

He Tūāpapa ki te ora - Infrastructure for a Better Future

Submission and comments from a group of Tai Tokerau Northland organisations comprising:

Northpower Ltd, Northport Ltd, Top Energy Ltd, Culham Engineering Co. Ltd, Marsden Maritime Holdings Ltd, McKay Ltd, Refining NZ, Whangarei District Council, Northland Regional Council, Kaipara District Council, Northland Inc, and Northland District Health Board

About our organisations

Northpower Limited

Northpower operates and maintains both the electricity distribution and fibre networks in the Whangarei and Kaipara region with more than 60,000 connected customers. The company also provides specialist contracting services to its partners, other network owners and operators, across the North Island of New Zealand.

Northport Limited

Northport is the northern-most multi-purpose port in New Zealand and the closest port to the majority of New Zealand's international markets. The company owns a three-berth facility at Marsden Point, together with considerable backup land. Although primarily for the export of forest products, the terminal is a flexible facility catering for large multi-purpose vessels.

Marsden Point is a deep-water port mainly served by a road connection. Northland as a province has much to offer international markets, particularly in forestry, processed timber products, agriculture, horticultural products and cement that are all exported through this port.

Top Energy Ltd

Top Energy Ltd is based in Kerikeri and is owned by a consumer trust. The company supplies energy to the Far North area, including from the recently commissioned Ngāwhā geothermal power station. The company is a major contributor to the community's financial well-being, managing assets of over \$300 million and employing over 200 staff. As one of the largest businesses based in the region, Top Energy is uniquely placed to act as a catalyst to develop economic potential in the region.

Culham Engineering Co. Ltd

Culham Engineering Co. Ltd is a substantial Whangarei-based company employing over 500 staff. It operates one of the largest fabricated steel workshops in New Zealand and specialises in all areas of heavy engineering, from structural steel fabrication to storage tank engineering, high pressure vessels, heat exchangers and piping systems.

Marsden Maritime Holdings Ltd

With over 150ha of prime commercial property available immediately behind Northland's deep water port and transport infrastructure, Marsden Maritime Holdings (MMH) is a key driver in

Northland's growing economy. Marsden Maritime Holdings also holds part ownership in Northport, which is a 50/50 joint venture with Port of Tauranga and is a co-submitter to this paper.

MMH seeks to enable Northport's growth and actively invest in business ecosystems and infrastructure to transform Northland's economy. The company is dedicated to transforming Northland's economy by offering tailored commercial and industrial land for lease to growing businesses.

McKay Ltd

McKay is a Northland-founded, Whangarei-based electrotechnology company with 12 branches across New Zealand. The family-owned company's head office is in Northland, and supply routes and connectivity with the rest of New Zealand are therefore critical to its operations.

With 500 employees and a turnover of \$100 million plus, McKay is a significant driver of economic development for Northland.

Refining NZ

Refining NZ is the country's only oil refinery and the leading supplier of refined petroleum products to the New Zealand market, including petrol, diesel, aviation fuel and other products. The Marsden Point oil refinery supplies around 70% of New Zealand fuel demand, delivering fuel to Auckland through the Refinery to Auckland Pipeline (RAP), to Northland from the Marsden Point site and to other parts of New Zealand through coastal shipping vessels.

In response to a significant decline in refining margins as a result of excess refining capacity in the Asian region, Refining NZ initiated a strategic review of the business, to determine the optimal future business model and capital structure for the Company's future. Refining NZ is shortly set to conclude this process and will update its key stakeholders about future plans once a final investment decision has been taken. It is likely the company will transition to an import-only terminal, and cease refining operations.

Whangarei District Council

Whangarei District Council services a district that is made up in area largely by rural land and includes a fifth of the Northland Region. It extends southwards to the southern end of Bream Bay, northwards to Whangaruru and almost to the Bay of Islands, and westwards up the Mangakahia River valley past Pakotai and almost to Waipoua Forest. It includes the Hen and Chicken Islands and the Poor Knights Islands. The District had a population of 90,960 at the 2018 New Zealand census.

Northland Regional Council

Northland Regional Council manages the air, land, freshwater and coastal resources of the Northland region. The Council also co-ordinates civil defence, transport and economic development. Our mission is to work with our people and partners to create a healthy environment, strong economy and resilient communities. NRC is joint owner of Northland Inc (described below) with Kaipara District Council and Far North District Council.

Kaipara District Council

Kaipara District Council is based in Dargaville and services an area of 3,100 km² covering Dargaville Otamatea, Central and West Coast wards with a population, in total, of around 25,000 at June 2020.

