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

Organisation: **Tuatahi First Fibre Limited**

Reference: **NIPC24-0003096** | Submitted: **10/12/2024 03:51 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

Page 2 - Context for the Plan

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Testing our thinking

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?

Tuatahi First Fibre (Tuatahi) is pleased to have the opportunity to provide a response to the discussion document Testing our thinking – Developing an enduring National Infrastructure Plan.

Tuatahi is a fibre telecommunications network operator and supplier of wholesale fibre access services throughout the Waikato, Bay of Plenty, Manawatū-Whanganui, Taranaki, Hawkes Bay, Rotorua and Auckland areas. Formed in 2010 as part of the ultrafast broadband (UFB) initiative tender process run by the Crown, Tuatahi (formerly Ultrafast Broadband Ltd) was created to deliver the UFB initiative through a public-private-partnership (PPP) model.

Tuatahi delivered 13.7% of the UFB network, paying back the government funding in September 2016. Alongside Chorus, Enable and Northpower collectively we delivered fibre to 87% of New Zealand's population on time, in one of the most successful public-private partnerships ever undertaken. As such Tuatahi have a wealth of experience in effective delivery and management of a large-scale infrastructure investment, as well as quality asset management.

We have reviewed and reflected on the discussion document both through the lens of the success of the UFB initiative and what lessons can be learned and applied from this experience for the infrastructure sector, as well as our ongoing role in continuing to grow and maintain the fibre network within the telecommunications sector more specifically.

Nothing in this submission is confidential, and we are happy to discuss any aspects of it with the Commission.

The challenges outlined by the Infrastructure Commission are comprehensive and we commend the Commission for the research and thinking that has been done. The UFB national fibre network rollout initiative, was an excellent example of management of a largescale infrastructure investment utilising a PPP model. We acknowledge that this investment has helped place telecommunications in the enviable position of not having an infrastructure deficit comparable to those listed upfront in the discussion document (power, water, transport, healthcare and education), however we would urge the Commission to treat telecommunications with the same level of national importance as these when thinking about the New Zealand of the future, as it plays a pivotal role in productivity, safety and wellbeing.

During crises (recently the Covid-19 response, Hawkes Bay flooding) telecommunications is rightly considered essential infrastructure, and it is important it is considered with the same weight as the other traditional lifeline utilities.

*With this in mind, there is significant opportunity to continuing increasing New Zealand's productivity through furthering Fibre reach, and utilisation. This is examined in the recent Deloitte report Unleashing fibre**[1]**.*

When thinking about the broadband needs of future New Zealand, the Deloitte report is a good tool to examine where we want to head. To ensure that New Zealand continues to build on the productivity gains already delivered by the UFB roll out it is important that Fibre networks are considered essential where practical for private investment, and co-investment is considered where roll out is non-economical but the benefits significant.

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[1] https://www.deloitte.com/content/dam/assets-zone1/nz/en/docs/services/financial-advisory/2024/deloitte-unleashing-fibre-future-of-digital-fibre-infrastructure.pdf

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

Our name, Tuatahi, is te reo Māori for 'first' and was developed in consultation with our local kaumatua. This name represents our core function of providing New Zealanders with access to high quality broadband. It also embodies our track record of firsts – first choice for internet connectivity, putting our communities first, first to the future, and our people-first culture. In acknowledgement of our name's origin and its meaning for us, we support measures that will improve outcomes for Māori and are glad to see the inclusion of te ao Māori perspectives and principles proposed in the Plan.

Tuatahi operate throughout the Waikato, Bay of Plenty, Manawatū-Whanganui, Taranaki, Hawkes Bay, Rotorua and Auckland areas and while we support the intention to recognise te ao Māori in this Plan, we do not consider it appropriate for us to provide specific comment on how te ao Māori should be incorporated nationally—this authority lies with mana whenua. Instead we stress the importance of engaging with iwi/hapū Maōri when determining how te ao Māori should be used to strengthen the Plan's approach to long-term infrastructure planning.

To do so we recommend consultation and engagement with iwi/hapū Māori occur at all stages of the Plan's timeline. The Crown is obligated to engage with the mandated and approved iwi/hapū Māori entity that represent the mana whenua in each rohe where infrastructure development is planned and must ensure adequate and appropriate engagement occurs without placing unnecessary burden on iwi/hapū Māori who will have to use their own resources to contribute to this work.

