

2 July 2021

Infrastructure Commission
95 Customhouse Quay
Wellington 6011
NEW ZEALAND

Tēnā koutou

Greater Christchurch Partnership Submission on He Tūāpapa ki te Ora, Infrastructure for a Better Future – the Aotearoa New Zealand Infrastructure Strategy Consultation Document, May 2021

Introduction

1. Thank you for the opportunity to submit on He Tūāpapa ki te Ora, Infrastructure for a Better Future – the Aotearoa New Zealand Infrastructure Strategy Consultation Document, May 2021.
2. The Greater Christchurch Partnership is a collaborative partnership of the Councils in the Greater Christchurch area (Christchurch City Council, Environment Canterbury, Selwyn District Council, Waimakariri District Council), Te Rūnanga o Ngāi Tahu, the Canterbury District Health Board, and central government, represented currently by Waka Kotahi (NZ Transport Agency). The Partnership has been in existence since 2007 and is focused on integrated transport, infrastructure, and land use planning in the context of intergenerational wellbeing.
3. The Greater Christchurch Partnership supports the submissions provided by the GCP Partners and Canterbury Mayoral Forum.
4. Canterbury and Greater Christchurch are an example where forward planning for growth and infrastructure and lead infrastructure provision has enabled affordable housing (relative to NZ). A significant proportion of this initial capital cost (3-waters infrastructure and local roads) has been borne by developers, noting that this does not, however, cover ongoing operations and maintenance costs.

Vision, Outcomes & Principles

1. We support an integrated national infrastructure strategy, and a te ao Māori perspective on infrastructure, which includes concepts of intergenerational wellbeing, kaitiaki, integration, longevity and connection to place.
2. We support the importance of a holistic view of infrastructure, recognising that this includes social infrastructure provided by central government (education and health) and local government (community facilities, parks etc). We think, however, that local government social infrastructure provision and its role in contributing to wellbeing is not as clear or explicit as it could be in the consultation document. We also support the definition of



infrastructure in the 2020 discussion document *Infrastructure Under One Roof*, which puts wellbeing at the core of infrastructure provision.

3. We recognise that the concept of resilience is included in the proposed decision-making principles, specifically that decisions are future focused. We would like to see this concept more explicitly referenced in a national infrastructure strategy. This may mean adjusting the proposed vision and/or outcomes.
4. We would like the concept of innovation to be included in the decision-making principles alongside future-focused, transparent, focused on options, integrated and evidence based. Innovation includes concepts of bravery in the face of significant challenges facing us and a creative approach to delivering outcomes.

Building a Better Future

5. Greater Christchurch's urban form is highly dispersed. It is also the most vulnerable urban area to sea level rise in terms of population, with significant buildings and infrastructure potentially affected (including \$1.5bn of local government infrastructure at risk from a 1.5m sea level rise over the next 100 years). We acknowledge the important and urgent need to address climate change in the context of infrastructure, for the wellbeing of current and future generations. We consider that *oranga tangata* and *kaitiaki* should be inherent in all infrastructure decisions.
6. We therefore advocate strongly for **long-term thinking when planning in the context of climate change and other disruptive change**. We support the introduction of decision-making mechanisms that will encourage the kind of long-term thinking that is required, such as a bright-line infrastructure resilience test to ensure new major capital works will withstand a range of major stresses and shocks. However, support for this particular proposal is dependent on appropriate criteria being developed.
7. We also note, however, that for coastal communities that will be impacted by sea level rise, different, short-term infrastructure solutions may be required.
8. Our long-term planning through the Greater Christchurch Urban Development Strategy enabled Greater Christchurch to respond quickly and effectively to the highly disruptive effects of the Canterbury earthquakes, emphasising the importance of long-term planning to enable rapid and effective response to shocks and stresses. And despite post-earthquake demand rapidly utilising some of the headroom created by that Strategy, Greater Christchurch residents are still benefitting from that forward planning in the form of comparatively lower housing prices, in the context of today's housing crisis.
9. There are many other **lessons from Greater Christchurch's experience with natural hazards** to be learned and embedded in a national infrastructure strategy and applied to future infrastructure projects and decisions. We particularly draw attention to the need to consider the AF8 (Alpine Fault) risk in infrastructure planning. We encourage the Infrastructure Commission to consider including in the national strategy, or linking the strategy to, defining case studies from Greater Christchurch, and from around the country.
10. Our post-earthquake experience in particular also acted as a catalyst for a **closer partnership with iwi**. **Ngāi Tahu** has been a partner in the Greater Christchurch Partnership since before the earthquakes. Te Rūnanga o Ngāi Tahu protects and advances the collective interests of



Ngāi Tahu's over 68,000 registered members. The tribe hold rangatiratanga not just in Greater Christchurch but over 80 per cent of the motu (or about 40 per cent of the country). The iwi delivers social and cultural programmes and manages assets using an intergenerational framework. They are a critical partner in Greater Christchurch, including for infrastructure decision making. There are opportunities for Māori to have a more significant role in the sector through stronger partner with government, co-governance and co-design of infrastructure provision.