Northland Inc

Northland Inc is the Regional Economic Development Agency and Regional Tourism Organisation for Northland. Their mission is to strengthen, diversify and grow the Northland economy and does so through connecting people and businesses across the region with national initiatives, such as the Regional Business Partner (RBP) Network, to strengthen opportunities for growth and facilitate investment in research, development and innovation.

Northland Inc also works proactively to connect potential investors with investment opportunities within the region and advocate for investment in infrastructure that supports opportunities for value-added activities and value chain improvements. A lot of these opportunities are outlined in the Tai Tokerau Northland Economic Action Plan, for which they oversee continued development and execution, and which is discussed in further detail in Para 9 et seq. below.

Northland District Health Board

Northland DHB funds and provides most of the hospital and community health services in Northland. The DHB is Northland's largest employer with over 3500 staff and a budget of over \$800 million.

Its support for this submission is based largely on the fact that its services are greatly impacted by the highest road crash mortality and morbidity in New Zealand.

Background to our Feedback

1. This submission contains the joint feedback of the organisations described above, each of which is a material stakeholder in the Northland region with a strong commitment to the region's infrastructure, and a substantial investment and interest in the region's economic wellbeing.
2. As a collective group we wish to be involved in the development of the role of the Infrastructure Commission particularly as it relates to the economic and social wellbeing of our Tai Tokerau Northland region, and we look forward to ongoing engagement and consultation with the Commission.
3. As owners and operators of larger businesses or entities operating in the region, we take our responsibility for fostering and supporting economic growth in the region seriously. Jointly we have invested material sums in infrastructure, skills development, and capability development in the region.
4. Our purpose in engaging with the Commission is to seek a unified approach to ensuring appropriate economic development for the region is achieved. We consider the effective development of effective multi-nodal transport links to the region as the Commission's / Government's key stake in supporting these outcomes.
5. This submission has been prepared to support our comments contained in the feedback form for the He Tūāpapa ki te ora - Infrastructure for a Better Future report. Our submission is also made at the suggestion of Hon Grant Robertson, Minister of Infrastructure who, during a recent meeting with Northland stakeholders, provided further background to the decision to cancel the 22km Whangarei to Port Marsden upgrade project.

6. In making this announcement, the Government has expressed the view that the cancellation is justified because *“the Marsden Point rail spur will be a strategic investment in Northland’s future prosperity, getting heavy trucks off the road to make the highway safer, and reduce emissions. We know safety on SH1 is a concern for locals, so there will be targeted safety upgrades, including median barriers, along the route”*¹.
7. In this submission we explain why this decision will, in our view, be detrimental to the future of our region, and why it does not conform to the views expressed in the He Tūāpapa ki te ora consultation document which sets out to establish important principles for a 30 year infrastructure horizon. [See insert box below].

Extract from He Tūāpapa ki te ora - Infrastructure for a Better Future (Page 89)

Regions are the country’s economic backbone from which the bulk of our primary exports are sourced.

For example, prior to COVID-19 disruptions, primary-sector exports represented nearly 80 percent of New Zealand’s total merchandise exports by value, and more than half of total exports when including services.¹⁰² High levels of regional connectivity are required for economic success and community wellbeing. Regional connectivity provides New Zealanders with access to employment, health, education, and other services within and between cities, towns and rural areas. It enhances the movement of people, information and goods, enabling social cohesion and wellbeing. Road, rail, air and coastal shipping are critical to regional connectivity.

Strengthening regional connectivity is challenging for several reasons. New Zealand has geographically isolated areas, with infrastructure networks that are expensive to build and maintain due to climate, geology and seismic factors. Low population density also means that many areas do not have multiple competing infrastructure networks. One of the challenges for regional infrastructure is to help address regional disadvantage by improving access to employment and social infrastructure and reduce living costs for those in more isolated locations.

Unlocking Economic Development in Northland / Supporting Auckland’s Growth.

8. The history of sub-optimal economic development in the Northland region has been well-documented by successive Government-commissioned studies over the past several years. Perhaps most comprehensively in recent times, the 2015 Martin Jenkins report - *“Tai Tokerau Northland Growth Study – Opportunities Report”* - prepared for Ministers of Economic Development, Primary Industries and Māori Development provides a robust study of the area. In that report it was concluded (inter alia) that:-
 - a. *“Northland’s economy accounts for only 2.6 percent of New Zealand’s GDP despite being home to 3.6 percent of the population. Real GDP in the region increased by 1.6 percent per annum on average over the past ten years, compared to the national average of 2.2 percent. Northland has an unemployment rate two percentage points above the national rate. Real GDP per capita is around 26 percent below the national average”*; and....

