



Feedback from

**Raukawa**

To

**NZ Infrastructure Commission – Te Waihangā**

On

**DRAFT National Infrastructure Plan**

**6 August 2025**

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NZ Infrastructure Commission – Te Waihanga  
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Tēnā tātou katoa,

**Raukawa feedback on the Draft National Infrastructure Plan**

**1. INTRODUCTION**

- 1.1.** This feedback on the draft *National Infrastructure Plan* [NIP] is made on behalf of the Raukawa Settlement Trust [RST] and the Raukawa Charitable Trust [RCT] on behalf of the Raukawa iwi.
- 1.2.** RST represents 17 marae and is the post-settlement governance entity for Raukawa. The RCT is mandated by RST, as the iwi authority, to represent Raukawa on all environmental matters.
- 1.3.** Raukawa's 16 mandated marae are located across four traditional pou whenua: Te Pae o Raukawa, Wharepūhunga, Maungatautari and Te Kaokaorua O Pātetere. These four areas include Mōkai, Atiamuri, Whakamaru, Mangakino, Arapuni, Tokoroa, Putāruru, Tirau, Tapapa, Matamata, Kēmureti (Cambridge), Kihikihi and Te Awamutu. This network provides Raukawa with deep, place-based relationships, trusted community connections, local knowledge, and a strong boots-on-the-ground presence across the takiwā.
- 1.4.** Raukawa welcomes the opportunity to provide feedback on NIP. We acknowledge the Plan's intent to strengthen infrastructure delivery, improve system efficiency, and respond to changing demographic, environmental, and economic conditions. The emphasis on affordability, resilience, and pipeline transparency is broadly aligned with Raukawa's regional experience of underinvestment, asset decline, and infrastructure stress — particularly on freshwater, whenua, and rural transport.
- 1.5.** However, our support is not unconditional. The NIP, while comprehensive in its technical diagnosis, does not go far enough to embed the Crown's obligations to iwi under existing Treaty settlements, nor does it fully integrate the long-term consequences of spatial, environmental, and climate-related infrastructure impacts in our rohe.
- 1.6.** Infrastructure is not just steel and concrete. It is also about place, people, and partnership. We urge the Commission to strengthen the final Plan so that it reflects the obligations of the Treaty relationship, acknowledges the lived experience of iwi, and delivers infrastructure that upholds intergenerational wellbeing, not just economic productivity.
- 1.7.** The experience of our iwi with infrastructure is long-standing and complex. Across the takiwā, the legacy of infrastructure development—often implemented without our input or consent—has left both visible and intangible marks. Roads, dams, rail corridors, and transmission lines were placed through our whenua frequently enabled by legislation such as the Public Works Act, which facilitated the compulsory acquisition of Māori land. These developments resulted in the forced

removal of our communities, the fragmentation of whenua, and the degradation or destruction of sites of cultural and environmental significance.

- 1.8. These experiences underscore our strong interest in ensuring that future infrastructure decisions do not repeat the mistakes of the past. They must reflect our role as enduring stewards of the whenua and partners in shaping Aotearoa’s long-term development.
- 1.9. We offer the following thematic feedback to support refinement of the final Plan.

### **Raukawa Treaty Settlement Arrangements and System Stability**

2. The NIP makes only broad references to the Crown’s obligations in relation to iwi and omits any meaningful recognition of Treaty settlement instruments, legislation, or enduring commitments that shape how infrastructure should be planned, developed, and delivered.
- 2.1. For Raukawa, these obligations are not abstract principles but legally binding commitments that form the foundation of our relationship with the Crown. These include (but are not limited to):
  - a. The Raukawa Claims Settlement Act 2014
  - b. The Deed in Relation to a Co-Management Framework for the Waikato River (2009)
  - c. Statutory Acknowledgements, Joint Management Agreements, and other redress instruments
  - d. Te Ture Whaimana o Te Awa o Waikato – the primary direction-setting document for the health and wellbeing of the Waikato River
- 2.2. Despite their legal status, these instruments are at risk of being diluted or bypassed under the current infrastructure settings. This concern was clearly outlined in our submission on the National Direction Package for Infrastructure and Development, where we highlighted:
  - a. A lack of mechanisms to give proper weight to settlement instruments in national planning.
  - b. The risk that fast-track consenting or nationally significant infrastructure policies override settlement obligations.
  - c. The failure to embed Treaty commitments into the investment and regulatory architecture guiding infrastructure development.
- 2.3. The NIP is positioned as a national-level plan to guide infrastructure strategy and investment. As such, Raukawa are of the view that it must meet the standards required of any plan that influences regulatory or decision-making frameworks. This includes ensuring alignment with existing Treaty settlements and redress agreements.
- 2.4. The NIP rightly identifies the need for stable, coherent policy settings to give infrastructure investors certainty and reduce the risk of disruption. Raukawa agrees that stability is important—but it must not come at the expense of rights and responsibilities guaranteed through formal settlements. If stability is to be achieved, it must be built on integrity, and that means designing policy frameworks that uphold—not marginalise—existing commitments.
- 2.5. The Crown is currently progressing multiple interdependent sector reform processes, including:
  - a. Resource management reform
  - b. Energy and resources reform (including renewable energy, hydrogen, and transmission infrastructure)

