Environment Canterbury submission on the Aotearoa New Zealand Infrastructure Strategy Consultation Document

Introduction

1. Environment Canterbury welcomes the opportunity to comment on the Aotearoa New Zealand Infrastructure Strategy Consultation Document. We provide our submission in the context of our roles and responsibilities as a regional council, including those under the Resource Management Act 1991, Local Government Act 2002, Land Transport Management Act 2003, and the Climate Change Response (Zero Carbon) Amendment Act 2019.

2. Environment Canterbury is the regional council for the largest geographical region and second most populous region in New Zealand. Our region encompasses substantial diversity, both in terms of our geography and population, which contributes to a wide range of community needs and expectations.

3. Our scope of activities as a regional council ranges from providing public transport services – primarily within urban areas – to providing resource management regulatory services within the context of our large rural economy. Our main infrastructure assets include river management and flood protection assets. Environment Canterbury manages 59 river control and drainage schemes from Kaikōura to Waitaki, which has a total asset value of around $660 million.

4. In this context, the focus of our submission is on those key issues and matters that are of most relevance to Environment Canterbury. We have provided general comments on the proposed vision, outcomes and principles for the Infrastructure Strategy, and more specific comments on each of the three proposed Action Areas and their related needs. We also wish to endorse the separate submissions provided by the Canterbury Mayoral Forum and the Greater Christchurch Partnership (Environment Canterbury is a partner of both).

Vision, Outcomes and Principles

Vision

5. Environment Canterbury strongly supports the use of Te Ao Māori to think about infrastructure in New Zealand from the perspectives of wellbeing, kaitiaki, integration, longevity and connection to place, as well as using it to shape the proposed vision for infrastructure in New Zealand looking out to 2050. We agree that it is important that a holistic, intergenerational view of infrastructure is taken in New Zealand, recognising its connections with our land, environment, communities and people.

6. In this context, we support the proposed infrastructure vision for New Zealand and note its strong alignment with Environment Canterbury's own vision (see below):

   Taking action together to shape a thriving and resilient Canterbury, now and for future generations | Toitū te marae o Tāne, toitū te marae o Tangaroa, toitū te iwi.

7. While we recognise that the key issue of resilience has been considered in developing the proposed vision, we still wish to strongly emphasise the criticality of resilience to achieving this vision, and enabling our people, places and businesses to thrive for generations. Key strategic infrastructure in Canterbury and the wider South Island is vital for a well-functioning national network. This was an important lesson learnt in Canterbury following the disruptions caused by the earthquakes. The importance of resilient core infrastructure has also been highlighted more recently during the Canterbury flooding in May 2021. Given that we will encounter future stresses and shocks, especially in the context of climate change, ensuring our infrastructure is resilient will enable us to face these future stresses and shocks more confidently, and needs to be a key outcome of the New Zealand Infrastructure Strategy. This preparedness will require integrated, long-term thinking, partnership with central government, and ongoing conversations about how infrastructure is funded.

Outcomes and principles

8. Environment Canterbury supports the proposed outcomes and principles to guide infrastructure decision making in New Zealand, particularly the overarching principles that infrastructure decisions must be guided by Te Tiriti o Waitangi and its principles, and that infrastructure should support oranga tangata or the wellbeing of people. We agree that the benefits of infrastructure should be considered – and appropriately balanced – across the four wellbeings (economic, social, environmental and cultural) when assessing the value for money of infrastructure decisions.

9. Other decision-making principles that could be considered alongside the principles already identified in the Consultation Document include:

    - Being bold: The Consultation Document recognises that we need to think about how we want to live in the future in the context of issues like a changing climate, new technology, and challenges like earthquakes and pandemics. This means some difficult questions will need to be asked and big decisions will need to be made. We must be bold and brave in our decision making to deal with these issues and challenges and support the wellbeing of our people.

    - Being creative: The Consultation Document identifies a principle about considering all relevant options to deliver outcomes. We agree with this principle but think it could be stronger in terms of encouraging creativity and innovation in how we deliver outcomes. We have the opportunity to increasingly think outside the box for how we plan, build, operate and pay for infrastructure, particularly as new technology is rapidly changing what is possible.

10. The following sections provide more specific comments on each of the proposed Actions Areas for the Infrastructure Strategy, and their related needs.

Building a Better Future

F1. Prepare infrastructure for climate change

11. Environment Canterbury notes the importance the strategy places on transitioning to a low-carbon economy. We encourage the Infrastructure Commission to strongly emphasis the perspectives of oranga and kaitiaki in all aspects of the natural environment when making infrastructure decisions.