¹ Ministers press release 4 June 2021

- b. *“Northland’s relatively low population density and geographic remoteness have contributed to its economic underperformance. Even though Northland is in relatively close proximity to the strongly performing Auckland economy, travel times and limitations to transport connections make it difficult to benefit from that proximity”².*

The 2015 Martin Jenkins study has provided important input to the Tai Tokerau Northland Economic Action Plan (referred to above under Northland Inc) released in February 2016 and subsequently refreshed in 2019.

9. The Action Plan represents growing partnerships between industry, hapū and iwi Māori, community and central and local government, with an interconnection between the Action Plan and He Tangata, He Whenua, He Oranga, the Māori Economic Development Strategy for Northland. The authors of the plan describe it as being *“on a journey of working together, building a climate of high trust, collaboration and co-operation to support the transformation of Northland’s economic wellbeing”*.
10. An integral part of the Action Plan is the emphasis on a safe, resilient and efficient multi modal transport system and the recognition that *“in a region challenged by a relatively poor³ road safety record and the interaction of increasing flows of heavy freight traffic and visitor traffic, improvements and upgrades to the transport network taking an **integrated multi-modal approach is critical** (emphasis added). There are areas of low resilience along SH1 and other key tourism and freight routes, rail growth is currently restricted, diversion routes do not always have sufficient capacity to take heavy vehicles, and not all transport modes are optimised.”*
11. More generally, there is also widespread recognition of the Upper North Island as the economic powerhouse of New Zealand’s GDP. A Programme Business Case (PBC) prepared for the NZ Transport Agency in 2017⁴ summarised the position as being that... *“State Highway One (SH1) plays a critical transport accessibility role, connecting Northland with New Zealand. Improving the northern state highway network will help Northland contribute to the so-called ‘golden triangle’ of Auckland, Hamilton and Tauranga. Together these three centres generate 36% of New Zealand’s Gross Domestic Product (GDP) with a prediction for this to rise to 47% by 2026. Investment in transport between Auckland and Whangarei will contribute significantly to this”*.
12. We agree with this analysis. But we note that in the development of the three regions closest to the metropolitan area of Auckland – Tauranga, Hamilton and Northland – tangible economic benefits are clear from massive recent investment in arterial links in the former two, but Northland has continued to languish for several years as successive reports and studies focus and obfuscate on alternative solutions to an integrated multi-modal approach, and essential investment has been delayed or withheld.

² Tai Tokerau Northland Growth Study – Opportunities Report – February 2015 – Martin Jenkins p2-3

³ In fact, the state of Northland region’s roading network is cited by the DHB as a major contributor to the highest road crash mortality and morbidity in New Zealand.

⁴Whangarei to Auckland – Connecting Northland - Programme Business Case - Jim Sephton - August 2017

13. Even more recently (September 2020) in a Government Policy Statement (GPS) released by the Ministry of Transport it is stated that *“when considering the 10 year context (2021/22-2030/31), the Government has identified four strategic priorities for land transport investment to best contribute to improving our communities’ wellbeing and liveability.*
 - a. *Safety: Developing a transport system where no-one is killed or seriously injured;*
 - b. *Better Travel Options: Providing people with better transport options to access social and economic opportunities;*
 - c. *Improving Freight Connections: Improving freight connections for economic development;*
 - d. *Climate Change: Developing a low carbon transport system that supports emissions reductions, while improving safety and inclusive access.*
14. Much as it is a welcome modal enhancement for the Northland region, the rail upgrade project and a road safety upgrade programme to be rolled out over an as yet unspecified timeframe, will simply not act as a satisfactory surrogate for the cancellation of this important roading network project. Nor will it achieve the economic benefits that would accrue to the region which have, in the past, been enthusiastically endorsed by various Government studies and reports. Moreover, for our region it appears to walk back at least some of the principles articulated in the GPS described above in Para 13.
15. The continuing postponement and deferral of infrastructure investment must be addressed to unlock the potential of Northland with urgency. The region has been planning and investing on the assumption that upgraded road links were fully endorsed by central Government, and we are concerned that our collective focus will be materially impacted by a retreat from structured infrastructure investment to the region. For example negative impacts will be felt on or by:
 - The emerging role of Northport in complementing ports in Tauranga and Auckland, which collectively offer a strong logistical network for the upper North Island;
 - A strong engineering base and marine focus capable of supporting the marine industry at scale, including established business, capability and credibility;
 - Consistent growth in the horticulture industry, with good long term prospects for growth, similar to that experienced over the past two decades in Tauranga;
 - Post-Covid, burgeoning international tourism potential for the region with proximity to Auckland as a ‘short hop’ destination; and
 - Strong renewable energy potential, with established generation, transmission, and distribution positioned well to support Auckland’s growing energy needs.
16. In addition, the satellite cities of Tauranga, Hamilton, and Whangarei provide valuable support for Auckland’s growth, particularly as remote working and ‘short stay’ commuting become a reality. Whangarei, to the North or Auckland is uniquely situated to provide a Northern sister city location within two hours of central Auckland. This outcome is however dependent on effective transport links.
17. We support the Infrastructure Commission in trying to bring a co-ordinated, multi-faceted and systematic approach to the development of Aotearoa New Zealand’s infrastructure, and we accept this necessarily involves a longer-term thirty year perspective.

