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## **Christchurch City Council staff submission on the draft National Infrastructure Plan**

### **Introduction**

1. Christchurch City Council (the Council) thanks the New Zealand Infrastructure Commission (Te Waihanga) for the opportunity to provide comment on the draft National Infrastructure Plan (NIP).
2. The Council values its ongoing engagement with Te Waihanga, particularly in aligning strategic infrastructure priorities across local and national levels. This collaboration is instrumental in shaping resilient, future-focused infrastructure that reflects the unique needs of Christchurch and the wider Canterbury region.
3. The Council, as a local government authority, owns and manages billions of dollars' worth of assets on behalf of the community. We are under a direct legal obligation to manage these assets responsibly and sustainably. We see the Draft NIP as a valuable opportunity to lift infrastructure management standards across the country, including within the local government sector. Both central and local government face similar challenges including, securing sustainable funding, maintaining and renewing aging infrastructure, attracting and retaining skilled workers, adapting to climate change and resilience requirements, and responding to evolving community expectations around service levels and equity.

### **Submission**

4. Our submission is included as an attachment to this cover letter.

### **Conclusion**

5. The Christchurch City Council staff submission to the draft National Infrastructure Plan provides comprehensive feedback across funding, planning, delivery, and resilience of infrastructure. The submission strongly supports smarter, more equitable funding mechanisms, including user-pays models where appropriate, while cautioning against their use for public-good infrastructure. It advocates for multi-year funding to reduce disruption and improve delivery and calls for better alignment between central and local government planning, especially in transport and water sectors.

Staff emphasise the importance of evidence-based decision-making, independent assessments, and transparent reporting to improve infrastructure outcomes. They support clearer rules and stable policies to reduce delays and uncertainty and stress the need for integrated spatial planning and workforce development to meet long-term infrastructure needs. In addition, staff highlight the opportunity for improved alignment and cooperation between central and local government in infrastructure delivery. This includes better coordination between central government agencies such as the Ministry of Education, Ministry of Health, and others engaged in long-term planning and local authorities to ensure that infrastructure and services are delivered in step with urban development. For example, as new housing developments are planned, early engagement between central and local entities could help anticipate and address the need for schools, health services, libraries, and recreational facilities. This proactive, joined-up approach would support more efficient infrastructure investment and better outcomes for communities.

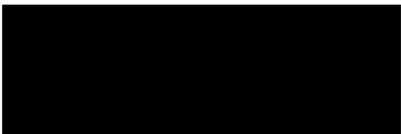
Capability development is a key theme, with strong support for growing the infrastructure workforce through long-term planning, training, and retention strategies. The submission highlights the challenge of retaining skilled professionals and recommends centrally funded cadetships, better alignment between education and job markets, and foundational training in asset lifecycle management. It also calls for clearer expectations and career pathways for public sector infrastructure leaders, supported by mandated use of professional resources like the International Infrastructure Management Manual and Āpōpō governance courses. Staff stress that capability-building must be matched by stable workflows and meaningful work to retain talent and maintain morale.

The submission highlights the urgency of prioritising maintenance, establishing asset registers, and improving performance reporting consistently across both central and local government. It also calls for stronger national direction on climate resilience, decarbonisation, and nature-based solutions, and recommends setting consistent standards and vulnerability thresholds for infrastructure assets.

Equity, resilience, and sustainability are recurring themes, with particular concern for lower-income households and hazard-prone communities. The submission concludes with strong support for the inclusion of Greater Christchurch Mass Rapid Transit in the national plan, reflecting its strategic importance to the region.

Thank you for the opportunity to provide this submission.

For any clarification on points within this submission please contact   


Yours faithfully  


 **GM Strategy, Planning & Regulatory**

## Submission Attachment

### Establish affordable and sustainable funding

**Finding smarter ways to pay so we can keep the essentials affordable for everyone.**



**New Zealand already spends a lot on infrastructure - more than most countries like us - but we are not always getting good value for what we spend. At the same time, both the Government and households are facing tighter budgets. Ageing infrastructure still needs to be looked after, and new infrastructure is needed for a changing population and growing economy, while managing the effects of climate change and other natural hazards. We need a smarter way to decide who pays, when, and how much, while making sure essential services remain affordable for everyone.**

**To what extent do you agree that 'establishing affordable and sustainable funding' is a priority for New Zealand?**

Christchurch City Council staff agree with this statement.