- c. Water services reform and three waters regulation
- d. Conservation law reform
- e. Climate Resilience and Adaptation reform.

**2.6.** These regimes are rapidly evolving and carry wide-ranging implications for infrastructure development. However, their interrelationship with Treaty settlements has not been clearly defined, and their implementation pathways often lack mechanisms for place-based alignment with our treaty settlement instruments, iwi planning documents or local environmental objectives.

**2.7.** If the NIP is to function as a strategic infrastructure plan that integrates sector reforms and guides long-term investment, it must provide a clear line of sight to Treaty obligations across all these reform settings. Otherwise, the system will remain fragmented, and the risk of policy conflict, delayed delivery, or legal challenge will remain high.

**2.8.** The NIP also notes that some infrastructure developers experience challenges when engaging with iwi and Māori. In our view, these frustrations often stem from a lack of understanding, inadequate preparation, and a transactional approach that delays or avoids engagement until it becomes a compliance issue.

**2.9.** These are not problems of iwi capacity—they are failures of the development sector to recognise the value, legal authority (via treaty settlement arrangements), and insight that iwi bring to infrastructure decision-making. The commentary in the NIP suggesting a misalignment between developers and Māori appears disingenuous and misses the real issue: developers too often ignore the importance of early, sustained, and respectful engagement.

**2.10.** Raukawa recommends that the final NIP:

- a. Explicitly recognise the enduring relevance and enforceability of Treaty settlement instrument, including Te Ture Whaimana as the primary setting document for our rohe.
- b. Promote implementation mechanisms that ensure all future policy and regulatory settings are designed to give effect to these commitments.
- c. Acknowledge the leadership role of iwi in shaping infrastructure outcomes and build expectations of early and genuine engagement into national guidance and investment processes.
- d. Ensure that sector reforms and infrastructure investments proceed with clear Treaty alignment to avoid future conflict and ensure durability of outcomes.

**2.11.** Raukawa is of the view that without addressing these matters, the NIP risks missing an opportunity to build trust and demonstrate alignment with the commitments that underpin long-term partnership.

### Theme 1: Establish Affordable and Sustainable Funding

**3.** Raukawa supports the premise that establishing affordable and sustainable funding is a national priority. As the NIP notes, New Zealand already spends heavily on infrastructure, yet too often this expenditure delivers suboptimal outcomes. This reflects deeper structural and governance issues—not simply a lack of investment.

**3.1.** A smarter funding system must go beyond tweaking fiscal settings; it must address the fundamental issues in how infrastructure is prioritised, delivered, and owned. Without this, efforts to improve affordability and value will be undermined by inefficiencies in the system itself.

**Structural Constraints Are Undermining Value**

**3.2.** Public monopolies—particularly across central and local government—continue to dominate the infrastructure landscape. These ownership structures are not incentivised for whole-of-life asset management, long-term planning, or innovation. Essential maintenance and renewals are often deferred due to political considerations, which undermines affordability in the long run.

**3.3.** Funding is frequently subject to short political cycles, contributing to a 'stop-start' delivery model. Raukawa support the recommendation to provide multi-year funding for well-performing agencies but note that even this will not solve the problem unless accountability, performance benchmarking, and resilience planning are embedded across the system.

