



Title: **Testing our thinking - Developing an enduring National Infrastructure Plan**

Organisation: **Christchurch City Council**

Reference: **NIPC24-0002974** | Submitted: **05/12/2024 12:07 pm** | Submitted by:

Summary of information submitted

Page 1 - Introduction

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We're seeking feedback

Our Discussion Document, [Testing our thinking: Developing an enduring National Infrastructure Plan](#), sets out our thinking as we begin work to develop a National Infrastructure Plan. The Discussion Document sets out what we expect the Plan will cover and the problem it's trying to solve, as well as the approach we're proposing to take to develop it.

We're sharing this now to test our thinking and give you the chance to share your thoughts. Let us know if we've got it right or if there are issues you think we've missed.

We'll use your feedback as we develop the Plan. We'll be sharing our thinking by presenting at events around the country, hosting workshops and webinars, and sharing updates through our website, newsletter, and social media. We'll also seek feedback on a draft Plan before publishing the final Plan in December 2025.

Submission overview

You'll find 17 main questions that cover the topics found in the Discussion Document. You can answer as many questions as you like and can provide links to material within your responses. On the final page (6. Next steps) you can provide any other comments or suggestions that you would like us to consider as we develop the National Infrastructure Plan. Submissions are welcomed from both individuals and organisations.

A few things to note:

- You can save progress using the button at the top right of this form.
- A red asterisk (*) denotes a mandatory field that must be completed before the form can be submitted.
- We expect organisations to provide a single submission reflecting the views of their organisation. Collaboration within your organisation and internal review of your submission (before final submission), is supported through our Information Supply Platform. You'll need to be registered with an Infrastructure Hub account, and be affiliated with your organisation to utilise these advanced features. Many organisations will already have a '*Principal respondent*' who can manage submissions and assign users at your organisation with access to the draft responses.
- Submissions will be published on our website after the closing date. The names and details of organisations that submit will be published, but all personal and any commercial sensitive information will be removed.

Further assistance

Each submission that is started is provided a unique reference identifier. These identifiers are shown in the top right of each application page. Use this identifier when seeking further assistance or communicating with us about this submission by using one of the following methods.

- Use info@tewaihanga.govt.nz to contact us with any questions relating to our Discussion Document and consultation.
- Use inform@tewaihanga.govt.nz for help managing roles and permissions of user accounts affiliated with your organisation in the Information Supply Platform (ISP).

Submission method

Our preferred method is to receive responses through this form. However, we anticipate some submitters will wish to upload a pdf document, especially where their submission is complex or long. If this submission method is necessary, please use [this word template](#) and save as a pdf. We ask that you retain the structure and headings provided in the template as this will support our processing of responses.

Select a submission method

To continue, select the method you will be using.

[Online form](#)

The Discussion Document includes five sections. Below we're seeking feedback on why we need a National Infrastructure Plan. We also want to test our thinking on our long-term needs and make sure we have a clear view of what investment is already planned.

Section one: Why we need a National Infrastructure Plan

A National Infrastructure Plan can provide information that can help improve certainty, while retaining enough flexibility to cancel or amend projects as circumstances or priorities change.

1. What are the most critical infrastructure challenges that the National Infrastructure Plan needs to address over the next 30 years?

The lack of medium-term agreements disrupts the delivery of large infrastructure projects:

There is a lack of medium-term agreement on infrastructure provision, which can be especially disruptive when big infrastructure projects take longer than the three-year election cycles to plan and deliver.

Fragmented infrastructure funding makes political alignment crucial for investment:

Our infrastructure funding often comes from a variety of sources including local, regional, and central government budgets. This exacerbates the impacts of political cycles and makes it even more difficult to get alignment. If investment can only occur when multiple layers of government are in political alignment, it's highly likely that there will be under-investment as a consequence. An example of this would be public transport in Christchurch.

Addressing historic underinvestment and ensuring ongoing maintenance is critical:

Significant infrastructure investment is required to address historic underinvestment in asset maintenance and renewals. As well as continued investment to keep up with demand and maintain acceptable levels of service.

2. How can te ao Māori perspectives and principles be used to strengthen the National Infrastructure Plan's approach to long-term infrastructure planning?

Te ao Māori principles support sustainability, community connection, and responsibility:

Incorporating te ao Māori principles into the National Infrastructure Plan can enhance long-term infrastructure planning by fostering sustainability, community connection, and intergenerational responsibility.

Kaitiakitanga encourages sustainable environmental stewardship:

Kaitiakitanga encourages environmental stewardship, promoting sustainable resource management.

Whanaungatanga and manaakitanga improve community engagement and equity:

Whanaungatanga and manaakitanga strengthen community engagement and social equity, ensuring that infrastructure meets diverse needs.

