

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, you can provide any other comments or suggestions that you would like us to consider as we develop the National Infrastructure Plan. Submissions are welcome from both individuals and organisations.

Deadline for submissions: 5.00pm on 10 December 2024.


A few things to note:

- 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.

Submission method

We prefer feedback to be submitted through our [online survey](#). Alternatively, you may use this Word template to generate and upload a PDF.

Instructions for PDF submission:

1. Complete your response using this Word template. You can edit the document at points marked with the  cursor. This includes adding tables, images and text as normal.
2. Save the file type as PDF by selecting 'Save as' in MS Word and choosing 'PDF' as the file type.
3. Complete the introduction section of the online form.
4. Select 'PDF attachment' as your submission method. You'll then be prompted to upload your PDF.

Important: PDF submissions that are not generated from this Word template cannot be processed.

If you have any questions, please feel free to email info@tewaihanga.govt.nz and one of our team will follow up with you.

Context for the Plan

Section one: Why we need a National Infrastructure Plan

- Q1. What are the most critical infrastructure challenges that the National Infrastructure Plan needs to address over the next 30 years?

ORC Engineering

- Providing longer term intergenerational benefits with the funding that's available.
- Increasing resilience to help critical infrastructure deal with change or shocks. These may occur due to natural disasters, new or changing government regulations, or changes of governance or organisational strategic direction. Note that we are aware that overall community and organisational resilience is needed here, not just building physical resilience to shocks or changes. It can be difficult to absorb these when it comes to large scale, time consuming, and relatively high-cost works such as maintaining or improving the performance of flood protection assets.
- Workforce capabilities and availability in the regions.

- Q2. How can te ao Māori perspectives and principles be used to strengthen the National Infrastructure Plan's approach to long-term infrastructure planning?

No feedback

Section two: Long-term expectations

- Q3. What are the main sources of uncertainty in infrastructure planning, and how could they be addressed when considering new capital investments?

ORC Engineering

- Funding.
- Changing community and governance directions.
- Demand for flood protection and drainage infrastructure isn't driven by population alone (if at all in some areas). It's important to ensure that the other factors identified are also taken into consideration when considering future investment.
- Climate change and its impact on the performance of our flood protection and drainage infrastructure, and community expectations around levels of service.

Section three: Existing investment intentions

- Q4. How can the National Infrastructure Pipeline be used to better support infrastructure planning and delivery across New Zealand?

Engineering

- ORC Engineering has recently started submitting some project information to this platform. We also plan to submit more across our broader programmes of work in future.

- Over time it would be good to increase the number of organisations that are submitting information to the Pipeline. This is something that the Infrastructure Commission appears to be actively working on already.
- The Pipeline doesn't appear to address uncertainty in the data being provided. This could be useful storytelling when it comes to the National Infrastructure Plan and provide an incentive for organisations to provide data to a core standard to increase confidence in the information being used in the Plan.

Section four: Changing the approach

Q5. Are we focusing on the right problems, and are there others we should consider?

ORC Engineering – agree with focus

ORC Transport - ORC endorses many of topics and problems traversed in the document but is disappointed in the omission of opportunity cost as a core focus of the report, particularly with regards to transport. The deterioration of Otago's rural roads bridges and a failure to invest in public transport will inevitably cost more money in the long-term than making short-term investments now.

Capability to plan and build

Theme one: Capability to plan and build

Investment management: Stability, consistency and future focus

- Q6. What changes would enable better infrastructure investment decisions by central and local government?
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ORC Transport - Recent changes to the LTMA requiring TLAs to collaborate around key decisions is a valuable step toward enabling better infrastructure investment decisions. However, it is difficult to coordinate infrastructure spending that supports public transport due to the timing of funding and the misalignment of LTPs. ORC's ability to align investments with TLAs through the LTP remains a challenge. The outcome is that some TLAs make decisions around developments that are not well-integrated with regional LTPs and that will be expensive from an infrastructure perspective.

