

12 August 2025

*Te Waihangā New Zealand Infrastructure Commission
Level 7, The Todd Building
95 Customhouse Quay
Wellington 6011*

Tēnā koutou,

Canterbury Regional Council (Environment Canterbury) Submission: Te Waihangā New Zealand Infrastructure Commission's *draft National Infrastructure Plan*

Thank you for the opportunity to provide comment on Te Waihangā New Zealand Infrastructure Commission's *draft National Infrastructure Plan*. Please find Canterbury Regional Council (Environment Canterbury)'s submission attached.

We welcome this consultation and look forward to more opportunities to engage on this topic.

Our submission is reflective of our responsibilities as a regional council – including as primary provider of flood protection and public transport services and as the enabler of other forms of network and social infrastructure throughout the Waitaha/Canterbury Region.

For all enquires please contact:

[Redacted contact information]

Ngā mihi,

[Redacted signature]

Chair, Canterbury Regional Council (Environment Canterbury)

Encl: Canterbury Regional Council (Environment Canterbury) submission

Canterbury Regional Council (Environment Canterbury) submission on Te Waihanaga New Zealand Infrastructure Commission's *draft National Infrastructure Plan*

Introduction

1. Canterbury Regional Council (Environment Canterbury, the Council) welcomes the opportunity to comment on Te Waihanaga New Zealand Infrastructure Commission's *draft National Infrastructure Plan* (the Plan).
2. We are the regional council for the largest geographical region and second most populous region in New Zealand. Our region encompasses substantial diversity, both in terms of our geography, hazardscape, and population, which contributes to a wide range of community needs and expectations for infrastructure.
3. Waitaha/Canterbury's regional boundaries lie within the takiwā of Ngāi Tahu, and recognition of Ngāi Tahu rangatiratanga is guaranteed under both the Ngāi Tahu Claims Settlement Act and the Deed of Settlement.
4. The Waitaha/Canterbury region faces numerous natural hazards, including earthquakes, landslips, floods, droughts, storms, tsunamis, erosion, and wildfires. Climate change is expected to worsen these challenges. The broader Waitaha/Canterbury region holds nationally significant natural resources that support economic prosperity. Canterbury's water accounts for 65 per cent of the nation's hydroelectricity storage capacity and almost half of the total land area in the region accounts for agricultural and horticultural uses.
5. We provide our submission in the context of our roles and responsibilities for infrastructure as a regional council under legislation including the Soil Conservation and River Control Act 1941, Resource Management Act 1991, Local Government Act 2002, Civil Defence Emergency Management Act 2002, Land Transport Management Act 2003, and Water Services Act 2021.
6. Regional councils are the direct provider of regional flood protection and public transport services. We are responsible for supporting the regional delivery of other network infrastructure including land transport, waste, and energy. Our core service of providing Environmental Regulation and Protection also requires our contribution in providing for infrastructure through Resource Management processes. Canterbury Regional Council also supports delivery and provision of social infrastructure and community facilities, such as regional parks.

Infrastructure for a thriving region

7. We agree that infrastructure is the foundation for thriving and resilient communities. It enables the connectedness between people and communities. Enhanced connectivity is fundamental to community wellbeing and supports the economic health of the regions.
8. A regionalised approach to infrastructure resilience is essential to ensure economic prosperity under current and future climate conditions. Protecting essential infrastructure from flooding events and ensuring continuity of services for businesses and communities is vital for Waitaha/Canterbury's and New Zealand's economic resilience.
9. Our region continues to face significant population and demographic change. These changes bring opportunities and challenges for infrastructure. Within our rural and semi-

urban areas these can include supporting the food and fibre sectors and ensuring high speed digital connectivity. In Greater Christchurch, the main urban centre of Canterbury, and largest urban area in the South Island, there are significant opportunities for economic growth and prosperity and to connect nationally and internationally.

10. However, fostering the region's economic potential while safeguarding environmental, social, and cultural wellbeing requires a clear understanding of the region's infrastructure capacity, housing availability, labour market, and transport connectivity.
11. Council notes the importance of transitioning to a low-carbon economy and stresses the importance of responding to climate change for current and future generations and stress the need to align our infrastructure with ambitious, achievable, enduring, transparent and equitable emissions reduction.
12. Council encourages infrastructure decisions, planning and delivery to account for the aspirations, rights and cultural values of mana whenua, recognising their role as kaitiaki and their enduring relationship with the natural environment.

