

File No: 25 12 05
Document No: 32745718
Enquiries to: [REDACTED]



Te Kaunihera a Rohe o Waikato

Private Bag 3038
Waikato Mail Centre
Hamilton 3240, NZ

waikatoregion.govt.nz
0800 800 401

5 August 2025

New Zealand Infrastructure Commission, Te Waihanga
Level 7, The Todd Building
95 Customhouse Quay
Wellington 6011

Email: info@tewaihanga.govt.nz

Dear Sir/Madam

Waikato Regional Council staff feedback to Draft National Infrastructure Plan

Thank you for the opportunity to provide feedback on the Draft National Infrastructure Plan. Please find attached Waikato Regional Council's staff feedback on this document signed under delegated authority on **5 August 2025**.

Should you have any queries regarding the content of this document please contact [REDACTED]
Senior Policy Advisor, Strategic and Spatial Planning directly on [REDACTED] or by email
[REDACTED].

Regards,

[REDACTED]

[REDACTED]
Manager, Strategic Policy Implementation

Submission from Waikato Regional Council staff on the Draft National Infrastructure Plan

Introduction

1. Waikato Regional Council (WRC) staff appreciate the opportunity to provide feedback on the Draft National Infrastructure Plan (the Plan). The feedback reflects staff experience in providing regional infrastructure, and aims to support the development of the Plan.
2. Our feedback is structured around the key priority areas in the draft Plan. We have focused on areas most relevant to WRC's functions and expertise to aid with the direction of the final Plan.
3. We acknowledge the government's commitment to addressing infrastructure challenges in New Zealand and shaping its future development. We broadly support the direction of the draft Plan, while noting that it remains high-level at this stage and lacks detail in key areas.
4. The key priority areas are generally supported and reflect the same challenges experienced by local authorities, in particular key priority areas one and three. Ageing infrastructure, managing the effects of climate change, natural hazards and demographic change, maintenance of our infrastructure, and driving decarbonisation are key challenges recognised and experienced by WRC.
5. We consider that greater emphasis should be placed on flood protection and drainage management in the Plan, given their critical role in climate resilience and safeguarding communities.
6. We agree that early and ongoing engagement with Māori, respect for mātauranga Māori, and trust-based relationships are vital, and we support increasing Māori participation across the infrastructure sector.
7. We note that the recommendations are high-level and require further refinement and identification of implementation pathways. It was difficult to comment on some of the recommendations without this detail.
8. A summary of our feedback on the recommendations is as follows:
 - Recommendation 3: we **support** forward guidance and agree with the key drivers of infrastructure investment, while noting that climate change should also be included alongside resilience to natural hazards. We recommend that the Plan is strengthened to address ageing infrastructure, and should have regard to community long-term adaptation planning.
 - Recommendations 5 and 6: we agree that transport system reform is required; however, we **do not support** a simplistic user-pays approach, which doesn't work for all infrastructure, especially where there are equity considerations.
 - Recommendation 13: we **agree** that multi-year budget funding should be available so infrastructure projects can effectively navigate government changes. This will particularly assist transport where the main uncertainty is the fluctuating availability of funding.
 - Recommendation 7: we **support** proposals to strengthen spatial planning and recommend the Plan recognises that spatial plans must be linked to relevant instruments, include social infrastructure, and identify high-risk areas for development.
 - Recommendation 8: we have **concerns** with the wording used in the Plan – 'by as many people as possible' – and what this means in practice. This needs to be considered alongside managing interactions with surrounding land uses and negative impacts on the natural environment at the local level.
 - Recommendation 9: we **disagree** with Recommendation 9, 'an enabling environment', and recommend amendments to achieve an appropriate balance when enabling infrastructure to align with section 5 of the RMA.

- Recommendations 12 and 19: we **agree** that central government should be held to the same standards as local authorities in relation to asset management and investment planning.
9. We look forward to any future consultation processes on the draft National Infrastructure Plan and would welcome the opportunity to comment on any issues explored during its development.

