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Infrastructure Commission Te Waihanga
Wellington
New Zealand

By email: info@infracom.govt.nz

Canterbury Mayoral Forum submission on *He Tūāpapa ki te Ora: Infrastructure for a Better Future* (Aotearoa New Zealand Infrastructure Strategy Consultation Document)

1. The Canterbury Mayoral Forum (CMF) thanks the New Zealand Infrastructure Commission Te Waihanga for the opportunity to make a submission on Aotearoa New Zealand Infrastructure Strategy Consultation Document.
2. In this submission the CMF provide comment on the key issues for Canterbury in the consultation document.

Background and context

Canterbury Mayoral Forum

3. The CMF comprises the Mayors of the ten territorial local authorities in Canterbury and the Chair of the Canterbury Regional Council (Environment Canterbury), supported by our Chief Executives. The purpose of the Forum is to promote collaboration across the region and increase the effectiveness of local government in meeting the needs of Canterbury's communities.
4. All Canterbury councils actively participate in the Forum: the Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate and Waitaki District Councils, the Christchurch City Council and the Canterbury Regional Council.

Mayors standing together for Canterbury.

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5. Collectively, our councils encompass substantial diversity, both in terms of our geography and population, which contributes to a wide range of community needs and expectations.
6. The CMF published the *Mayoral Forum's Plan for Canterbury* in September 2020¹, which sets out the CMF's five key priorities in this local government term:
 - **Sustainable environmental management of our habitats** (land, air, water and ecosystems), focusing on land use and freshwater management.
 - **Shared economic prosperity** – through sustainable, value-added primary production, high-value manufacturing, high-value tourism, growing attracting and retaining a skilled workforce and attracting new businesses.
 - **Better freight transport options** – mode shift to optimise movement of long-distance freight by rail and coastal shipping to improve road safety, decrease carbon emissions and reduce wear and tear on the region's roads.
 - **Climate change mitigation and adaptation** – reducing our carbon footprint, building community resilience and making our infrastructure as strong as it can be.
 - **Three Waters services** – securing safe drinking-water supplies, and ensuring that infrastructure, institutional arrangements and regulation enable the sustainable management of drinking water, wastewater and stormwater in Canterbury.
7. Fit-for-purpose, future-focused and sustainable infrastructure is a key part of achieving our aspirations for our region.
8. The following submission has been developed with input from across Canterbury's councils.
9. We note that Environment Canterbury, Christchurch City Council and Ashburton and Waitaki District Councils are also making individual submissions, as is the Greater Christchurch Partnership (GCP). We support the Infrastructure Commission's careful consideration of these submissions.
10. Below we set out some general comments on the vision, outcomes and principles within the draft strategy, and then comment on specific areas set out in the consultation document.

General comments

Vision, outcomes and principles

Vision

11. The CMF strongly supports the use of Te ao Māori to think about infrastructure in New Zealand from the perspectives of wellbeing, kaitiaki, integration, longevity and connection to place, as well as using it to shape the proposed vision for infrastructure in New Zealand looking out to 2050. We agree that it is important that a holistic, intergenerational view of infrastructure is taken in New Zealand, recognising its connections with our land, environment, communities and people.

¹ The Plan for Canterbury is available here: <https://canterburymayors.org.nz/forums/plan-for-canterbury/>

12. The CMF suggests that the whakataukī used in the vision is more appropriately cited in full. The extract quoted is from a wider whakataukī and has a more specific meaning. It is clear from the whakataukī as a whole that people are not divorced from their environment, and it is only when our most vulnerable are surrounded by their whanau that they will grow².
13. In this context, we support the proposed infrastructure vision for New Zealand – *infrastructure lays the foundation for the people, places and businesses of Aotearoa New Zealand to thrive for generations* – and note its strong alignment with both the Mayoral Forum’s Plan for Canterbury vision – *sustainable development with shared prosperity, resilient communities and proud identity*.
14. While we recognise that the key issue of resilience has been considered in developing the proposed vision, we still wish to emphasise the criticality of resilience to achieving this vision, and enabling our people, places and businesses to thrive for generations. This was an important lesson learnt in Canterbury following the considerable disruptions caused by the earthquakes. The importance of resilient core infrastructure has also been highlighted more recently during the Canterbury flooding in May 2021.
15. 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, and needs to be a key outcome of the New Zealand Infrastructure Strategy. This preparedness will require integrated, long-term thinking, partnership with central government and ongoing conversations about how infrastructure is funded.

