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Te Waihanga, New Zealand Infrastructure Commission
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Kia ora,

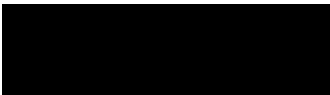
**NZPI FEEDBACK ON 'TESTING OUR THINKING: DEVELOPING AN ENDURING NATIONAL
INFRASTRUCTURE PLAN'**

Thank you for the opportunity to provide feedback on this discussion document, and for the extension to lodge this feedback. Te Kōkiringa Taumata | New Zealand Planning Institute (NZPI) sees great opportunity for a National Infrastructure Plan to work alongside the land use and environmental planning system to achieve better outcomes for all New Zealanders.

NZPI is the professional body representing over 3,000 practicing planners and resource managers. Our members come from diverse backgrounds and work for a variety of organisations and clients, such as councils, central government, developers, environmental groups, infrastructure providers, and consultancy firms. As professionals working within the system, we apply an implementation lens to our feedback. We advocate for ways we can be better at planning for a better New Zealand, and infrastructure is an important part of this.

Our answers to three questions in the discussion document of particular relevance to NZPI's interests and expertise are attached. We are happy to discuss our answers, if that would be helpful.

Ngā mihi,



CEO

Te Kōkiringa Taumata | New Zealand Planning Institute



Introductory comments

We are very supportive of the increased focus the government has placed on better planning for infrastructure. We acknowledge the issues set out in the 'Testing our thinking' document as you work towards developing an enduring National Infrastructure Plan.

We consider it is critical for New Zealand to have certainty around what the agreed priority infrastructure projects are. This will provide increased certainty for the planning system too, especially in respect of other land use and environmental outcomes that are often linked to infrastructure investment. We acknowledge well planned, constructed and maintained infrastructure has potential to minimise some environmental effects of land uses. We also acknowledge that infrastructure can have significant effects on the environment, especially during the construction phase and it is appropriate that there are consenting processes available to manage these effects.

Our planning system and profession can assist with ensuring diversity and inclusion of thinking with regard to infrastructure. We provide a long-term, future-focused, systems lens that incorporates a range of values and acknowledges the Treaty partnership. Integrating with the planning system will benefit a National Infrastructure Plan and help it achieve its intentions.

Given the particular interests and expertise of NZPI, this submission focuses on the link between infrastructure planning and two key aspects of the planning system: spatial planning, and effective land use and environmental regulation. We provide answers to three of the questions in the discussion document, starting with Question 16, which is the most pertinent to NZPI's interests and expertise, followed by questions 11 and 12. We have used the headings from the discussion document.

Regulation: Charting a more enabling path

Question 16: What regulatory settings need to change to enable better infrastructure outcomes?

In summary, we need legislated spatial planning in the planning system to enable better infrastructure outcomes. Rather than infrastructure projects interacting with the planning system at the resource consent end of the planning process, we need infrastructure planning to integrate with national and regional level spatial planning, right at the beginning of the planning process. In this way, the system can be more enabling of better infrastructure outcomes.

As noted in the document, RMA processes influence the timely, cost effective and certain delivery of infrastructure. As the document clearly demonstrates, the RMA is not the only factor impacting the delivery of infrastructure, but we acknowledge it can be a significant one depending partly on whether the infrastructure is new and its proposed location.

Even where planning regulation is already relatively enabling, the lack of infrastructure or enough capacity in existing infrastructure can hold up desired development outcomes. We consider that land use/environmental regulation goes hand in hand with effective infrastructure planning and funding and financing. All three need to come together to deliver on the Government's goals for a more productive Aotearoa. Spatial planning offers a way to bring these aspects together.

As noted on page 72 of the document, the Government is actively amending the RMA settings as part of three phases of reform. They have signalled this will include introducing new RMA national direction for infrastructure and updating existing national direction for renewable energy, transmission and telecommunication facilities. We expect the proposed new national direction for Infrastructure will require greater recognition of the benefits of infrastructure, which we agree in principle is needed in the system.



The Government has also signalled wider reform of the system as part of Phase 3. It is in this space that we consider there is the greatest potential to improve the regulatory settings for infrastructure. As per our submission on the now repealed Spatial Planning Bill, and as set out in our Position Statement on a Future Planning System for NZ (which can be found [here](#)), we strongly support the discipline of spatial planning.

The absence of a legislated spatial planning layer in the resource management system has no doubt impacted on the provision for infrastructure. The RMA's approach to focus on 'managing effects of activities' along with changes to the designation regimes over the RMA's 30 years has reduced the ability to do longer term planning for infrastructure, particularly where this has required corridor protection. The fiscal implications of delivering infrastructure when demand demonstrates the need, rather than well in advance, has likely added to the significant cost of infrastructure provision.

We consider that spatial planning allows crucial decisions to be made 30-50 years in advance, such as:

- Where growth should occur
- How and where growth will be provided with infrastructure
- Funding for growth and infrastructure
- Provisions for industries that support growth
- Where the natural environment needs to be protected.