Submitter details

Waikato Regional Council
Private Bag 3038
Waikato Mail Centre
Hamilton 3240

Contact person:

[REDACTED]
Senior Policy Advisor, Strategic and Spatial Planning

Email: [REDACTED]

Phone: [REDACTED]

SUBMISSION ON DRAFT NATIONAL INFRASTRUCTURE PLAN

Key Area/ Recommendation	Submission
	General comments
General comments	<p>Māori perspectives</p> <p>We acknowledge that the draft Plan highlights the importance of engaging with Māori and addressing their unique needs, supporting their increasing participation across the infrastructure sector. We agree that early and ongoing engagement, respect for mātauranga Māori, and trust-based relationships can reduce project risks, improve efficiency, and foster more effective stakeholder relationships while meeting Treaty obligations.</p> <p>We acknowledge the Plan's emphasis on clear communication, early role definition, and accessible information to build trust-based relationships, while recognising the practical challenges of engaging with multiple-owned Māori land. Ensuring adequate resourcing for engagement and removing barriers to core services – especially for rural and lower-income Māori communities – can support wider participation and equitable access.</p> <p>We agree with the Plan's inclusion of ongoing monitoring and transparent reporting on Māori outcomes, as this will support accountability and help ensure that infrastructure investments deliver the intended economic and social benefits for all communities.</p> <p>Flood protection and drainage management</p> <p>We consider that greater emphasis should be placed on flood protection and drainage management in the Plan, given their critical role in supporting regional economies, enabling functional national infrastructure (i.e. state highways, climate resilience and safeguarding communities. WRC's infrastructure assets protect 3000km² of land and include around 124 flood pump stations, 635km of stop banks, and 460 floodgates. The increasing frequency and intensity of climate-related events are placing growing pressure on these schemes, highlighting the need for stronger national direction and strategic infrastructure planning.</p> <p>Collaboration and working together</p> <p>We recommend that the Plan actively promotes partnerships between local authorities, central government, and iwi to support collaborative and inclusive infrastructure outcomes.</p> <p>Linkages across instruments</p> <p>We recommend that the Plan establishes strong linkages with the Land Transport Management Act 2003 (LTMA) and infrastructure planning under the Local Government Act 2002. A large part of the strategic planning and funding of land transport is driven through the LTMA. Under the LTMA, the government sets out its strategic transport priorities and expectations around funding through the Government Policy Statement on Land Transport.</p> <p>Land transport</p> <p>We recommend that the final Plan acknowledges the important role of inland ports.</p>

Area one: Establish affordable and sustainable funding	
Is this key area a priority for New Zealand?	<p>Agree that this is a priority area for New Zealand.</p> <p>Ageing infrastructure is a key issue for WRC. The majority of councils' assets were constructed by the government between the late 1950's to 1970's and have since been inherited by local authorities. The assets were built according to the requirements of the day, with varying design standards, expected asset lives, and levels of service in mind. Regulatory, climatic, morphology and land use change have impacted on the expectations of assets, meaning that many do not meet current requirements. Added to this, insurance companies are re-evaluating the level of risk they are willing to insure against and may not cover flooding in high-risk areas across our region. Overcoming these shortfalls requires significant investment (including accommodating inflationary pressures of recent times) and needs to be cognisant of asset age, life expectancy, condition, and performance. These aspects combined mean that WRC may not have/be collecting adequate monies through rates and depreciation to cover the cumulative range of impacts being experienced. These are inter-generational issues and simply increasing the rates take, or debt burden is not a solution. A combination of asset-based options and financial solutions will be required.</p>
Recommendation 3 - Sustainable investment: Forward guidance is refreshed through quarterly updates to the National Infrastructure Pipeline and ongoing updates to the Infrastructure Priorities Programme and the Infrastructure Needs Analysis.	<p>Agree with Recommendation 3, with the following recommendations:</p> <ul style="list-style-type: none"> • Strengthen the plan to address: <ul style="list-style-type: none"> ◦ resilience to both natural hazards and <u>climate change</u>, including long-term adaptation planning. ◦ ageing infrastructure. • Forward guidance should have regard to local authority and community long-term adaptation planning. <p>We support developing forward guidance through the National Infrastructure Pipeline, Infrastructure Priorities Programme and Infrastructure Needs Analysis. We also agree with the key drivers of infrastructure investment, in particular maintenance and renewal of existing infrastructure, resilience to natural hazards, demographic change, and decarbonising our economy.</p> <p><u>Resilience to natural hazards</u></p> <p>Resilience to natural hazards and climate change is one of the biggest challenges that needs to be fully understood when making decisions around infrastructure investment; we note that climate change has been omitted from the long-term drivers of infrastructure investment. This includes a recognition that the infrastructure required to provide an acceptable level of service may cease to be economic when the effects of climate change reach a certain level. We need to build for the future and design higher quality infrastructure that is resilient and adaptable, to mitigate natural hazard and climate change risk.</p> <p>We highlight that several local authorities are working with communities to produce long-term adaptation strategies and plans to manage the impacts of natural hazards and climate change risk. These strategies and plans often identify exposure of local infrastructure and assess the risk appetite for communities and asset owners based on different natural hazard scenarios. Any forward guidance should have regard to the information coming out of long-term adaptation planning, both for its insights on infrastructure exposure and because it records communities' expectations around access, infrastructure provision and thresholds for managed retreat.</p> <p><u>Maintenance and renewal of existing infrastructure:</u> understanding the state and performance of our current infrastructure is vital for any forward guidance. This will help identify any areas of deficits and performance issues so these can be addressed and aligned with future needs. For example,</p>