Outcomes and principles

16. The CMF supports the proposed outcomes and principles to guide infrastructure decision-making in New Zealand, particularly the overarching principles that infrastructure decisions must be guided by Te Tiriti o Waitangi and its principles, and that infrastructure should support oranga tangata or the wellbeing of people. We agree that the benefits of infrastructure should be considered – and appropriately balanced – across the four wellbeings (economic, social, environmental and cultural) when assessing the value for money of infrastructure decisions.
17. We note that the consultation document focuses on network infrastructure that is provided largely by central government. Improving well-being of New Zealanders also relies on the quality of places where we live and this includes community infrastructure provided by local government (libraries, parks, recreational facilities and the like). Consideration of community infrastructure would provide a more wholistic view of infrastructure which contributes to the strategy’s vision.
18. Other decision making principles that could be considered alongside the principles already identified in the consultation document include:
 - being bold: the consultation document recognises that we need to think about how we want to live in the future in the context of issues like a changing climate, new technology, and challenges like earthquakes and pandemics. This means some difficult questions will need

² See the full whakataukī here:

<https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Resilient/Resilient-Greater-Christchurch-Plan.pdf>

to be asked and big decisions will need to be made. We must be innovative, bold and brave in our decision making to deal with these issues and challenges, and support the wellbeing of our people

- being creative: the consultation document identifies a principle about considering all relevant options to deliver outcomes. We agree with this principle but think it could be stronger in terms of encouraging creativity and innovation in how we deliver outcomes. We have the opportunity to increasingly think outside the box for how we plan, build, operate and pay for infrastructure, particularly as new technology is rapidly changing what is possible

19. The remainder of this submission comments on the specific Action Areas for the draft strategy and their related needs.

Building a better future

F1. Prepare infrastructure for climate change

20. The CMF notes the importance the strategy places on transitioning to a low-carbon economy. We encourage the Infrastructure Commission to strongly emphasise the perspectives of ora and kaitiaki in all aspects of the natural environment when making infrastructure decisions. This needs to be phased in a manner that allows time to make changes, particularly where there are significant costs involved.
21. We also understand and acknowledge the importance of and urgent need to address climate change for the benefit of current and future generations. We strongly agree with the need to prepare our infrastructure for climate change. We are pleased to see the attention given to climate change and its impacts, and support an approach to reducing emissions that is ambitious, achievable, enduring and transparent. We also advocate for the need for long-term thinking when planning in the context of climate change and other disruptive change.
22. The CMF is working with Te Rūnanga o Ngāi Tahu to prepare a detailed climate change risk assessment for Canterbury (the initial results of the assessment fed into the National Climate Change Risk Assessment). We believe that this work is critical to developing a collective understanding of the risks and opportunities of climate change, and the adaptation work that needs to be progressed. We are surprised the need for a robust evidence base to better understand climate change risks has not been strongly highlighted in the consultation document.
23. New Zealand's weather-related risk profile is rapidly changing. Climate change will inevitably make events similar to the recent flooding more frequent and potentially bigger in magnitude. Loss of life is a real possibility. Our regional leaders are facing up to this inevitable challenge. Improvement of flood protection infrastructure is a critical first action in adaptation to the impacts of climate change and the objective of achieving a more resilient New Zealand. Environment Canterbury's submission speaks more to flood protection infrastructure which the CMF supports.