18. We also understand that the definition of infrastructure includes a wide range of elements of which the development and delivery of efficient roading networks forms only a part.
19. On the other hand, we do not agree that it is appropriate to cancel projects such as essential Northland roading upgrades that have already endured a development lead time measured in decades, and then to place them into a new consultation process with a thirty year time horizon via the He Tūāpapa ki te ora report. Transport links to the North are already under material stress, and early and focused attention must be taken. Failing to do so would be a missed opportunity in light of the economic potential of Northland discussed above.

An integrated multi-modal solution for transport is an essential contributor to Northland's economic wellbeing.

20. In September 2018 much of the same wording in the PBC referred to in Para 11. was repeated in the Transport Agency Re-Evaluation report prepared for Waka Kotahi. Additionally, this report concluded:
 - a. *“At present the corridor between Auckland and Whangarei is closed up to 200 hours a year..... the poor accessibility is an impediment to economic growth in Northland.*
 - b. *“The SH1 road corridor is identified as a National route from Wellsford to Whangarei and SH15A, due to their role providing access between Whangarei and Auckland (including international airport and port facilities).*
 - c. *“The current demand ... shows that traffic flows range from 12,000 (Te Hana) – 28,000 (urban Whangarei) vehicles per day from Te Hana to SH14 in Whangarei. It indicates that the heaviest flows are between Whangarei and SH15 and HCV make up between 6-11% of the traffic composition. Growth has been relatively consistent through the corridor for the last 5 years at approximately 5% per annum. By 2030 traffic volumes in the corridor could be over 55,000 vpd.*
 - d. *“The route is also currently unsafe with 104 DSI⁵ over the last 5 years. In accordance with the ONRC, this National state highway should have at least a 3-4 star KiwiRAP rating. Currently the corridor has approximately 36% of its length is rated 2-star. The evidence shows that the current SH1 safety record is poor and is not commensurate with its ONRC. The Safer Roads Alliance (SRA) are currently looking at on line improvement throughout the corridor”.⁶*
21. The Whangarei to Marsden Point highway project which forms an essential link in the upgrade of the Whangarei to Te Hana upgrade continued, until recently, to have the unqualified endorsement of Waka Kotahi. In its website link⁷, until June 2021 when the Government's announcement to cancel the project led to the deletion of the webpage. Waka Kotahi had stated (inter alia):

⁵ Death and Serious Injury Accidents

⁶ Whangarei to Te Hana Re-evaluation summary – Report by Commute Transport Consultants for Waka Kotahi 11 September 2018