	<p>flood protection infrastructure is facing more severe events as a result of climate change and in some cases, no longer meets the required level of service. This should be the first step in any infrastructure needs analysis to provide the evidence base/justification for new infrastructure investment.</p> <p><u>Decarbonising our economy:</u> this is a key driver that will require significant planning and investment if we're to meet the Government's Emissions Reduction Plan. We consider that there is a great opportunity to better manage our transport emissions. Transport is the second biggest source of emissions nationally; 90% of transport emissions are due to land transport. We recommended more broad thinking and considering transport options to reduce emissions such as electrified rail, public transport, walking and cycling. We also consider that the government should use all policy levers to incentivise investments for decarbonising our infrastructure. A commitment to sustainable funding and decarbonisation is required. For example, in the Waikato region, funding for public transport initiatives and other active modes has significantly decreased through the latest planning/funding cycle (NLTF). This has adversely affected agreed regional policy outcomes to fund the transformative shift that is required to support our metro-spatial area and emissions reductions.</p> <p>WRC recognises the importance of this driver and the need for immediate action. This commitment is reflected in WRC's strategic direction to transition to a low-emissions economy, and in WRC's Climate Action Roadmap. To further support this transition, WRC is currently reviewing its Regional Energy Strategy, which will identify key opportunities and barriers, and set out the actions required to enable a shift to a low-emissions future.</p> <p><u>Demographic change:</u> this will have major implications for the provision of transport infrastructure. The way in which people access essential services and activities will change and infrastructure providers will need to provide for better public transport and urban development that supports walking. An ageing population will require innovative and sustainably funded public transport solutions.</p> <p>We note that the Plan's recognition of changing Māori demographics provides a strong basis for targeting investment to areas of growing demand, particularly in education, health, and essential services. This targeted approach can help address historical disparities and enhance economic and social outcomes in the regions.</p>
<p>Recommendation 5 - Transport system reform: The land transport funding gap is closed by requiring user charges to fully fund planned investment.</p>	<p>Disagree with Recommendation 5.</p> <p>We agree that transport system reform is required to close the transport funding gap. However, while a user-pays system can work well from an efficiency perspective and for certain types of transport infrastructure, it is too simplistic and doesn't work well for all infrastructure, particularly public transport where there are equity considerations.</p> <p>Please see further comments below under Recommendation 6.</p>
<p>Recommendation 6 - Funding pathways: Funding tools are matched to asset type (user-pays for network infrastructure, commercial self-funding for economic-development assets, and tax funding for social</p>	<p>Disagree with Recommendation 6.</p> <p>Aligning funding tools to asset type as suggested is too simplistic and is not always the best solution, particularly in the context of providing public transport infrastructure. While user pays principles for network infrastructure such as roading networks may make sense, the approach becomes problematic when applied to providing equitable public transport infrastructure and services. The Waikato region has isolated, small, rural and ageing populations, as well as rural areas with populations, who cannot afford to fully self-pay for essential infrastructure. We have a duty under the Land Transport Management Act 2003 to provide for the needs of the transport disadvantaged.</p>

