Submission to Draft National Infrastructure Plan

Date: 30 July 2025

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1. Executive Summary

We commend Te Waihanga for producing a well-reasoned and forward-looking Draft National Infrastructure Plan. The Plan acknowledges the rising pressure on infrastructure systems across New Zealand and the urgent need to address deferred maintenance, fragmented investment planning, and systemic inefficiencies. However, there are **critical gaps** in how **local infrastructure**, particularly **bridges**, and **spatial planning frameworks** are addressed.

Our submission focuses on:

- The **national bridge infrastructure gap** and its impacts on fast-growing Tier 1 areas like **Cambridge**.
- The **misalignment between infrastructure funding frameworks (e.g. NZTA business cases)** and strategic national goals such as urban intensification.
- The insufficient emphasis on **statutory spatial planning** as a tool for forward-looking infrastructure coordination.
- Specific answers to Te Waihanga's consultation questions.

2. Local Infrastructure Gaps: Example - Cambridge's Bridge Network

Cambridge is a **Tier 1 urban area under the National Policy Statement on Urban Development (NPS-UD)** and is experiencing rapid population growth, especially on the Leamington side of the Waikato River. Its two bridges — **Fergusson Bridge** and **Victoria Bridge** — are no longer sufficient to support the planned (and yet to be planned for) growth required by Government policies

- **Fergusson Bridge** is structurally sound but **too narrow and approaching capacity** at peak hours (school drop-offs, Fieldays, work commute).
- **Victoria Bridge**, built in 1907, is **weight-and height-limited**, **unsuitable for modern vehicles**, and **requires extensive costly maintenance**.
- Growth pressure, especially with **Leamington's residential expansion (and likely future expansion)**, is not matched by any planned increase in cross-river capacity.

Despite repeated local efforts, the proposal for a third bridge has been **repeatedly deferred as "unaffordable"**, especially in the absence of NZTA business case support. The outdated **Beca study**, conducted during COVID, fails to reflect true growth or traffic patterns and Cambridge continues to grow as a desirable place to live and as a service centre. It is noted that the original financing in 1907 of the Victoria bridge involved wider Councils sharing the cost. It is further noted that Cambridge Connections study is currently being "re-set" having failed to reflect community expectations.

3. Strategic Misalignment: Business Case Bias and Central Funding Gaps

We support the Plan's concern over fragmented decision-making, but **bridge infrastructure projects like Cambridge's third bridge** are particularly disadvantaged because:

- **NZTA's traditional business case model** undervalues resilience, long-term growth enablement, and land-use integration.
- Small local councils individually **cannot fund regionally significant infrastructure** alone and there is little opportunity for regional cost sharing.
- **Delayed corridor planning dramatically increases land costs**, undermining project viability.

This systemic issue demands central attention and funding innovation, particularly for **sub-$100M, high-impact local and sub-regional projects**.

4. Elevating Spatial Planning: Beyond Aspirational Visions

We are also concerned that **Ahu Ake**, the intended spatial plan for Waipā District, **does not function as a statutory 30-year zoning place-making plan**. While it provides high-level direction, it **lacks infrastructure alignment, corridor protection, and zoning certainty** — all essential for effective infrastructure delivery.

We recommend the final National Infrastructure Plan:

1. Elevate **spatial planning to a standalone thematic priority and focus area**. in the National Infrastructure Plan, recognising that corridor protection, cumulative effects forecasting, and integrated infrastructure-environment trade-offs are essential for long-term delivery. We note that other stakeholders (e.g., Environmental Defence Society) also identify this as a critical national gap. Spatial planning must go beyond land allocation to include future-proofing for resilience, consent viability, and equitable delivery.
2. Promote the development of **statutory, map-based spatial plans with 30-year growth corridors and infrastructure overlays**.
3. Require **early identification and protection of infrastructure corridors** (particularly bridges, roads, and pipes) in Tier 1 and 2 areas.