Transport

24. We support actions that will increase the uptake of low carbon transport options. We recognise that the greatest opportunities to reduce transport emissions will be in urban areas. However, decarbonisation also needs to be considered in relation to our freight networks, and our more sparsely populated rural areas where people regularly need to travel longer distances to access and fulfil their basic needs.
25. In an area like the wider Canterbury region, there is dispersed housing, schools, workforce, places of work, and sporting, recreational and cultural facilities and activities. This cannot be fully serviced by public transport or walking and cycling. Private passenger vehicles are moving at an accelerating pace to electrification, lower carbon emissions and ride sharing. These technological advances will be able to support the community of Canterbury in a carbon neutral manner without compromising choice or lifestyle.
26. We agree with the principle that non-built solutions be considered ahead of physical changes to infrastructure. Infrastructure is expensive to build and maintain. Much of our infrastructure is long-lived, lasting in excess of 50 to 100 years, and similarly has a long-lasting influence on human behaviour. In a rapidly changing economy and society, what we expect from our infrastructure is rapidly evolving also. Considering non-built solutions first reduces the risk of over-investing in stranded assets and allows infrastructure providers to be more adaptable and responsive to emerging behavioural, demographic and technological needs, and emerging risks.
27. However, this should not be used as an excuse to avoid providing lead infrastructure such as trunk services and preserving and advancing critical transportation routes that are needed to allow for development. A good example of future-proofed infrastructure has been the Christchurch Northern Corridor. This has made provision for walking and cycling, improved freight connection to the port, relieved traffic congestion, allowed for growth, and provided a high occupancy vehicle lane allowing rapid commuting from previously geographically dispersed areas.
28. We support options that further encourage use of public transport, including provision and development of key transport corridors. While electrification of public transport will contribute to reduced emissions, the greatest impact will be made by shifting more journeys from private motor vehicles to public transport and other low carbon transport options.
29. The CMF supports Environment Canterbury's view that there needs to be a discussion about how improvements to public transport are funded, because to truly improve service levels and make public transport attractive, increased funding is required. However, this must be done in an enabling way and recognising that different travel options should be catered for and should not be wholly at the expense of the private vehicle, as these will still have a part to play, particularly in a region such as Canterbury which is geographically dispersed.
30. We also support options that further enable active modes of transport. Increasing densities in our urban areas can support low carbon transport options like walking and cycling, but a greater shift in transport choice might be achieved when coupled with other interventions, such as requiring secure cycle parking in new developments, improved pavements and surfacing of cycleways, better integration of existing cycle networks, and improved signage,

wayfinding and traffic signalling. These interventions largely provide non-built transport solutions.

Waste

31. The CMF supports using better waste management to help reduce emissions. The Canterbury councils work collaboratively for the purposes of waste minimisation, diversion of waste from landfill and modern waste management.
32. We would like to see a stronger emphasis placed on waste minimisation as part of the Infrastructure Strategy. The efficacy of using procurement processes to drive waste minimisation would be bolstered by applying a product life cycle lens to decision making. Additionally, while agreeing that there is a need for waste-disposal charges to better reflect the true cost of waste disposal, we would like to see financial incentives for waste reduction at the source instead of focusing on end of pipe solutions.
33. We support the aims of diverting waste from landfill. However, there are environmental issues associated with stockpiling and storage of the feedstocks resulting from higher recycling and recovery rates. Without stronger drivers to reduce waste, there may be a continued reliance on exporting our waste. We also advocate for actions for mitigating the impact of climate change on existing landfills. This does need to be advanced while acknowledging that landfills do play a part in managing waste and they should be part of the mix in providing affordable waste services. The Kate Valley Landfill in Canterbury is an example of a modern landfill with a very long life ahead in terms of airspace where emissions are captured and harnessed to produce electricity.

F2. Transition energy infrastructure for a zero carbon 2050

34. We agree 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 (including electrification of the private vehicle fleet), along with greater use of public and active transport. We also note the potential role of green hydrogen to support emission-free public transport fleets in New Zealand and suggest that this is given more attention in the Infrastructure Strategy.