**Smarter Ways to Pay Must Be More Equitable**

**3.4.** The current user-pays model for network infrastructure (fuel taxes, rates, etc.) does not consistently capture value, particularly from high-use, high-profit private sector users. In practice, these costs are often passed on to the average consumer, while larger commercial users are not paying their fair share. Raukawa supports a more consistent cost-recovery model, but this must include:

- Mechanisms to prevent cost offloading by private sector operators.
- Tiered or progressive charging that reflects the scale and intensity of benefit.
- Investment rules that protect vulnerable communities and ensure equitable access to essential services.

**3.5.** Raukawa is of the view that smarter funding must include smarter accountability. This means asking not just who pays, but who benefits—and whether that benefit is proportionate to their contribution.

**Investment Must Reflect a Wider Set of Outcomes**

**3.6.** Current investment decisions continue to be overly dependent on benefit-cost ratios (BCRs), which systematically disadvantage iwi and regional Māori. Projects in high-density urban areas tend to score higher under conventional BCRs, sidelining infrastructure needs in regions where Māori reside or seek to return under the principle of Ahikāroa.

**3.7.** This creates a structural bias against Iwi aspirations and regional development. The funding framework must be recalibrated to include broader measures of value—such as cultural, social, and intergenerational wellbeing.

**3.8.** This is particularly evident in the case of Papa Kaingā development, where funding for enabling infrastructure—such as roads, water, power, and wastewater connections—is often insufficient or absent altogether. Despite the Crown's stated support for Māori housing solutions, current funding settings do not provide a viable pathway for whānau and iwi to deliver fit-for-purpose infrastructure on Māori land. Without targeted investment mechanisms, the infrastructure component becomes a barrier to realising housing aspirations, even where whenua and community readiness are strong.

### **Unlocking Iwi Investment and Reducing Monopolisation**

**3.9.** Iwi have capital, time horizons, and investment strategies well suited to infrastructure. Yet we are consistently crowded out of investment opportunities due to public debt constraints, ownership monopolies, and opaque procurement processes.

**3.10.** Raukawa is of the view that a sustainable funding model should:

- enable blended finance models that actively include iwi investment partners.
- treat PSGEs as long-term infrastructure stakeholders, not just consultees or community partners.
- support partnership-based infrastructure delivery, particularly in housing, energy, and regional economic development.

### **Depoliticising Major Investment Decisions**

**3.11.** The NIP notes that large transport projects represent key upcoming funding decisions. Raukawa agrees—but is concerned that these decisions are too often politicised, favouring headline projects that lack local benefit or fail to deliver long-term value.

**3.12.** Future infrastructure planning and funding decisions must:

- be subject to transparent, multi-year scrutiny and regional alignment.
- prioritise readiness and resilience over scale and visibility.
- include governance input from a diverse set of infrastructure users—including iwi, regional authorities, and communities.

**3.13.** In summary, Raukawa supports the NIP’s recommendations in principle but emphasise that reform must go beyond funding instruments to address systemic inequities in how infrastructure is governed, prioritised, and delivered. Sustainable funding cannot be achieved without structural change.

## **Theme 2: Clear the Way for Infrastructure**

**4.** Raukawa agrees that delivery delays, regulatory friction, and underutilised infrastructure undermine the efficiency and equity of the system. We support the need for better coordination and longer-term planning, but caution that reform efforts must not compromise the ability of local communities and iwi to participate meaningfully in planning and decision-making.

**4.1.** The NIP’s recommendations around improved planning alignment, stable policy settings, and workforce capacity are directionally useful. However, Raukawa is of the view that effective implementation will depend on the extent to which these tools can accommodate diverse regional needs and ensure that iwi perspectives are integrated early.

### **Use Existing Infrastructure Better**

**4.2.** The proposal to update planning rules to support better use of existing infrastructure is sound. Many urban and peri-urban areas within the Raukawa takiwā are already under pressure from ad hoc development that fails to align with existing infrastructure capacity.

**4.3.** However, care must be taken to avoid using this objective to justify intensification in ways that overlook regional aspirations, environmental sensitivities, or Māori land interests. Raukawa

supports a balanced approach where planning rules incentivise better land-use decisions, but retain appropriate checks for cultural, environmental, and infrastructure alignment.

#### **Keep Policy Stable**

**4.4.** Raukawa strongly support the recommendation to set clear and stable policies. Infrastructure investment depends on predictability. As noted in the NIP, frequent rule changes — especially in the energy and planning sectors — have undermined investor confidence and delayed critical projects.