⁷ <https://www.nzta.govt.nz/projects/sh1-whangarei-to-port-marsden-highway/>

- a. *“Northland’s population has grown faster than any other region as a result of growth overflow from Auckland. The upgraded corridor (i.e. the Whangarei to Te Hana link) will strengthen the region’s transport links with Auckland, supporting the annual movement of two million tonnes of freight between Northland and Auckland. The project will support Northland economic growth, such as tourism which contributes around \$1 billion per year to the region and improve road safety, which in turn will help improve travel reliability for all users.*
 - b. *“More than 100 people have died or been seriously injured during the last five years on SH1 between Whangārei and Te Hana, the worst section being between Whangārei and the Port Marsden turn-off. Many of these crashes involved drivers crossing the centreline and colliding with oncoming traffic. Safety improvements planned for this section of SH1 under the Safe Network Programme will still be required.*
 - c. *“Road closures as a result of crashes have impacted on Northland’s economic growth, as many detour routes are unsuitable for freight vehicles. The new corridor will provide for safer, easier and more reliable journeys for everyone.*
22. The observations made by Waka Kotahi in Para 21b. and c. above can only be exacerbated by the Government’s cancellation of the Whangarei to Marsden Point highway. Waka Kotahi is currently consulting on options to enhance road safety on the road corridor between Warkworth and Whangarei including a proposal that speed limits on this corridor might be reduced to 80kmh. If this proposal were to be implemented, it would represent yet another temporary and inefficient fix to the long term needs of the region.
23. Moreover, the Climate Change Commission has highlighted the need to identify and implement solutions to support effective decarbonisation of the economy. An effective multi-modal solution including fit-for-purpose roading links appears to be a critical part of this solution, with the value of this investment increasing with the electrification of the vehicle fleet.

Rail is part of the solution, not a full replacement.

Freight modal choices rely on many factors

24. We consider that a major shift of freight from road to rail as a result of the rail spur and line upgrade is an oversimplification of what will actually happen.
25. Mode choices are a function of several factors – reliability, product care, safety, timeliness, cost and connectivity. With respect to the last two, businesses are constantly looking to minimise cost either through improved efficiency and / or productivity across the entire supply chain. Single movements of freight are often only one component of a supply chain which can include warehousing, distribution, consolidation, exporting and importing. Mode choices are often linked to arrangements made across the supply chain that are designed to deliver on wider objectives.

26. Secondly, a key decision-driver is the cost per kilometre of travel and required delivery timeframes. Businesses will generally choose rail where timeframes are less urgent and freight is moved over long distances, volumes are large, or other alternatives are problematic. Rail generally has a lower cost per kilometre than road transport over longer distances. However, the cost of double handling and transfers often mean that rail needs to be moved over and above a distance threshold to be commercially viable.
27. Extending the rail link to Otiria is an important strategic objective in providing this modal connection to the northern part of Northland, but assumes that the rolling stock, locomotives and rail infrastructure will be readily available to undertake the transfer of freight (most notably logs) instead of road transport. We understand that the reopening of the Kauri to Otiria section will include 60km of track refurbishment, and replacement of approximately 8km of track, 20,000 sleepers, and 15,000m³ of ballast⁸. We expect that this project (which is positioned by Kiwirail to commence in 2022) will take a number of years and that the existing log volumes from the northern regions will continue to be transported by road to Marsden Point or further south.
28. The concept of mode neutrality is important to the Government. Its Government Policy Statement on transport⁹, in specifying four key principles of transport policy notes:

“Efficient, reliable, safe, mode-neutral and resilient freight transport – within cities, between regions and to ports – is vital for a thriving economy. Regional New Zealand’s primary production is a key driver of the national economy. The transport system needs to support the movement of freight by the most appropriate mode, improving interregional corridors, and increasing resilience.”

Traffic composition suggests minimal benefit to roading network from reduction in HCV traffic

29. As the Transport Agency report noted (see para [20c] above), the volume of heavy commercial vehicle traffic on the roading network amounts to only 6-11% of the total traffic composition. Even if the whole of the HCV freight task were moved to rail, it would make only a small difference to road traffic density.

Main benefit accrues to Auckland, not the Northland region

30. Shifting inbound freight away from Port of Auckland to be landed and railed from Port Marsden, may well benefit the Auckland economy and points further south, but will not especially benefit the Northland regional economy other than by providing additional job opportunities at Port Marsden, assuming the rail expansion in turn leads to expansion of the port. In our opinion, these job opportunities, (if realised), will not offset the much wider economic benefit that would have been achieved through the roading upgrade project.

The visitor industry will not benefit from this decision

31. The rail upgrade (and the concurrent cancellation of the highway upgrade) appears to ignore the importance of the tourism sector to the region, which, in a post Covid era, will be hugely critical to Northland’s economic growth. There are multi-faceted plans for the development

⁸ See <https://www.railway-technology.com/projects/northland-line-upgrade/>

⁹ Government Policy Statement on Land Transport : 2021/22 – 2030/31 - see p13

of the visitor industry contained in the Tai Tokerau Economic Development Plan. In our view, visitors to Northland region will not seek to use the rail link to Whangarei preferring either private transport or high occupancy vehicles.

32. As we have noted above (Para 21a), Waka Kotahi itself, in support of the highway project, stated that the highway improvement would support Northland economic growth, such as tourism which contributes around \$1 billion per year to the region.