F3. Adapt to technological and digital change

35. The CMF agrees with the need to embrace emerging technologies that will help deliver better outcomes for the infrastructure sector. We note that technology is constantly evolving and that it is impossible to predict with any certainty what the future will look like. We therefore believe in taking a bold and innovative approach to trialling and testing new ideas, learning from them, and being committed to continual improvement.
36. We advocate for there to be more support for trialling and testing new ideas or technologies, 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 transport system by optimising use of our assets, managing the network efficiently, and gathering useful data about problems and opportunities across the network.

37. We also note the work that Environment Canterbury is currently doing with territorial authorities and private sector water infrastructure owners in Canterbury on a significant initiative to improve Audited Self-Management practices based on data. This work is being undertaken using a three part approach: a water meter programme, a wider water data programme, and a digital twin approach to enable a better understanding of infrastructure interactions with water bodies. We encourage the Te Waihanga to discuss this further with Environment Canterbury.

F4. Respond to demographic change

38. The CMF agrees with the need to understand how the population will change over time and where people will live to better plan for future infrastructure. With rapid population growth expected to continue in the upper North Island, there will be more pressure placed on infrastructure in this area. We believe that further thought should be given to how growth could be encouraged in other New Zealand cities and regions where there is capacity – and in some cases a need – for additional growth.
39. Canterbury is the fastest growing region in New Zealand, outside Auckland, with around 80 percent of the Canterbury regional population living in Greater Christchurch. The current projected population for Greater Christchurch by 2048 is 640,000, which represents an increase of around 150,000 people from the 2018 population. Having sufficient funding for the growth of New Zealand's second largest city and the largest city in the South Island, and for investment in the new infrastructure required for all urban areas in Canterbury is essential to accommodate growing needs.
40. Significant investment has been made in Greater Christchurch by the public and private sector as part of the earthquake recovery. Leveraging these investments in infrastructure and assets represents a unique opportunity to support growth at a lower marginal cost than would be required in other New Zealand cities. We believe that there is value in better distributing growth across the country to support national resilience and achieve higher wellbeing for New Zealanders overall. This could be considered as part of any future national population strategy.
41. Greater Christchurch is a good example of where collaboration, planning, zoning, provision of lead three waters and roading infrastructure has allowed for managed development, affordable housing and great opportunities for employment, education and recreation.

F5. Partner with Māori: Mahi Ngātahi

42. The CMF and chairs of Canterbury's papatipu rūnanga are working to establish an enduring and collaborative relationship. Councils across the region have established and continue to build on their relationships with iwi and hāpu. We strongly endorse all decision-making about infrastructure being guided by Te Tiriti o Waitangi and its principles, and that collaboration and partnering with Māori will lead to better outcomes for all.
43. We support steps to better integrate te ao Māori into infrastructure planning and delivery, and actions that will increase Māori participation in the infrastructure sector.

F6. Ensure security and resilience of critical infrastructure

44. We agree with the importance of preparing infrastructure for climate change. We would support a unified approach to risk management that encompasses increased meteorological events as a result of climate change, natural hazards, climate change's multiplying effect on existing hazards, and cyber security. This would be aided by linking infrastructure decision-making with the National Disaster Resilience Strategy.
45. We also strongly encourage the Alpine Fault being a headline consideration when assessing the resilience and security of critical infrastructure. New research on the Alpine Fault indicates that there is a 75% probability of an Alpine Fault earthquake occurring in the next 50 years. This brings an almost certain event into the planning window of all current and planned infrastructure in the South Island, and lower North Island.
46. The proposal to move towards open data for better provision of infrastructure projects would also help support emergency management. Transparent and open data supports planning for, and responding to, shocks and stressors. This requires a common format and framework for gathering and aggregating data.
47. It is important that all new development carried out avoids natural hazards, including climate change. There is less reliance on infrastructure, and infrastructure is more resilient, when the whole development has been built with this in mind. Examples include avoiding or mitigating liquefaction risk areas, building entire developments away from, or above, flood and sea level rise levels.

