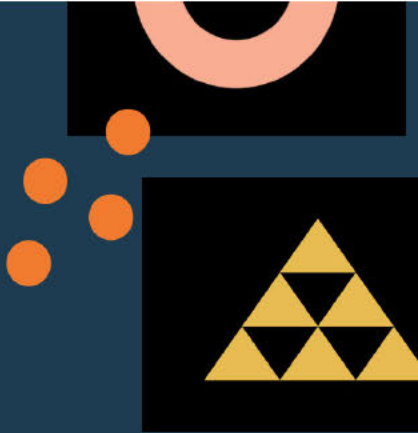




Hamilton City Council – Staff Feedback

**Draft National Infrastructure Plan
(June 2025)**

New Zealand Infrastructure Commission

6 August 2025



Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this staff feedback is aligned with all of Hamilton City Council's five priorities.

Council Approval and Reference

This staff feedback was approved by Hamilton City Council's Chief Executive on 6 August 2025.

Feedback # 810

It should be noted that the following feedback is from staff at Hamilton City Council and does not, therefore, necessarily represent the views of the Council itself.

Introduction

1. Hamilton City Council staff welcome the opportunity to provide feedback to the New Zealand Infrastructure Commission on its June 2025 **Draft National Infrastructure Plan**.
2. Hamilton City Council has a vested interest in the infrastructure space with its total asset value, prior to the waters CCO arrangements to IAWAI, being well over \$6 billion, and as part of that figure, infrastructure assets approaching \$5 billion (as of 30 June 2025). Operating and Maintenance costs are around \$60 million per annum.
3. Over the 10-year period of Hamilton City Council's Long-Term Plan, the Council's asset base is projected to increase by a further \$6.3 billion (i.e. \$13 billion total asset value at June 2034 – including waters), with total operating and maintenance costs over this 10-year period being \$860 million.
4. Hamilton is also undergoing rapid population growth, being the country's fastest-growing city in the past two years, with the current population being around 190,000. This growth is likely to continue, which will place increasing pressure on existing infrastructure and the requirement to add new infrastructure.
5. The cost of maintaining existing infrastructure and the ongoing provision of new infrastructure is an issue faced by Hamilton City Council and all Councils, with costs continuing to escalate significantly.
6. We have made a number of infrastructure-related submissions over the years, including our December 2024 staff feedback ([refer here](#)) to the New Zealand Infrastructure Commission's **Testing our Thinking – Developing an Enduring National Infrastructure Plan – Discussion Document**, and our July 2021 Council submission ([refer here](#)) to the New Zealand Infrastructure Commission's May 2021 consultation document **Infrastructure for a Better Future: Aotearoa New Zealand Infrastructure Strategy**.

Key Messages and Recommendations

7. Staff support the development of a National Infrastructure Plan as a vital step toward improving infrastructure coordination, prioritisation, and delivery across New Zealand, and commend the Commission's transparency in identifying systemic challenges.
8. Staff recommend that the Plan be strengthened with clearer implementation pathways, including tangible actions, timelines, and mechanisms for delivery, to ensure it functions as a directive framework rather than a strategic overview.
9. Staff support the Plan's emphasis on spatial planning and recommend providing guidance on the impacts of Fast Track on integrated planning to guide infrastructure investment and avoid fragmented development.
10. Staff endorse the Plan's emphasis on asset management and recommend rewording the 'Start with Maintenance' section to "Require Industry Best Practice for Infrastructure Asset Management," reflecting the importance of consistent standards, performance reporting, and assurance frameworks to support effective long-term infrastructure management.