11. We agree that **non-built solutions should be considered ahead of physical changes** to infrastructure in the context of a changing economy, society and environment.
12. We support **better utilisation and application of infrastructure to improve environmental outcomes** including encouraging public and active modes of transport, better waste minimisation and management and, transitioning to renewable energy sources. We also believe that giving effect to Te Mana o Te Wai is an omission from the document that should be rectified.
13. We support an **integrated approach to deliver better outcomes from infrastructure**, which includes integrated infrastructure and land use planning, alongside **tools and policies to encourage behaviour change**, including for example, congestion pricing. We support removal of legislative barriers to implement these tools. However, we recognise these tools may lead to unintended consequences, for example, increased inequalities. The equity and affordability outcomes will therefore need to be strong drivers in any options analysis.
14. We support better recognition and costing of externalised costs to the environment and society from infrastructure provision and use which could enable better price signals to encourage behaviour change.
15. We agree with the **need to embrace emerging technologies**, including better data collection and aggregation, and open access to data, to deliver better outcomes from infrastructure and **we advocate for more support for trialling and testing new ideas and technologies**.
16. We encourage a **national view of infrastructure utilisation**, including consideration of how growth could be encouraged in cities and regions where there is infrastructure capacity – and in some cases a need – for additional growth. We agree with submissions from the Canterbury Mayoral Forum and Christchurch City Council on this and related points, such as the need for national and sub-national population strategies. A good illustration of this is Christchurch's central city where there has been significant central and local government investment in infrastructure, but this investment needs supporting strategies and policies to ensure utilisation of this infrastructure is maximised for local and national benefit.
17. We support stronger linking of infrastructure decision-making with the National Disaster Resilience Strategy.
18. In response to the specific options identified in the consultation paper, we have specific feedback on the following:

F1.1	Adapt business case guidelines to ensure full consideration of mitigation and adaption.	Support
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F1.2	Recognise climate uncertainty in decision-making processes.	Support
F1.3	Require a bright-line (pass/fail) infrastructure resilience test.	Support, contingent on appropriate criteria being developed
F1.4	Ensure non-built transport solutions are considered first.	Support
F1.5	Enable active modes of transport.	Support
F1.6	Require local government to consider information from insurance markets to inform climate-risk-related planning policy	Support¹

Enabling Competitive Cities and Regions

19. While we agree in principle with the need to enable a responsive planning system, we are **concerned about the increased risk of misalignment between development and infrastructure provision** as private sector drivers of development may be towards those areas where infrastructure is not currently planned and away from urban areas where infrastructure is currently under-utilised. For example, the relative commercial returns and risks to developers of greenfield development on the Canterbury plains compared with brownfield development within the central city results in pressure for additional investment in new infrastructure on the city fringe and rural towns while existing infrastructure within the city is under-utilised. Mechanisms to de-risk brown-fields development through enabling planning frameworks, along with price signals that better reflect the societal and environmental cost of development for current and future generations, could assist to better align development with infrastructure provision.
20. Our experience post-earthquakes highlights the **importance of lead investment** in infrastructure to support future growth. We support the mechanisms (policy, legislative and financial) to better enable corridor protection.
21. We are currently developing a Mass Rapid Transit Indicative Business Case for Greater Christchurch and integrating this work with spatial planning to ensure we consider opportunities to achieve better land use outcomes (e.g., density) supported by lead investment in ‘city-shaping’ transport infrastructure. We support the concept of a comprehensive approach to lead infrastructure planning, and a national infrastructure strategy that provides lead infrastructure policy and supporting implementation guidance.
22. We agree **pressures on infrastructure funding could be reduced by increasing development opportunities in areas where there is capacity or low-cost options to upgrade and reducing**

¹ Noting (1) this should be broader to include other relevant information sources such as GNS, NIWA; (2) planning can pre-empt withdrawal and price increases made by insurance companies –action taken by local government to adapt to existing exposure to climate change issues could impact the availability, affordability or need for insurance



development opportunities in areas where infrastructure does not exist or is insufficient.

This consideration should apply at a local, regional and national level.