**4.5.** However, policy stability must not come at the expense of good design. Stability without alignment to Treaty settlement obligations or community needs simply locks in existing inequities. As noted in section 2 above, the NIP must function as a stabilising influence across fast-moving reform processes, including resource management, energy transition, spatial planning, and water reform.

**4.6.** Clear and stable policy settings should:

- align with Treaty commitments and settlement legislation.
- reflect iwi and community plans as part of the policy design process.
- minimise reactive lawmaking that bypasses due process under the guise of urgency.

#### **Enable Good Projects**

**4.7.** Raukawa agrees that infrastructure consenting can be slow and inconsistent but cautions against viewing all delays as system failure. Many of the delays occur because of insufficient early engagement, poor-quality applications, or a failure to address environmental and community concerns.

**4.8.** The NIP's call to simplify approvals is understandable, but must be balanced by expectations of quality, accountability, and engagement. Good projects are those that are supported by the community, environmentally responsible, and culturally aligned—not just those that move quickly through the system.

**4.9.** Raukawa support streamlined pathways only when they:

- require early engagement with iwi and affected communities.
- maintain appropriate assessment of cultural and environmental impacts.
- embed integrity and transparency into approvals processes.

#### **One Map for Growth**

**4.10.** Raukawa agree with the NIP's emphasis on the need for long-term spatial planning to align land use, infrastructure, natural resource extraction and funding decisions. Recommendation 7 suggests that spatial plans will help clarify the relationship between growth planning and key legislative tools such as the Local Government Act and the Land Transport Management Act.

**4.11.** This direction is welcome but must go further. If spatial plans are to be the foundation for future investment decisions, they cannot be developed in isolation from other key national reform programmes. The 'one plan' approach should not just support population growth and housing development but must integrate with planning instruments under the resource management reform, conservation law reform, climate adaptation policy, and natural hazard resilience.

**4.12.** True coordination means spatial planning must serve as the integrative tool that aligns environmental limits, resilience needs, cultural priorities, and infrastructure sequencing—rather than defaulting to growth enablement alone.

**4.13.** This is particularly important given the current disconnect identified in our submission on the National Direction Package 1 for Infrastructure and Development. For example, the NIP highlights in Box 17 the critical need to manage natural hazard risks, yet the proposed National Policy Statement on Infrastructure (NPS-I) fails to incorporate or link to the proposed National Policy Statement for Natural Hazards (NPS-NH).

**4.14.** This inconsistency undermines the credibility of the spatial planning framework and departs from the NIP’s own position on the importance of sound and stable policy settings. Without explicit alignment between hazard management and infrastructure policy, there is a real risk that spatial plans will support development in high-risk areas, with long-term implications for safety, insurance, and public cost.

**4.15.** Raukawa supports spatial planning in principle—but only when it:

- a. is integrated with all relevant national direction and sector policies.
- b. embeds the role of iwi and existing settlement instruments from the outset.
- c. is grounded in resilience, sustainability, and cultural responsiveness—not solely in projected economic growth.

**4.16.** Spatial plans offer a genuine opportunity to avoid the fragmented, reactive approaches of the past. But if the NIP’s spatial planning vision is to succeed, it must be broader, better aligned, and informed by a more comprehensive policy ecosystem.

#### **Grow the Infrastructure Workforce**

**4.17.** Raukawa supports the ambition to grow a skilled, sustainable, and regionally distributed infrastructure workforce. Long-term infrastructure success depends not just on what is built, but on who builds and maintains it. Historically, workforce planning in Aotearoa has been short-sighted, centralised, and disconnected from both demographic trends and regional realities. This is a clear opportunity to reset—by building a future-ready workforce strategy that unlocks Māori potential, particularly among our rangatahi.

**4.18.** Māori are one of the youngest population groups in Aotearoa, with a median age of just 27.2 years (2023 Census). Regions like the Raukawa takiwā face a dual challenge and opportunity: the decline of traditional industries such as forestry and manufacturing, and the presence of a youthful, capable workforce ready to be trained and retained on their whenua. Realising this opportunity requires targeted investment—particularly in reskilling and post-redundancy transitions, apprenticeships, and pathways into high-value roles.

**4.19.** Raukawa also note the Crown’s recent NCEA reforms, including the proposed focus on vocational pathways. While this initiative may better align education with employment outcomes, it must be implemented carefully. There is a risk that Māori and Pasifika youth could be funnelled into low-wage or low-skill roles, reinforcing historical patterns of marginalisation.

