure Strategy.
4. The consultation document introduces the extent of New Zealand's infrastructure problems and highlights the key issue of historic underinvestment in infrastructure. It recognises there is a significant gap between the infrastructure needed and what can be afforded. It notes there are limits to spending and that building all infrastructure desired by communities is not a viable option.
5. The document recognises that we must make better use of existing infrastructure and extending its life along with new funding and financing to provide access to more capital for new infrastructure projects. It recognises that productivity improvements in infrastructure planning, construction and management are also needed.
6. The document highlights other key challenges such as climate change, a growing and ageing population, housing affordability, increasing construction cost pressures, technological / digital change and equity.
7. Auckland Council has previously provided input to the Commission's Asset Owner Survey, which was a key input in informing their draft 30-year Infrastructure Strategy. This work identified infrastructure challenges and opportunities across different sectors. Some of the key themes identified included funding and financing challenges, asset management and procurement, natural hazards and climate change, and the challenges of moving to a low emissions economy.
8. At the Maungakiekie-Tāmaki Local Board's 28 April 2020 business meeting, it delegated authority to the Chairperson and Deputy Chairperson to approve and submit the local board's input into Auckland Council submission on formal consultation from government departments, parliament, select committees and other councils (resolution: MT/2020/32).

Relevance to the Local board

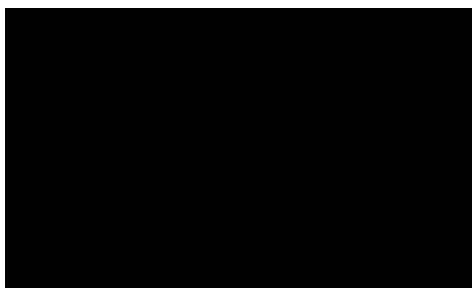
9. Local boards are responsible for decision-making on local issues, activities and services and providing input into regional strategies, policies and plans. Local boards also have a role in representing the views of their communities on issues of local importance.
10. Every three years, local boards set their strategic direction through a local board plan. He Tūāpapa ki te ora - Infrastructure for a better future, has relevance to the following outcomes and objectives in the 2020 Maungakiekie-Tāmaki Local Board Plan:

Outcomes	Objectives
Outcome two: Te ao Māori is thriving and visible	We enable active Māori participation in local decision-making
Outcome three: Our physical and social infrastructure is future proofed	We support quality housing choices
	We encourage well-planned physical infrastructure that supports our growth
Outcome four: Our transport choices are accessible, sustainable and safe	More people have the choice to use public or active transport to go about their daily lives
	People and traffic move more freely and safely around our area
Outcome five: Our built, natural and cultural taonga/treasures are protected and celebrated	Our community is resilient and feels prepared for the effects of climate change

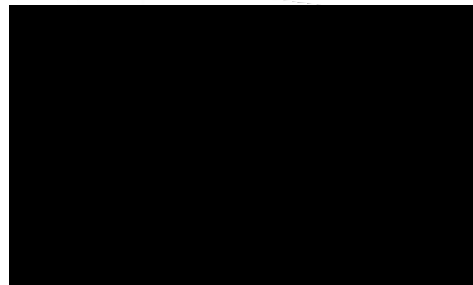
Maungakiekie-Tāmaki Local Board feedback on He Tūāpapa ki te Ora, Infrastructure for a Better Future:

The Maungakiekie-Tāmaki Local Board provides the following input:

- a) endorse in principle Auckland Council's draft submission for He Tūāpapa ki te Ora, Infrastructure for a Better Future, in particular:
 - i. to recognise the importance of upholding democracy and local board decision making
 - ii. the importance of direct engagement with iwi Māori to ensure that the delivery and implementation of the proposed Infrastructure Strategy aligns with and is produced through a Te Ao Maori Lens and viewpoint
- b) recommend including these points in Auckland Council's submission:
 - i. implement a cyclical maintenance programme to ensure new infrastructure is maintained to match the fast pace of urban development and housing demands in Auckland
 - ii. to ensure the quality of new housing and new infrastructure builds are monitored for quality assurance as there has been a history of leaking home cases in Aotearoa
 - iii. ensure all current infrastructure developments meet the proposed Infrastructure Strategy as there are low socio-economic areas with infrastructure currently below these proposed standards and need more support



Chair
Maungakiekie-Tāmaki Local Board



Deputy Chair
Maungakiekie-Tāmaki Local Board

End.