<p>infrastructure) to keep the overall capital envelope affordable. User-pricing principles are applied across all network sectors so user charges fully fund investment, guide efficient use of networks and distribute the benefits of network provision.</p>	<p>In recent submissions to the government on related policy matters, we have outlined (along with Transport Special Interest Group colleagues from the regional sector) that public transport should be viewed as social infrastructure. Funding from taxes/rates will be necessary to ensure public transport outcomes are equitable for our communities. Accessibility, equity and safety are all important considerations. We suggest explicit recognition of public transport in the definition of social infrastructure in the same way other essential facilities will be included in the scope (such as schools and hospitals), in the final Plan.</p> <p>In terms of WRC's flood protection and drainage services, changing circumstances mean that the current approach to investment, and the necessary funding, are potentially creating challenges, particularly for some targeted ratepayers, who are responsible for funding the bulk of expenditure in this area. The majority of the councils' assets are ageing and with regulatory, climatic, morphology and land use changes, many of the assets do not meet current requirements. Paying for solutions can add undue financial pressures to our ratepayers and communities, meaning schemes may become unaffordable or changes to levels of service are required.</p>
<p>Recommendation 11 - Needs based government investment: Fiscal strategy is informed by infrastructure investment and asset management planning and the NZ Infrastructure Commission's independent view of long-term needs.</p>	<p>Agree with Recommendation 11.</p> <p>Infrastructure planning is tied to annual budget cycles, which can constrain long-term decision making. As a result, infrastructure projects may prioritise short-term affordability over long-term resilience and capacity. This approach can lead to the selection of lower cost solutions that meet the immediate budget requirements but fail to account for growth, evolving community needs, or the full design life of the infrastructure.</p> <p>Such short-term planning can result in infrastructure that becomes outdated or insufficient more quickly, requiring costly upgrades, retrofits, or replacements. In contrast, investing in future-proofed infrastructure from the outset, designed to accommodate projected demand, climate resilience, and technological change, can deliver greater value over time. Although the upfront costs may be higher, this approach reduces the risk of repeated capital expenditure, service disruptions, and missed opportunities for integrated, sustainable development.</p>
<p>Recommendation 13 - Stable central government funding: Multi-year budget funding is available for central government agencies with strong planning, delivery and asset management practices.</p>	<p>Agree with Recommendation 13.</p> <p>A consistent and predictable policy, regulatory and legislative environment is critical to enabling timely infrastructure investment.</p> <p>Changes in the political cycle create uncertainty in the operating environment, with changes to parties' philosophies leading to changes in policy direction, which creates uncertainty for investment. Regardless of political preferences, the government should agree on a path to bring certainty for operators and investors and this should be supported through cross-party agreements.</p> <p>In terms of transport, the main uncertainty is the fluctuating availability of funding. Successive governments tend to have different priorities, and this is reflected in the Government Policy Statement on land transport, and the National Land Transport Programme. Local government finds it difficult to plan beyond the 3-year cycles when there is no guarantee of central government funding being obtained. Multi-year budgets and cross-party agreements would assist with this, so infrastructure projects can continue through government changes.</p> <p>There is currently a disjoint between regions' long-term Regional Land Transport Plans which outline strategic objectives and priorities for land transport, funding provided or not provided due to fluctuating and short-term government policy and funding cycles.</p>