Enabling Competitive Cities and Regions

C1. Enable a responsive planning system

48. The CMF agrees 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. This is with the proviso that there should still be a choice for other development options rather than solely intensification of existing urban areas. We note that most of the options identified to address this need in the consultation document relate to processes already being progressed by the Government, including the resource management reforms, National Policy Statement on Urban Development and National Planning Standards. We are actively engaged in these processes.
49. The main concern we have about the concept of a more responsive planning system is the increased risk of misalignment between development and infrastructure provision. The three waters reform agenda may undermine this goal. There is a risk that entities with different spatial boundaries and different drivers will not coordinate as well as a local government model that has the same district or regional boundaries and aligned governance and drivers.
50. Further, the National Policy Statement on Urban Development requires councils to have particular regard to plan changes that provide significant development capacity, regardless of whether it is enabled in a plan or in sequence with planned land release. While this policy provides more opportunities for housing supply, it also risks development occurring in areas where infrastructure is not currently well planned, and infrastructure that has already been

identified in growth and urban regeneration areas in resource management plans and/or spatial plans being under-utilised.

C2. Coordinate delivery of housing and infrastructure

51. The CMF agrees with the need for integrated planning that coordinates the delivery of infrastructure and development, and reduces the pressures that growth places on infrastructure networks. 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.
52. We support the option identified in the consultation document that relates to regional spatial planning being a way to improve coordination across the sector. We note that Environment Canterbury has allocated funding through its draft Long-Term Plan 2021-31 for spatial planning, and would encourage the Government to also consider helping to fund and resource the development of these plans.
53. We note the significant work being progressed by the GCP to prepare a Greater Christchurch spatial plan. The GCP through the urban development strategy has a successful history of integrating infrastructure and planning in a collaborative and joined-up way while maintaining the best housing affordability in NZ.
54. The CMF agrees that pressures on infrastructure funding could be reduced by increasing development opportunities in areas where there is capacity in existing networks, or where there are low-cost opportunities to upgrade networks. While we assume that this point is focused on the city or regional level, we suggest that it would equally apply when considering where additional growth should occur at the national level. We again note that the Government should consider how it could encourage growth in cities and regions where there is existing capacity for higher levels of growth.
55. We also recognise the need for better monitoring and agree with the approach of using post-implementation reviews of transit-oriented development policies. There is currently little comparative information at the regional level, so we see advantages in conducting a review of recent transit-oriented developments in New Zealand cities and assessing these against international best practice.
56. We recognise the challenges that growing cities place on water infrastructure and agree with the need to ensure that the provision of three waters infrastructure effectively supports urban development. We note that the options identified in the consultation document to address this issue generally relate to the three waters reform. We are actively engaged in this process.
57. We note, however, there is continuing pressure of the cost of growth to be deferred to future communities. The key rationale for this is that infrastructure generally has a long life; therefore it is reasonable that the capital cost of assets is spread over its life. The theme is apparent in the draft strategy and also a key plank of the proposed three waters reform. The counter to this is a compelling case. Where the cost of infrastructure is included in the cost of development, this is the most fair and transparent approach. In our view, the reasons for this include:

- if development costs are not paid for by the developer but rather offset through loan funding and deferred to future communities the purchase price of property is not necessarily going to reduce by a commensurate amount. It would be very naive to think that property values would reduce if the infrastructure costs were avoided by developers; there are many market factors that drive the price of property. In reality if the cost of growth is not paid for by the developer it is likely this will only increase the developers profit, and a greater cost to the wider community, rather than lead to an improvement in housing affordability
- when costs of infrastructure for growth are included in the development of property purchasers generally fund this through taking on housing loans, thereby spreading the cost over time. Importantly this is borne by the individuals who are benefiting from the growth rather than the wider community
- councils generally fund depreciation of assets and this has been the practice in recent decades. This allows renewal funds to be built up and be available for replacement assets. Therefore if the cost of infrastructure is passed from the developer to users, then the current community could end up paying twice for the same use of an asset by paying for a loan on the existing infrastructure and funding depreciation for the replacement.