**Te Waihanga New Zealand Infrastructure Commission's consultation document He
Tūāpapa ki te Ora, Infrastructure for a Better Future, Aotearoa New Zealand
Infrastructure Strategy**

Feedback from the Ōrākei Local Board

Auckland is the economic powerhouse of the country. Central government is passing laws and making decisions which impact Auckland's future and add currently un-budgeted costs. Central government is not making adequate financial contributions to support these changes eg; massive increase in Kāinga Ora housing (15-20,000 units over the next ten years); by-passing the unitary plan to allow fast-tracking of major infrastructure projects; climate change disciplines adding cost etc.

Government construction standards are inflexible and often over-engineered, often causing inappropriate over-investment and waste.

The Resource Management Act is cumbersome and adds unnecessary cost and time for development.

Given Auckland's borrowing constraints, the costs of growth can only be funded by Development Contributions, rates or government contribution. The Development Contribution fund mechanism is not adequate and needs to be re-configured. Substantial increases will be, and should be, implemented.

17 June 2021

Feedback on:

Auckland Council's submission on Te Waihanga New Zealand Infrastructure Commission's consultation document: He Tūāpapa ki te Ora, Infrastructure for a Better Future, Aotearoa New Zealand Infrastructure Strategy

18 June 2021

Context

1. The New Zealand Infrastructure Commission, Te Waihanga, is an autonomous Crown entity with an independent board, officially formed on 25 September 2019. The Commission seeks to lift infrastructure planning and delivery to a more strategic level and by doing so, improve New Zealanders' long term economic performance and social wellbeing.
2. A key function of the Commission is to produce a 30-year infrastructure strategy to replace the government's current 30-year plan.
3. The Commission has released its consultation document, He Tūāpapa ki te Ora, Infrastructure for a Better Future, which sets out the approach that it proposes to take in developing its draft 30-year Infrastructure Strategy.
4. The document highlights key challenges including climate change, a growing and ageing population, housing affordability, increasing construction cost pressures, technological / digital change and equity.
5. Auckland Council has previously provided input to the Commission's Asset Owner Survey, which was a key input in informing their draft 30-year Infrastructure Strategy. This work identified infrastructure challenges and opportunities across different sectors. Some of the key themes identified included funding and financing challenges, asset management and procurement, natural hazards and climate change, and the challenges of moving to a low emissions economy.

Relevance to the board

6. Local boards are responsible for decision-making on local issues, activities and services and providing input into regional strategies, policies and plans. Local boards also have a role in representing the views of their communities on issues of local importance.
7. Every three years, local boards set their strategic direction through their local board plan. He Tūāpapa ki te ora, Infrastructure for a better future has relevance to the following outcomes and objectives in the 2020 Ōtara-Papatoetoe Local Board Plan:

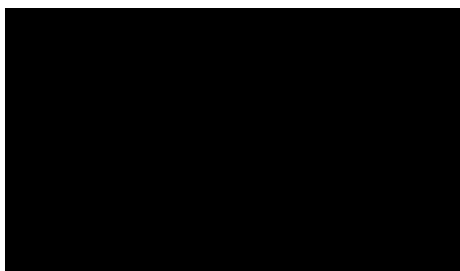
Outcomes	Objectives
Outcome one: Transform Manukau	Transform Manukau through good planning and sustainable development
Outcome two: A prosperous local Economy	Revitalising Ōtara and Papatoetoe town centres
	Supporting local procurement and priority on Māori outcomes
Outcome five: Sustainable, healthy natural environment	Promoting and enhancing sustainable practices by local businesses, families and neighbourhoods

Outcome six: Connected area and easy to get around	Using public transport is a viable option for getting around
	Safe cycling and pedestrian environments