### **Recommendation 1 of 5 - Keep useful information up to date.**

**Regularly update 'forward guidance' - long-term information about what New Zealanders need and where, which projects can best meet those needs in the most affordable way, and what infrastructure is in progress in the national 'pipeline' - so that decision makers have what they need to make well informed decisions.**

Christchurch City Council staff support the intent of the recommendation to provide regular forward guidance and keep infrastructure information up to date, noting this is critical to ensuring investment decisions are well-informed and aligned with long-term needs.

We emphasise the importance of maintaining stability in infrastructure planning, avoiding politically driven changes that undermine affordability and long-term outcomes. Forward guidance should explicitly address climate change risks, resilience priorities, and the growing challenges of ageing and vulnerable infrastructure, while also making clear the costs and risks of inaction. It is important that information is not only robust but also delivered at the right time and in an accessible format to support decision-making at Budget time and enable transparent public and political dialogue about trade-offs.

Guidance should include whole-of-life costings including operational, maintenance, disposal, carbon costs and reflect the asset's ability to adapt to changing conditions, such as sea level rise, to ensure sustainability over its economic life.

We also recommend reviewing decision-making responsibilities to ensure they sit at the appropriate level of government central, regional, or local, particularly in sectors like transport where there is scope

for improvement. Clear accountability for decisions is essential, and sustainability should reflect both the ability to fund and maintain infrastructure over time and the ongoing value it delivers.

## **Recommendation 2 of 5 - Invest based on real needs and independent advice.**

**Use independent advice from the Infrastructure Commission to guide long-term budgeting, so that decisions about how much we can spend in the future are based on evidence of what New Zealand needs, to ensure we can invest the right amount in the right places, at the right time.**

Christchurch City Council staff support the recommendation to invest based on real needs and independent advice, recognising that infrastructure decisions should be guided by evidence and long-term national needs rather than constrained by short-term budget cycles. We agree that using independent advice, such as from the Infrastructure Commission, can help ensure investment is directed to the right places at the right time, but emphasise the need for continuity so that plans endorsed by one government are not discarded by the next.

It is also important that the advice reflects local government needs and capacities, and that councils are supported with tools and guidance to prioritise within their own long-term plans, asset strategies, and business cases. Forward planning should explicitly account for climate risks, resilience costs, and the significant benefits of timely investment, including avoided environmental, social, and economic impacts, and the contribution to productivity, incomes, and emissions reduction.

We caution against overly centralised or outsourced approaches and recommend ensuring sufficient space for local and regional perspectives to shape priorities, while maintaining robust and transparent processes to moderate bias and fairly assess competing infrastructure needs (e.g., between roads, hospitals, and other sectors). We also note the need to improve the quality of information provided by contractors, and to incentivise better performance and accountability in this regard.

Finally, while expert, evidence-based advice is essential, we note that infrastructure investment also reflects societal values and community priorities, and decision-making must strike an appropriate balance between evidence and democratic input at the appropriate level of government.

## **Recommendation 3 of 5 - Reward good planning**

**Allow government agencies that plan and perform well to get funding that covers multiple years, so they can better deliver infrastructure projects with less disruption.**

Christchurch City Council staff support the recommendation to reward good planning by enabling multi-year funding for agencies that plan and perform well, as this would help reduce the disruption of stop-start infrastructure delivery caused by annual funding cycles. We strongly agree that longer-term, stable funding is essential to deliver complex infrastructure projects effectively and efficiently, and we emphasise the need to ensure that such funding commitments are protected from being overturned by changes in government.

We note there may be merit in identifying certain types of infrastructure that should be decoupled from short-term political cycles altogether, with funding and prioritisation agreed through mechanisms such as cross-party support, super-majority approval, or independent authorities guided by national policy objectives. Climate change considerations should also be explicitly incorporated in assessing infrastructure proposals, ensuring that investments align with emissions reduction and resilience goals.



It is important that multi-year funding frameworks do not become overly bureaucratic, and that they remain focused on delivering real outcomes rather than just compliance with administrative processes. Funding assessments should include whole-of-life costs and recognise the adaptability of assets to changing circumstances, particularly because of climate change. We recommend preserving a stable baseline of funding for critical asset types, supported by transparent processes to request additional funding where justified by updated data (for example, evidence of earlier-than-expected asset deterioration).

We also note that local government would benefit from similar tools and support, enabling councils to align their own long-term planning and funding with central government pipelines. In the transport sector specifically, while the existing three-year National Land Transport Programme offers some certainty, we support exploring longer-term horizons, up to ten years to better align with local government long-term plans and improve certainty for investment and delivery.

