

5 August 2025

New Zealand Infrastructure Commission Te Waihanga
tewaihanga.govt.nz feedback uploaded on website

Tēnā koutou

Canterbury Mayoral Forum Submission: New Zealand Infrastructure Commission Te Waihanga's Draft National Infrastructure Plan

1. The Canterbury Mayoral Forum thanks the New Zealand Infrastructure Commission Te Waihanga for the opportunity to provide feedback on the Draft National Infrastructure Plan.
2. The Canterbury Mayoral Forum comprises the Mayors of the ten territorial authorities in Canterbury and the Chair of the Canterbury Regional Council (Environment Canterbury), supported by our Chief Executives. The purpose of the Forum is to promote collaboration across the region and increase the effectiveness of local government in meeting the needs of Canterbury's communities.
3. All Canterbury councils actively participate in the Forum: the Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate, and Waitaki District Councils, the Christchurch City Council, and the Canterbury Regional Council.
4. The Canterbury Mayoral Forum published the Plan for Canterbury in 2023 with the following three key focus areas:
 - **Sustainable environmental management of our habitats** (land, air, water and ecosystems) – focusing on land use and freshwater management
 - **Shared prosperity for all our communities** – focusing on building on our economic strengths and developing emerging sectors, growing, attracting and retaining a skilled workforce, improving the transport network and coordinating strategies for housing our communities
 - **Climate change mitigation and adaptation** – reducing our carbon footprint, working together on climate action planning, building community resilience, and making our infrastructure as strong as it can be.
5. In this current triennium we will have finalised the Canterbury Climate Partnership Plan, Canterbury Energy Inventory and Waitaha Canterbury Regional Housing Strategic Plan.

Mayors standing together for Canterbury.

Secretariat, E: secretariat@canterburymayors.org.nz W: www.canterburymayors.org.nz
C/- Environment Canterbury, PO Box 345, Christchurch 8140 T: 03 345 9323

*Ashburton District Council • Canterbury Regional Council • Christchurch City Council • Hurunui District Council
Kaikōura District Council • Mackenzie District Council • Selwyn District Council • Timaru District Council
Waimakariri District Council • Waimate District Council • Waitaki District Council*

6. We are also progressing with work towards the development of a potential future Regional Deal with Central Government. The current focus of this work is on transport, housing, energy, and infrastructure. Infrastructure being the foundation in which all other areas can thrive.
7. We acknowledge the array of work currently underway with regard to national direction, and that the Government's intention is to provide more clarity to regulators and asset owners in the near future. We make this submission in the midst of change to ensure we get the balance of priorities right.

General comments

8. The following submission has been developed with input from across Canterbury councils and focusses on matters of general agreement, noting that some Canterbury councils will also be making individual submissions.
9. We support the intent of the National Infrastructure Plan. Infrastructure, by its nature, is multi-generational and deserves strategic planning and funding that complements its lifespan.
10. While we all have the same overarching issues in maintaining existing infrastructure and delivering new infrastructure that our communities need for the future, the way this is presented across the sectors and region can differ. Smaller councils have the added hurdle of small ratepayer bases, with some also catering to high tourist numbers.
11. We acknowledge the differing needs of sectors and that it would be unwise to look at infrastructure in isolation. Canterbury is a region with high rates of tourism, a strong agriculture sector, and high growth urban centres. We have an international airport, ports, a high-use freight network, potential to increase renewable energy contributions, and particular vulnerabilities to flooding.
12. We note Te Waihanga's analysis of the challenges faced across different infrastructure sectors. We recommend including the impact of the Tourism Growth Roadmap¹ on existing infrastructure, with particular emphasis on towns with high tourist numbers relative to ratepayers.
13. Prioritisation and compromise is certain, and we stress that the local councils are best placed to address these needs.