12. Environment Canterbury understands and acknowledges the importance of and urgent need to address climate change for the benefit of current and future generations. We strongly agree with the need to prepare our infrastructure for climate change. We are pleased to see the attention given to climate change and its impacts, and support an approach to reducing emissions that is ambitious, achievable, enduring and transparent. We also advocate for the need for long-term thinking when planning how to prepare for, and adapt to, the effects of climate change.

13. When considering how to prepare infrastructure for climate change, consideration also needs to be given to how we fund initiatives that increase the resilience of existing and planned infrastructure. Local authorities and communities are often having to meet the financial burden of repair and maintenance of infrastructure which is integral to wider networks. Increased frequency and severity of meteorological events as a result of climate change will only increase this cost burden.

14. New Zealand's weather-related risk profile is rapidly changing. Climate change will inevitably make events similar to the recent flooding in Canterbury more frequent and potentially bigger in magnitude. Loss of life is a real possibility. Our regional leaders are facing up to this inevitable challenge. Improvement of flood protection infrastructure is a critical first action in adaptation to the impacts of climate change and the objective of achieving a more resilient New Zealand. Collectively Regional Councils in New Zealand are currently investing $175m into flood protection per annum and intend to incrementally increase the size of this investment.

15. 'Fit-for-the-future' solutions are required that consider important ecological, environmental, whole-of-catchment and iwi considerations, alongside community protection needs, spatial planning and community preparedness. However, the backbone of community resilience will always be the construction and/or maintenance of robust flood protection schemes in the right places. We would welcome inclusion in the Strategy of a better recognition of the evolution of river management approaches and specific reference of flood protection infrastructure.

16. Environment Canterbury supports actions that will increase the uptake of low carbon transport options. We recognise that the greatest opportunities to reduce transport emissions will be in urban areas. However, decarbonisation also needs to be considered in relation to our freight networks, and our more sparsely populated rural areas where people regularly need to travel longer distances to access and fulfil their basic needs.

17. We agree that infrastructure is the foundation for thriving communities. It enables the connectedness between people and communities. Enhanced connectivity is fundamental to community wellbeing and supports the economic health of the regions. As such, we encourage a greater emphasis on initiatives that improve access to infrastructure and the connectivity of rural communities.

18. We agree with the principle that non-built solutions be considered ahead of physical changes to infrastructure. Infrastructure is expensive to build and maintain. Much of our infrastructure is long-lived, lasting in excess of 50 to 100 years, and similarly has a long-lasting influence on human behaviour. In a rapidly changing economy and society, what we expect from our infrastructure is rapidly evolving also. Considering non-built solutions first reduces the risk of over-investing in stranded assets and allows infrastructure providers to be more adaptable and responsive to emerging behavioural, demographic and technological needs, and emerging risks.

19. We support options that further encourage use of public transport. While electrification of public transport will contribute to reduced emissions, the greatest impact will be made by shifting more journeys from private motor vehicles to public transport and other low carbon transport options. We believe there needs to be a discussion about how improvements to public transport are funded, because to truly improve service levels and make public transport attractive, increased funding is required. Such improvements relate to more and better services for our communities.

20. We also support options that further enable active modes of transport. Increasing densities in our urban areas can support low carbon transport options like walking and cycling, but a greater shift in transport choice might be achieved when coupled with other interventions, such as requiring secure cycle parking in new developments, improved pavements and surfacing of cycleways, better integration of existing cycle networks, and improved signage, wayfinding and traffic signalling. These interventions largely provide non-built transport solutions.

21. Environment Canterbury supports using better waste management to help reduce emissions. While Environment Canterbury has no direct responsibility to collect waste or run schemes for diverting waste from landfills, we actively engage with territorial authorities that are responsible for these schemes. We work with territorial authorities for the purposes of waste minimisation, diversion of waste from landfill and modern waste management.

22. We would like to see a stronger emphasis placed on waste minimisation as part of the Infrastructure Strategy. The efficacy of using procurement processes to drive waste minimisation would be bolstered by applying a product life cycle lens to decision making. Additionally, while agreeing that there is a need for waste-disposal charges to better reflect the true cost of waste disposal, we would like to see financial incentives for waste reduction at the source instead of focussing on end of pipe solutions.