58. Our rationale for the above points is further explained in subsequent parts of this submission.

59. While the consultation document focuses on challenges for three waters infrastructure in the context of urban growth, we believe the Infrastructure Strategy should also address the key issues facing water infrastructure in the context of our rural economy. This includes the water storage and distribution networks used for irrigation. This is particularly important for Canterbury given our large agricultural economy, with 70 to 80% of irrigated land in New Zealand in Canterbury. We consider this to be a key gap in the consultation document that should be addressed.

60. We also advocate for the Infrastructure Strategy to reflect the role of infrastructure in delivering on Te Mana o Te Wai. While the consultation document references the role of stormwater and wastewater infrastructure in contributing to these outcomes, it does not mention the role of green infrastructure (e.g. constructed wetlands or managed aquifer recharge) to improve water quality outcomes. While the overall scale of this infrastructure will be much smaller than three waters infrastructure, the same principles of good practice in planning, managing and funding the infrastructure should apply.

61. A good example of an infrastructure project incorporating biodiversity and recreational values is the work being undertaken by Environment Canterbury on a region-wide braided river berm transition project that will transition braided river berms to multi-functioning areas. The goal is for these areas to be rich in native biodiversity, and have enhanced mahinga kai and recreational opportunities, while also strengthening the berms to enhance their resilience to floods. We encourage the Commission to discuss this work further with Environment Canterbury.

C3. Improve access to employment

62. The CMF agrees with the need to ease traffic congestion and improve access on our transport networks. We support the use of congestion pricing and/or road tolling to improve urban accessibility and the removal of legislative barriers to implementing these tools. These tools

have the potential to support key transport outcomes, including enabling a user-pays approach for funding road maintenance (particularly low volume, high value roads).

63. However, a balanced approach is needed. Congestion charging may reduce traffic congestion, but there will be social and economic consequences that need to be understood before it is used. It should also be used as an enabler rather than as punitive measure - allowing funding for improved transportation services rather than a draconian measure to force people to change to other modes or services at the expense of their lifestyle and choices.
64. The hypothecation model for transport funding is now not fit for purpose for a multi-modal system. The current system favours roads that carry high volumes of traffic, and is not well suited to roads that have high heavy vehicle usage but low annual average daily traffic counts (such as rural roads primarily used to access forestry and farming blocks). In such circumstances local communities effectively subsidise heavy vehicle usage on these roads. Applying new pricing tools could support a fairer allocation of these costs.
65. We note that the use of financial deterrents as a behaviour change mechanism can be accompanied with unintended consequences and unforeseen impacts that undermine the intended outcome. This can exacerbate existing inequities in transport access. Through our behaviour change work with both homeowners and the farming community, we have learned that there are households whose behaviour is impervious to price changes – it just results in making day to day life more expensive. Behaviour change initiatives need to consider motivations and target initiatives accordingly.
66. We also support greater use of pricing mechanisms in locations that are already well serviced by alternative transport modes or in combination with investment that make alternative transport choices more attractive. The submission from the Greater Christchurch Partnership makes some comments on this point the Infrastructure Commission may wish to consider.