**4.20.** Instead, Raukawa encourage the development of inclusive vocational and tertiary pipelines that lead to higher-paying, skilled roles—particularly in civil engineering, STEM, project management,

and digital infrastructure. Raukawa are well-positioned to partner with government, industry, and education providers to co-design these pathways. This includes:

- a. expanding access to apprenticeships and tertiary training.
- b. developing iwi-led infrastructure academies.
- c. creating regional education-to-employment pipelines that reflect our economic aspirations.

**4.21.** Workforce development must also be equitable. Māori and Pasifika remain under-represented in infrastructure leadership, technical, and professional roles, despite strong presence in labour-intensive fields. It is not enough to increase participation—we must create progression pathways, ensure roles are fairly remunerated, and support employees through transport, digital access, and wrap-around pastoral services.

**4.22.** Raukawa already have proven infrastructure to deliver workforce outcomes. Raukawa are not just community stakeholders—they are investment partners, employment engines, and regional capability leaders. We should be embedded formally in the workforce development ecosystem.

**4.23.** Raukawa recommends:

- a. formal Crown-iwi regional workforce partnership agreements.
- b. procurement rules that require Tier 1 contractors to work with iwi on employment outcomes.
- c. investment in iwi-led training hubs aligned with major project pipelines.

**4.24.** Regarding regional workforce partnerships, these should be aligned with the Crown’s broader social investment approach, ensuring that infrastructure investment is not just about physical assets, but also delivers intergenerational outcomes for our communities.

**4.25.** Raukawa sees potential for alignment with the Social Investment Agency’s work on integrated place-based delivery and recommends that regional workforce strategies be designed to connect training, employment, housing, and wellbeing outcomes across agencies — with iwi as co-designers and delivery partners.

**4.26.** These initiatives align with our Raukawa 2050 and 2030 strategies, which prioritise intergenerational wellbeing, prosperous communities, and local economic resilience.

#### **Build Public Sector Capability**

**4.27.** Raukawa agrees that capability in government infrastructure delivery must be strengthened. Many of the issues we face at the regional level stem from high turnover, inconsistent leadership, and under-resourcing of key government delivery agencies.

**4.28.** Raukawa support:

- a. investment in training and leadership development within the public sector.
- b. clear expectations and competencies for those managing infrastructure portfolios.
- c. stable resourcing for infrastructure units that interface regularly with iwi and local authorities.

**4.29.** Public sector infrastructure leaders must be equipped not only to manage complexity, but also to work constructively in a values-based and partnership-led environment.

### **Make Performance Visible**

**4.30.** Raukawa support the call for transparent performance reporting across infrastructure providers. This aligns closely with our feedback under Theme 1, where we called for stronger asset management transparency, more consistent performance metrics, and clearer visibility of infrastructure conditions across regions.

**4.31.** Public reporting must:

- be consistent across sectors.
- include both financial and service delivery metrics.
- provide disaggregated data to reveal regional and demographic equity.

**4.32.** Performance visibility is essential to accountability and should be seen as a core infrastructure function—not an administrative after thought.

### **Theme 3: Start with Maintenance**

**5.** Raukawa agrees that deferred maintenance is one of the most pressing and costly challenges facing New Zealand's infrastructure system. This extends across public assets—such as schools, hospitals, roads, and civic facilities—but also includes significant private infrastructure. While large corporates may have greater financial capacity to invest in maintenance, in practice, performance is mixed. Market pressures, short-term cost control, and shareholder returns can deprioritise long-term asset renewal, particularly in sectors where maintenance does not directly impact revenue generation.

**5.1.** Raukawa support the NIP's position that maintenance must be brought to the front of the queue. However, to achieve system-wide resilience and service continuity, both public and private infrastructure owners must be held to consistent expectations of transparency, forward planning, and risk mitigation.

### **Know What We Own**

**5.2.** Raukawa agree that central government agencies must be required to maintain accurate asset registers and long-term maintenance plans. However, this expectation should not stop at the public sector. Private entities—particularly large industrial players own significant infrastructure that has environmental, social, and economic impacts within our regions.

**5.3.** These operators should be held to the same level of transparency and public accountability. Where private infrastructure failure can affect community services, environmental outcomes, or spatial planning, there should be a clear line of sight on the condition, location, and risk profile of those assets.