Best practice

14. Infrastructure is the foundation for thriving, resilient, and connected communities. Enhanced connectivity is fundamental to community wellbeing and supports the economic health of regions.
15. In order to commit to holistic and co-ordinated long-term planning, the infrastructure sector and asset owners need certainty of funding and policy to plan, deliver, and maintain these assets appropriately. A three-yearly Budget and funding cycle does not provide this. Cross-party agreement is needed to give confidence to invest in the sector. This mix of rigidity and uncertainty can also inhibit the formation of innovative solutions.
16. Cross-party agreement segways into stable policy conditions. We recognise the significance of the resource management system overhaul and adapting to the change in water services delivery to bring confidence to the sector.
17. Project planning for large infrastructure can take years before the shovel hits the dirt. It is critical that the sector has confidence that both central and local government can commit to these projects, so as each player can invest adequately in their workforce capabilities and capacity to deliver.
18. As noted in the Plan, central government 'sets the rules of the game' and, both as a 40% shareholder and the distributor of policy settings and funding, should also set the benchmark for best practice. This should apply to the business cases, project management, asset management and ongoing maintenance.

¹ [Tourism Growth Roadmap | Ministry of Business, Innovation & Employment](https://www.mbie.govt.nz/immigration-and-tourism/tourism/tourism-growth-roadmap)

19. With that said, the 'rules' should be proportionate to the needs of the project and balance standardisation against rising cost, project delays and the risks of bureaucratic stagnation. Information for infrastructure should be publicly available and accessible to support better decision-making for public infrastructure and more rigorous evaluation of projects once implemented.
20. We support going back to basics on maintenance of our existing assets to maximise their output, while considering how to appropriately expand. In Waitaha/Canterbury, we have over 1,900 bridges that are nearing end-of-life, and some of which are at high risk in a natural disaster. If these are left to dilapidate, economic growth stagnates and communities could be cut off in cases of emergency.
21. We agree that infrastructure comes with a cost, and we agree that for some asset types it would make sense to have a contribution from the user – this could be by way of a development levy for new builds, congestion charges or tolls for new roads, the cost of entry at a public swimming pool.
22. When considering user charges, we recommend all externalities are considered – the social benefits provided by the asset, emissions contribution (positive or negative), and that viable affordable and attractive alternatives are available *prior* to any change in charging. This may mean subsidies for select users or, to use road user congestion charging as an example, ensure there are safe and connected cycleways and sufficient levels of public transport to accommodate an increase in demand.

A changing game

Resilience

23. We recommend that resilience has a stronger focus in the Plan. Extreme weather events are increasing in frequency and intensity; Canterbury, with its extremely active riskscape, has received its fair share of earthquakes, flooding, and alpine weather events, such as frost heave and snow clearance events, in the past decade or so. We are increasingly seeing this across other parts of the country as well. We know that there is a high chance of further disrupting events in our lifetime, such as a high-magnitude Alpine Fault earthquake, or a Hikurangi subduction zone tsunami.
24. The Canterbury Climate Change Risk Assessment (2022) identified 31 risks related to elements of infrastructure. Of these, two are rated extreme or high in the present day, only increasing in rating in the lookout to 2100.
25. We need to build and maintain infrastructure that can 'weather the storm' saving us money and time in recovery, but also provides critical lifelines in emergencies. This is particularly relevant when insurance premiums are increasing well-above inflation and questions are being raised about what may or may not be covered in the near future.
26. Investment in risk reduction and resilience pre-event simultaneously reduces the impact of damaged critical infrastructure on impacted communities and economies, reduces response costs and increases the speed of restoration.
27. Any nationally-led infrastructure discussions need to connect with community and council adaptation planning. While central government works on a National Adaptation Framework, it is essential that infrastructure continues to serve community aspirations around resilience and risk reduction.
28. The CMF notes the importance of transitioning to a low-emissions future and stresses the importance of responding to climate change for current and future generations. Our infrastructure needs to be aligned with ambitious, achievable, enduring, transparent and equitable emissions reduction.
29. Within this transition to a low-emissions region, the placement of supporting infrastructure will be crucial to any widespread uptake. The topography of the region, and in fact all of Te Waipounamu, will need particular consideration through this transition process.
30. The Canterbury Climate Partnership Plan (CCPP) was agreed by the CMF in August 2024 as a bold statement of our collective commitment to climate action in the region. With funding secured through each councils Long-Term Plans, the CCPP takes on emissions reduction, adaptation, and the design of a blue-green network to leverage the environments' natural capabilities, amongst other climate

initiatives. We urge the Government to give these considerations greater weight in policy and funding decisions.