A powerful precedent is the **Peacocke Bridge in Hamilton**, which required major central funding and early corridor planning to connect an available area within the city boundaries (as extended) and to support growth. Cambridge is a similar case — but without this foresight, the window of opportunity is closing.

> *We note that the Environmental Defence Society (EDS), in its submission on the Infrastructure and Development National Direction, similarly identified spatial planning as a critical shortcoming in current policy design. EDS highlighted the absence of integrated, enforceable spatial instruments that link infrastructure with environmental and land-use outcomes. While their comments relate to statutory planning under the RMA, we agree that this strategic gap also applies at the infrastructure level — and must be addressed in the National Infrastructure Plan. A clear and spatially grounded framework for identifying future infrastructure corridors (e.g., bridges) is essential to delivering both resilient and environmentally sustainable urban growth.*

(See EDS submission: https://eds.org.nz/wp-content/uploads/2024/11/EDS-submission-infrastructure-Final.pdf)

5. Background: NZTA Policy Framework and Bridge Infrastructure Treatment

While NZTA/Waka Kotahi maintains rigorous technical policies for bridge design and renewal through instruments such as the **Bridge Manual (SP/M/022)**, **Work Categories 216 and 322**, and the **Uneconomic Infrastructure Policy**, these frameworks are **not supported by a national strategy to identify or prioritise bridge infrastructure gaps**. This absence is critical in towns like Cambridge, where national growth policy collides with local fiscal and structural limitations.

Notably:

- The **Bridge Manual** ensures engineering quality but does not guide prioritisation.
- NZTA's funding eligibility for new or replacement bridges is channelled through **regional land transport plans (RLTPs)**, with **no dedicated national-level bridge prioritisation mechanism**.
- The **Uneconomic Transport Infrastructure Policy** provides for funding outside traditional BCRs but is discretionary and seldom deployed.
- Seismic and resilience standards are evolving, but **do not factor into spatial or growth-related prioritisation frameworks**.
- The **Government Policy Statement on Land Transport (GPS 2024)** and the **National Land Transport Programme (NLTP)** provide no dedicated bridge stream, and regional bridges outside the state highway system receive low attention.

This technical and funding gap reinforces our concern: **NZTA's current frameworks may technically allow for bridge investment, but they fail to prioritise it strategically** — leaving fast-growing urban areas like Cambridge structurally under-served.

6. Reprioritising Bridge Infrastructure as a National Strategic Theme and Focus area

We urge Te Waihanga not to rely on NZTA's existing systems as adequate, but to recognise the **systemic national under-prioritisation of local bridge infrastructure**. Specifically:

- There is **no strategic bridge programme or register**, despite the fact that many New Zealand towns (including Tier 1 areas like Cambridge) are **dependent on one or two ageing crossings**.
- **Business case frameworks disincentivise medium-scale, under-$100M projects**, even when critical for resilience or urban intensification.
- **Corridor protection for future bridge infrastructure is largely absent**, which leads to exponential land acquisition costs and blocks long-term infrastructure pathways.
- **Tier 1 urban growth objectives (e.g., NPS-UD) cannot be realised** without functional bridge access, especially across natural barriers like rivers.

Specific Recommendations:

1. Create a **National Bridge Resilience and Growth Programme**, identifying constrained urban crossings of national/regional significance.
2. **Require corridor safeguarding** for future bridges under spatial planning instruments and sub-regional growth strategies.
3. Mandate that GPS 2027 includes **bridges as a discrete infrastructure theme**, with funding pathways for sub-regional (district) and non-state highway crossings.
4. Reform the NZTA business case model to allow **weighted consideration of resilience, growth enablement, and future cost avoidance** (e.g., delayed land acquisition).
5. Consider introducing a **Bridge Infrastructure Equity Fund** to support towns with high strategic need and low local revenue capacity.
6. **Support integration of environmental effects monitoring and spatial foresight into infrastructure planning.**
   Recent consent decisions (e.g., Ruakākā Solar Farm) demonstrate that infrastructure impacts extend beyond footprint-based environmental assessment. The National Infrastructure Plan should explicitly support forward-looking assessment tools (e.g., heat island monitoring, spatial cumulative impact planning) and integrate these into early corridor planning and infrastructure forecasting.