General Comment

13. In general, Council is supportive of the Te Waihanga New Zealand Infrastructure Commission's *draft National Infrastructure Plan*.
14. We note the interconnections between the Plan and the recently released new national direction, particularly the NPS-Infrastructure, the NPS for Natural Hazards, and the "Going for Housing Growth" programme. We wish to reiterate the support provided in our submission on these topics as they relate to specific infrastructure needs.
15. We support holistic long-term planning and clear and consistent funding and financing decisions for infrastructure. These factors are vital for ensuring sustainable long-term infrastructure, which in turn is vital for regional prosperity and supporting Waitaha/Canterbury's economic, environmental, social and cultural wellbeing.
16. We strongly support the Plan in guaranteeing that environmental protections and outcomes are a primary consideration during infrastructure planning and delivery. We agree that environmental, social, and cultural wellbeing are as important for successful infrastructure as economic.
17. The Council agrees with the need for better coordination in the planning, funding and delivery of infrastructure in New Zealand, and we support the intention of the Plan to provide this. In Canterbury there is plenty of existing infrastructure and planning is underway to anticipate and plan for future needs. We support the Plan in recognising that the main focus of infrastructure management should be in ongoing maintenance and resilience.
18. We support the four principles of the Plan, however we recommend that further focus and priority should be given to the resilience of infrastructure throughout the Plan.
19. Council acknowledges a need to embrace emerging technologies in infrastructure provision and operation that will help deliver better community outcomes from the infrastructure sector. We believe in taking a bold and innovative approach to trialling and testing new ideas, learning from them, and being committed to continual improvement.

20. We advocate for more support for trialling and testing new ideas and technologies in flood protection and land transport infrastructure, particularly where there would be national benefit in doing so. We also support increased uptake of data and technologies that provide better ways to operate our infrastructure systems by optimising use of our assets, managing the network efficiently, and gathering useful data about problems and opportunities.
21. Council considers that the current draft Plan is limited in its considerations of new and emerging infrastructure needs and forms, particularly technological infrastructure and distributed infrastructure. We encourage the plan to further consider how applicable it is to new and novel infrastructure needs, such as the infrastructure requirements for data and data centres (at multiple scales) and emerging sectors.
22. Council agrees that there is a need for better coordination in the planning, funding and delivery of infrastructure. We support the Plan in the call for more rigor and a general raising of standards during infrastructure project planning and delivery. However, we caution that these requirements must be proportional to the needs of the project and balance standardisation against rising cost, risk of project delay and the risks of bureaucratic stagnation.
23. We support ensuring information for infrastructure is publicly available and accessible to support better decision-making for public infrastructure and more rigorous evaluation of projects once implemented.
24. Consenting for infrastructure can be a major hurdle to effective infrastructure provision, both in time and in cost (as much as 16% of project costs can be for consenting¹) and as the regulator of these consents we are often seen as obstructionist to community aspirations. Council supports making key decisions on infrastructure projects earlier than the current process and in an integrated manner. We see a process such as spatial planning being used to reduce what and how much is required to go through the consenting system. This would support regional councils in providing a high-quality consenting system for all and allow for more resourcing to be allocated to infrastructure design and resilience.
25. Council encourages the Commission to consider that infrastructure needs differ between rural and urban settings. While it can be easy to see and prioritise the needs of urban communities due to the larger numbers of people involved, good infrastructure and the connections between people and place that that brings is just as important for rural communities and economies. We encourage the Plan to ensure adequate emphasis is given to rural communities when planning for infrastructure. This should include criteria for decision-making based on more than population impacted, as this approach disproportionately favours urban communities.

Resilience of Infrastructure

26. While issues relating to the resilience of infrastructure are touched upon in the draft plan, chiefly in the “start with maintenance” focus area, we feel the topic of resilience is not given strong enough weight within the Plan. Council strongly advocates that resilience of

¹ Infrastructure Commission's report - <https://media.umbraco.io/te-waihanga-30-year-strategy/py0p420w/the-cost-of-consenting-infrastructure-projects-in-new-zealand.pdf>

infrastructure should be a key focus area, particularly given its importance to community resilience and the disruptive impacts a lack of resilience across the infrastructure sector can result in.