Ōtara-Papatoetoe Local Board feedback on Auckland Council's submission on Te Waihangā New Zealand Infrastructure Commission's consultation document He Tūāpapa ki te Ora, Infrastructure for a Better Future, Aotearoa New Zealand Infrastructure Strategy

The Ōtara-Papatoetoe Local Board

- a) is generally supportive of Auckland Council's draft submission for He Tūāpapa ki te Ora, Infrastructure for a Better Future.
- b) agree that equity needs to be added to the list of priorities in the Infrastructure Strategy, and request the Infrastructure Strategy include specifics on how equity will be met.
- c) note that while New Zealand and Tāmaki Makaurau have an aging population, there are higher than average birth rates in our Māori, Pacific and Asian communities. These communities make up a large proportion of South Auckland and Ōtara-Papatoetoe in particular, with Pacific Peoples comprising 46 per cent, Asian 35 per cent and Māori 16 per cent. As a result, the future workforce will be from Auckland, in particular from the diverse populations of South Auckland. Decisions regarding infrastructure and future development therefore need to take this into consideration when planning for equity outcomes for the future.
- d) agree there is a need to upskill in infrastructure planning, integration to spatial planning, infrastructure decision making, and policy development. However, the board requests this be addressed through providing opportunities for our diverse communities to upskill in these areas to enhance and develop local and social procurement and ultimately to enable local residents to deliver key infrastructure projects in their local area.
- e) request the Infrastructure Commission connect with the Amotai social procurement initiative to engage with Māori and Pacific Peoples' owned businesses to promote supplier diversity in all key infrastructure developments.
- f) agree there needs to be greater emphasis on engagement with Māori and that the proposed Te Ao Māori input needs to be more than an advisory role to ensure the Infrastructure Strategy is delivering on the principles of Te Tiriti o Waitangi.
- g) support the emphasis on increasing housing capacity and affordability and council's suggestion of a top-down planning approach that focuses on delivering quantity and high-quality housing.



Chair, Ōtara-Papatoetoe Local Board

I generally support the draft from Auckland Council on Infrastructure. I have a few other comments, and some are connected to earlier government pieces of work.

Skills

Infrastructure industry planning for skilled employees at all levels and new training and employment schemes are essential – a degree is 4+ years and a certificate level is 2 years and people can remain in work during this time.

This discussion is of a broader nature, but I consider that council should be using Auckland examples and NZ examples in some of their comments. All the recent government discussion papers are interrelated.

Auckland Second Waitemata Harbour Crossing

It is essential that the second Auckland harbour crossing is planned and built and not just a cycle/walking bridge as they must both be planned together – if an underground public transport system, bus and light rail and emergency services goes under the harbour then surely a clip-on on this current bridge could be used for the cycle/walking lane with the cycle/walking linking tunnels required being planned/ built as the new underground PT connection tunnel was built.

Heavy Rail and Highways

The country cannot plan NZ's main highway network without first making best use of freight on our heavy rail network and rebuilding some of the spur lines to very big industry (e.g. Fonterra) and regional centres, including the links to/from our regional ports and the associated storage and spoke network.

The heavy rail line must be in place so that heavy diesel trucks can be removed from most roads as many make long-haul journeys that are better suited to rail.

Clean electric trains - affordable electricity when the smelter closes down.

Commercial and PT electric vehicles

Generally electric vehicles are lighter than diesel or petrol and create less damage to roads and other infrastructure.

All buses and taxi in NZ should be electric or clean fuel (the new clean natural gas product). It is essential the commercial fleet and PT fleet is changed to compulsory electric/ clean fuel before the private consumer has to bear the costs of a compulsory change to electric as generally commercial vehicle costs are expensed against a business.

Heavy vehicles have a longer fleet life and damage road assets and create more pollution.

The technology for clean electric and alternative fuel heavy vehicles is still being developed so time must be allowed for this change – time that allows for the upgrade of heavy rail.

All vehicle should have emissions testing for a WOF and this will gradually see dirty polluters taken off the roads.

Many thanks

Kind regards

[REDACTED], JP, BSocP, Dip Bus

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