While our submission focuses on enabling critical cross-river infrastructure in intensifying urban areas, we support the principle that such infrastructure must be located and designed in ways that are spatially planned, environmentally responsible, and aligned with broader national direction under the RMA, or the laws that replace the RMA.

A recent example highlighting the evolving nature of infrastructure-environment integration is the 2025 Environment Court decision granting consent for the **Ruakākā Solar Farm** in Northland. While the project was eventually approved following appeals, the Court imposed New Zealand's first consent condition requiring **monitoring of the heat island effect** — marking a shift toward recognising indirect and spatially diffuse environmental impacts of infrastructure. This case illustrates that environmental constraints are no longer confined to traditional site boundaries and reinforces the need for **early-stage spatial planning to anticipate cumulative and systemic effects**. We consider that the National Infrastructure Plan should reflect and support such evolving best practice, by prioritising **corridor protection, resilience forecasting, and spatial-environmental coordination** in both national and local infrastructure projects.

General Recommendations

We recommend Te Waihanga:

- Classify **bridge infrastructure resilience** as a national priority.
- Include **Cambridge's third bridge** as a forward-looking resilience and growth enabler project.
- Establish a **Bridge Infrastructure Equity Fund** for high-growth, low-funding-capacity towns.
- Integrate **spatial planning** into infrastructure prioritization, with corridor protection requirements.
- Adjust NZTA and Treasury frameworks to support **strategic, not just economic**, investment cases.

7. Responses to Draft Plan Questions

1. Are there infrastructure issues not well addressed in the draft Plan?

Yes.

The Plan **understates the scale and national significance of local bridge infrastructure gaps**. It also **does not sufficiently address the role of enforceable spatial planning in infrastructure readiness**. These gaps hinder fast-growing Tier 1 areas like Cambridge (Waipa) from achieving integrated, future-proof infrastructure solutions.

2. Do the recommendations seem appropriate and realistic?

Yes, in principle.

However, **key gaps exist**:

- Bridges must be addressed as a distinct national challenge.
- NZTA business case criteria should be revisited to reflect **strategic alignment, not just short-term BCR**.
- Local governments need **predictable support** for major infrastructure where sub-regional benefit exceeds local fiscal capacity.

3. What would help local infrastructure providers improve outcomes?

- Access to **central funding support for essential but unaffordable assets** (like bridges).
- **Statutory spatial planning tools** with corridor protection.
- Policy certainty that ensures long-term planning is not undermined by **lack of delivery tools or funding alignment**.

4. Are there changes that would improve the Plan's usefulness to decision-makers?

Yes:

- Elevate **spatial planning** to a stand-alone planning and investment lens.
- Create a **registry or map of constrained infrastructure areas** (e.g. single-point bridge towns);
- Embed a principle that **early land acquisition for infrastructure corridors** is a national planning responsibility.

5. Are the Plan's assumptions and forecasts reasonable?

Generally, yes.

But they **overlook land cost inflation** tied to corridor planning delays and **underestimate the infrastructure pressure in Tier 1 urban areas not classified as metro** (e.g. Cambridge, Wanaka). These assumptions should be revisited.

8. Conclusions

The Draft National Infrastructure Plan is a major step forward. However, it will only be successful if it **brings local infrastructure realities into national strategy**, particularly:

- **Bridges as resilience and growth infrastructure**,
- **Spatial planning as a statutory, not aspirational, tool**,
- **Funding models that reflect strategic priorities, not just economic return**.

We would welcome the opportunity to discuss or elaborate on this submission further.

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