27. Waitaha/Canterbury as a region, and New Zealand as a whole, has an extremely active riskscape, and from our experience we know how disruptive events such as earthquakes, storms, and floods can be to infrastructure. We also know that climate change is changing the frequency, intensity, and distribution of many natural hazard events. Areas of our region and regional infrastructure are still recovering from large natural hazard events such as the 2010/2011 Canterbury Earthquake Sequence, the 2015 Kaikōura-North Canterbury Earthquake or the 2021 Mid-Canterbury flooding.
28. Infrastructure should be a long-term investment which benefits multiple generations. Within this current generation of infrastructure and the next generation, we know that there is a strong likelihood of disrupting events, such as a large seismic event on the Alpine Fault, a Hikurangi subduction zone tsunami, or climate triggered weather events. Climate change will be a major threat to critical infrastructure, both through the exacerbation of existing natural hazards and the cascading of events. The Canterbury Climate Change Risk Assessment (2022) identified 31 risks related to elements of infrastructure. Of these, two are rated as extreme or high in the present day, a number which rises to 18 by 2050 and 27/30 (RCP4.5/8.5) by 2100.
29. Provision of infrastructure, and the Plan itself, needs to also connect with future climate adaptation planning, led by the community and by council. Because infrastructure is so vital to society and can be at risk from climate triggered events, it is often a topic of discussion during community adaptation planning conversations, many of which are active within the region and focus on the provision of infrastructure. While central government is currently working on an Adaptation Framework for the country it is essential that infrastructure retains its ability to serve community aspirations, with a focus on building resilience and risk reduction. Given that we will encounter future stresses and shocks, especially in the context of climate change, ensuring our infrastructure is resilient will enable us to face these future stresses and shocks more confidently.
30. Investment in risk reduction and resilience pre-event has far greater economic benefits in terms of reducing response costs, the speed of restoration, and reducing the impact of damaged critical infrastructure on impacted communities and economies. If we do not pay in advance for risk reduction and resilience, we will ultimately pay a higher price in the recovery phase in responding to impacts on critical infrastructure. We will also bear increased economic impacts from when the damage occurs, to when it is restored, e.g., the one-year closure of SH1 following the Kaikōura earthquake.
31. Council ultimately envisages a transition from networks that are static and disrupted, to those that are flexible and adaptive, and which continue to function through adversity, and/or can recover quickly. Doing this cost-effectively means considering a full range of dynamic adaptive pathways (DAPP Pathways) for critical infrastructure, and not just hard infrastructure solutions or traditional asset approaches.

Māori engagement in infrastructure

32. The Council recognises the importance of our partnership with Ngāi Tahu. We acknowledge that their enduring relationship with ancestral lands and waters is

inextricably linked to the work we do as a regional council and the joint aspirations we have for our communities. In line with this commitment, we look to be guided by Ngāi Tahu for their infrastructure needs and aspirations, not only as mana whenua for their takiwā but also as investors, owners, suppliers and users of infrastructure. As such, we strongly recommend that the Commission look to further their relationship with mana whenua at place.

33. We strongly support a holistic, intergenerational approach to infrastructure that acknowledges its connections to land, environment, people and communities. Council seeks to reinforce our support for the use of te ao Māori in thinking about infrastructure from the perspectives of wellbeing, kaitiaki, integration, longevity and connection to place.
34. The Council supports the integration of te ao Māori, mātauranga Māori and Te Tiriti Waitangi and its principles across all infrastructure decision-making, planning and delivery, and encourage actions in the Plan that will enable and support Māori participation in these processes.
35. In relation to infrastructure requirements and infrastructure-ready capacity, we note that a history of underinvestment and marginalisation in and for Māori infrastructure has resulted in ongoing service discrepancies affecting papakāinga, Nohoanga, and whenua Māori. For example, while upcoming resource management reforms may provide a more enabling environment for papakāinga development and Kainga Nohoanga, a lack of adequate infrastructure has unfairly excluded Māori landowners from development opportunities. We encourage the Plan to create a stronger enabling environment for Māori infrastructure and place-based solutions and further support Māori aspirations relating to infrastructure for papakāinga and Kainga Nohoanga on Māori land².