General Comments

11. Hamilton City Council staff support the development of a Draft National Infrastructure Plan (the Plan). It is a critical step toward improving the coordination, prioritisation, and delivery of infrastructure across New Zealand, and has the potential to guide long-term investment, improve resilience, and unlock economic and social benefits for communities.
12. We commend the Infrastructure Commission for its forthright and constructive approach in identifying the systemic challenges facing infrastructure in New Zealand. The Plan does not shy away from acknowledging the difficult realities—such as the growing gap between infrastructure ambitions and fiscal capacity, the underinvestment in maintenance, and the limitations of current asset management practices. This level of transparency sets a strong foundation for meaningful reform. It also signals a shift toward more responsible and sustainable infrastructure planning, which we strongly support.
13. While the Plan provides valuable context and framing of infrastructure challenges, staff note that it lacks a clear implementation pathway. There was an expectation by staff that the Plan would be more action-oriented, setting out tangible steps, timelines, and mechanisms for delivery. Without this, the Plan risks being perceived as a strategic overview rather than a directive framework.
14. However, staff also acknowledge that the Infrastructure Commission operates within a specific institutional and legislative environment, and that its mandate may limit its ability to prescribe specific actions or funding commitments. The Commission’s role in providing independent advice, facilitating coordination, and supporting prioritisation is vital—but it must be complemented by clear mechanisms for implementation across central and local government.
15. We support the alignment of the Plan with the National Infrastructure Strategy and acknowledge the inclusion of key infrastructure sectors, noting that housing, transport, education, health, social infrastructure, defence, and resilience infrastructure are given prominence early in the Plan. However, we recommend waters infrastructure be given equal prominence, given its foundational role in enabling housing and commerce, and protecting public health.
16. Acknowledging the above, we also urge even stronger recognition of social infrastructure—such as aquatics, indoor recreation, sports fields, and parks—which underpins community wellbeing and cohesion. These assets should be integrated into national planning and prioritisation frameworks alongside core networks, with clearer recognition of their long-term value to help prevent service gaps and ensure equitable access for all communities. Exploring alternative funding models, shared-use arrangements, and alignment with national health and education priorities would also strengthen their long-term viability and address current challenges due to local government funding constraints.
17. Staff are appreciative that two of our key infrastructure projects have been included in the Infrastructure Priority List. These, along with our other key infrastructure projects, have been developed through an integrated planning lens, aligning infrastructure with land use, transport, environmental, and economic objectives.
18. To meet the objectives of the National Infrastructure Strategy and the Plan, staff recommend that the Plan, and its prioritisation program, more explicitly reflect the value of clustering infrastructure projects to support integrated place-based development and unlock long-term benefits for communities. Prioritising infrastructure as clusters—rather than standalone projects—amplifies impact. For example, Hamilton City Council has the Southern Growth Corridor, which includes transport upgrades (e.g. SH3 and SH1B), water and wastewater extensions, stormwater systems, and enables infrastructure for industrial and residential development. Delivered together, these projects unlock housing, attract investment, and improve regional connectivity—delivering synergistic benefits that far exceed the sum of individual

components. Staff seek to avoid ad hoc planning as it can result in fragmented urban form, inefficient resource use, missed economic opportunities, and increased environmental and social risks.

19. Staff also acknowledge and support the Plan's recognition of the importance of partnering with Māori and enabling Māori-led infrastructure development, but recommend that the Plan more explicitly highlight Te Tiriti o Waitangi as a foundational framework for infrastructure planning and investment. While the Plan references Treaty principles, it would benefit from a clearer articulation of how Te Tiriti obligations will be upheld across all stages of infrastructure development – from strategy and planning to delivery and governance.

Establish Affordable and Sustainable Funding

20. Staff support the principle of user-pays systems for infrastructure services; however, we note two critical challenges:
 - a. **Affordability for Vulnerable Communities:** User-pays models may disproportionately impact low-income households and smaller councils with aging infrastructure.
 - b. **Funding Gaps for Capital Investment:** Large-scale renewals and upgrades often exceed what can be recovered through user fees alone.
21. The Plan's *Recommendation 6*, which calls for a review of funding pathways, aligns with our call for alternative models that go beyond user-pays, especially for small or rural councils.
22. *Recommendation 11*, which promotes needs-based government investment, supports our view that central government co-investment is essential for infrastructure that serves the public good. We also endorse *Recommendation 13*, which advocates for stable central government funding, as this is necessary to ensure infrastructure investment is not subject to political cycles and can be planned over the long term.
23. *Recommendation 3*, which focuses on sustainable investment, reinforces our emphasis on lifecycle-based funding approaches that reflect long-term value and resilience. We note the proposed changes to the development contributions system and seek assurance that these will not result in double-charging ratepayers or discourage development. Innovative financing mechanisms, including private finance and infrastructure bonds, should be explored to close funding gaps and support equitable infrastructure delivery.

Clear the Way for Infrastructure

24. Staff support the Plan's emphasis on spatial planning and integrated decision-making. The Future Proof Strategy ([refer here](#)) exemplifies this approach, aligning infrastructure with land use, transport, environmental, and economic objectives at a sub-regional level. *Recommendation 7*, which promotes spatial planning, and *Recommendation 9*, which calls for an enabling environment, support our advocacy for integrated, long-term planning.
25. However, the role of Future Proof is becoming increasingly challenging due to ongoing shifts in national planning policy. A key challenge is the Fast Track consenting process, which threatens the integrity of the subregional settlement pattern outlined in the Future Development Strategy. Fast Track approvals can create unrealistic expectations that councils—such as Hamilton City and its partners—will continually adjust infrastructure plans and priorities to accommodate developments that fall outside agreed spatial strategies. This includes pressure to service unplanned or out-of-sequence developments ahead of those identified through robust,

integrated planning. If multiple Fast Track applications are approved, the cumulative effect could significantly undermine long-term infrastructure planning and investment.