33. The Draft Regional Land Transport strategy published in March 2021^{10, 11} on the same subject of tourism noted (inter alia) that:

- a. *“Continuing to make improvements to SH1 and the existing rail infrastructure between Auckland and Whangārei is, therefore, crucially important for the commercial future of the whole of Northland. The importance of Northport to sustain future export growth is highlighted in the Upper North Island Strategic Alliance port study.*

Whilst the above statement focusses on the importance of SH1 connecting Northland to the rest of New Zealand, it in no way diminishes the importance of the other state highways in Northland. For example, for tourism, the Twin Coast Discovery route which includes SH10,11 and 12, and for the movement of forestry product, SH15 and SH14 are crucial.”;

- b. *“While the planned investment in the Auckland-Northland rail link upgrade and related expected benefits are acknowledged , it is still important to remember that the road network still requires further upgrades for smaller industry freight, just-in-time deliveries, agricultural produce and tourism”.; and*
- c. *It is estimated that visitors to the region travelled a total of almost 200 million kilometres on roads in Northland during the year ended June 2016. This is 33% higher than the distance travelled in the year ended June 2005. The distance travelled in light vehicles by visitors to Northland in 2015/16 is estimated to be around 13% of the total distance travelled by light vehicles on Northland roads. This is slightly up on the 11% estimated for 2004/05. With the increase in visitor numbers expected over the next few years, the distance travelled by visitors on Northland roads is also forecast to increase”.*

34. We acknowledge that an unspecified safety upgrade programme announced by Government [Para 6] may reduce DSI risk to Northland visitors but we consider the programme to be in the nature of a stop-gap solution that will not adequately substitute for a reliable roading network infrastructure that is required for our tourism industry.

¹⁰ Regional Land Transport Plan for Northland 2021-2027 – March 2021 - A joint publication by Far North District Council, Kaipara District Council, Whangarei District Council, Northland Regional Council and Waka Kotahi.

¹¹ Released by the combined Councils and Waka Kotahi just a few months before the Government’s decision to cancel the Whangarei – Marsden Point highway project.

Summary

35. We concur with the statements made (Page 89) in the He Tūāpapa ki te ora - Infrastructure for a Better Future report regarding the importance of regional connectivity enabling social cohesion and wellbeing. We also agree with the number of previous studies by Government pointing to the opportunity of a stronger economic contribution from the Northland region and the importance of focussing on stronger regional roading networks.
36. Accordingly, we would like to see the Commission's strategy put strong emphasis on the importance of multi-modal transport links between Auckland and the Northern region, as a key enabler of economic and social wellbeing.
37. The (now removed) summary overview by Waka Kotahi of benefits for the region to be gained by the upgraded road corridor - the Whangarei to Te Hana link – was that it would support Northland economic growth, such as tourism which contributes around \$1 billion per year to the region and improve road safety, which in turn will help improve travel reliability for all users.
38. Cancelling / deferring this key transport link is a missed opportunity for unlocking Northland's economic potential, and for supporting Whangarei's emerging role as a satellite city to Auckland.
39. The core arguments we have set out in this submission regarding roading are representative of a wider opportunity. Long term, consistent, infrastructure planning by central government, appropriately linked and meshed to regional infrastructure plans would provide a blueprint for unlocking the economic potential of New Zealand's regions. We would welcome collective engagement with the Commission on this core principle.
40. We note as a group, that the Infrastructure Commission's consultation document is necessarily broad and multifaceted. For this reason, we have chosen as a group to comment specifically on the aspect of the document we consider critical to the economic development of the region. We would however welcome specific engagement with a view to proving up how a meshed central / regional planning process could work. Northland has the cohesion scale, and collective skills to provide an active 'sandpit' to develop this concept.
41. We will continue to provide input to and participation in the work of the Infrastructure Commission but remain concerned that the longer term perspective of the Commission's role (Aotearoa 2050) provides no immediate comfort to the long-awaited major Whangarei to Marsden Point highway upgrade, the cancellation of which will continue to be a significant cause of exacerbation and delay in a region focused on delivering its potential in terms of economic growth.
42. We thank you for this opportunity to provide joint feedback to the Infrastructure Commission.

If you require any further information or comment from us on this specific submission, or would like to meet with the signatories as a co-ordinated group please contact in the first instance:

- [REDACTED], Chief Executive, Northpower Ltd.
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If you have questions regarding the specific interests and industry focus from the signatories to this submission, they should be contacted directly as follows:

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