We do note that the discussion document acknowledges that "Some of the drivers of future infrastructure demand, such the need to build resilience to natural hazards, and our changing population, could impact upon Māori disproportionately" and "Many iwi are

*already investors in a range of infrastructure projects"**[1]**, Tuatahi support engagement with iwi/hapū Māori to address these matters.*

In our own operations, we are committed to measures that increase connectivity for all New Zealanders. Unfortunately evidence shows those most at risk of digital exclusion in New Zealand include, Māori, disabled people, Pacific people, people in social housing, seniors, unemployed, and remote communities[2] . Tuatahi has long advocated for Government support for wholesale fibre infrastructure networks to partner with Māori to deliver fibre broadband to kura and marae, and increased rural infrastructure.

*We know from the 2018 Census, that rural communities have a higher proportion of Māori than urban populations (around 22% identifying as Māori, compared to 15% in urban areas) and this is increasing. The 2023 Rural Health Strategy states "There is a digital divide between urban and rural households, which is more pronounced in remote areas and for people with lower incomes" (page 31)**[3]**. A lack of digital connectivity can impact people's access to important services like online health and social services. The National Infrastructure Plan will need to address this divide, and we suggest engaging on this topic specifically.*

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[1] Page 28 Testing our thinking – Developing an enduring National Infrastructure Plan

[2] https://www.digital.govt.nz/dmsdocument/177~report-digital-inclusion-user-insights-maori/html

[3] https://www.health.govt.nz/system/files/2023-07/rural-health-strategy-oct23-v2.pdf

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?

We believe the eight drivers of infrastructure spend identified in the discussion document (figure 7) are the right drivers to consider when thinking about infrastructure needs. There are uncertainties in many of the drivers which make planning difficult. As a company we are invested in all drivers, but resiliency and technology change have been of particular note this year, and are difficult to predict.

The drivers outlined are useful but illustrate only part of the considerations to be made during infrastructure planning. The impact of infrastructure should also be considered, both economic and social. This is important in ensuring we get the right value from our plans. This can be well illustrated by the vast benefits the UFB initiative has delivered, that are projected to continue as our economy evolves[1].

[1] https://www.deloitte.com/content/dam/assets-zone1/nz/en/docs/services/financial-advisory/2024/deloitte-unleashing-fibre-future-of-digital-fibre-infrastructure.pdf

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?

The National Infrastructure Pipeline can be used to better support infrastructure planning and delivery across New Zealand by using its data to assess opportunities for holistic infrastructure investment that will save money, time and resources in the long run.

As mentioned in the discussion document[1], one of the areas New Zealand can improve our efficiency of infrastructure spend is in improving collaboration. We see huge opportunity in collaborative approaches to large scale infrastructure projects, as the fibre footprint can be incrementally expanded more cost effectively through "tacking on" laying duct as part of other projects. Visibility and transparency of these large-scale projects, and consideration of where collaboration between multiple infrastructure can occur would be an important step-change.

This could also be a useful tool to embed lessons learned from successful largescale projects. For example, there are lessons in effective largescale project management that can be learned from the Christchurch earthquake recovery, that have been captured by SCIRT learning legacy[2]. Many of these relate to areas for improvement outlined in the discussion document, for example, lessons learned from the coordination across utilities providers for the repair of utilities has been captured[3].

We believe that this approach is the correct one, noting that to be fully effective it will require ongoing cross-party support.

[1] Page 19 Testing our thinking – Developing an enduring National Infrastructure Plan

[2] https://scirtlearninglegacy.org.nz/

[3] https://scirtlearninglegacy.org.nz/wp-content/uploads/2021/07/qsr-part_338633.pdf

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?

Market settings once infrastructure is in place are critically important. The discussion document discusses the role regulatory settings play in ensuring adequate asset management outcomes[1], but there is a broader role that market settings play (particularly in the telecommunications sector) in ensuring that we get the most out of our infrastructure.

For example, the impact of the roll out of the fibre network, and the opportunities it presents for the future productivity of New Zealand have been analysed in the recent Deloitte report[2]. This report shows that to derive the largest benefit from the technology, footprint and uptake must continue to lift.

Rather than it being an easy task to follow this advice, the broadband market now has other lower quality alternatives such as fixed wireless and LEO satellite available. While these alternate technologies are cheaper for the consumer, the transmission rates achievable do not approach what is possible on the fibre network. However, the market settings favour the sale of these alternatives, due to vertically integrated business models, and we have concerns that these potential productivity gains will be left on the table, without a full assessment of what the right path is.

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[1] Page 53 Testing our thinking – Developing an enduring National Infrastructure Plan

[2] https://www.deloitte.com/content/dam/assets-zone1/nz/en/docs/services/financial-advisory/2024/deloitte-unleashing-fibre-future-of-digital-fibre-infrastructure.pdf

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?

No response provided

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

When thinking about prioritisation of infrastructure funding and getting more out of each dollar we spend on our infrastructure, it is evident from the discussion document the Commission has done a significant amount of research and thinking on this issue.