Mātauranga Māori offers Indigenous knowledge for climate resilience:

Mātauranga Māori brings valuable Indigenous knowledge, especially for climate resilience. Together, these principles encourage an inclusive, resilient, and future-focused approach that aligns with both Māori values and national infrastructure goals.

Section two: Our long-term needs

The National Infrastructure Plan will reflect on what New Zealanders value and expect from infrastructure. To do this, the Plan needs to consider New Zealanders' long-term aspirations and how these could be impacted over the next 30 years.

3. What are the main sources of uncertainty in infrastructure planning, and how could they be addressed when considering new capital investments?

Local needs and environmental impacts are unclear in the proposed system-wide approach:

It is unclear if the proposed 'system-wide approach to assessing needs' would take into account local community needs and aspirations, whole-of-life carbon impacts, and environmental impacts.

The plan does not provide sufficient detail on decarbonising infrastructure:

While one of the drivers for infrastructure spend is 'decarbonising the economy', the discussion document does not elaborate on how infrastructure could support decarbonising, other than referring to the Climate Change Commission's modelling.

Section three: What investment is already planned

We already gather and share data on current or planned infrastructure projects through the National Infrastructure Pipeline. This data, alongside other information gathered by the Treasury or published by infrastructure providers, helps to paint a picture of investment intentions.

4. How can the National Infrastructure Pipeline be used to better support infrastructure planning and delivery across New Zealand?

Clarification is needed on specific areas of transport spending within the pipeline:

Transport seems to take up the bulk of the pipeline's spending over the next ten years, it would be great to get clarity on what specific areas of transport this would cover, for example, public and active transport or motorways.

Transparency is required on the selection and contribution of the mega projects:

It would be great to know what the '17 mega projects in the pipeline' are and why they were chosen, as well as how these projects could contribute to decarbonising the economy.

Section four: Changing the approach

We have used our research and publicly available information on infrastructure investment challenges to identify key areas for change. The next question and the following three pages seek further detail on the three themes in section four of our paper. Within each of the three themes, we explore some topics in more detail, outlining the evidence, discussing the current 'state of play', and asking questions about where more work is needed.

5. Are we focusing on the right problems, and are there others we should consider?

No comment.

Page 3 - Capability to plan and build

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Changing the approach — Capability to plan and build

Section four looks at changes that we can make to our infrastructure system to get us better results. We've broken these changes down into three themes: capability to plan and build, taking care of what we have, and getting the settings right.

For the first theme, we look at three key areas:

- Investment management: Stability, consistency, and future focus
- Workforce and project leadership: Building capability is essential
- Project costs: Escalation means less infrastructure services.

Investment management: Stability, consistency, and future focus

We're interested in your views on how we can address the challenges with government infrastructure planning and decision-making.

6. What changes would enable better infrastructure investment decisions by central and local government?

Planning and understanding project options upfront are crucial for cost and carbon impacts:

The Council agrees that “when organisations don’t take the time to plan and understand project options and details upfront, there is a greater risk of it costing more or taking longer to build than expected.” This also applies when it comes to the carbon impacts of an infrastructure project. Planning will affect the extent to which infrastructure projects can reduce their carbon footprints across the assets’ lifecycles.

Objective frameworks can help assess and prioritise infrastructure projects:

There need to be better ways of informing incoming governments about the relative worth of different infrastructure projects, in an effort to curb wholesale changes every three years. There also needs to be more objective ways of assessing the worth of competing projects through, for example, cost-benefit ratios, willingness-to-pay studies, land value capture, and the review of the effectiveness of development contributions.

Delegating responsibilities can streamline infrastructure investment decisions:

The Council seeks for there to be clearer delegation of responsibilities to avoid situations where infrastructure investment is prerequisite on multiple layers of government all having to be aligned. For example, central government delegating funding decisions on small residential streets down to local government.

7. How should we think about balancing competing investment needs when there is not enough money to build everything?

Maintaining existing infrastructure should take precedence over new builds:

Invest in current infrastructure first before building more (unless demand requires more).

Workforce and project leadership: Building capability is essential

We’re interested in your views on how we can build capability in the infrastructure workforce.

8. How can we improve leadership in public infrastructure projects to make sure they're well planned and delivered? What's stopping us from doing this?

No comment.

9. How can we build a more capable and diverse infrastructure workforce that draws on all of New Zealand's talent?

No comment.

Project costs: Escalation means less infrastructure services

We're interested in your views on further opportunities to improve our ability to deliver good infrastructure at an affordable cost.

10. What approaches could be used to get better value from our infrastructure dollar? What's stopping us from doing this?

No comment.

Page 4 - Taking care of what we've got

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Changing the approach — Taking care of what we've got

The second theme in section four looks at how we can get better at taking care of what we have. It looks at three areas:

- Asset management: Managing what we already have is the biggest task
- Resilience: Preparing for greater disruption
- Decarbonisation: A different kind of challenge.

Asset management: Managing what we already have is the biggest task

Asset management means looking after our infrastructure. We are interested in your views on how we can improve planning for this.