23. We **support exploring the use of demand management techniques** such as congestion pricing and/or road tolling to improve urban accessibility and the removal of legislative barriers to implement these tools. We agree that there are potential equity impacts arising from such measures, which would need to be understood and carefully managed.
24. As a significant national logistics hub and critical hub for the South Island, Greater Christchurch **supports a long-term national supply chain strategy** for New Zealand. Furthermore, Greater Christchurch's economy has a strong interdependency with the regional agricultural economy. We would like to see more explicit consideration of infrastructure in the context of the rural economy, including water storage and distribution networks for irrigation and electricity networks.
25. In response to the specific options identified in the consultation paper, we have specific feedback on the following:

C1.3	Set targets for housing development capacity and triggers for release of additional development capacity.	Caution – risk of misalignment between development and infrastructure provision
C2.3	Improve information on infrastructure capacity and costs to service growth.	Support
C2.5	Implement regional spatial planning.	Support
C3.1	Implement congestion pricing and/or road tolling to improve urban accessibility.	Support, subject to good management of equity impacts
C3.2	Use congestion pricing to plan for new transport infrastructure.	Support
C3.3	Plan for congestion pricing schemes in other NZ cities.	Support, with controls to understand social and economic impact
C4.1	Develop a lead infrastructure strategy, supporting implementation guidance and a corridor protection evaluation methodology.	Support
C4.3	Establish a corridor reservation fund to protect lead infrastructure corridors.	Support
C5.1	Develop a long-term national supply chain strategy.	Support



Creating a Better System

26. Irrespective of the agencies and functions involved with infrastructure and land use planning and delivery, we strongly support an **integrated and aligned approach**, which is able to reflect the needs and aspirations of local communities, mana whenua and national interests.
27. We **support the development of a priority list of projects and initiatives** and the use of this pipeline of forward work intentions to inform and help to de-risk commercial decision-making. We note that Christchurch City Council has been maintaining and operating a central city pipeline of forward work intentions for this purpose since taking this over from the Canterbury Earthquake Recovery Authority in 2016. It has proven to be very useful and is another example of a useful learning from the Canterbury Earthquakes that has been embedded in business as usual operations. We note that the City Council is in discussions with Infrastructure Commission about its utility.
28. The earthquake rebuild also provides many lessons in major infrastructure procurement and delivery. And it is clear from other major infrastructure projects around the country that entities across the public sector that are responsible for **delivering such projects would benefit from a greater level of capability development support and access to readily available expertise**.
29. We note that local government currently has a lot of drivers that compel and enable coordination of infrastructure and land use planning. **There is a risk that the proposed reforms that separate these functions carry a risk of reducing integration**. This should be a consideration of reform. We also consider that the Government's current reform programme is large and not necessarily sequenced or aligned as well as it could be. Additionally, existing policy does not always correspond to emerging policy. To a certain extent this is to be expected in complex systems. The development of a national infrastructure strategy is an opportunity, however, to rectify the more glaring examples. Consistent and reliable guidance on how to respond to unsolicited and market-led proposals would also be beneficial.
30. Local and central government and iwi are working closely together on the challenging issue of housing supply and affordability through the **urban growth partnership mechanism**. This is a forum in which local and central government formalise and maintain a long-term and enduring relationship which brings together existing, but disparate processes, information, and resources in a joint effort to deliver on Urban Growth Agenda objectives. This primarily involves joint strategic spatial and transport planning. This mechanism could also be a useful way for local and central government to mount a more effective joint effort to manage, plan and implement infrastructure more generally.
31. We support both the **development of long-term funding principles** (such as 'funding of depreciation') of infrastructure assets and consideration of other income streams to support infrastructure needs to reflect the spread of benefits across current and future generations and the ongoing operating costs of infrastructure.
32. **Optimise the use existing infrastructure at a local, regional and national level is a first order priority** in the context of significant infrastructure costs. Optimising use includes considering how existing infrastructure can adapt and respond to a dynamic environmental, economic and social change through the use of technology, data and pricing that reflects value capture.



33. In response to the specific options identified in the consultation paper, we have specific feedback on the following:

S1.1	Clarify funding of spatial plans.	Support
S2.1	Fund tourism infrastructure.	Support
S2.2	Rating Crown Land.	Support
S2.3	Develop a transition plan for transport funding.	Support
S2.5	Enable land-value change as a basis for a targeted rate.	Support
S3.1	Consider non-built options.	Support
S3.2	Investigate New Zealand Government Asset Management Team.	Support
S3.3	Improve pricing to optimise use of existing infrastructure.	Support
S4.1	Undertake a post-implementation review of all major infrastructure projects.	Support
S5.1	Develop a priority list of projects and initiatives.	Support
S5.2	Improve the use of the pipeline for commercial decision-making.	Support
S6.1	Establish a major projects leadership academy.	Support
S6.2	Revisit New Zealand's approach to market-led proposals.	Support
S7.3	Develop a planning system that is more enabling for infrastructure.	Support

Thank you for the opportunity to provide this submission. For any clarification on points within this submission please contact our secretariat at secretariat@greaterchristchurch.org.nz.

Nāku, nā

Jim Palmer

GCP Independent Chair