C4. Plan for lead infrastructure

67. We agree with the need to better plan for lead infrastructure, which includes protecting and providing for such infrastructure in advance of new development. We support in principle the options identified in the consultation document for legislative and policy reform to enable corridor protection for lead infrastructure, and for establishing a corridor reservation fund to help protect lead infrastructure corridors.
68. We recognise the need for new mechanisms to identify and protect corridors, set aside funding for their development and identify clear triggers for delivery that complement a competitive land market where the location of future growth is far less certain. Such an approach needs to recognise the significant holding costs to local government and infrastructure providers in the expansion of existing networks to facilitate new growth. We also support in principle extending a 10 year lapse period for infrastructure corridor designations to 30 years (to be consistent with spatial planning). While the existing framework provides the ability to gain extensions under section 184 of the Resource Management Act, it does not give the same level of certainty for communities for these long-term projects.
69. The GCP is developing a Mass Rapid Transit Business Case for Greater Christchurch. This work will identify any preferred route(s) and mode(s) for future mass rapid transit in Greater Christchurch, and could significantly benefit from a better approach to planning for lead

infrastructure in New Zealand. We note that this work is also being integrated in spatial planning work being progressed by the GCP.

C5. Improve regional and international connections

70. The CMF strongly agrees with the need to improve regional and international connections in New Zealand. We note that the option identified in the consultation document to develop a long-term national supply chain strategy aligns with the direction set out in the recently adopted Canterbury Regional Land Transport Plan 2021-2031. Such a national strategy would support more effective and efficient movement of freight, and investment in the supporting infrastructure.
71. We consider the draft strategy should recognise the need to have transportation infrastructure from the farm gate to market, including funding for rural low volume road networks as well as high capacity transport corridors to ports.

Creating a better system

S1. Integrate infrastructure institutions

72. We agree with the need for better coordination in the planning, funding and delivery of infrastructure in New Zealand. This is a key aspect of much of the current local government reform processes, most notably three waters and resource management. However, we acknowledge that local government functions related to infrastructure could change following these reforms, as well as the Review into the Future for Local Government. While we are actively engaged in these processes, we note that the resource management and three waters reform are being progressed ahead of the local government review, meaning that the best outcome for local government may not be achieved as a result.
73. Responsibility for three waters, roading, community services and planning within a local authority organisation enables and compels integration. A good example is the infrastructure provision that has enabled the development to support growth in the Greater Christchurch area in the last ten to twenty years. This included roading upgrades, motorway extensions, Waimakariri District's Ocean Outfall, Selwyn's Pines wastewater treatment plant, new water supply to Rangiora and the sporting and swimming pool facility development in greater Christchurch including Waimakariri and Selwyn. Forward funding and construction of this infrastructure has allowed upgrades for existing communities, and equitable sharing of the cost and coordination with enabling planning provisions. This has taken place in the collaborative environment of the GCP. Under the proposed reform processes, it is difficult to see how this kind of integration would occur.
74. Given that there will be an ongoing need to ensure that agencies work collaboratively to progress infrastructure planning and delivery regardless of the reform outcomes, we again support the option of regional spatial planning that outlines how and where regions will grow, and what infrastructure is required to support this growth.
75. A strengthened partnership approach between local and central government, iwi, and other key agencies will also be necessary to develop and implement regional spatial plans, and ensure effective planning and delivery of infrastructure. We note the urban growth

partnerships being set up to help address the opportunities and challenges of growth in high growth areas in New Zealand as good examples of a strengthened partnership approach.

S2. Ensure equitable funding and financing

76. The provision and maintenance of river management, land drainage and flood protection infrastructure would benefit from a clarification of roles and responsibilities between territorial authorities and regional councils. Funding arrangements may need to be updated to better reflect these roles and responsibilities and apportionment of costs between councils.
77. The CMF agrees with the depreciation of infrastructure assets being budgeted for. A continuing challenge for local government is the ongoing asset maintenance, including depreciation and renewal, of capital works which were initially co-funded by central government.
78. We encourage further investigation and consideration of how income streams other than rates – for example fuel tax, parking levies, tolls, or a tourist tax – could help local government meet and fund future infrastructure needs. Consideration will need to be given to how new funding streams may adversely, and disproportionately, impact low-income earners.