23. We support the aims of diverting waste from landfill. However, there are environmental issues associated with stockpiling and storage of the feedstocks resulting from higher recycling and recovery rates. Without stronger drivers to reduce waste, there may be a continued reliance on exporting our waste. We support consideration of how emerging

technologies can create opportunities for better waste reuse, recycling and disposal. We also advocate for actions for mitigating the impact of climate change on existing landfills.

24. Environment Canterbury is working with territorial authorities and Te Rūnanga o Ngāi Tahu to prepare a climate change risk assessment for Canterbury (the initial results of the assessment fed into the National Climate Change Risk Assessment). We believe that this work is critical to developing a collective understanding of the risks and opportunities of climate change, and the adaptation work that needs to be progressed. We are surprised the need for a robust evidence base to better understand climate change risks has not been strongly highlighted in the Consultation Document.

F2. Transition energy infrastructure for a zero-carbon 2050

25. Environment Canterbury agrees with the need for energy production from renewable sources to increase substantially to meet a growing demand for electricity and clean energy. This includes to support the major shift of our transport system to net zero emissions, which will require electrification of transport, along with greater use of public and active transport.

F3. Adapt to technological and digital change

26. Environment Canterbury agrees with the need to embrace emerging technologies that will help deliver better outcomes for the infrastructure sector. We note that technology is constantly evolving and that it is impossible to predict with any certainty what the future will look like. We therefore believe in taking a bold and innovative approach to trialling and testing new ideas, learning from them, and being committed to continual improvement.

27. We advocate for there to be more support for trialling and testing new ideas or technologies, particularly where there would be national benefit in doing so. We also support increased uptake of data and technologies that provide better ways to operate our transport system by optimising use of our assets, managing the network efficiently, and gathering useful data about problems and opportunities across the network.

28. We also note the work that Environment Canterbury is currently doing with territorial authorities and private sector water infrastructure owners in Canterbury on a significant initiative to improve Audited Self-Management practices based on data. This work is being undertaken using a three part approach: a water meter programme, a wider water data programme, and a digital twin approach to enable a better understanding of infrastructure interactions with water bodies. We would be happy to further discuss this work with Te Waihanga.

F4. Respond to demographic change

29. Environment Canterbury agrees with the need to understand how the population will change over time and where people will live to better plan for future infrastructure. With rapid population growth expected to continue in the upper North Island, there will be more pressure placed on infrastructure in this area. We believe that further thought

should be given to how growth could be encouraged in other New Zealand cities and regions where there is capacity – and in some cases a need – for additional growth.

30. Canterbury is the fastest growing region in New Zealand outside Auckland, with around 80% of the Canterbury regional population living in Greater Christchurch. The current projected population for Greater Christchurch by 2048 is 640,000, which represents an increase of around 150,000 people from the 2018 population. Having sufficient funding for the growth of New Zealand's second largest city and the largest city in the South Island, and for investment in the new infrastructure required for all urban areas in Canterbury is essential to accommodate growing needs.

31. Significant investment has been made in Greater Christchurch by the public and private sector as part of the earthquake recovery. Leveraging these investments in infrastructure and assets represents a unique opportunity to support growth at a lower marginal cost than would be required in other New Zealand cities. We believe that there is value in better distributing growth across the country to support national resilience and achieve higher wellbeing for New Zealanders overall. This could be considered as part of any future national population strategy.

F5. Partner with Māori: Mahi Ngātahi

32. We strongly endorse all decision-making about infrastructure being guided by Te Tiriti o Waitangi (the Treaty of Waitangi) and its principles, and that collaboration and partnering with Māori will lead to better outcomes for all.

33. Environment Canterbury works closely with Ngāi Tahu Papatipu Rūnanga to achieve better outcomes for everyone. The Tuia Relationship Agreement, signed in 2012, underpins our partnership with the ten Papatipu Rūnanga of the region. This agreement acknowledges and brings together the tikanga responsibilities of Ngāi Tahu and the statutory responsibilities of Environment Canterbury. Additionally, two Tumu Taiao (mana whenua experts) were appointed to Council in 2020.

34. Environment Canterbury supports conversations and investigations about how infrastructure can support Māori aspirations related to papakāinga and the protection of Māori owned land.

35. We also support steps to better integrate Te Ao Māori into infrastructure planning and delivery, and actions that will increase Māori participation in the infrastructure sector.

F6. Ensure security and resilience of critical infrastructure

36. Environment Canterbury agrees with the importance of preparing infrastructure for climate change. We would support a unified approach to risk management that encompasses increased meteorological events as a result of climate change, natural hazards, climate change's multiplying effect on existing hazards, and cyber security. This would be aided by linking infrastructure decision-making with the National Disaster Resilience Strategy.

