

We're seeking feedback

Our Discussion Document, [Testing our thinking: Developing an enduring National Infrastructure Plan](#), sets out our thinking as we begin work to develop a National Infrastructure Plan. The Discussion Document sets out what we expect the Plan will cover and the problem it's trying to solve, as well as the approach we're proposing to take to develop it.

We're sharing this now to test our thinking and give you the chance to share your thoughts. Let us know if we've got it right or if there are issues you think we've missed.

We'll use your feedback as we develop the Plan. We'll be sharing our thinking by presenting at events around the country, hosting workshops and webinars, and sharing updates through our website, newsletter, and social media. We'll also seek feedback on a draft Plan before publishing the final Plan in December 2025.

Submission overview

You'll find 17 main questions that cover the topics found in the Discussion Document. You can answer as many questions as you like and can provide links to material within your responses. On the final page, you can provide any other comments or suggestions that you would like us to consider as we develop the National Infrastructure Plan. Submissions are welcome from both individuals and organisations.

Deadline for submissions: 5.00pm on 10 December 2024.


A few things to note:

- We expect organisations to provide a single submission reflecting the views of their organisation. Collaboration within your organisation and internal review of your submission (before final submission), is supported through our [Information Supply Platform](#). You'll need to be registered with an Infrastructure Hub account and be affiliated with your organisation to utilise these advanced features. Many organisations will already have a 'Principal respondent' who can manage submissions and assign users at your organisation with access to the draft responses.
- Submissions will be published on our website after the closing date. The names and details of organisations that submit will be published, but all personal and any commercial sensitive information will be removed.

Submission method

We prefer feedback to be submitted through our [online survey](#). Alternatively, you may use this Word template to generate and upload a PDF.

Instructions for PDF submission:

1. Complete your response using this Word template. You can edit the document at points marked with the  cursor. This includes adding tables, images and text as normal.
2. Save the file type as PDF by selecting 'Save as' in MS Word and choosing 'PDF' as the file type.
3. Complete the introduction section of the online form.
4. Select 'PDF attachment' as your submission method. You'll then be prompted to upload your PDF.

Important: PDF submissions that are not generated from this Word template cannot be processed.

If you have any questions, please feel free to email info@tewaihang.govt.nz and one of our team will follow up with you.

Context for the Plan

Section one: Why we need a National Infrastructure Plan

- Q1. What are the most critical infrastructure challenges that the National Infrastructure Plan needs to address over the next 30 years?
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- Q2. How can te ao Māori perspectives and principles be used to strengthen the National Infrastructure Plan's approach to long-term infrastructure planning?
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Section two: Long-term expectations

- Q3. What are the main sources of uncertainty in infrastructure planning, and how could they be addressed when considering new capital investments?
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Section three: Existing investment intentions

- Q4. How can the National Infrastructure Pipeline be used to better support infrastructure planning and delivery across New Zealand?
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Section four: Changing the approach

- Q5. Are we focusing on the right problems, and are there others we should consider?
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Capability to plan and build

Theme one: Capability to plan and build

Investment management: Stability, consistency and future focus

Q6. What changes would enable better infrastructure investment decisions by central and local government?

Q7. How should we think about balancing competing investment needs when there is not enough money to build everything?

Workforce and project leadership: Building capability is essential

Q8. How can we improve leadership in public infrastructure projects to make sure they're well planned and delivered? What's stopping us from doing this?

Q9. How can we build a more capable and diverse infrastructure workforce that draws on all of New Zealand's talent?

Project costs: Escalation means less infrastructure services

Q10. What approaches could be used to get better value from our infrastructure dollar? What's stopping us from doing this?

Taking care of what we've got

Theme 2: Taking care of what we've got

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

- Q11. 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?

Resilience: Preparing for greater disruption

- Q12. How can we improve the way we understand and manage risks to infrastructure? What's stopping us from doing this?