### **Up-to-date Decision Making**

**5.4.** Raukawa support the recommendation to require agencies to regularly report on how well they are delivering on their infrastructure plans and asset condition. However, this must also be integrated with performance reporting, spatial planning, and renewal scheduling.

**5.5.** Raukawa proposes that all renewal work programmes be reviewed and reported as part of long-term planning and council infrastructure strategies. Where renewal works are deferred, this should be subject to heightened scrutiny, including:

- a. independent review or audit of reasons for deferral.
- b. ministerial sign-off or escalation where delays create risk.
- c. alignment with central government expectations on resilience and service equity.

**5.6.** This issue is particularly relevant in the context of the Local Government (System Improvements) Amendment Bill 2025, which is currently under consultation. That bill aims to relieve pressure on council rates while improving accountability. It is critical that maintenance transparency and renewal oversight be incorporated into the final design of that legislative reform, which will link into the Plan.

#### **Independent Maintenance Audits**

**5.7.** Maintenance transparency is also critical to climate adaptation and infrastructure resilience. Assets that are poorly maintained or already at the end of their lifecycle are far more vulnerable to climate-related hazards such as flooding, heat, drought, and severe weather events. Without a clear understanding of asset condition and exposure, government agencies and communities cannot plan proactively for resilience, nor make informed decisions about relocation, reinforcement, or decommissioning.

**5.8.** Embedding maintenance reporting within a broader climate adaptation framework will support smarter prioritisation, risk management, and long-term public safety.

**5.9.** Raukawa support the use of independent audits to verify the quality and implementation of long-term infrastructure plans. Relying on self-assessment has proven insufficient, and greater consistency is needed across agencies and sectors.

**5.10.** Audits must:

- a. use nationally consistent standards for performance and risk.
- b. include both asset condition and delivery performance.
- c. be shared publicly to enable regional and iwi partners to engage in infrastructure planning with confidence.

**5.11.** Overall, a transparent, accountable, and cross-sector approach to maintenance will support more durable outcomes, fairer funding, and better regional infrastructure resilience.

### **Theme 4: Right size new investment**

**6.** Raukawa supports the NIP's intent to strengthen how infrastructure projects are prioritised, planned, and delivered. We agree that many projects in the past have been announced prematurely—without robust business cases, proper risk management, or sustained delivery planning. This results in cost overruns, delivery failures, and lost public confidence.

**6.1.** Raukawa strongly support a shift away from politically driven capital decisions and toward evidence-based, transparent, and regionally informed processes.

#### **Make Big Decisions More Transparent**

**6.2.** Raukawa support the recommendation to publish project business cases, budget requests, and supporting evidence. Transparency is essential to restoring trust in the infrastructure system—especially when projects require large public investment and affect regional communities.

- 6.3. For Raukawa, transparency also supports earlier and more informed engagement. Where we can access the same information used by agencies and ministers, we are better placed to assess assumptions, identify risks, and propose partnership opportunities that add value and resilience.
- 6.4. This expectation should apply not only to central government agencies but also to Crown entities, council-controlled organisations (CCOs), and infrastructure partnerships involving large contractors.

#### **Test Before We Invest**

- 6.5. Raukawa supports the recommendation to strengthen the investment readiness process through independent assessment. We agree that central government-funded infrastructure proposals should be assessed thoroughly before public funds are committed. Cost overruns, delays, and suboptimal project delivery erode public trust and strain already limited capital budgets.
- 6.6. However, we believe the independent assessment process must include a robust test of social licence and regional equity outcomes, alongside technical and financial readiness. This means not only evaluating commercial and engineering feasibility, but also identifying potential risks around land use, cultural impacts, and community disruption early in the planning process.
- 6.7. As highlighted throughout this submission, past infrastructure investment has disproportionately impacted iwi communities—particularly where projects have proceeded without adequate engagement, or through mechanisms such as the Public Works Act. Independent assessments must therefore require project sponsors to demonstrate that engagement with affected iwi has occurred early, and that the project has been designed to avoid or mitigate intergenerational harms (such as land loss or environmental degradation).
- 6.8. These risks can be managed within the procurement and due diligence phases. For example, central agencies could require investment-ready proposals to include:
  - a. confirmation of engagement with local PSGEs.
  - b. iwi impact statements aligned with regional spatial planning.
  - c. clear demonstration that project delivery supports inclusive workforce and procurement outcomes.