37. We also strongly encourage the Alpine Fault being a headline consideration when assessing the resilience and security of critical infrastructure. New research on the Alpine Fault indicates that there is a 75% probability of an Alpine Fault earthquake occurring in the next 50 years. This brings an almost certain event into the planning window of all current and planned infrastructure in the South Island, and lower North Island.

38. The proposal to move towards open data for better provision of infrastructure projects, would also help support emergency management. Transparent and open data supports planning for, and responding to, shocks and stressors. This requires a common format and framework for gathering and aggregating data.

Enabling Competitive Cities and Regions

C1. Enable a responsive planning system

39. Environment Canterbury agrees in principle with the need to enable a responsive planning system in New Zealand that provides more opportunities to build new homes, particularly where this supports increased intensification in our urban areas. We note that most of the options identified to address this need in the Consultation Document relate to processes already being progressed by the Government, including the resource management reforms, National Policy Statement on Urban Development and National Planning Standards. Environment Canterbury is actively engaged in these processes.

40. The main concern we have about the concept of a more responsive planning system is the increased risk of misalignment between development and infrastructure provision.

41. For instance, the National Policy Statement on Urban Development requires councils to have particular regard to plan changes that provide significant development capacity, regardless of whether it is enabled in a plan or in sequence with planned land release. While this policy provides more opportunities for housing supply, it also risks development occurring in areas where infrastructure is not currently well planned, and infrastructure that has already been identified in growth and urban regeneration areas in resource management plans and/or spatial plans being under-utilised.

C2. Coordinate delivery of housing and infrastructure

42. Environment Canterbury agrees with the need for integrated planning that coordinates the delivery of infrastructure and development, and reduces the pressures that growth places on infrastructure networks. We highlight the importance of investing in our infrastructure now to provide sufficient capacity for future growth, rather than investing in infrastructure once the pressure on our networks reaches a crisis point.

43. We support the option identified in the Consultation Document that relates to regional spatial planning being a way to improve coordination across the sector. We note that Environment Canterbury has allocated funding through our draft Long-Term Plan 2021-31 for spatial planning, and would encourage the Government to also consider helping to fund and resource the development of these plans. We also note the work

being progressed by the Greater Christchurch Partnership – of which Environment Canterbury is a partner – to prepare a Greater Christchurch spatial plan.

44. We also agree that pressures on infrastructure funding could be reduced by increasing development opportunities in areas where there is capacity in existing networks, or where there are low-cost opportunities to upgrade networks. While we assume that this point is focused on the city or regional level, we suggest that it would equally apply when considering where additional growth should occur at the national level. We again note that the Government should consider how it could encourage growth in cities and regions where there is existing capacity for higher levels of growth.

45. We also recognise the need for better monitoring and agree with the approach of using post-implementation reviews of transit-orientated development policies. There is currently little comparative information at the regional level, so we see advantages in conducting a review of recent transit-oriented developments in New Zealand cities and assessing these against international best practice.

46. Environment Canterbury recognises the challenges that growing cities place on water infrastructure and agrees with the need to ensure that the provision of three waters infrastructure effectively supports urban development. We note that the options identified in the Consultation Document to address this issue generally relate to the three waters reform. Environment Canterbury is actively engaged in this process.

47. While the Consultation Document focuses on challenges for three waters infrastructure in the context of urban growth, we believe the Infrastructure Strategy should also address the key issues facing water infrastructure in the context of our rural economy. This includes the water storage and distribution networks used for a variety of purposes that benefit rural communities, such as during times of drought, as a mechanism for controlling water flow – including during heavy rain events – and for power generation. This is particularly important for Canterbury given our large agricultural and horticultural economy, with 70 to 80% of irrigated land in New Zealand in Canterbury. We consider this to be a key gap in the Consultation Document that should be addressed.

48. We also advocate for the Infrastructure Strategy to reflect the role of infrastructure in delivering on Te Mana o Te Wai. Environment Canterbury is still transitioning from a focus on traditional flood protection, land drainage and erosion control to a ‘whole of river’ approach to waterways management. Recent central government direction – the Essential Freshwater package – supports or requires these changes. A good example of is this work is Environment Canterbury undertaking a region-wide braided river berm transition project that will transition braided river berms to multi-functioning areas. The goal is for these areas to be rich in native biodiversity, and have enhanced mahinga kai and recreational opportunities, while also strengthening the berms to enhance their resilience to floods. We would be happy to further discuss this work with Te Waihanga.