Flood protection

31. The CMF supports the work of the Te Uru Kahika Regional and Unitary Councils Aotearoa on flood protection, acknowledging the findings in the Before the Deluge Report 2023² that well-designed flood protection work can provide considerable return on investment; \$1 spent protecting a community avoids \$5-\$8 in direct losses after an event.
32. Assets, networks, and services provided by regional and unitary authorities for the means of flood protection, provide a benefit to the wider community, including to Crown assets and all other infrastructure. These protected assets include rail and road infrastructure, airports, education facilities, Crown land and health facilities, and more broadly, the efficient functioning of the economy and communities.
33. Flood schemes protect not just those living and working near the rivers, but everyone whose access to supplies, power, medical care, schools, workplaces, and family is impacted when major roading and other critical infrastructure is damaged.
34. Investment in flood protection assets that contribute to wider system resilience is a prerequisite for the efficient functioning of the economy and our communities, and is a responsibility that should be shared between regional councils and central government.
35. The CMF considers the current model for funding flood resilience infrastructure via a ratepayer-based approach to be unsustainable and fails to recognise the distributed benefits of these schemes. The CMF has a specific action in their Plan for Canterbury to continue to support and advocate for Te Uru Kahika – Regional and Unitary Councils Aotearoa business case for a more sustainable funding approach, such as committed government co-investment, and will continue to do so on behalf of our community, until a fit-for-future solution is available.

Transport

36. To reiterate our point in the *Best practice* section, in principle we support the intent that the priority for spending should be on maintenance and renewals. This will help address the infrastructure deficit without adding new and compounding pressures on central and local government, and is of particular importance for rural communities.
37. However, we must also acknowledge when investment in new infrastructure is required to support our growing towns and cities, and for economic opportunities. Ensuring connected and well-planned decisions are vital and could be supported by holistic processes such as spatial planning, which we speak to later in this submission.
38. As mentioned earlier in our submission, Waitaha/Canterbury's bridges are a significant transport network resilience risk which would benefit from increased focus. There are over 1,900 bridges in the region, many of which are ageing and at increasing risk from intensifying natural hazard events. The pipeline of bridge infrastructure projects will be fundamental to securing the resilience, connectivity, growth and productivity of Canterbury and the wider South Island, which in turn has significant benefit for the country.
39. The inclusion of the Greater Christchurch Mass Rapid Transport system in the Infrastructure Pipeline and as an Infrastructure Priority Project is an example of new infrastructure that will unlock economic growth for not just the Greater Christchurch area, but all of Canterbury and across Te Waipounamu.

² The 'Before the Deluge' report can be found on the Canterbury Regional Council website: [Co-investment in future flood protection | Environment Canterbury](https://www.ecan.govt.nz/your-region/your-environment/river-and-drain-management/climate-resilience-and-flood-protection-funding/co-investment-in-future-flood-protection)

40. Greater Christchurch is rapidly growing and without significant investment to support transport choices the city will reach a peak performance; there will be more congestion, longer journey times, increases in vehicle emissions, and impacts on the region's growth and productivity.
41. Public transport is the key way to move more people, more efficiently, and unlock the full development potential of our urban areas. Careful consideration of user-contribution is needed to make this an attractive option.
42. Public transport is equally important in our rural areas. While this may look different to 'traditional'/fixed schedule public transport services, Timaru's on-demand service *MyWay* is a successful story of meeting the needs of the locals.

Energy

43. Energy production from renewable sources needs to increase substantially to meet a growing demand for electricity and clean energy. This includes to support the major shift of our transport system to net zero emissions, which will require electrification of transport, along with greater use of public and active transport.
44. We recently published the Canterbury Energy Inventory Report. The report provides an overview of the current state of energy in the region, and recognises the important and increasing role of distributed energy generation. The next stage is to develop a regional high-level vision, strategic framework and principle, leading to a future energy strategy and implementation plan.
45. Energy and economic development are inextricably linked, and a regional approach and coordination of infrastructure is essential. We encourage the Plan to further consider how it can support decision-making for increasing distributed networks such as those found in the energy sector.

Spatial planning

46. Integrated and coordinated planning is imperative to achieving affordable and appropriately designed infrastructure. Strong partnerships, clear funding avenues, and supportive policy underpin this.
47. We see spatial planning as the avenue in which we can tie this together – projected growth areas, density of housing, transport, energy requirements, commitments with government, mana whenua, and communities. We support spatial planning being a key tool in which to plan appropriately for our region, to connect the broad suite of initiatives to achieve long-term and cross-sector success.
48. The draft National Infrastructure Plan focuses a lot on large scale central government infrastructure projects and we would like to highlight the importance of supporting projects that local councils do to achieve liveable communities, such as libraries, recreational facilities, and parks and reserves.