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

Risk to infrastructure, like risks to other sectors of society, should be evaluated through a comprehensive understanding of all potential hazards and threats. Although risk assessments are often hindered by limited data and informal processes, it is still crucial to assess risk based on the available information. NEMA supports the views expressed in the discussion document and is in favour of developing additional hazard models to help New Zealand better understand hazard exposure. When considering guidance for the infrastructure sector, it may be helpful to consider the various approaches already used by government. In addition to those outlined in the consultation document, NEMA would like to highlight the following government initiatives:

- The Government's National Disaster Resilience Strategy serves as the primary framework for enhancing resilience. Its first objective is the effective management of risk.
- CDEM Groups assess risks related to hazards and threats within their regions, following the Director of Civil Defence's [Risk Assessment Guidelines](#), which offer a thorough approach aligned with ISO 31000.
- DPMC's [National Risk Framework](#) applies a similar methodology at the national level and covers a wide range of internal and external hazards and threats.
- The Ministry for the Environment has issued guidance that supported the first [National Climate Change Risk Assessment](#).

Furthermore, infrastructure owners and operators can utilise other methods to gain a more detailed understanding of exposure and risk at the asset level. Ideally, a combination of both approaches should be used to capture risk at both the system and asset levels.

Most infrastructure owners follow international standard for risk management along with sector specific guidance such as that developed by the EEA (Electrical Engineer's Association), Apopo/IPWEA (the International Infrastructure Management Manual and Apopo AM Guide), and NZTA / REG.

In addition:

- NEMA is part of the NZ Lifelines Council, which has developed and regularly updates the National Infrastructure Vulnerability Assessment; a foundational document on NZ's critical infrastructure and its risks from hazards. We believe that a stronger partnership between the Infrastructure Commission and NZLC would be beneficial in developing this document, building on Infrastructure Commission's research and analysis in this space to make this a stronger evidence-based document.
- Most Regional Lifelines Groups have undertaken (or are currently underway with) regional Critical Lifelines Infrastructure Vulnerability/Resilience Assessments which allow system interdependencies to be considered in a regional view of critical infrastructure vulnerabilities. NZLC has developed Guidance for regional Lifelines Groups to support consistency around the country.
- It can be relevant to distinguish between horizontal and vertical infrastructure. Horizontal infrastructure encapsulates lifeline utility networks (eg. water, energy, telecommunications, road and rail). Vertical infrastructure relates buildings, which in turn speaks to key government social infrastructure portfolios such as hospitals, schools and corrections facilities.
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While NEMA cannot comment on specific barriers to risk assessment in the infrastructure sector, it can identify several common limitations, including:

- A lack of high-quality data and information.
- Insufficient guidance.
- Inadequate systems, expertise, or resources.
- Lack of specific mandates across the whole infrastructure (noting many sectors have requirements to manage through regulation).
- Potential for bias in assessments.

Decarbonisation: A different kind of challenge

Q13. How can we lower carbon emissions from providing and using infrastructure? What's stopping us from doing this?

Getting the settings right

Theme 3: Getting the settings right

Institutions: Setting the rules of the game

- Q14. Are any changes needed to our infrastructure institutions and systems and, if so, what would make the biggest difference?
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Network pricing: How we price infrastructure services impacts what we think we need

- Q15. How can best practice network pricing be used to provide better infrastructure outcomes?
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Regulation: Charting a more enabling path

- Q16. What regulatory settings need to change to enable better infrastructure outcomes?
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What happens next

Section five: What happens next?

Q17. Do you have any additional comments or suggestions that you would like us to consider as we develop the National Infrastructure Plan?

Thank you for providing feedback on our Discussion Document. We'll use your comments as we continue to develop the Plan. This will not be the only opportunity for you to provide feedback, but it is an important way to test our emerging thinking on the development of an enduring National Infrastructure Plan.

Please email info@tewaihanga.govt.nz if you have any questions or need more information.