### **Recommendation 4 of 5 - Smarter ways to pay.**

**Take a more consistent approach to the way New Zealanders pay for network infrastructure (like roads and water) by making sure charges to users and those who benefit cover the costs. This means we will have more money from general taxation for social infrastructure (like hospitals and schools).**

Christchurch City Council staff generally support the recommendation to adopt smarter, more consistent ways for New Zealanders to pay for network infrastructure, ensuring that those who use or benefit from services like roads, water, and transport contribute fairly to their costs. We recognise the value of user-pays approaches in internalising the true costs of individual behaviour, encouraging more efficient use of infrastructure, and supporting more sustainable urban development patterns for example, by making greenfield developments reflect their full infrastructure costs and improving the viability of mass transit and active modes.

We note, however, that user-pays alone is not always appropriate, particularly for infrastructure with strong public-good characteristics or resilience benefits, such as stopbanks, green infrastructure, or managed retreat. In such cases, we recommend establishing a national resilience or adaptation fund to fill the gap, with clear prioritisation criteria that reflect risk, equity, affordability, and the varying ability of councils to fund investments given their exposure to hazards, infrastructure condition, and socioeconomic context.

In addition, care is needed to fairly allocate costs and benefits, including environmental and carbon costs, across urban boundaries, between residents and visitors, and between different types of users. Tools such as bed taxes or visitor levies could help ensure tourists contribute to the local infrastructure they use, reducing the burden on ratepayers.

We also support the introduction of national directives, such as for volumetric water charging, which could drive efficiencies and best practice across the country. However, we caution that implementation needs to recognise the multi-dimensional value of resources like water, not only as infrastructure but also as a critical social and environmental asset, and to engage meaningfully with communities, given the diversity of views and the complexity of some funding arrangements. Finally, improving public understanding of how general taxation is spent, through tools like accessible dashboards, could help

build support for smarter funding approaches and enable more informed public dialogue about trade-offs.

## Recommendation 5 of 5 - Fix the transport funding gap.

**Require that charges for using our roads and rail (e.g. fuel taxes, road user charges, congestion pricing) cover the cost of building and looking after them, making the land transport system self-sustaining.**

Christchurch City Council staff generally support the recommendation to address the transport funding gap by making the land transport system self-sustaining through user charges that fully cover the costs of building and maintaining roads and rail. We agree that ensuring appropriate and ring-fenced maintenance budgets is critical to maintaining infrastructure to the necessary standards, and that local authorities should have input into the design and functionality of national infrastructure, reflecting local needs, behaviours, and aspirations.

We note that apportioning charges in ways that encourage mode shift rather than simply preserving the status quo will be important to achieving wider transport, climate, and urban development goals. Existing hidden subsidies within the current system distort behaviour, and unwinding these may face resistance, but it is a necessary step toward a more efficient and equitable transport network.

We also emphasise the need for an integrated, multimodal approach to transport funding, recognising that roads, rail, ferries, and active and public transport all form part of a single, interconnected system rather than being treated as add-ons to a roads-dominated network.

In implementing this recommendation, it is crucial to consider equity impacts both across different modes of transport and among different user groups and to account for external costs such as congestion and health impacts, not just the direct costs of construction and maintenance. Strategic transport decisions must balance the financial sustainability of the network with accessibility, fairness, and the broader benefits to society and the environment.

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## Clear the way for infrastructure.

**So, we can have clearer rules, better coordination, more stability, and a workforce with the right skills to get the job done.**



**Even when the money is there, it can take a long time and cost too much to deliver the infrastructure we need. Multiple layers of regulation, shifting policies, and poorly coordinated planning between councils, government agencies, and private providers make it harder to make best use of the infrastructure we already have, and harder to get projects built on time and at reasonable cost. We need clearer rules, better coordination, more stability, and a longer view of**

**workforce needs, so we can train and retain people with the right skills to get the job done. We also need to ensure public transparency and accountability, which are crucial for maintaining public confidence in infrastructure providers.**

**To what extent do you agree that 'establishing affordable and sustainable funding' is a priority for New Zealand?**

Christchurch City Council staff agree with this statement.