Social license

49. We strongly support that along with economic considerations, we also consider social, cultural and environmental needs.
50. Maintaining social license is particularly key for significant projects that are disruptive to everyday routines.

Partnerships

51. We have ten papatipu rūnanga in Waitaha/Canterbury who have a vested interest in how we plan for the future. We are continuously working on enduring and collaborative relationships with Ngāi Tahu and each Papatipu Rūnanga, both as mana whenua, and also as investors, owners, suppliers, and users of infrastructure. We support a te ao Māori approach to infrastructure planning.
52. We have engaged with Business Canterbury and the private sector to support the development of the Canterbury Ambition, a public/private endeavour to enhance economic growth in the region.
53. Through the Energy Inventory work we had significant engagement with a range of stakeholders in the energy sector, each with a vested interest to see this work progress.

Equitable distribution of efforts

54. Infrastructure can be enabling, increase accessibility, and enhance the lives of people in our communities by providing freedom of movement, connection, health and wellbeing. In contrast, with poor planning, certain communities or sub-groups may be excluded, intentionally or not.
55. With significant increase in population projected for some areas, a change in demographics, the transition to a low-emissions economy, and technological advances, we must consider equitable distribution of resources and development.
56. Understanding the region's infrastructure capacity, housing availability, labour market, and transport connectivity is essential to safeguard the reasons people move here in the first place – for the environmental, social, and cultural benefits, alongside the economic potential.
57. We have progressed work recently to gain a better understanding of our infrastructure needs. Along with the Canterbury Energy Inventory, we have developed the Waitaha Canterbury Regional Housing Strategic Plan (near completion) which speaks to the complexity of housing issues and needs regionwide. The Canterbury Climate Change Risk Assessment (2022) was the precursor to the development of the Canterbury Climate Partnership Plan. Planning is already underway for the Regional Land Transport Plan 2027, and we support the work Canterbury Regional Council is doing in regional flood protection.
58. Across all the work we undertake, we strongly support fair and equitable consideration in future planning. It is important to consider the criteria in which activities are proposed and prioritised.
59. Decision-making based primarily on population impacted disproportionately favours urban communities, so we encourage the Commission to consider equity in all senses in making its recommendations to government. Simultaneously, projects that are considered on a user-pays model could inadvertently sideline some sub-groups who do not have the means, nor access to alternatives.
60. With this said, we strongly support local decision-making in determining the prioritised order and location of both new infrastructure developments, and maintenance of existing assets. Central government direction must allow sufficient variation for regional and local application.

Innovation

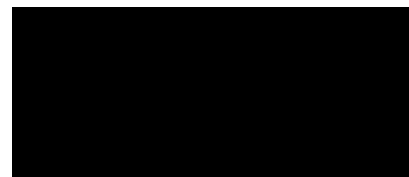
61. While the National Infrastructure Plan touches on new technologies and innovation, it could broaden to include emerging sectors where Aotearoa New Zealand could excel, for example aerospace.
62. The Waitaha Canterbury Aerospace Strategy has been developed by the Canterbury Aerospace Leadership Group and supported by the CMF, with a vision to build a globally renowned aerospace sector that delivers innovative solutions, advances humanity, and generates positive impact. The strategy intends to create long-term value for Canterbury through advancements in R&D, employment, and the expansion of industries such as professional services, science, technology, and telecommunications
63. We support more opportunity to test new ideas and technologies, or trial temporary implementation measures to both optimise the use of existing assets, and 'test the market'.

Conclusion

64. Thank you for considering our submission on the *National Infrastructure Plan*. We think this work is critical to ensuring a coordinated response to our infrastructure needs, while creating a community that people enjoy living in.
65. In planning for our people and our region, we turn to the guiding whakataukī of Ngāi Tahu: Mō tātou, ā, mō kā uri ā muri ake nei – for us and our children after us.

66. We are happy to expand on any points covered in this submission. Please contact

Nāku iti noa, nā



Chair Canterbury Mayoral Forum

Mayor Timaru District Council