C3. Improve access to employment

49. Environment Canterbury agrees with the need to ease traffic congestion and improve access on our transport networks. We support the use of congestion pricing and/or

road tolling to improve urban accessibility and the removal of legislative barriers to implementing these tools. These tools have the potential to support key transport outcomes, including enabling a user-pays approach for funding road maintenance (particularly low volume, high value roads).

50. The transport funding model currently favours roads that carry high volumes of traffic, and is not well suited to roads that have high heavy vehicle usage but low annual average daily traffic counts (such as rural roads primarily used to access forestry and farming blocks). In such circumstances local communities effectively subsidise heavy vehicle usage on these roads. Applying new pricing tools could support a fairer allocation of these costs.

51. We note that the use of financial deterrents as a behaviour change mechanism can be accompanied with unintended consequences and unforeseen impacts that undermine the intended outcome. This can exacerbate existing inequities in transport access. Through our behaviour change work with both homeowners and the farming community, we have learned that there are households whose behaviour is impervious to price changes – it just results in making day to day life more expensive. Behaviour change initiatives need to consider motivations and target initiatives accordingly.

52. We also support greater use of pricing mechanisms in locations that are already well serviced by alternative transport modes or in combination with investment that make alternative transport choices more attractive.

C4. Plan for lead infrastructure

53. Environment Canterbury agrees with the need to better plan for lead infrastructure, which includes protecting and providing for such infrastructure in advance of new development. We support in principle the options identified in the Consultation Document for legislative and policy reform to enable corridor protection for lead infrastructure, and for establishing a corridor reservation fund to help protect lead infrastructure corridors.

54. We recognise the need for new mechanisms to identify and protect corridors, set aside funding for their development and identify clear triggers for delivery that complement a competitive land market where the location of future growth is far less certain. Such an approach needs to recognise the significant holding costs to local government and infrastructure providers in the expansion of existing networks to facilitate new growth. We also support extending a 10 year lapse period for infrastructure corridor designations to 30 years (to be consistent with spatial planning).

55. We note that we are working with Christchurch City Council, Selwyn District Council, Waimakariri District Council and Waka Kotahi NZ Transport Agency to develop a Mass Rapid Transit Business Case for Greater Christchurch. This work will identify any preferred route(s) and mode(s) for future mass rapid transit in Greater Christchurch, and could significantly benefit from a better approach to planning for lead infrastructure in New Zealand. We note that this work is also being integrated spatial planning work being progressed by the Greater Christchurch Partnership.

C5. Improve regional and international connections

56. Environment Canterbury agrees with the need to improve regional and international connections in New Zealand. We note that the option identified in the Consultation Document to develop a long-term national supply chain strategy aligns with the direction set out in the recently adopted Canterbury Regional Land Transport Plan 2021-2031. Such a national strategy would support more effective and efficient movement of freight, and investment in the supporting infrastructure

Creating a Better System

S1. Integrate infrastructure institutions

57. Environment Canterbury agrees with the need for better coordination in the planning, funding and delivery of infrastructure in New Zealand, and acknowledges that local government functions related to infrastructure could change following the Review of the Future for Local Government, and other reforms for resource management and three waters. Environment Canterbury is actively engaged in these processes.

58. Given that there will be an ongoing need to ensure that agencies work collaboratively to progress infrastructure planning and delivery, regardless of the reform outcomes, we again support the option of regional spatial planning that outlines how and where regions will grow, and what infrastructure is required to support this growth We view these instruments as an important means to assist communities to adapt and build resilience to climate change by locating vital assets outside the zone of potential impact, making better provision for the management of flood events and by establishing land use patterns that provide for moderated / slowed flood-water run-off patterns.

59. A strengthened partnership approach between local and central government, iwi, and other key agencies will also be necessary to develop and implement regional spatial plans, and ensure effective planning and delivery of infrastructure. We note the urban growth partnerships being set up to help address the opportunities and challenges of growth in high growth areas in New Zealand as good examples of a strengthened partnership approach.

60. As part of your call for further options to improve New Zealand's governance of infrastructure, we urge that you recognise the vital importance of river management remaining part of the integrated catchment management approach applied by regional councils.

S2. Ensure equitable funding and financing

61. The provision and maintenance of river management and flood protection infrastructure would benefit from a clarification of roles and responsibilities between territorial authorities and regional councils. Funding arrangements may need to be updated to better reflect these roles and responsibilities and apportionment of costs between councils.

