

Registered Master Builders Association of New Zealand Incorporated

Submission on RMA Package 1: Infrastructure and Development

July 2025

The Registered Master Builders Association submission on Package 1: Infrastructure and Development

The Registered Master Builders Association (Master Builders) welcomes the opportunity to submit to the Ministry of Environment on *RMA Package 1: Infrastructure and Development*.

About Master Builders

The Master Builders represents over 3,000 commercial and residential builders and are the leading sector advocates on the built environment. Our members have been building the places where New Zealanders live, work, and play, since 1982.

Our sector is a key contributor to the New Zealand economy. For the year ended March 2024, the construction sector contributed 6.2 per cent of the country's real Gross Domestic Product (GDP) accounting to over \$17.2 billion¹. It also employed 294,100 people (or 10 per cent of the country's total workforce) in the year ended September 2024².

We are working hard to lead the change our sector needs by ensuring we have the regulatory systems and processes in place to build faster and better. We are supporting our members to grow their capability and business acumen to ensure a strong and healthy sector; to innovate and make the most of new technologies so we meet the climate change challenge; and to attract, train and retain skilled talent. We are proud to be New Zealand's best builders.

At Master Builders we are committed to transforming the sector and rebuilding our economy. We are focused on building better homes, communities and workplaces, and ultimately better lives for all New Zealanders. We want to ensure that the houses that we build now are well-built, accessible, affordable, and appropriate to the needs of our ever-changing society. We are building a better New Zealand.

Our members are supported on the ground by 23 branches across 6 regional hubs:

Branch hub	Serving
Auckland	Auckland, Northland, Coromandel
Midlands	Waikato, Tauranga, Whakatāne, Rotorua, Taupō
Central North Island	Taranaki, Whanganui, Hawke's Bay, Manawatū, Gisborne
Cook Strait	Wellington, Wairarapa, Nelson, Marlborough, West Coast
Canterbury	Canterbury, Ashburton, South Canterbury
Southern	Otago, Central Otago, Gore, Southland

¹ Statistics New Zealand – Infoshare: Gross domestic product – March 2024

² Statistics New Zealand – Infoshare: Household Labour Force Survey – September 2024

1. Introduction

- 1.1 The Registered Master Builders Association (Master Builders) welcomes the opportunity to comment on the proposed National Policy Statement for Infrastructure (NPS-I).
- 1.2 We represent over 3,000 commercial and residential builders across New Zealand, many of whom are actively involved in delivering vertical and social infrastructure such as schools, hospitals, aged care facilities, and civic buildings. These are more than physical structures. They are essential to community wellbeing, economic participation, and public service delivery.
- 1.3 Our members are directly affected by how infrastructure is planned, consented, and delivered. We support the intent of the NPS-I to enable timely delivery, improve consistency, and raise the value placed on infrastructure in planning and resource management decisions.

2. Specific Comments on the Proposals

- 2.1 Master Builders are particularly keen on the prospect of removing barriers for councils to deliver infrastructure needed for construction as member feedback has indicated that this is a major handbrake in producing housing stock in many centres.
- 2.2 We welcome the support for local NZ businesses to have more of an opportunity in delivering local infrastructure projects.

3. Support for the Expanded Definition of Infrastructure

- 3.1 Master Builders strongly supports the expanded definition of “infrastructure” proposed in the NPS-I, particularly the explicit inclusion of social infrastructure (Definitions D1 and D7).
- 3.2 This recognises the vital role of infrastructure that serves people directly, such as education and health. These assets have often been overlooked in favour of linear and network infrastructure. The proposed definition better reflects the realities of infrastructure delivery and the importance of public and community-facing assets in New Zealand.