### **Recommendation 1 of 7 - Use existing infrastructure better.**

**Make sure planning rules support more people to use the infrastructure we already have and that we plan to build.**

Christchurch City Council staff generally support the recommendation to ensure planning rules enable better use of existing and planned infrastructure, recognising that aligning land use and infrastructure is essential to maximise the value of past and future investments. We agree that enabling more people to live, work, and access services near existing infrastructure such as train stations, schools, and water networks can improve efficiency and support sustainable urban growth.

However, we note that intensification can have unintended consequences for service delivery and community outcomes, particularly when developments are designed more for short-term sale than for long-term liveability. Planning rules need to strike an appropriate balance, enabling sufficient density to achieve economies of scale while still respecting the practical limits of existing network capacity and ensuring quality outcomes for residents.

Some staff noted that national policy changes, including amendments to district plan zoning, have already gone some way toward addressing this challenge, and care should be taken not to undermine existing local planning work or create conflicting requirements. Overall, planning rules should be calibrated to both unlock the potential of infrastructure and maintain a realistic assessment of network capacity and community needs.

### **Recommendation 2 of 7 - Keep policy stable.**

**Set clear and stable policies so infrastructure investors can plan with confidence especially in key sectors like electricity.**

Christchurch City Council staff strongly support the recommendation to establish clear and stable policies to give infrastructure investors' confidence to plan for the long term, particularly in critical sectors. Consistency in policy settings is essential to reduce risk, lower costs, and enable timely delivery of infrastructure projects, while supporting broader objectives such as resilience, emissions reduction, and the transition to a net-zero carbon economy.

We recognise that achieving this stability may require mechanisms such as cross-party consensus, super-majority agreements, or other safeguards to minimise frequent policy shifts. In addition to stable high-level policies, we also see value in more detailed operational guidance that promotes outcomes like reduced capital carbon, greater mode shift, and adaptation to climate change impacts.

Staff also noted that infrastructure supporting key utilities could benefit from a prioritised pathway through the consenting and planning system, not necessarily fast-tracked, but given appropriate weight and attention to reflect its critical role in delivering reliable, affordable, and sustainable services.

### Recommendation 3 of 7 - Enable good projects.

**Make sure the resource management and planning rules enable important infrastructure projects while still protecting the environment and managing interactions with surrounding communities.**

Christchurch City Council staff generally support the recommendation to ensure that resource management and planning rules enable important infrastructure projects to proceed more efficiently, while still protecting the environment and managing community impacts. We agree that lengthy, inconsistent, and unclear approval processes create unnecessary costs and delays, and undermine confidence in delivering long-term projects.

We note frustration with situations where planning rules change mid-project, forcing proponents to restart processes, which waste time and resources for all parties involved. Greater certainty and transparency in planning rules and their application would significantly improve outcomes and reduce risk for investors and delivery agencies.

However, we also caution that streamlining processes must not come at the expense of proper environmental assessment or meaningful engagement with communities. It is important to maintain social license by ensuring that all relevant impacts are transparently and thoroughly considered, and that efficiency does not equate to shortcuts or narrow, short-term thinking. In the transport sector, we observe that poor decision-making often drives delays more than the planning rules themselves, suggesting that improving decision quality alongside regulatory clarity is equally important.

### Recommendation 4 of 7 - One map for growth

**Use long-term regional growth plans known as spatial plans to align where new homes, roads, and other infrastructure will go. These plans bring together land use, infrastructure, and funding decisions in one place, so that growth happens where infrastructure is already planned, affordable, and easier to deliver.**

Christchurch City Council staff support the recommendation to use long-term regional spatial plans to better align land use, infrastructure, and funding decisions, ensuring growth occurs where infrastructure is already planned, affordable, and resilient. We agree that prioritising medium- to high-density housing in existing urban areas can make more efficient use of current infrastructure (where capacity headroom exists) and reduce the need for costly extensions into new areas.

Staff note that spatial plans should also account for local infrastructure capacity and the resilience of infrastructure to area-specific hazards such as flooding, sea level rise, and land movement. Integrating spatial planning closely with infrastructure investment and climate adaptation planning, supported by clear national guidance, will help councils make transparent and robust trade-offs, including when to reduce or adjust service levels in high-risk areas.

We recognise that implementing effective spatial plans will require improved coordination between central and local authorities, as well as alignment with budget processes to prioritise investments



across regions. Mechanisms such as monitoring and reporting on delivery, and contingent Crown co-funding, could help strengthen accountability and ensure plans are realised.

A national GIS-based map that overlays existing and planned infrastructure with land use information could also support better planning and decision-making for councils, asset owners, communities, and businesses.