Area two: Clear the way for infrastructure	
Is this key area a priority for New Zealand?	<p>Agree in part with this priority area.</p> <p>We agree that shifting policies and poor coordination can make it difficult to effectively plan and deliver infrastructure. Furthermore, we support having clear policy direction and rules for the timely delivery of infrastructure in the right locations. However, we recognise the need for an appropriate balance to align with section 5 of the RMA to avoid, remedy or mitigate adverse effects on the environment. Infrastructure planning must also consider the broader environmental, social, cultural and economic impacts, both positive and negative, particularly given the scale and complexity of many infrastructure projects. Not all proposals will be suitable for all locations, and some may require careful mitigation of adverse effects, especially where they intersect with values of significance to local communities. Resource management frameworks are also important for managing situations where different infrastructure projects have competing space requirements.</p> <p>As noted under Recommendation 7, we believe that spatial planning also has a critical role to play in supporting infrastructure planning. We encourage leveraging the opportunities that spatial plans provide to guide infrastructure delivery in a way that is strategically located, environmentally responsible, and culturally appropriate.</p> <p>WRC's submission on <i>Package 1: Infrastructure and Development</i>¹ of the national direction consultation provides specific recommendations on these matters in relation to the proposed <i>National Policy Statement for Infrastructure</i>.</p>
Recommendation 1 - Workforce development: Workforce development planning and policy is informed by infrastructure investment and asset management plans and the NZ Infrastructure Commission's independent view of long-term needs.	<p>Agree with Recommendation 1.</p> <p>We agree that workforce development planning and policy is required to grow and retain a skilled infrastructure workforce in New Zealand. Better long-term planning is required around the timing of projects and ensuring the workforce is contracted throughout longer periods of time across multiple projects. This will provide certainty for staff and prevent movements to other markets. Having gaps between projects promotes workforce movement, including movements to different countries. Certainty for staff will help maintain a skilled workforce in New Zealand. However, this will only help to some degree given other deeper systemic problems to retaining skilled workers in New Zealand.</p> <p>Greater resilience is needed in the infrastructure labour supply, beginning with education. Targeted incentives could help attract more people into the trades and support the retention of skilled workers in New Zealand.</p>
Recommendation 2 - Public sector capability: Public sector project leadership is strengthened by standardising role expectations and improving career pathways.	No comment.

¹ [National Direction Packages 1 and 2 Submission](#)

<p>Recommendation 4 - Consumer protection: All infrastructure providers, regardless of sector have clear and well-understood transparency and accountability mechanisms that ensure that consumer interests are protected.</p>	<p>Agree with Recommendation 4.</p> <p>We agree that all infrastructure providers should have transparency and accountability mechanisms.</p> <p>We recommend adopting standard performance metrics to support transparency and accountability. Care should be taken to ensure these metrics do not inadvertently create perverse incentives, drive unanticipated behaviours, or lead to unintended consequences.</p>
<p>Recommendation 7 - Spatial planning: Under the new resource management system, spatial planning informs and is informed by infrastructure investment and asset management planning and the NZ Infrastructure Commission's independent view of long-term needs.</p>	<p>Agree with Recommendation 7, with the following recommendation:</p> <ul style="list-style-type: none"> • The Plan recognises that to be effective, spatial plans must: <ul style="list-style-type: none"> ○ Be linked to relevant instruments e.g. Government Policy Statement on Land Transport, and spatial planning processes under the Land Transport Management Act 2003 ○ Include social infrastructure as an integral component ○ Identify high-risk areas for development <p>We support proposals to strengthen spatial planning and ensure it both informs and is informed by infrastructure investment and asset management planning. This includes alignment with instruments such as the Government Policy Statement on Land Transport, regional land transport plans, and local authority long-term plans and infrastructure strategies.</p> <p>It is essential that spatial planning provisions are explicitly linked with the spatial planning processes under the Land Transport Management Act 2003—particularly through the development of regional land transport plans, and long-term funding and financing plans. We have consistently requested this alignment in our feedback on the national direction consultation, including the <i>National Policy Statement for Infrastructure</i>² and <i>Going for Housing Growth</i>³.</p> <p>We support the draft Plan's recognition that effective spatial planning requires alignment across statutes, institutions, goals, incentives, funding, and delivery capability. We also agree with the Plan's recognition that spatial planning done well can help identify where transport (as lead infrastructure) is required to support urban growth and regional development. It is also important for maximising the benefits of investment in transport infrastructure.</p> <p><u>Regional experience and lessons</u></p> <p>In the Waikato region, we have taken a sub-regional approach to spatial planning with the <i>Future Proof Strategy</i>, which is a 30-year growth management and implementation plan for the Hamilton, Matamata-Piako, Waipā, and Waikato sub-region. Despite being in place since 2007, we continue to observe a disconnect between the work of the partnership and the actions of individual partners. We believe the new resource management system presents an opportunity to address this fragmentation.</p>