- 6.9. This approach would lift the integrity of the investment process and ensure projects reflect a wider public interest mandate—including regional equity and respect for enduring settlement arrangements.

#### **Managing Risks**

- 6.10. Raukawa agree that stronger upfront risk assessment and assurance processes are essential. Projects that fail often do so because risks are misunderstood, externalised, or not disclosed early enough for proper mitigation.
- 6.11. It is also important to note that major infrastructure projects must also be assessed for biodiversity impact and include mechanisms for ecological restoration or compensation, aligned with iwi environmental planning instruments. This is especially important where infrastructure development intersects with sensitive catchments, native habitat, or taonga species.

**6.12.** Raukawa has seen first-hand how risks—particularly environmental, cultural, and consent-related—are underplayed in early stages of infrastructure planning. The result is delay, conflict, or redesign, which could have been avoided through meaningful engagement and place-based design.

**6.13.** Raukawa recommend that project risk registers explicitly include:

- a. cultural impact and mana whenua engagement risks.
- b. environmental degradation or resilience exposure.
- c. community or workforce capacity constraints.

**6.14.** These dimensions must be considered on equal footing with technical and financial risks.

#### **Learn from the Past**

**6.15.** Raukawa support the recommendation to track and publish actual costs, delivery timeframes, and benefits of completed infrastructure projects. This will help improve accountability, refine future business cases, and foster a continuous improvement culture.

**6.16.** Raukawa also suggest this information be published in a way that is accessible to iwi, communities, and non-technical users. Projects that affect regions like the Raukawa takiwā must be evaluated not just in terms of national benefit, but also local impact and lessons learned for future regional delivery.

**6.17.** Raukawa further recommends:

- a. embedding post-project review obligations into all government-funded infrastructure contracts.
- b. publishing lessons learned in a centralised, searchable format.
- c. including regional equity, cultural outcomes, and partnership effectiveness as key metrics in post-project evaluations.
- d. right-sizing investment is not about building less—it is about building smarter, more equitably, and in ways that maximise long-term outcomes for people and place.

### **Final Recommendations**

To support implementation of the NIP, Raukawa recommends:

- a. **Policy Alignment:** Ensure infrastructure-related reforms (e.g. RM reform, energy strategy, climate adaptation, spatial planning) integrate Treaty settlement instruments and regional environmental directives such as Te Ture Whaimana.
- b. **Equity in Investment:** Reform infrastructure appraisal frameworks to reflect intergenerational equity, place-based need, and regional aspiration — not just population density or short-term returns.
- c. **Unlocking Iwi Capital:** Establish formal investment pathways for PSGEs to participate in infrastructure projects alongside Crown and private sector partners — including energy, housing, and transition assets.
- d. **Early and Sustained Engagement:** Embed expectations for early, sustained iwi engagement across project planning, procurement, and investment assurance processes.

- e. **Workforce Development:** Develop regional workforce strategies co-designed with iwi to lift Māori participation across all levels of the infrastructure workforce — from trade and vocational pathways to governance and leadership roles.
- f. **Maintenance Transparency:** Require long-term renewal planning and asset condition registers for both public agencies and large private infrastructure operators, with oversight to prevent renewal deferrals.
- g. **Integrated Risk Management:** Expand infrastructure risk assessments to include cultural, environmental, land-use, and social licence considerations — not just financial or technical risks.
- h. **Performance and Accountability:** Track and publish not only delivery costs and timelines, but also project outcomes for iwi engagement, regional equity, and environmental resilience.

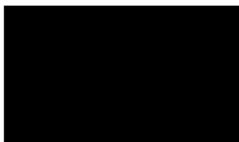
### Closing

Raukawa supports the intention behind the National Infrastructure Plan — to make better long-term decisions, to deliver more value, and to ensure infrastructure serves the needs of all communities. But strong foundations require more than technical reform. They require honouring commitments, protecting taonga, and investing in futures that reflect the diversity and aspirations of Aotearoa.

If the Plan is to enable truly enduring infrastructure outcomes, it must partner with iwi not at the edges — but at the centre. That means embedding existing settlement frameworks, building genuine relationships, and unlocking the capability and investment already present in our communities.

Raukawa is committed to working constructively with Te Waihanga and sector partners to shape an infrastructure future that is resilient, inclusive, and anchored in the values and responsibilities we carry as kaitiaki.

Ngā mihi,



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