Prioritisation is a key benefit of spatial planning. By analysing spatial patterns, spatial planning can help identify areas of critical infrastructure need (e.g., transportation corridors, energy grids, water supply) and prioritize investments accordingly.

Cross-collaboration is another benefit, with opportunities to maximise the introduction of new infrastructure. For example, new pipes and energy and telecommunications infrastructure at the same time as new roads.

Spatial planning processes involve extensive public and stakeholder engagement. This input can be valuable for identifying community priorities, addressing concerns, and building support for the infrastructure, rather than doing it on a case-by-case basis at consent stage. In this way, spatial planning can take some of the heat out of a consenting process and pave the way for a smoother consenting process.

We propose to advocate further in the RMA reform, that spatial planning will complement the goals of the National Infrastructure Pipeline and Infrastructure Priorities Programme. Linking these programmes with spatial planning will be very beneficial.

For example, we consider that where infrastructure projects have been included in a spatial plan, this indicates to a community that the project is necessary and appropriate. There should be no further need to demonstrate necessity or alternatives when an infrastructure provider moves forward with a specific proposal. Any consents required would be focused on managing the effects on the environment. We consider this approach helps to balance out greater-good issues with local effects.

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

Question 11: What strategies would encourage a better long-term view of asset management and how could asset management planning be improved? What's stopping us from doing this?

From a resource management perspective, where an asset provider is maintaining or upgrading an existing asset, this has the potential to reduce the need for (or at least delay) new assets that may impose new environmental impacts. There is an opportunity with RMA reform to better recognise the



benefits of using or upgrading existing infrastructure. If there was better recognition of these benefits in the planning system, it would help to encourage a better long-term view and reduce some of the regulatory complexity of asset management.

Spatial planning can also assist with asset management. Future needs can be identified and better informed decisions made on upgrades and expansions of infrastructure.

Resilience: Preparing for greater disruption

Question 12: How can we improve the way we understand and manage risks to infrastructure? What's stopping us from doing this?

In summary, we need to utilise spatial planning, improve coordination and sharing of information between local government and infrastructure providers, and introduce national direction on managing natural hazard risk, including for infrastructure.

NZPI agrees that management of the risks from natural hazards is a significant issue for New Zealand. Ideally, we would build infrastructure away from significant hazard risks. However, we have a legacy of infrastructure and development that is at significant risk from hazards and needs to be managed over time. For example, where infrastructure providers are considering what to do with existing assets, where they agree to retain them in hazardous places, there is an expectation to fund works to increase reliance/exposure to hazardous events.

Spatial planning is a key tool for developing resilient infrastructure. Spatial planning considers long-term trends and future scenarios, such as population growth, climate change, and technological advancements. This long-term perspective can help ensure that the National Infrastructure Plan is resilient and adaptable to future challenges.

Scenario planning is a critical element of spatial planning. By exploring different future scenarios, spatial planning can help identify potential risks and opportunities associated with different infrastructure investment strategies. This information can be used to develop more robust and resilient plans.

Spatial planning is also a key tool for avoiding development and infrastructure being located in the wrong places in the first place.

There are two key matters missing from the discussion on pages 57 and 58:

- The importance of avoiding risk in the first place and reducing risk. The discussion focuses, instead, on responding to and recovering from natural hazard events. If we can avoid or reduce risk, then the need to respond and recover is removed or greatly reduced. As such, risk avoidance or reduction is more cost effective than relying on responding and recovering.
- The discussion overestimates the role of central government in managing risk exposure and does not acknowledge the role of local government in the management of natural hazard risk.

To explain the second point further, while central government may play a role in managing our *vulnerability* through building code regulations, local government has a much greater role than central government in managing the *exposure* of people, property and infrastructure to risk. The land use planning system is the key tool for managing exposure, as it is the primary way we manage the location of activities. Central government currently has no regulatory role in land use planning – this is delegated entirely to local government.

In addition, local government is a key source of information on natural hazard risk, but this is not mentioned in the discussion. Local government is a key funder of natural hazard risk research, as part of its functions as managers of natural hazard risks, particularly regional councils with respect to flood risk, and as part of district plan development.



It is important to understand these roles and responsibilities when developing the national infrastructure plan. Greater coordination and sharing of information between local government and infrastructure providers will help create more resilient infrastructure.

There is also an opportunity for a strengthened role for central government, through the provision of national direction under the RMA on managing natural hazard risk, including for infrastructure. There is currently no national direction on natural hazard management, or infrastructure generally, but there are plans to introduce national direction for each of these issues. It is important that the potential for overlap between the two national direction documents is well managed, so there is consistent direction on managing natural hazard risk to infrastructure. It is also important that national direction learns from the on-the-ground experiences of local government undertaking natural hazard and adaptation planning.