Water and Waste

36. Canterbury Regional Council is the provider of regional flood and river resilience and river monitoring network infrastructure. We manage 59 river control and drainage schemes from Kaikōura to Waitaki, which have a total asset value of \$852 million (2022)³ and manage a network of 230 rainfall and river flow recording infrastructure. The provision of this infrastructure is a large part of our Community Preparedness and Response to Hazards core service to the community.
37. We consider the Water and Waste sector overview provided in the Plan to be too highly focused on the 'three waters' services and overlooks challenges and needs faced by other elements of the sector, such as rainfall and river flow telemetry networks and waste infrastructure.
38. Council knows that flood protection infrastructure is critical, nationally significant infrastructure. Assets, networks, and services provided by regional and unitary authorities

² Māori land is defined as land which includes Māori freehold and customary land (as defined by the Te Ture Whenua Māori Act 1993), Māori Reserves and Reservations (as defined by the Māori Reserved Land Act 1995, the Māori Affairs Act 1953, or the Te Ture Whenua Māori Act 1993), Treaty Settlement Land (returned as part of Te Tiriti settlement or by the exercise of rights under a Treaty settlement Act), General land owned by Māori, and land held on or on behalf of an Iwi or Hapū.

³ Environment Canterbury 30-Year Infrastructure Strategy 2024-2054 30-Tau Rautaki Hanganga 2024-2054

for the means of flood protection, provide a benefit to the wider community, including to Crown assets and all other infrastructure. These protected assets include rail and road infrastructure, airports, education facilities, Crown land and health facilities, and more broadly, the efficient functioning of the economy and communities. Flood schemes protect not just those living and working near the rivers, but everyone whose access to supplies, power, medical care, schools, workplaces, and family is impacted when major roading and other critical infrastructure is damaged.

39. Investment in flood protection assets that contribute to wider system resilience is a prerequisite for the efficient functioning of the economy and our communities and is a responsibility that should be shared between regional councils and central government.
40. Canterbury Regional Council considers the current model for funding flood resilience infrastructure via a ratepayer-based approach to be unsustainable and fails to recognise the distributed benefits of these schemes. We have been advocating for a number of years on behalf of Waitaha/Canterbury for a more sustainable funding approach, such as government co-investment, and will continue to do so on behalf of our community, until a fit-for-future solution is available.
41. While stopbanks and other hard protective measures have an important role in flood management, as we transition to a whole-of-rivers approach in our river work we increasingly support a focus on nature-based solutions, green infrastructure and technological innovations for infrastructure provision, particularly in locations where flexibility is valued.
42. Stopbanks are a long-lived solution (some stopbanks still operational in Waitaha/Canterbury are over 100 years old) and have a long-term impact on community behaviour. However, in some situations they have a high risk of either becoming a stranded asset (cut off from access) or enabling long-term risky behaviour such as increased development in flood prone areas. In a rapidly changing economy and society, what our community expects from infrastructure is also changing. The implementation of nature-based, green and technological solutions will be increasingly appropriate in some situations. We encourage the plan to enable infrastructure providers to become more adaptable and responsive to emerging behavioural, demographic and technological needs, and emerging risks.
43. Council supports more inclusion for waste infrastructure within this plan, including waste minimisation, emissions reduction from landfill and consideration of how emerging technologies can create opportunities for better waste reuse, recycling and disposal.

Land Transport

44. Canterbury Regional Council provides land transport planning and governance to our region, as well as providing public transport services in urban areas. As a region with both substantial urban and rural populations we know that transport options and expectations between these communities can be very different and there is not a one-size-fits-all solution for land transport. It is essential that due consideration is given to regions' different needs when making decisions at the national level.
45. We in principle support the intent that the priority for spending should be on maintenance and renewals. This will help address the infrastructure deficit without adding new and compounding pressures on central and local government and is of particular importance

for rural communities. However, we must also acknowledge when investment in new infrastructure is required to support our growing towns and cities and for economic opportunities. Ensuring connected and well-planned decisions are vital and could be supported by holistic processes such as spatial planning.