Finally, clarity on how the National Infrastructure Plan interacts with the new Resource Management system and the National Policy Statement for Infrastructure would help ensure spatial planning aligns with upcoming regulatory settings and supports long-term investment decisions.

## **Recommendation 5 of 7 - Grow the infrastructure workforce.**

**Plan how we train and grow the infrastructure workforce based on a longer-term view of New Zealand's infrastructure needs, beyond current projects, to ensure we have the right skills, in the right places, at the right time.**

Christchurch City Council staff strongly support the recommendation to grow and plan the infrastructure workforce based on a long-term view of New Zealand's needs, ensuring the right skills are available in the right places at the right time. Building a workforce aligned with future infrastructure demand will also strengthen resilience, particularly during emergencies when skilled workers are critical for response and recovery.

Staff note, however, that while New Zealand trains many infrastructure professionals, retaining this talent is a major challenge, as many leave for opportunities overseas. Retention strategies should therefore be a priority alongside training. Opportunities to strengthen the pipeline could include centrally funded cadetships available across councils and other government organisations, which would particularly help smaller organisations to bring in and train young workers. Ensuring universities and training institutions cater to local job markets and offering pathways for young New Zealanders to enter the sector are also essential.

It will be important to incorporate emerging skill needs such as expertise in climate adaptation, low-emissions infrastructure, and resilience into workforce planning and training programmes. In addition, all infrastructure professionals, regardless of their specialisation, should have a foundational understanding of the full life cycle of infrastructure assets and whole-of-life costs, even as they develop deeper expertise in specific areas like design, construction, or maintenance. Together, these measures will help build a capable, adaptable workforce equipped to deliver New Zealand's infrastructure now and into the future.

## **Recommendation 6 of 7 - Build public sector capability.**

**Support the people leading government infrastructure projects by setting clear job expectations and creating better training and career pathways.**

Christchurch City Council staff generally support the recommendation to build public sector capability by providing clearer expectations, better training, and more defined career pathways for those leading government infrastructure projects. Strengthening leadership capability is crucial to navigating the complexity of delivering large, multi-stakeholder projects and ensuring infrastructure investments deliver long-term value.

However, we note that capability development alone will not prevent skilled staff from leaving for overseas opportunities or other sectors. Competitive pay, meaningful work, and continuity of projects beyond the three-year election cycle are also key to retaining talent and maintaining morale. Staff also emphasise that building capability requires stable, predictable workflows, certainty of pipeline and purpose is fundamental to attracting and developing skilled leaders.

We support creating training pathways that include hands-on, foundational experience rather than placing leaders in roles without adequate grounding. Existing professional resources such as the *International Infrastructure Management Manual* (IIMM), Āpōpō Asset Management Governance courses, and IPWEA's foundational programmes should be mandated for leaders involved in infrastructure decision-making.

Finally, we recommend not only building capability where gaps exist but also recognising and retaining excellence where it already exists in the public sector, reinforcing a culture of professionalism and pride in delivering critical infrastructure.

## **Recommendation 7 of 7 - Make performance visible.**

**Require infrastructure providers to publish clear and transparent information about their performance, to ensure that the interests of the people who use and pay for infrastructure are protected.**

Christchurch City Council staff support the recommendation to improve transparency by requiring infrastructure providers to publish clear and consistent information about their performance. Making performance visible helps protect the interests of the public, who use and pay for infrastructure, and supports greater accountability across agencies, councils, and companies.

We note that transparency must be accompanied by meaningful consequences for persistent underperformance; otherwise reporting risks becoming a box-ticking exercise with little real incentive to improve. Alternatively, organisations could be rewarded for consistent high performance. Performance information should also include how infrastructure providers are planning for and safeguarding assets against emergencies, as well as how they are addressing climate risks, adapting to hazards, supporting mode shift, and meeting emissions reduction commitments.

It is important, however, that performance reporting is designed in a way that does not detract from effective project delivery or create excessive administrative burden. Reports must also be audited and interpreted by people with a strong understanding of infrastructure to ensure they are meaningful and credible, noting that current auditing processes, such as those for long-term plans, often lack sufficient technical expertise.

Finally, staff caution that transparency and reporting should focus on genuinely prioritised and evidence-based infrastructure decisions rather than becoming politicised, ensuring the public can trust the information and engage constructively with it.