We echo the Commission's emphasis on best practice infrastructure decision-making. Cost-benefit analysis is crucial in assessing whether there will be sufficient payback for the infrastructure investment (whether it be social or economic). We know that the UFB initiative has had immense payback for New Zealand across several areas;

*11) **Productivity**, the recent Deloitte report states that digital fibre infrastructure has delivered $31 billion of economic benefit between 2011 and 2023[1].*

*22) **Enablement** of working from home (essential during Covid-19 management)*

In addition to ensuring that investment is considered through strong business casing and under the lens of the benefits to the future New Zealand, we also suggest that upfront, the opportunity for collaboration across infrastructure providers is assessed. For fibre, laying ducting as part of a wider project provides cost sharing and efficiency opportunities. For example, when fibre is laid utilising a trench sharing agreement (with water &/or power), the cost to each utility provider lowers significantly.

In practice, this means that a project seemingly unrelated to telecommunications contains an opportunity to more cost effectively expand our fibre footprint. This is because fibre can be laid in conjunction with other services with minimal impact. For example, a water pipeline installation (new or replacement) could provide partnership opportunities to tack on fibre ducting and share costs.

[1] https://www.deloitte.com/content/dam/assets-zone1/nz/en/docs/services/financial-advisory/2024/deloitte-unleashing-fibre-future-of-digital-fibre-infrastructure.pdf

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 response provided

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

No response provided

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?

We reinforce our statements around improved collaboration opportunities in the answers to questions 4 and 7.

The other area where we see opportunity for improved cost efficiencies, is in revisiting the regulatory settings for the rollout of fibre. We see opportunity for change in the following areas:

11) We refer to the issue of regulatory settings encouraging the fibre network to be built within the road reserve in our response to question 12. Not only do the settings have impacts on risk management, but also an impact on build efficiency. Due to the fibre network being built alongside roading, the most direct pathways for the network are often not taken. From an engineering standpoint, this results in more repeaters being needed within the network, and a higher cost network. The use of utility corridors would be a vast improvement in this area.

22) The regulatory restrictions that restrict the business activity of the Local Fibre Companies should be removed. Part of the Crown requirements that underpinned the UFB rollout were restrictions on the business activity of the partners. This ensured a highly

focussed rollout, but the restrictions have served their purpose. Instead they now restrict innovation and evolution of product offerings in a rapidly evolving sector, and serve as an example of the need to ensure regulation evolves appropriately.

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?

Asset management of the Fibre network rolled out through the UFB initiative is well managed, and the asset management requirements are achieved via multiple mechanisms. In the discussion document the role of the Commerce Act 1986 in Price Quality regulation (relating to the power industry) is discussed. This tool is used for the fibre industry as well, with Chorus as the largest provider Price Quality regulated, and Tuatahi (and the other Local Fibre Companies) regulated through Information Disclosure.

In addition to this mechanism, part of the crown contracts for the rollout of the UFB contained clear service level obligations (contained in the Network Infrastructure Project Agreement (NIPA)). Including this obligation upfront, in the contracts with the Crown has also been a successful way to ensure that ongoing asset management was addressed from the outset. We would encourage this approach when contracting future projects.

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?

*New Zealand is increasingly exposed to infrastructure risks, due to the effects of climate change. The joint report from Treasury and the Ministry for the Environment Ngā Kōrero Āhuarangi me te Ōhanga – Climate Economic and Fiscal Assessment**[1]** outlines the economic implications of climate change.*

As mentioned in question 1, telecommunications is considered critical infrastructure – which has been evident during recent natural disasters. As such, we are invested in the work being done to review the approach to resiliency, and emergency management tools.

Cyclone Gabrielle highlighted the need for careful network planning, and the need to eliminate single points of failure in fibre networks. Fibre itself has been shown to be highly resilient (evidenced by the Christchurch earthquakes), so building networks in a manner that avoids high risk failure points will result in a more resilient network.

*Currently, the regulatory settings don't naturally drive towards this logical outcome. For example, roads and bridges are the main failure points during significant weather events, however regulatory settings encourage the fibre network to be delivered via road reserve. Looking at the UK's rural broadband infrastructure project B4RN (Broadband for the Rural North)**[2]** for a comparison, the network is entirely sub-surface (much of which crosses land rather than follows road), and yielded great results for a region prone to weather events. New Zealand should consider the benefits of amending the regulatory framework to allow for easier access to alternative routes for fibre, avoiding known high risk failure points. The use of well-placed utilities corridors would be of benefit in addressing this issue.*

When considering the broader risk and emergency management environment, Tuatahi refer to the Telecommunications Forum submission.

