

**SUBMISSION BY THE NORTHERN INFRASTRUCTURE FORUM ON THE DRAFT NATIONAL
INFRASTRUCTURE PLAN**

To: New Zealand Infrastructure Commission Te Waihanga
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Introduction

The Northern Infrastructure Forum (NIF) welcomes the opportunity to comment on the Draft National Infrastructure Plan (the Draft Plan), and commends Te Waihanga on producing what is a high-quality, accessible document.

The NIF is a policy and advocacy organisation formed to help raise the standard of infrastructure planning and decision-making across the Upper North Island, and maximise the contribution that infrastructure can make to productivity and living standards. The group's membership brings together a range of businesses and industry groups who design, build, own and utilise New Zealand's infrastructure assets, including:

- Aecom
- Auckland Business Chamber
- Civil Contractors New Zealand
- Maven
- National Road Carriers Association
- NZ Automobile Association (Auckland District)
- Ports of Auckland Ltd
- Tactical Group
- Vector Ltd
- Waikato Chamber of Commerce
- WSP

The Draft Plan sets out the serious challenges facing New Zealand's infrastructure system in an honest and insightful way, and provides a pragmatic framework for navigating those challenges in the years ahead. It sets the tone for a public and political discussion around infrastructure that is guided by a more realistic understanding of need, affordability and deliverability, by

robust decision-making processes, and by a clear focus on outcomes. In this sense, it is strongly aligned with the NIF's organisational values and objectives, though inculcating the judgements and conclusions behind the Draft Plan – a number of which reflect inconvenient truths – into the wider public and political mindset will not be without challenges.

The recommendations put forward in the document are logical and well-reasoned, and focus on the areas of the sector where we believe action should be prioritised, hence we have little to add to them by way of feedback. There are three issues in the Draft Plan that we believe warrant greater attention, and these are set out below.

Feedback

i. Private capital

We are strong believers in the potential benefits that private capital can bring to infrastructure planning and investment – by driving value for money, transparency and accountability, skills transfer to the local workforce (both public and private sector), and outcomes-focused delivery – and would argue that these benefits align well with the thrust of the Draft Plan. The Draft Plan includes minimal consideration of private capital or its benefits (it simply identifies private capital as one option in a range of financing tools available to decision-makers). In our view, a more detailed discussion in the final version of the plan would be appropriate.

ii. Time-of-use charging

NIF members are long-standing supporters of time-of-use charging as a policy tool, and we are pleased to see it referenced in the Draft Plan (in the context of drawing on user charges to guide efficient use of networks). While we see an important role for time-of-use charging in addressing congestion in our main centres (in Auckland, particularly), it is certainly not a de-congestion silver bullet. In a fiscally constrained environment, we see a risk of time-of-use charging being inadequately supported by other demand- and supply-side interventions, and increasing demand by private vehicles being addressed by dialling up user charges. We are therefore eager to understand Te Waihangā's view of the future role of time-of-use charging – guidance on this in the final version of the plan would be valuable.

iii. Infrastructure Priority Programme

Additional work is also required in relation to the Infrastructure Priority Programme (IPP). We have been vocal supporters of the IPP, and are pleased to see it receive a strong focus in the Draft Plan, but believe that more work is needed to demonstrate how the IPP will be operationalised. That is to say, how it will move from being a concept to an active component of the infrastructure decision-making framework.

As we have commented before, a key step will be the development of a mechanism whereby elected officials are held to account for any investment decisions that deviate from the IPP. We would value Te Waihangā's insights on the form that this mechanism could take.

Another key step will be to resolve how the IPP will accommodate land transport. Where transport projects are funded under the National Land Transport Fund, decisions relating to planning, prioritisation and investment sit squarely in the hands of NZTA – much of this control would need to be transferred in order for transport projects to be included in the IPP framework. The shift to full user-pays funding (which would see 100% of transport funding pass through the NLTF) would make this issue all-the-more pressing.

The campaign ahead of next year's general election, and the inevitable discussion around infrastructure priorities, will provide an excellent opportunity to demonstrate the value of the IPP as a decision-making framework, and as a de-politicisation mechanism. It is essential that the IPP is well and truly bedded in by then and, to that end, we believe that further analysis of the matters raised above is essential.

We would be delighted to meet with your team to discuss our feedback in more detail.

Yours sincerely,



Executive Director, Northern Infrastructure Forum