- Q7. How should we think about balancing competing investment needs when there is not enough money to build everything?
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No feedback

Workforce and project leadership: Building capability is essential

- Q8. 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?
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No feedback

- Q9. How can we build a more capable and diverse infrastructure workforce that draws on all of New Zealand's talent?
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No feedback

Project costs: Escalation means less infrastructure services

- Q10. What approaches could be used to get better value from our infrastructure dollar? What's stopping us from doing this?
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ORC Engineering

- Funding committed and projects able to progress without delays caused by the challenges and uncertainties already noted e.g. changing regulatory requirements, governance direction, availability of workforce etc.

Taking care of what we've got

Theme 2: Taking care of what we've got

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

Q11. 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?

- **ORC Engineering**
- Building broader recognition of the role that asset management plays in forward work programming.
- Developing consistent data standards across the different sectors to ensure this information is reliable and of a consistent standard. Please see note re uncertainty in response to question 4 above.
- Implementing some form of regulation.

Resilience: Preparing for greater disruption

Q12. How can we improve the way we understand and manage risks to infrastructure? What's stopping us from doing this?

- **ORC Engineering**
- Similarly to the question 11, developing consistent data standards for each sector to enable this data to be more readily shared with those undertaking studies or undertaking broader analysis.
- Raising community awareness.
- **ORC Natural Hazards**
- Consistent, nation-wide, natural hazards mapping for all key natural hazard types.
- National guidance/standards for the assessment of risks from all key natural hazard types, so that these risks are evaluated and characterised consistently across the country.
- Having the two points above in place would enable proactive nation-wide assessment and prioritisation for work to address natural hazard risks to infrastructure.
- In addition, national standards are also required for the infrastructure design for all those hazard types. Having unified design standards for everything from floodbanks to bridges to water/wastewater/stormwater systems would allow infrastructure managers to identify where the issues are and plan and design for improvements.
- There is not yet nation-wide coverage of LiDAR topographical survey data. This is a critical input dataset for many natural hazards assessments (e.g. flooding assessment, or geotechnical studies), so this data needs to be captured and made easily accessible, as a foundational step to ensuring natural hazards are comprehensively considered in infrastructure management/design.

Decarbonisation: A different kind of challenge

Q13. How can we lower carbon emissions from providing and using infrastructure? What's stopping us from doing this?

ORC Transport - The GPS on land transport's omission of quantifying greenhouse gas emissions sends the wrong signal to ORC, as it muddles a clear pathway to reduce emissions and limits our financial incentive to do so.

Getting the settings right

Theme 3: Getting the settings right

Institutions: Setting the rules of the game

- Q14. Are any changes needed to our infrastructure institutions and systems and, if so, what would make the biggest difference?
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No feedback

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

- Q15. How can best practice network pricing be used to provide better infrastructure outcomes?
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No feedback

Regulation: Charting a more enabling path

- Q16. What regulatory settings need to change to enable better infrastructure outcomes?
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No feedback

What happens next

Section five: What happens next?

Q17. Do you have any additional comments or suggestions that you would like us to consider as we develop the National Infrastructure Plan?

ORC Transport:

- ORC would like more clarification on the broader role of the National Infrastructure Agency and the relationship with the NZ Infrastructure Commission?
- ORC would like explicit reference to AF8 and the implications a magnitude 8+ earthquake would have on infrastructure.
- The deterioration of rural bridges and roads is a key issue in the South Island. These bridges and roads are important from an economic perspective, as they enable livestock, agriculture products and tourists to move around. They are also an important lifeline for many rural communities, where there are no other options to access essential services, such as hospitals. Rural bridges and roads are therefore strategically important and linked with providing high economic value, even though their usage is lower than those in more populated areas. A key consideration moving forward is how we will maintain infrastructure in rural areas which may not appear to significantly impact lots of people but have a high per capita contribution of GDP.

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.

Please email info@tewaihanga.govt.nz if you have any questions or need more information.