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[1] https://www.treasury.govt.nz/publications/climate-economic-fiscal-assessment/nga-korero-ahuarangi-me-te-ohanga-2023#executive-summary

[2] https://b4rn.org.uk/about-b4rn/the-technology

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?

As previously discussed in question 4 and 7, collaboration across infrastructure network providers creates efficiencies, with trench sharing agreements significantly lowering the cost of expanding the fibre footprint. There are also environmental efficiencies gained from some forms of collaboration like this. If fibre, water and power all coordinate and share trenching on a project, the use of machinery is reduced.

A longer-term view of the carbon emissions impact of infrastructure is important as New Zealand moves towards decarbonisation. It is essential that the role of high speed-broadband connectivity is considered, as this is an enabler of an individual's ability to reduce their carbon footprint (as evidenced by an increased ability to work from home[1]), as well as an enabler of productivity gains for the country, and growth of non-physical exports.

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[1] https://www.thinkstep-anz.com/resrc/news/the-carbon-benefits-of-working-from-home/

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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 response provided

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 response provided

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?

The UFB roll out is a success story, utilising the PPP model for infrastructure investment very effectively. The roll out of a completely new fibre network to 87% of the country over such a short period is an incredible achievement for the country. However, many of the regulatory instruments that were put in place to ensure efficient delivery of the roll out have served their purpose but remain in place. This creates a complicated operating environment now the roll out is complete, which is increasingly inflexible given the rate of change in the telecommunications sector. It is important that regulatory instruments are removed once they are no longer achieving their purpose. For example, to ensure that Local Fibre Companies delivering the UFB initiative were focussed on efficient delivery of the roll out, the Crown imposed a condition that restricted the businesses scope to providing fibre services. The objective of this condition was achieved (a highly efficient delivery), the crown funding was repaid, but the restriction on business activity has remained. This limits Tuatahi in our ability to evolve with the market and look at alternative means to close coverage gaps.

A general reflection on the regulatory settings that were utilised for the UFB rollout is that they were highly effective for a time but are slow to fall away. Aside from change to the regulatory restrictions that govern LFC activities (changes are currently being considered via. MBIE consultation), there are several other areas where regulatory settings could be changed to enable better outcomes:

National standard for fixed telecommunications services in new developments:

As mentioned upfront in question 1, it is important that where practical, fibre is considered essential. High levels of fibre network coverage are needed to ensure New Zealand fully captures the productivity benefits of the fibre network. One practical application, where

New Zealand could change its current approach to ensure we aren't inadvertently making short-sighted or inefficient decisions, is in the telecommunications requirements for new subdivisions. We are increasingly seeing the costs of infrastructure in greenfield developments drive some developers to persuade councils that fibre is not needed to fulfil telecommunications requirements, instead relying on fixed wireless as an alternative. This is both inefficient and a false economy, as it is far more efficient to install fibre at the time of development, and the fibre alternatives do not offer the same transmission rates as a fibre network.

To fix this, New Zealand could follow the lead of Australia, setting a mandate that new housing developments must have access to modern fixed telecommunications services. The Australian Parliament passed laws that require all developers to arrange for fibre-ready pit and pipe infrastructure to be installed in proximity to building lots or building units before those developers sell or lease the building lots or units. The objectives of this Telecommunications in New Developments (TIND) policy are to provide people moving into new developments with ready access to modern fixed and mobile telecommunications services; and to support a competitive and sustainable market for the provision of such infrastructure by fostering efficiency, innovation and choice.

The 2024 Telecommunications in New Developments Policy report[1] states, "The provision of fixed infrastructure is best done as part of the development process, as it involves more investment and co-ordination, and has been historically more challenging than other utility infrastructure. While an increasing amount of telecommunications traffic is now carried by mobile networks, fixed networks still carry the vast majority of internet traffic, for example, streaming videos and large file downloads." Currently, in New Zealand, the decision lies solely with individual councils.

A change in the regulatory preference for building to the road reserve

As mentioned in our feedback relating to both resiliency of infrastructure (question 12) and how we can improve the value of our infrastructure dollar spend (question 10), the regulatory settings that encourage the fibre footprint to follow the road have cost and resiliency implications. We suggest reviewing the settings, and further considering the use of infrastructure corridors. We note that the Infrastructure Commission has already recommended the use of infrastructure corridors as a means to reduce cost[2], and we strongly encourage further development & pursuit of this recommendation.

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[1] https://www.infrastructure.gov.au/sites/default/files/documents/telecommunications-in-new-developments-policy-february-2024-final.pdf

[2] https://tewaihanga.govt.nz/recommendations/reduce-costs-by-optimising-infrastructure-corridors

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

No response provided

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.