

SUBMISSION ON DRAFT NATIONAL INFRASTRUCTURE PLAN

Thank you for the opportunity to provide feedback on the Draft National Infrastructure Plan (the Plan).

Sport NZ supports the intent and direction of the Plan. However, we think there is an opportunity to go further and ensure that we derive the maximum value from our infrastructure investment by taking greater account of the impact that core infrastructure can make to creating active, liveable cities and urban environments.

Overall comments

We support the focus in the Plan on:

- Getting better value from our investment
- Prioritising maintenance, renewals, and the improvement of existing assets over developing new ones
- Providing transparent processes for prioritising and funding infrastructure based on evidence for need and robust business cases that articulate whole of life commitments so that we can optimise the lifespan of the assets and ensure the right assets, of the right scale, in the right place
- Considering a long-term, connected network approach rather than a short-term issues-based responses particularly through spatial planning that considers infrastructure across sectors (i.e. retirement village planning should also consider connected walking and public transport networks to key services)
- The inclusion of community facilities as infrastructure; the planning, prioritisation, and funding of these must be considered in the same way as other infrastructure as they are vital to thriving, liveable communities

The challenges in the system and the recommendations in the Plan align strongly with the work Sport NZ has completed with in relation to facilities for the play, active recreation, and sport sector which include:

- The Spaces and Places Framework [New Zealand Spaces and Places Framework 2024 | Sport New Zealand - Ihi Aotearoa](#) – this outlines the ten foundation principles and best practice application for quality spaces and places provision which align closely with the objectives above

- Our recent National Aquatics [national-aquatic-facilities-strategy.pdf](https://sportnz.org.nz/media/euec1dtg/national-aquatic-facilities-strategy.pdf) and Indoor Courts [national-indoor-facilities-strategy.pdf](https://sportnz.org.nz/media/agjnhb44/national-indoor-facilities-strategy.pdf) Strategies which indicate (with the exception of Auckland and Northland for aquatics and Auckland, Waikato, and Bay of Plenty for indoor courts) that there is enough provision nationally for the short to medium term (in some places there is too much). The existing provision needs to be better optimised, maintained, renewed or consolidated, and improved (mostly to assist with optimisation by a broader range of users and energy efficiency).

The recommendations in the Plan also align well with the National Sport Facilities Strategy (focussed on event stadia, high performance training venues, and facilities of national and international significance) that we are currently developing.

Specific recommendations

We agree with the Plan that ensuring we make our investment work for us and deliver the best possible value is key. Like the New Zealand Infrastructure Commission, we also value 'thriving urban environments' and 'infrastructure that enables vital services that support our wellbeing'. This is why it's important to think about how infrastructure spend can deliver the broadest possible value beyond its primary purpose.

The Plan provides a way to ensure that the funding that is invested in major infrastructure projects also supports the delivery of other public policy priorities. For example, if major transport upgrades or stormwater infrastructure can be designed in ways to promote physical activity, then these investments can deliver added value for both local communities and government. Urban environments where physical activity is 'designed in' create more liveable cities and reduce future costs for government through health savings.

For example, stormwater management and flood prevention infrastructure can be designed in ways to also provide environmental, social, cultural, and wellbeing benefits (i.e. as seen in the Northcote and Wesley Kāinga Ora developments). In these examples stormwater infrastructure also provides opportunities for quality recreation, active travel, and socialising while connecting mana whenua with important natural resources and improving biodiversity and water quality.

Another example is the design of sea walls to reduce erosion and mitigate sea level rises (i.e. the Petone to Ngauranga sea wall) which can also provide opportunities to increase physical activity and health through walking and cycling paths, and thus help to reduce emissions, reduce congestion and reduce wear and tear on roads.

Sport NZ is currently leading the development of Active Design Guidance to support quality planning and design practice to enable physical activity for all as part of everyday life. This guidance will be designed to include comprehensive tools and resources to support the diverse stakeholders involved in shaping New Zealand's urban environment, for example, urban planners, landscape architects, public health specialists, and council members. This short video produced by

<https://sportnz.org.nz/media/euec1dtg/national-aquatic-facilities-strategy.pdf>

<https://sportnz.org.nz/media/agjnhb44/national-indoor-facilities-strategy.pdf>

Sport England provides a useful introduction to Active Design <https://youtu.be/ruWWSYqGAow>

While we would support the adoption of an 'Active Design' approach as a key element of the Infrastructure Plan, this approach has particular relevance for the following two recommendations.

- **Recommendation 8:** *Maximising use: Land-use policies enable new and existing infrastructure to be used by as many people as possible.* Active Design is a great way to achieve this recommendation as the Active Design approach is all about ensuring that public infrastructure can be used by as many people as possible in their daily lives.
- **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.* Again, Active Design provides a way to bring this recommendation to life by using these Active Design principles to ensure that major infrastructure projects are planned and implemented in ways that create enabling and supportive urban environments for all.

In countries such as Denmark it is compulsory to consider how co-benefits from infrastructure design can be delivered and this is built into the system (e.g. through funding criteria and process, incentivisation, best practice design guidance etc). This type of approach could be adopted to ensure that the maximum possible value was delivered from all infrastructure spend.

One way to address this would be to include a requirement that business cases for specific infrastructure projects must include information about the Social Return on Investment (SROI) from the proposed project. There is increasing evidence available that quantifies the benefits that come from engaging in sport and recreation¹ (a similar argument would apply to other social and cultural activities). Including a requirement for an SROI in infrastructure business cases would provide a robust and consistent way for these broader social benefits to be identified and considered alongside the direct economic benefits of proposed projects.

Inclusion of social infrastructure such as community facilities and parks and open spaces.

We are pleased to see that you identify the need to consider community infrastructure such as community sport and recreation facilities, and parks and open spaces in the draft Plan. We would welcome a greater focus on these areas as they are a critical part of the social infrastructure that needs to be in place to support New Zealanders to thrive wherever they live. We consider that many of the issues facing community infrastructure are similar to the issues outlined in the Plan for civil infrastructure. Our national guidance (such as the Spaces and Places, Aquatics and Indoor Courts Strategies referred to earlier) clearly articulates the challenges and opportunities for built facility provision in particular. This could be highlighted alongside the other sectors in section 7.0.

¹ Social Return on Investment Report of Recreational Physical Activity
<https://sportnz.org.nz/resources/social-return-on-investment-sroi-report/>

Unintended Consequences of the Land Transport Funding Model

The proposal for the land transport funding gap to be entirely funded by user charges is at odds with the desire to improve safety and decrease emissions through reduced private vehicle use. We consider that alternative funding models should be considered to enable prioritisation of walking, cycling, and public transport options that can improve health, environmental, productivity, and social outcomes.

Thank you for the opportunity to provide feedback on the Plan and for the inclusion of identified priority sport, active recreation, and play projects from the Regional Spaces & Places Plans (focused on community facility and open space provision) in the Infrastructure Pipeline.

We would be happy to discuss or expand on any of the points in this submission. Please contact [REDACTED] for any further discussions.