62. Environment Canterbury agrees with the depreciation of infrastructure assets being budgeted for. An ongoing challenge for local government is the ongoing of asset maintenance, including depreciation and renewal, of capital works which were initially co-funded by central government. Research on the effectiveness of New Zealand's existing flood protection schemes demonstrates that whilst schemes cannot completely contain major flood events from impacting our communities, to date they have provided safety and security from the full force of such events. Around 1.5 million hectares of our most productive and intensely used land, and over 100 towns and cities around the country are protected. Schemes also provide value of around five times the amount of their capital worth.

63. For the past three decades, Crown and related assets have received flood protection at a cost to regional and targeted local ratepayers, with little contribution from the Crown. These protected Crown assets include rail and road infrastructure, some airports, education facilities, Crown land and health facilities, and more broadly, the efficient functioning of the economy and communities. We would like to see this challenge identified and a pathway for resolution addressed in the Strategy.We encourage further investigation and consideration of how income streams other than rates – for example fuel tax, parking levies, tolls, or a tourist tax – could help local government meet and fund future infrastructure needs. Consideration will need to be given to how new funding streams may adversely, and disproportionally, impact low-income earners.

S3. Make better use of existing infrastructure

64. To ensure infrastructure is affordable for providers and users, and to prioritise new investment, we agree that optimising existing infrastructure should be a first order consideration when planning for future needs. In Canterbury, most of the required flood protection, land drainage, and erosion control infrastructure is already in place. Therefore, the main focus of asset managers is the ongoing maintenance required to keep the infrastructure fit for purpose.

65. We encourage assessing the ability of existing infrastructure to respond and adapt to changes in climate, population, technology, and land use against the emissions generated by developing new infrastructure. Where new infrastructure is necessary, we encourage investigating the opportunities these projects provide to enhance the surrounding natural environment at the same time.

S4. Require informed and transparent decision-making

66. We agree with encouraging the further adoption of Better Business Cases to support decision making. This aligns with Environment Canterbury's approach to project scoping, selection, and delivery. We also support making publicly available information that supported decision-making for public infrastructure, and rigorous evaluation of projects once implemented.

S5. Develop and prioritise a pipeline of work

67. Environment Canterbury agrees with the need for a prioritised list of infrastructure projects for New Zealand. We suggest that this pipeline should include both upcoming infrastructure investments or major construction opportunities, as well as projects that are already underway. We believe there would be value in tracking the progress of projects. We also suggest that the pipeline identifies, where possible, the alignment of projects to key outcomes across the wellbeings. This would help demonstrate how the infrastructure pipeline is delivering to different outcomes for New Zealand.

S6. Improve project procurement and delivery

68. Environment Canterbury manages flood protection and control works for the region. We support in principle initiatives that improve the planning, funding, decision making and delivery of infrastructure projects. While our flood protection projects would generally not be large enough to warrant the level of external influence that a central government procurement agency would provide, we recognise that the responsibilities for flood protection and management at a regional and territorial level could be better understood and defined. Our flood protection and control works protect other vital infrastructure. Climate change puts stress on these works and should help inform broader considerations of funding, maintenance, and management.

S7. Reduce costs and improve consenting

69. Environment Canterbury agrees in principle with the need for a planning system that is suitably enabling of infrastructure, and that reduces costs and delays associated with consenting. We note that the option identified to address this need largely relates to the resource management reforms. Environment Canterbury is actively engaged in this process. We would caution that being more enabling of infrastructure should only be in appropriate locations, with the right checks and balances in place to prevent perverse planning outcomes.

70. We also support efforts to grow the capability and capacity of the workforce – including in relation to consenting – to achieve productivity gains and cost reductions for planning and delivering infrastructure. We make this point in the context of the influx of plan change requests that have been received by councils in response to the National Policy Statement on Urban Development (particularly in Greater Christchurch), which has put council consenting functions under pressure. It is important to recognise the wider system challenges associated with increased infrastructure delivery.

S8. Activate infrastructure for economic stimulus

71. Environment Canterbury agrees with the need to have a clear pipeline of infrastructure projects in New Zealand, and that this pipeline should have the ability to identify priority projects that can help stimulate economies and preserve jobs during periods of economic downturn. This pipeline should have both new projects that can be brought forward and existing projects that can be ramped up. We also note that there would be value in being able to prioritise projects based on other key outcomes, for example the impact of projects on delivering environmental outcomes for New Zealand.