11. What strategies would encourage a better long-term view of asset management and how could asset management planning be improved? What's stopping us from doing this?

Central government guidance on asset prioritisation frameworks is needed:

The Council seeks guidance from central government in the form of an asset prioritisation framework. This is currently an area that is difficult for councils to manage. This could be focused not just on cost but also social and environmental impacts and infrastructure demand.

Resilience: Preparing for greater disruption

We are interested in your views on how we can better understand the risks that natural hazards pose for our infrastructure.

12. How can we improve the way we understand and manage risks to infrastructure? What's stopping us from doing this?

Adapting to long-term risks requires a 50- to 100-year planning horizon:

The National Infrastructure Plan needs to focus on adaptation to make infrastructure more resilient over time. This could include forecasting changes and planning for 50-100 years rather than 30 years. The current decision-making framework planning for 30 years will make it more difficult to plan for uncertainty and could lead to maladaptation.

A national framework for risk analysis is essential for consistent decision-making:

The Council recommends that the National Infrastructure Plan should set out a framework for risk analysis to provide guidance to councils and organisations on how to proceed with this regarding infrastructure. Consistent thresholds for cruciality would also be helpful.

Decarbonisation: A different kind of challenge

We're interested in your views on how we can improve understanding of the decarbonisation challenge facing infrastructure.

13. How can we lower carbon emissions from providing and using infrastructure? What's stopping us from doing this?

Infrastructure construction and maintenance must focus on lower carbon options:

Reducing the emissions we generate when we build and maintain infrastructure should also apply to when we use the infrastructure. For example, using electric vehicles or public transport on roads.

Scaling up demand for lower-carbon materials can reduce costs:

For roading infrastructure, we know there are lower-carbon options such as lower-carbon concrete or reusing existing asphalt surfaces when renewing/resurfacing a roadway. The Council is aware lower-carbon concrete costs more, but it would be great to understand if this is due to lower demand compared to regular concrete. There could be cost advantages with a greater economy of scale. Central government could lead by specifying lower-carbon concrete or assisting in procurement processes.

Early-stage carbon planning needs clear tools and guidance:

There is currently a lack of requirement to incorporate carbon planning at the earliest stage of a project. Project managers need clear guidance and tools to support them to manage carbon in their projects. Planners need direction to ensure they build in carbon assessment into their business cases and project plans. Designers and builders need information on and access to affordable lower-carbon options. Central government could assist by providing the resources that infrastructure owners, planners, designers, builders, and engineers need to build and maintain their assets across the whole-of-life for those assets.

Changing the approach — Getting the settings right

The third theme in section four looks at how we can get our settings right to get better results from our infrastructure system. It looks at three areas:

- Institutions: Setting the rules of the game
- Network pricing: How we price infrastructure services impacts what we think we need
- Regulation: Charting a more enabling path.

Institutions: Setting the rules of the game

We're interested in your views on what changes to our infrastructure institutions would make the biggest difference in giving us the infrastructure we need at an affordable cost.

14. Are any changes needed to our infrastructure institutions and systems and if so, what would make the biggest difference?

No comment.

Network pricing: How we price infrastructure services impacts what we think we need

We're interested in your views on further opportunities to improve network infrastructure pricing.

15. How can best practice network pricing be used to provide better infrastructure outcomes?

No comment.

Regulation: Charting a more enabling path

We're interested in your views on further opportunities to improve regulation affecting infrastructure delivery.

16. What regulatory settings need to change to enable better infrastructure outcomes?

No comment.

Page 6 - What happens next?

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Additional information to support our development of the Plan

Section five in the Discussion Document is on the next steps. In this section, we're asking you for any additional comments, suggestions, or supporting documentation that we should consider in our development of the National Infrastructure Plan.

17. Do you have any additional comments or suggestions that you would like us to consider as we develop the National Infrastructure Plan?

Click 'Add another' to add multiple suggestions or comments.

Item 1

This is a staff submission on behalf of Christchurch City Council.

[REDACTED]

18. Attach any documents that support your submission

Click 'Add another' to add multiple attachments in PDF format.

Document 1

No attachment

Thank you for your response

Thank you for providing feedback on our Discussion Document. We'll use your comments as we continue to develop the Plan. This will not be the only opportunity for you to provide feedback, but it is an important way to test our emerging thinking on the development of an enduring National Infrastructure Plan.

If you have prepared a submission on behalf of an organisation, you'll need to be an authorised *respondent* to make the final submission. If you entered a new organisation during sign-up, or your organisation does not already have a *Principal respondent* assigned, you will have been asked to nominate yourself or someone else for this role as you started this submission. Our team will have worked to verify these accounts allowing *Principal respondents* to manage access and assignment of requests for information to people within your organisation.

If you require any assistance please reach out to our team at
inform@tewaihanga.govt.nz.