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## **Start with maintenance.**

**Look after the infrastructure we already have, so that it can keep looking after us.**



**New Zealand has fallen behind on maintaining some of the infrastructure we already have. Many schools, hospitals, roads, rail lines, and government buildings are in poor condition, and we do not always know how much we are spending or how big a problem we have. When maintenance is deferred, repairs become more expensive, services fail, and health and safety risks grow. We need to put maintenance at the front of the queue.**

**To what extent do you agree that 'starting with maintenance' is a priority for New Zealand?**

Christchurch City Council staff strongly agree with this statement.

### **Recommendation 1 of 3 - Know what we own.**

**Require all central government agencies to develop and maintain full, accurate registers of their infrastructure and produce long-term plans for how they will look after it and improve it.**

Christchurch City Council staff strongly support the recommendation to require all central government agencies to develop and maintain full, accurate registers of their infrastructure, along with long-term plans for maintenance and improvement. We believe this is fundamental to understanding the true state of infrastructure, prioritising investment, and avoiding the higher costs and disruption that come from reactive repairs.

Many staff also recommend extending this requirement to local government, noting that councils manage a significant proportion of New Zealand's critical infrastructure and would benefit from the same discipline and clarity. Establishing asset registers should also include a criticality framework, identifying which assets are more vital to community outcomes (e.g., a pipe feeding a hospital versus one serving a few remote properties), to guide where condition assessments and preventive maintenance should be prioritised. Not all assets require the same level of monitoring or intervention, and some can appropriately be allowed to run to failure.

We also note the need for adequate resourcing and support for those tasked with maintaining these registers and developing plans, to ensure this is not just a compliance exercise but a useful tool for efficient and effective asset management. Registers and plans should also reflect the long-term relevance of assets, recognising that some may become obsolete or require adaptation due to factors like sea level rise or changing service needs. Incorporating approaches like zero-based budgeting could help align operational and maintenance budgets more closely with the actual infrastructure requirements and lifecycle.

### **Recommendation 2 of 3 - Up-to-date decision making.**

**Require agencies to report how well they are delivering on their long-term infrastructure plans, including how their infrastructure is performing, so that decisions can be made based on up-to-date information.**

Christchurch City Council staff strongly support the recommendation to require agencies to report on how well they are delivering their long-term infrastructure plans, including the current performance of

their assets. Regular, transparent reporting ensures that decisions are informed by up-to-date information, enables proactive planning, and builds trust with the public by showing accountability and progress.

We recommend extending this requirement to local government as well, given councils' responsibility for much of New Zealand's infrastructure. To make reporting meaningful, it should also include information on the risk and vulnerability of assets (particularly in the context of climate change) so that decision-makers can fully understand the resilience of the infrastructure portfolio.

Staff caution that reporting requirements must be designed in a way that does not overly burden already limited resources or take focus away from effective delivery. To enhance efficiency and transparency, a national GIS platform or dashboard could be developed to display infrastructure condition, performance metrics, and planned capital projects. Such a tool would make information accessible, improve accountability, and support a shared understanding of priorities across agencies, councils, and the public. We understand there is a national forward works viewer, however not all organisations are signed up to it, therefore it would be more effective for such an initiative to be driven and funded by central government.

We also note the importance of establishing consequences or support mechanisms for agencies or councils that demonstrate chronic underperformance, to ensure the reporting leads to meaningful action and improvement rather than just compliance.

### **Recommendation 3 of 3 - Independent maintenance audits**

**Have experts independently check whether government agencies' long-term infrastructure plans are sound and being followed.**

Christchurch City Council staff generally support the recommendation to have independent experts audit whether government agencies' long-term infrastructure plans are robust and being properly implemented. Independent assessment can improve consistency, accuracy, and accountability, ensuring that maintenance planning and delivery meet appropriate standards.

We recommend extending this approach to include local government, given councils' significant role in maintaining critical infrastructure. Such audits should also include mechanisms to address chronic underperformance, ensuring the findings lead to tangible improvements rather than simply identifying issues.

Staff note, however, that the expertise of auditors is critical, they must have appropriate, context-sensitive knowledge and avoid applying generic or ill-suited benchmarks. Local circumstances and practical realities should be factored into assessments, and councils themselves should have an opportunity to contribute to the review process, highlighting implementation challenges and potential improvements.

Some caution was expressed about relying too heavily on expensive external consultants with limited understanding of local environments. There may be merit in complementing independent audits with industry-led benchmarking and collaborative approaches, which can foster improvement while being more cost-effective.