4. Recognising the Broader Benefits of Infrastructure

- 4.1 Master Builders strongly supports the proposal to introduce a new National Policy Statement for Infrastructure (NPS-I). This is a much-needed step to reduce the fragmentation in how infrastructure is planned and delivered across New Zealand.
- 4.2 We commend the NPS-I’s intention, particularly through Objective OB1 and Policy P1, to provide a more balanced and comprehensive understanding of the value of infrastructure to people, communities, and the country.
- 4.3 Planning decisions have too often focused on localised environmental effects, without fully considering the broader and longer-term benefits that infrastructure brings.
- 4.4 We are not suggesting that environmental protections be weakened. Instead, we support a more proportionate approach that ensures:
 - The benefits to families, communities, towns and cities are given appropriate weight.
 - The role of infrastructure in enabling resilience, wellbeing, education and public health is clearly recognised.

- The interconnected nature of infrastructure networks is understood and planned for.

4.5 We support the direction in P1.2 and P1.3 which will help decision-makers balance effects and benefits more consistently.

5. Enabling Delivery Through Engagement and Practical Planning

5.1 Master Builders support the practical and delivery-focused approach set out in Policies P2, P3, P4 and P9.

5.2 In particular, we endorse the emphasis on:

- Recognising functional and operational needs of infrastructure providers (P2).
- Supporting flexibility and innovation in infrastructure delivery (P4).
- Aligning infrastructure with strategic and long-term planning (P3).
- Encouraging early and meaningful engagement with infrastructure providers (P9).

5.3 To strengthen implementation, we recommend:

- Including explicit reference to Early Contractor Involvement (ECI), which supports better design development, improves buildability, and reduces delivery risks.
- Promoting wider use of Master Builders' Good Contracting Principles, which help clarify roles and responsibilities, support fair risk allocation, and encourage stronger working relationships between clients and contractors.

6. Elevating the Role of Social Infrastructure

6.1 We are particularly pleased to see social infrastructure clearly recognised and defined in the NPS-I. In our experience, this type of infrastructure:

- Is often deprioritised in district and regional planning.
- Faces avoidable consenting delays, despite its high public value.
- Plays a critical role in economic, cultural and social wellbeing, especially in growing cities and regional centres.

6.2 We recommend the NPS-I provide further guidance to councils on how to prioritise and support the delivery of social infrastructure. This should include advice on how to weigh its broader benefits alongside environmental considerations in a consistent and transparent way.

6.3 We support the introduction of national direction to better enable papakāinga development on Māori land, recognising its central role in supporting Māori housing, community cohesion, and the exercise of tino rangatiratanga over whenua. The proposed National Environmental Standards for Papakāinga (NES-P) are a welcome step toward reducing barriers to whānau-led development on ancestral land.

6.4 We welcome the proposal to introduce national direction for granny flats (minor residential units), which serve as a practical form of social infrastructure by enabling intergenerational living, ageing in place, and more flexible housing supply. Providing for minor units in district plans as a permitted

activity where appropriate would help meet demographic changes and housing affordability challenges.

7. Conclusion

7.1 Master Builders supports the direction of the proposed NPS-I and welcomes the clarity it brings to national resource management priorities. The strengthened focus on infrastructure benefits and the inclusion of social infrastructure (D1, D7) are timely and important.

7.2 However, how the NPS-I is implemented will be the true test of its success. The administration of the RMA has long been affected by inconsistencies in interpretation and variable decision-making across local authorities. This lack of consistency adds cost, causes delay, and leads to uncertainty for infrastructure providers and the communities they serve.

7.3 Clarification through national direction is a step in the right direction. But to achieve the desired outcomes, it must be followed by consistent and practical implementation on the ground. Councils and decision-makers will need support to give effect to the intent of the NPS-I in a way that is workable and proportionate.

7.4 We offer the following key points:

- We support the expanded definition of infrastructure, especially the inclusion of social infrastructure.
- We support the recognition of national, regional and local benefits in planning decisions (OB1, P1).
- We encourage stronger focus on early engagement (P9), flexible delivery (P4), and the use of tools like ECI and good contracting practices.

7.5 Thank you for the opportunity to contribute to this consultation. We welcome continued engagement as the NPS-I is finalised and implemented.

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