S3. Make better use of existing infrastructure

79. To ensure infrastructure is affordable for providers and users, and to prioritise new investment, we agree that optimising existing infrastructure should be a first order consideration when planning for future needs. In Canterbury, most of the required flood protection, land drainage, and erosion control infrastructure is already in place. Therefore, the main focus of asset managers is the ongoing maintenance required to keep the infrastructure fit for purpose.
80. We encourage assessing the ability of existing infrastructure to respond and adapt to changes in climate, population, technology, and land use against the emissions generated by developing new infrastructure. Where new infrastructure is necessary, we encourage investigating the opportunities these projects provide to enhance the surrounding natural environment at the same time.

S4. Require informed and transparent decision-making

81. We agree with encouraging the further adoption of Better Business Cases to support decision-making. This aligns with councils' approach to project scoping, selection, and delivery. We also support making publicly available information that supported decision-making for public infrastructure, and rigorous evaluation of projects once implemented.

S5. Develop and prioritise a pipeline of work

82. We agree with the need for a prioritised list of infrastructure projects for New Zealand. We suggest that this pipeline should include both upcoming infrastructure investments or major construction opportunities, as well as projects that are already underway. Tracking the progress of projects would also be critical. We also suggest that the pipeline identifies, where possible, the alignment of projects to key outcomes across the wellbeings. This would help

demonstrate how the infrastructure pipeline is delivering to different outcomes for New Zealand.

S6. Improve project procurement and delivery

83. It is considered that our respective council capital works programmes individually would not warrant the level of external influence that a central government procurement agency would provide, however the CMF supports in principle initiatives that improve the planning, funding, decision making and delivery of infrastructure projects.
84. Funding options need to be improved for council capital works programmes, particularly when Crown and related assets receive benefits from these works that are funded from regional and local ratepayers. For example Canterbury flood protection works, funded by regional and targeted local ratepayers, include rail and road infrastructure, some airports, education facilities, Crown land and health facilities and more broadly the efficient functioning of the economy and communities.
85. The CMF would like to see this challenge of local funding and central benefit identified and a pathway for resolution addressed in the Infrastructure Strategy.

S7. Reduce costs and improve consenting

86. We agree in principle with the need for a planning system that is suitably enabling of infrastructure, and that reduces costs and delays associated with consenting. We note that the option identified to address this need largely relates to the resource management reforms. All Canterbury councils are actively engaged in this process. We would caution that being more enabling of infrastructure should only be in appropriate locations, with the right checks and balances in place to prevent perverse planning outcomes.
87. We also support efforts to grow the capability and capacity of the workforce – including in relation to consenting – to achieve productivity gains and cost reductions for planning and delivering infrastructure. We make this point in the context of the influx of plan change requests that have been received by councils in response to the National Policy Statement on Urban Development (particularly in Greater Christchurch), which has put council consenting functions under pressure. It is important to recognise the wider system challenges associated with increased infrastructure delivery.

S8. Activate infrastructure for economic stimulus

88. The CMF agrees with the need to have a clear pipeline of infrastructure projects in New Zealand, and that this pipeline should have the ability to identify priority projects that can help stimulate economies and preserve jobs during periods of economic downturn. This pipeline should have both new projects that can be brought forward and existing projects that can be ramped up. We also note that there would be value in being able to prioritise projects based on other key outcomes, for example the impact of projects on delivering environmental outcomes for New Zealand.

Conclusion

89. In summary, the CMF is supportive of the intent of these proposals for the development of the draft Infrastructure Strategy to be presented to the Minister for Infrastructure in September. We look forward to the final 30-year strategy being released.
90. Thank you once again for the opportunity to make a submission on this draft strategy.
91. The CMF Secretariat is available to provide any further information or answer any questions the Commission may have about this submission. Contact details are: Maree McNeilly, Canterbury Mayoral Forum Secretariat, secretariat@canterburymayors.org.nz , 027 381 8924.

Ngā mihi

A handwritten signature in black ink, consisting of a stylized 'S' followed by a horizontal line that tapers to the right.

Sam Broughton
Mayor, Selwyn District Council
Chair, Canterbury Mayoral Forum