26. We request that the Infrastructure Commission provide further guidance in the Plan on how Fast Track disruptions can be reconciled with the Plan's stated intention to set a clear, long-term, and protected direction for funding, priorities, and allocation. This may be partly resolved by establishing the primacy of the National Infrastructure Plan for major infrastructure decisions, with local infrastructure decisions being subordinate to that national framework.
27. We also support *Recommendation 4* on consumer protection and *Recommendation 10* on policy stability, which align with our concerns about reactive planning and legislative volatility. Consumer protections must be consistent and clearly defined to ensure confidence in infrastructure delivery and service standards.
28. Additionally, enabling growth requires a coordinated planning approach that integrates land use, infrastructure, and natural hazard considerations. Too often, land use planning occurs in isolation from infrastructure capacity and environmental constraints, leading to inefficiencies and increased risk.
29. We further recommend that the Plan provide clear guidance and guarantees around the pipeline of infrastructure works. This is essential to give confidence to the infrastructure workforce, enabling investment in training, retention, and succession planning. *Recommendation 1*, which addresses workforce development, supports this need for pipeline certainty. Making the infrastructure sector attractive as a career is also critical to ensuring a sustainable workforce. Investment in workforce development and visibility of long-term infrastructure commitments will help attract and retain talent across the sector.
30. Finally, we recommend that the Plan explicitly acknowledge the roles of existing regional partnerships such as Future Proof or UNISA (Upper North Island Strategic Alliance), which strive to set boundary-less priorities for infrastructure to enable growth. UNISA is currently undertaking a prioritisation exercise to identify key infrastructure projects for inclusion in the Pipeline. These projects, collectively agreed upon by UNISA members—representing over half of New Zealand's population and GDP—carry a powerful mandate for incorporation.

Start with Maintenance

31. Staff agree with the prioritisation of maintenance and renewal of existing assets. However, we recommend that this section be reworded to "Require Industry Best Practice for Infrastructure Asset Management" to better reflect the intent and content of the associated recommendations.
32. *Recommendation 12*, which focuses on asset management and investment planning, *Recommendation 18* on performance reporting, and *Recommendation 19* on asset management assurance all reinforce our view that infrastructure providers must be held to consistent standards of transparency and accountability. Asset management is the foundation of infrastructure resilience, efficiency, and long-term value.
33. We recommend that the Plan go further by requiring infrastructure providers to demonstrate adherence to industry best practice in asset management, incorporating asset criticality analysis, and supporting robust asset management practices. Deferring maintenance often leads to higher long-term costs, and the Plan should promote lifecycle cost analysis and business cases grounded in asset management principles.
34. Staff also acknowledge and support the role of sector organisations such as Apōpō, which provide leadership in promoting consistent, high-quality asset management practices across New Zealand. Their work in developing standards, providing training, and fostering collaboration across the

infrastructure sector is essential to achieving the goals outlined in the National Infrastructure Plan.

Right Size, New Investment

35. Staff support the recommendations around investment readiness, transparency, and risk management. *Recommendation 14*, which promotes investment readiness assessment, and *Recommendation 16*, which emphasises risk management, support our call for better project sequencing and alignment with spatial goals.
36. We support *Recommendation 15* on project transparency and *Recommendation 17* on learning from past projects. However, we acknowledge that the ability to learn from past projects may be constrained by commercial sensitivity and confidentiality agreements. We encourage the Commission to explore mechanisms for anonymised or aggregated reporting to support sector-wide learning without breaching contractual obligations.
37. We also recommend, as already mentioned, prioritising infrastructure clusters that deliver synergistic benefits, and ensuring business cases reflect long-term spatial goals and cumulative impacts.

Further Information and Opportunity to Discuss our Feedback

38. Should the New Zealand Infrastructure Commission require clarification of the feedback from Hamilton City Council staff, or additional information, please contact [REDACTED], or email [REDACTED] in the first instance.
39. Hamilton City Council representatives would welcome the opportunity to discuss the content of this feedback in more detail with the New Zealand Infrastructure Commission.

Yours faithfully

[REDACTED]
CHIEF EXECUTIVE

FURTHER INFORMATION

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