

Submission

To: The New Zealand Infrastructure Commission Te Waihanga

By: Northland Regional Council

On: The Draft National Infrastructure Plan

1. Introduction:

- 1.1. The Northland Regional Council (NRC) appreciates the opportunity to comment on the Draft National Infrastructure Plan (NIP) and applauds the Commission on a comprehensive and honest assessment of what faces New Zealand regarding the present state and future of its infrastructure. Continuation of the present situation is neither a viable nor acceptable long-term option.

- 1.2. While NRC supports in principle the tenet of the NIP, there are several issues it would like to bring to the attention of the Commission. These are:

2. Assets

- 2.1. The NRC is concerned that many of the listed government agencies do not have the required asset register in place detailing assets, condition and maintenance, renewal, replacement plans and costs. As this is the very cornerstone of an efficient, effective and financially prudent infrastructure system, it should be the first issue to be addressed in the NIP.

2.2. Recommendations

That the Commission:

- i. Request all relevant Acts, secondary legislation and government policy be amended to ensure that all infrastructure agencies are required to have detailed and annually up-dated asset registers that are used as the basis for managing existing infrastructure assets and applying for funding assistance.
- ii. Due to their vital importance at all times, but particularly during emergency events, the Commission advocates for and supports the inclusion of Power and Communications as strategic assets in the NIP.

3. Maintenance/Renewals vs New Projects

- 3.1. To prudently manage all infrastructure, the first question asked should be “What needs to be done against what can we afford”. Unless there is a valid reason, the ideal pathway would be maintaining existing infrastructure first, end of life replacement and finally, funding permitting, new projects.

3.2. One of the biggest issues facing New Zealand roading infrastructure, and to some extent flood mitigation infrastructure near roads and rail lines, is the continued “sweating” of the asset to the extent that maintenance is no longer a viable option. Additional funding must invariably be sought to fully rehabilitate or replace the asset.

3.3. Recommendation

That the Commission:

- i. Continue to support and promote the concept of prioritising Maintenance – Renewals – then New Projects as an integral part of the funding approval process.

4. Funding

4.1. An important factor that should again be considered by all infrastructure entities is “What can we reasonably afford?”. It is concerning that there would appear to be limited consideration given to this important aspect of any planned works.

4.2. Sound business cases should be a first step pre-requisite for any application for funding assistance for new projects. That nearly 50% of projects put forward for the Infrastructure Priorities Pipeline either have no business case or included business cases requiring additional work before they can be assessed is cause for concern as there are likely to be projects with good evidentiary basis being blocked for national funding consideration due to projects with incomplete or inadequate business cases consuming ‘capacity’ in the system.

4.3. For many years, the Road Controlling Authorities and Public Transport Agencies have advised that the New Zealand Transport Agency Waka Kotahi (NZTA) business case requirements are difficult, onerous and expensive to compile leading to applications for funding assistance not being submitted, particularly by the smaller councils who have neither the funds nor resources to undertake these.

4.4. Recommendations

That the Commission: -

- i. Advocate for better use of business cases and require fully completed business cases as a requirement for inclusion in the Pipeline and for IPP endorsement
- ii. Investigate a simplified nationally consistent, business case system to ensure all agencies have an equal opportunity when applying for funding assistance.

5. Strategies/Plans

5.1. Presently there would appear to be a myriad of district, regional and national strategies, policies, plans and programmes in place for the infrastructure sector. Many of these duplicates, contradict or over-ride each other. This leads to constant and increasing confusion and frustration when attempting to deal with most issues pertaining to infrastructure related work. This includes environmental, resource consent, funding and project related initiatives.

5.2. The NRC believes a full re-assessment of all relevant documents to ensure better alignment and ease of use for all sectors is required. We recommend that spatial plans underpin infrastructure planning at the regional scale, with a requirement to recognise and provide for national programmes/priorities.

5.3. Recommendation

That the Commission: -

- i. Investigate the feasibility of aligning all relevant infrastructure related district, regional and national strategies, policies, plans and programmes to ensure better alignment and ease of use.

6. **Legislation**

6.1. One adverse aspect created by current legislation is the time delay experienced from commencement to completion of most projects and/or infrastructure initiatives, particularly large ones.

6.2. Present legislation is seen as an impediment to timely and cost-efficient completion of infrastructure related initiatives. From when approval is first sought to start of construction, budgeted costs and timeframes are outdated leading to unnecessary scope adjustments to meet outdated budgets, timelines not being met and cost escalations. The result is invariably work being downscaled, completed late or cost overruns or a combination of these.

6.3. The above issues detrimentally affect those projects and infrastructure initiatives awaiting funding approval. Many will be delayed and/or cancelled due to lack of available finance created by the above.

6.4. Recommendations

That the Commission: -

- i. Advocate for all applicable legislation to be amended to allow for speedier and more cost-efficient completion of all projects and infrastructure initiatives, while managing environmental effects.
- ii. In conjunction with resource management reforms, improve and broaden the scope for use of designations by infrastructure providers to provide a more efficient permissions regime for building and maintaining infrastructure (by reducing the number of activities requiring resource consents).

7. **Constant Change**

7.1. The most disruptive aspect affecting infrastructure and possibly most government agencies is the continued uncertainty created by change in government as there is invariable change to priorities and requirements leading to existing and planned work streams being disrupted, delayed or cancelled and funding being diverted to new initiatives and projects. This has and continues to result in wasted time, money and effort as incomplete projects get shelved and new ones started. This has contributed to “65 percent of firms reducing staff over the past twelve months, and nearly half had lost workers to overseas markets¹”.

¹ Infrastructure NZ [2025-Industry-Survey-Results-and-2024-Comparison.pdf](https://infrastructure.org.nz/wp-content/uploads/2025/03/2025-Industry-Survey-Results-and-2024-Comparison.pdf)

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7.2. We strongly advocate that where infrastructure needs have been confirmed through regional spatial plans and supported by business cases, this infrastructure be effectively 'embedded' in the Pipeline and IPP with a long-term commitment to funding.

7.3. Recommendation:

- i. That the Commission advocate for change to legislation to allow for funding for infrastructure works to be ring-fenced for a pre-determined period to provide greater long-term certainty to both the infrastructure sector and the planning and construction industry. Specifically, infrastructure with a completed Business Case and identified in a regional spatial plan.
- ii. That the Commission advocate for long-term support for and commitment to infrastructure related funding.

8. Conclusion

8.1. As a rural region with large low socio-economic areas and in many cases a low rating base, Northland unfortunately has suffered the effects of what is described in the Draft Infrastructure Plan. Promises of recognised and prioritised infrastructure related work continues unabated. Some of the more well-known promises include: -

- Four-laning SH1 between Auckland and Northland.
- Rail Link to Marsden Point Port.
- Upgrade of the North Auckland Rail line.

8.2. Strategically, the importance of Marsden Point Port cannot be overemphasised, particularly in the event of a national disaster that may affect Auckland and its ability to receive or distribute freight,

8.3. In closing, the Northland Regional Council would again like to thank the New Zealand Infrastructure Commission Te Waihanga for the opportunity to provide feedback on the Draft Infrastructure Plan.

Signed on behalf of Northland Regional Council
[REDACTED] (Chief Executive)



Dated: 5 August 2025