46. We are proposing significant increases in the level of investment in maintenance, operations and renewals across the region, representing at least 40% of the planned transport investment by central and local government over the next decade. This investment aims to both maintain existing levels of service and address deferred maintenance on parts of the network.
47. Waitaha/Canterbury's bridges are a significant transport network resilience risk which would benefit from increased focus. There are over 1,900 bridges in the region, many of which are ageing and at increasing risk from intensifying natural hazard events. The pipeline of bridge infrastructure projects will be fundamental to securing the resilience, connectivity, growth and productivity of Canterbury and the wider South Island. This infrastructure pipeline is of national significance.
48. As an example of growing new critical infrastructure, Council acknowledges the inclusion of the Greater Christchurch Mass Rapid Transport system in the Infrastructure Pipeline and as an Infrastructure Priority Project. Greater Christchurch is rapidly growing and without significant investment to support transport choices, there will be more congestion, longer journey times, increases in vehicle emissions, and impacts on the region's growth and productivity. Public transport must play a role in moving more people, more efficiently, and unlocking the full development potential of our urban areas.
49. We support the intent to account for the expected shift in travel demand from private vehicles to public and active transport in urban areas. However, we note to the Commission that there is a risk that demand for road capacity investment will be slow to reduce even with the transition – the demand shifts anticipated by the Climate Change Commission in the Fourth Emissions Budget appear to be premised on time-of-use charges, which could limit the extent of this shift.
50. We acknowledge that land transport is currently facing unsustainable and unequitable funding with Canterbury experiencing a significant funding gap. We note the intent to close the land transport funding gap by requiring user charges to fully fund planned investment and the recommendation relating to land transport governance and oversight. Without more details we are unable to fully comment on these plans and encourage early and open dialogue with the relevant providers to consider these further.
51. We agree that plateauing population/economic growth will likely reduce public ability and willingness to fund increased investment in transport expansion. However, we caution that there may be a lag period where the public's expectation of increased investment remains high, if individuals' transport choices and preferences remain the same as in recent years.

Energy

52. Canterbury Regional Council agrees with the need for energy production from renewable sources to increase substantially to meet a growing demand for electricity and clean energy. This includes to support the major shift of our transport system to net zero

emissions, which will require electrification of transport, along with greater use of public and active transport.

53. The Canterbury Mayoral Forum recently published the Canterbury Energy Inventory Report. This provides an overview of energy matters in the region and recognises the important and increasing role of distributed energy generation. Energy and economic development are inextricably linked, and a regional approach and coordination of infrastructure is essential. We encourage the Plan to further consider how it can support decision-making for increasing distributed networks such as those found in the energy sector.

Resource Management Reforms and National Direction

54. Canterbury Regional Council agrees with the Plan in identifying a need to ensure integrated and unified planning for infrastructure and development across the various planning and legislative requirements.
55. We particularly acknowledge the links between the Plan and new National Direction, such as the NPS-Infrastructure, NPS for Natural Hazards, and the "Going for Housing Growth" programme. We agree in principle with the need to enable a responsive planning system in New Zealand that provides more opportunities to build new homes, particularly where this supports increased intensification in our urban areas. We agree that while there is a need to enable the right infrastructure in the right place, settings need to be framed to ensure these don't just protect infrastructure at all costs, especially in light of emerging climate risks and other changes.
56. We also wish to note in relation to the NPS-Infrastructure that while we view this as a good first step, we see this plan as an important element of the national picture particularly in relation to the issues of sustainable funding for infrastructure and ensuring a long-term focus on maintenance, improvement and resilience.
57. We caution the Commission that there is a large risk that development and infrastructure decisions become uncoupled from each other and this presents a large risk of prolonged mismanagement and misalignment. An example of this is legislation enabling growth in areas that does not align with spatial and infrastructure planning.
58. We strongly encourage consideration for how to ensure that future development is matched with the provision of infrastructure (and vice versa) in a way that aligns with the aims of the plan to maximise existing infrastructure over building new for new's sake. We highlight the importance of investing in our infrastructure now to provide sufficient capacity for future growth, rather than investing in infrastructure once the pressure on our networks reaches a crisis point.
59. We support Spatial Planning as a tool for guiding these coordinated infrastructure decisions. Council particularly supports a Spatial Planning process as a key mechanism for making up-front decisions on infrastructure as a means of providing certainty to infrastructure providers and communities and in such a way as to reduce opportunities for relitigating decisions in later regulatory stages.
60. We urge that standards and planning for infrastructure not become too reliant on a single 'one-size-fits-all' approach. While there is room within the different sectors for closer alignment on practices these must not come at the cost of ignoring local knowledge or mana whenua concerns and should be cognisant of local contexts (including local

geography, hazardscape, population trends, or historic underinvestment or marginalisation). Council supports local spatial planning to achieve this local context.