² [National Direction Packages 1 and 2 Submission](https://www.waikatoregion.govt.nz/assets/WRC/Submission-National-Direction-Packages-1-and-2-Infrastructure-and-development-and-primary-se.pdf) <https://www.waikatoregion.govt.nz/assets/WRC/Submission-National-Direction-Packages-1-and-2-Infrastructure-and-development-and-primary-se.pdf>

³ [National Direction Package 4 Submission](https://www.waikatoregion.govt.nz/assets/WRC/Submission-National-Direction-Package-4-Going-for-Housing-Growth-Discussion-document.pdf) <https://www.waikatoregion.govt.nz/assets/WRC/Submission-National-Direction-Package-4-Going-for-Housing-Growth-Discussion-document.pdf>

	<p>We have also seen communities grow ahead of essential social infrastructure, which has been developed at a later stage as an 'after thought'. Social infrastructure is integral to successful and thriving communities and should be central to spatial planning.</p> <p><u>Risk-awareness and unplanned development</u></p> <p>Spatial plans must guide infrastructure investment to avoid development in unsuitable or high-risk areas, such as peat soils and flood-prone land. We are currently seeing high infrastructure costs associated with development on such land, which could be avoided through better spatial planning.</p> <p>Spatial plans should identify the infrastructure requirements for identified growth cells. In doing so, infrastructure requirements will already be in place for any unplanned or out of sequence development, such as through the Fast Track process, in these locations. Currently, developments are considered reactively, and costs are often determined through ad-hoc private developer agreements. Costing triggers should be identified in the spatial plan or a relevant local authority infrastructure strategy that sits alongside the spatial plan.</p>
<p>Recommendation 8 - Maximising use: Land-use policies enable new and existing infrastructure to be used by as many people as possible.</p>	<p>We have concerns with Recommendation 8.</p> <p>We understand the intent of Recommendation 8 but have some concerns with its implementation. Land use policies that enable new and existing infrastructure to be used by as many people as possible is a complex and possibly problematic approach which needs more guidance on what weight or credence is meant by 'used by as many people as possible'.</p> <p>We support the new resource management system to include infrastructure-specific tools and pathways to enable infrastructure with national and regional benefits but this needs to be considered along with managing interactions with surrounding land uses and negative impacts on the natural environment at the local level.</p> <p>This recommendation appears to put priority on wider benefits of infrastructure being used 'by as many people as possible' against, or "relative to" any localised adverse effects on the environment. We do not consider this to be appropriate, as localised adverse effects can include irreversible effects on threatened species and sensitive or significant environment types, habitats, or values.</p>
<p>Recommendation 9 - An enabling environment: The resource management system enables infrastructure with national and regional benefits, while managing interactions with surrounding land uses and negative impacts on the natural environment.</p>	<p>Disagree with Recommendation 9.</p> <p>We consider that an appropriate balance needs to be achieved when enabling infrastructure, to align with section 5 of the RMA to avoid, remedy or mitigate adverse effects on the environment. We are concerned that this recommendation is weighted towards the delivery of infrastructure over the adverse effects on the natural environment.</p> <p>We recommend amendments to proposed policies to improve the balance between consideration of national and regional benefits and localised effects, to recognise that these may include significant and irreversible effects on the natural environment. We also recommend amendments to policies relating to assessing and managing adverse effects of infrastructure, to align these with section 5 of the RMA and other national direction. Please note that we have previously commented on the design of the new resource management system in our submission on <i>Package 1: Infrastructure and Development</i>⁴ of the national direction consultation.</p>