Overall, independent audits, if done thoughtfully and constructively, can help lift the quality of infrastructure maintenance planning and delivery across both central and local government.

## Right-size new investment

**So that projects proceed when they are well-planned and affordable.**



**Many big infrastructure projects get announced before they are fully ready. When they do not have full business cases, clear funding, or proper risk management, this can lead to delays, cost blowouts, or projects being cancelled halfway through. We need stronger processes so decision makers can ensure that only well-planned, affordable projects proceed, and we can review and learn, with transparency built-in so the public can see what is going on.**

**To what extent do you agree that 'right-sizing new investment' is a priority for New Zealand?**

Christchurch City Council staff strongly agree with this statement.

## Recommendation 1 of 4 - Make big decisions more transparent.

**Make the information that government uses to decide on infrastructure projects public - like business cases, budget requests, and expert advice - so people can see how decisions are made.**

Christchurch City Council staff generally support the recommendation to make the information underpinning major government infrastructure decisions (such as business cases, budget requests, and expert advice) publicly available. Greater transparency can help build public confidence that the right projects are being chosen, and that they will meet New Zealand's long-term needs effectively.

However, staff caution that transparency must be implemented thoughtfully to avoid information overload, where excessive or poorly presented data risks confusing the public or being misinterpreted and used to advance narrow agendas. To mitigate this, technical information should be clearly explained and accessible, with assumptions (such as those about population growth, climate scenarios, or economic conditions) made explicit and transparent, as modelling is only as reliable as the assumptions it rests on.

While there is recognition that political cycles can undermine good decision-making and create inefficiencies, increased openness about the evidence base and rationale for decisions could help counteract this by holding decision-makers more accountable.

On balance, staff see value in a transparent process that enables informed public engagement and fosters trust, provided it is supported by good communication and clear presentation of the underlying information.

## Recommendation 2 of 4 - Test before we invest.



## **All central government-funded infrastructure projects have an independent assessment to make sure they are ready before money is spent.**

Christchurch City Council staff strongly support the recommendation that all central government-funded infrastructure projects undergo independent assessment before funding is committed. Independent reviews help ensure projects are well-planned, ready for delivery, and provide genuine value for money, reducing the risks of delays, cost overruns, and cancellations that waste limited public resources.

Staff emphasise that assessments should consider the full picture not just upfront capital costs but also operational and maintenance expenses over the asset's whole life. Whole-of-life costing and multi-criteria evaluations that account for changing circumstances, such as climate impacts, are essential to sound decision-making.

Engagement with local government during project due diligence is critical to capture local context and address community-specific issues early. Additionally, agencies like the Climate Commission should have a role in reviewing projects that affect emissions, resilience, mode shift, or electrification.

To be effective, these assessments must be timely and adequately funded as part of the project budget. Clarity on the scope and independence of the assessments is also important to build confidence in the process.

In the transport sector, staff note existing assessment processes and suggest reviewing relationships between agencies like NZTA and the Ministry of Transport to strengthen independent scrutiny. They also recommend revising guidance language to properly recognise the importance of non-monetary benefits such as user comfort and safety, which are critical but often hard to quantify. Supporting research into better valuing these benefits would improve future investment decisions.

Overall, staff see independent, comprehensive assessment as a key safeguard that will help ensure infrastructure investments are justified, feasible, and aligned with long-term public interests.

## **Recommendation 3 of 4 - Managing risks.**

### **Stronger upfront risk management and assurance processes are required for all projects – making sure risks are visible and well-managed from start to finish.**

Christchurch City Council staff strongly support the recommendation for stronger upfront risk management and assurance processes across all infrastructure projects. Making risks visible and actively managed from the earliest stages through to project completion is essential to reducing unexpected problems, cost overruns, and delays.

Staff highlight the need for the industry and clients to move beyond simply accepting the lowest tender, recognising that selecting bids with lower risk profiles even if higher in initial cost can result in better long-term outcomes and overall savings.

This approach should also extend to clearly defining risk management responsibilities within contracts and ensuring contractors are held accountable for managing risks effectively.

Overall, embedding comprehensive risk management throughout project lifecycles will support more resilient, cost-effective infrastructure delivery and better safeguard public investment.