⁴ [National Direction Packages 1 and 2 Submission](https://www.waikatoregion.govt.nz/assets/WRC/Submission-National-Direction-Packages-1-and-2-Infrastructure-and-development-and-primary-se.pdf) <https://www.waikatoregion.govt.nz/assets/WRC/Submission-National-Direction-Packages-1-and-2-Infrastructure-and-development-and-primary-se.pdf>

<p>Recommendation 10 - Policy stability: Energy investors have predictable policy and consenting settings that support affordability, security of supply, and the decarbonisation of the economy.</p>	<p>Neutral view on Recommendation 10.</p> <p>It is difficult to comment on this further without the details of the policies proposed. Similar to Recommendation 9, more enabling policies and consenting environments should recognise that these may include significant and irreversible effects on the natural environment. Given this broad reference to 'Energy investors' we refer to our previous submission on <i>Package 1: Infrastructure and Development</i>⁴ of the national direction consultation, specifically comments on the <i>National Policy Statement for Renewable Electricity Generation</i> and <i>National Policy Statement for Electricity Networks</i>.</p>
Area three: Start with maintenance	
<p>Is this key area a priority for New Zealand?</p>	<p>Agree that this is a priority area for New Zealand.</p> <p>In principle, using our infrastructure better, optimising infrastructure and building resilience into our infrastructure networks is supported. For example, better maintained flood protection and drainage schemes can cope better with increasing climate change challenges.</p>
<p>Recommendation 12 - Asset management and investment planning: Central government agencies are legislatively required to prepare and publish long-term asset management and investment plans.</p>	<p>Agree with Recommendation 12.</p> <p>Local authorities are mandated to prepare and publish long-term plans and infrastructure strategies under the Local Government Act 2002. This ensures that infrastructure is effectively and efficiently managed in the interests of the community. We agree that central government should also be mandated to prepare long-term asset management and funding and financing plans, which will promote consistency and strengthen coordination across all levels of government.</p> <p>We support the implementation mechanism suggested to amend the LTMA to incorporate long-term asset management and investment plan requirements.</p>
<p>Recommendation 18 - Performance reporting: Require central government agencies to legislatively report on performance against their asset management and investment plans.</p>	<p>Agree with Recommendation 18.</p> <p>Requiring central government agencies to report on performance will enhance transparency and accountability, support improved decision-making, strengthen risk management, and build public trust and confidence.</p>
<p>Recommendation 19 - Asset management assurance: Central government agencies' asset management and investment plans are independently assessed.</p>	<p>Agree with Recommendation 19.</p> <p>Local authority long-term plans (including infrastructure strategies) are independently assessed by the Auditor-General to ensure they give effect to section 93 of the Local Government Act 2002. Consistent with our feedback on Recommendation 12, we believe that central government agencies should be held to the same standards as local authorities in relation to asset management and investment planning. This will ensure transparency and accountability, support improved decision-making, strengthen risk management, and build public confidence and trust. Independent assessments will provide an objective evaluation of assessment management.</p>

Area four: Right-size new investment	
Is this key area a priority for New Zealand?	Agree that this is a priority area for New Zealand. Improved prioritisation across the full portfolio through the Infrastructure Priorities Programme is supported.
Recommendation 14 - Investment readiness assessment: All crown-funding infrastructure proposals pass through a transparent, independent readiness assessment before funding.	No comment.
Recommendation 15 - Project transparency: All business cases, budget submissions, and advice on central government infrastructure investments are published.	No comment.
Recommendation 16 - Risk management: Project assurance for central government agencies ensures that risks are well managed.	No comment.
Recommendation 17 - Learning from projects: Post completion information on actual project costs, delivery dates and benefits are provided and published in a standard format, enabling comparisons to what was expected when funded.	We have concerns with Recommendation 17. We support capturing post-completion information on project delivery and costs and consider this a crucial part of the project management process. Furthermore, we support greater transparency in infrastructure investments. However, we have concerns with the suggested implementation mechanism to regularly submit project information to the National Infrastructure Pipeline. This may create added administrative burden for local authorities. WRC creates project close out reports for all infrastructure projects, however the manner in which they are developed are for internal learning and to publish this information externally would require additional administrative work.