## Recommendation 4 of 4 - Learn from the past.

**Track and publish what projects cost, when they are delivered, and what benefits they provide so that we can improve future infrastructure projects.**

Christchurch City Council staff strongly support the recommendation to track and publish key information on infrastructure projects, including actual costs, delivery timelines, and the benefits realized. This kind of transparent, evidence-based reporting enables thorough post-project reviews to identify what worked well and where improvements are needed, helping to ensure future projects are planned and delivered more effectively.

Staff emphasize the importance of conducting detailed post-mortem analyses to compare outcomes against original business cases and apply lessons learned to upcoming investments. Such information should also inform independent assessments, ensuring decisions are grounded in real-world evidence rather than assumptions or short-term pressures.

Additionally, planning must consider long-term community needs and climate resilience to ensure infrastructure investments remain sustainable over time even if that means sometimes deciding to cancel projects that may not be financially viable in the long run.

Transparency should include multi-value assessments that account for societal, environmental, and other non-monetary benefits and costs, providing a fuller picture beyond just financial metrics. Improved understanding of the gaps between anticipated and actual outcomes, particularly in sectors like transport, will strengthen future infrastructure decision-making and resource allocation.

## Challenges and priorities in different sectors or regions

**We want to know your view of what else is important, now and in the future.**

**What do you think are the most important infrastructure issues, opportunities, or priorities?**

Christchurch City Council staff highlight several key priorities for infrastructure now and into the future. They emphasize the need for proper, long-term, evidence-based planning at both central and local government levels, warning that political agendas often override sound decisions. Current infrastructure delivery is described as overly defensive, requiring extra steps to withstand public scrutiny, which drives up costs and reduces efficiency.

Resilience is critical, building redundancy into infrastructure and investing substantially in climate adaptation are urgent needs, yet funding pathways for this scale of investment remain insufficient. National guidance is needed on prioritizing infrastructure investments and on when reducing service levels is a practical resilience response.

Spatial planning must drive infrastructure decisions, reflecting local nuances and constraints. Staff caution against loosening planning rules that could undermine coordinated spatial planning, leading instead to reactive, ad hoc infrastructure development.

Standardisation across design, construction, and data management is seen as essential for efficiency, better asset management, and consistent information capture. Workforce development and prioritizing maintenance of existing assets over expensive new projects are also critical.

Multi-value assessment approaches should be standard practice considering societal, environmental, and long-term costs and benefits, especially with climate change impacts in mind.

In transport, better investment decisions are needed, with pricing reforms to reflect true costs and benefits. Equity concerns are prominent, as lower-income households currently bear a disproportionate share of infrastructure costs. Any changes to pricing or funding models must address and mitigate these inequities.

Overall, staff stress that government must take a proactive role in directing infrastructure investment to support sustainable, resilient, and equitable growth that aligns with long-term community needs and climate goals.

**Please tell us in your response if your feedback relates to a particular place, sector, or type of infrastructure.**

Christchurch City Council staff responses primarily focus on local government infrastructure, particularly in areas related to water supply, wastewater, stormwater, and transport. Many responses emphasize challenges and planning needs in hazard-prone or climate-vulnerable urban centres, including coastally affected parts of Christchurch. There is also attention to resource recovery and emergency management (CDEM) sectors.

Overall, feedback is grounded in practical experience with local and regional infrastructure planning and funding, especially within the three waters (water supply, wastewater, stormwater) and transport sectors.

**Is there anything else you would like to comment on and include as part of your feedback?**

There is a strong call for clearer national direction on how infrastructure projects are designed, built, and maintained to minimize greenhouse gas emissions addressing both embodied and operational carbon. The current draft plan mentions decarbonization but lacks specific guidance on this important aspect.

Resilience is emphasized as vital, particularly given New Zealand's unique geological and meteorological hazards. Feedback highlights the need for the plan to include clear regulatory obligations and tools for local government, so priorities in infrastructure investment and long-term planning (e.g., LTPs, business cases) are better aligned and consistent.

There is also support for integrating nature-based resilience solutions (e.g., floodplain restoration, dune, and wetland protection), which are often more sustainable and cost-effective but currently underused due to lack of policy and funding support.

Overall, the lack of consistent national infrastructure resilience standards is seen as a gap that creates risk, inefficiency, and inconsistent performance. Staff suggest establishing national standards and vulnerability thresholds for different asset types to provide clear, consistent direction.

Some also propose rebranding the document as a Policy rather than a Plan to better reflect its purpose.

Finally, there is strong support for the inclusion of Greater Christchurch Mass Rapid Transit within the plan, reflecting its importance to the region's future infrastructure.