

3 June 2022

Submission of Infrastructure New Zealand on the Draft National Adaptation Plan

1. Introduction

1.1 Infrastructure New Zealand welcomes the opportunity to make a submission on the draft National Adaptation Plan – Te mahere urutaunga ā-motu (tuhinga hukihuki) released by the Ministry for the Environment 6 May 2022.

1.2 Infrastructure New Zealand is New Zealand’s membership association for the infrastructure sector. We promote best practice in national infrastructure development through research, advocacy and public and private sector collaboration. Our members come from diverse sectors across New Zealand and include infrastructure service providers, investors and operators.

1.3 We would be happy to meet and discuss our submission.

1.4 Please direct enquiries to Claire Edmondson, Chief Executive, at Claire.edmondson@infrastructure.org.nz

2. Objectives

2.1 We understand the overall purpose of the National Adaptation Plan is to create a cohesive plan to help people understand and properly prepare for the effects of climate change. It is designed to set clear responsibilities across govt agencies, govt authorities, industries and communities.

2.2 The plan encompasses three main areas with associated actions:

- i. Reform institutions to be fit for a changing climate
- ii. Provide data, information, tools and guidance to allow everyone to assess and reduce their own climate risks
- iii. Embed climate resilience across government strategies and policies

2.3 One of INZ’s strategic pillars is focused on climate change and the role of infrastructure to mitigate impacts through sustainable infrastructure.

2.4 Climate change and its implications are well-recognised, with several councils around the country and the Government having already declared a climate emergency. The time to act is now. There is an opportunity to design and build our cities in a way that makes them better and more sustainable places to live. This ranges from quality compact urban forms to shifting to a low-emissions transport fleet.

2.5 There is also an opportunity to make better use of the infrastructure we already have, including using it in transformational ways.

2.6 Infrastructure will play a significant role in how we respond to climate change, whether it is mitigation, adaptation or increasing resilience. Infrastructure-related decisions will have a significant impact on our path to decarbonisation and net zero emissions.

2.7 We have been supportive for some time of a stock take on how resilient public infrastructure (at the local and central government level) is to the adverse impacts of a changing climate, and setting the scene for a national dialogue on choosing between continued use or alternative solutions. We are supportive of the conversation that this draft plan will progress in that regard.

2.8 INZ is also supportive of the principle of ‘build back better’. The Government’s commitment to reducing New Zealand’s emissions profile needs to be accompanied by a commitment from local and central government that all infrastructure projects will go through a sustainable and climate lens. This is especially critical because of the long-lived nature of infrastructure.

3. System-wide changes – Resource management system

3.1 One of the critical actions under system-wide actions is to reform the resource management system. INZ supports changes to the RMA as seen in our submission on the Resource Management (Enabling Housing Supply) Amendment Bill in November 2021. INZ’s position is that a well-functioning resource management system will: integrate well with the wider urban planning system simplify; streamline and shorten the length of processes; reduce the number of instances a consent application is required; recognise the net benefits of a project instead of decisions being made on the support and objections received on an application, which are often localised; enable critical and/or significant infrastructure to be consented/approved faster compared to under the RMA; negate the need for a statute like the COVID-19 Recovery (Fast-track Consenting) Act 2020 or the Housing Accords and Special Housing Areas Act 2013 to progress significant infrastructure projects or enable urban development; and enable urban development to occur without vexatious objections.

3.2 Ensure the planning system does not continue to disproportionately hamper infrastructure delivery through delays and excessive costs. The reform of the resource management system provides a key opportunity to address this, that is, a more efficient system that still provides good environmental outcomes. We would like to reiterate our support for the reform of the resource management system.

4. Infrastructure Chapter objectives

4.1 We broadly agree with the outcomes and objectives set out in the Infrastructure chapter and will be watching as these develop further.

- Reduce the vulnerability of assets exposed to climate change
- Ensure all new infrastructure is fit for a changing climate

- Use renewal programmes to improve adaptive capacity

4.2 The National Adaptation Plan has identified several actions to support adaptation in all infrastructure types and all regions of Aotearoa. This consultation has asked stakeholders to identify potential for further aligning actions across local government, central government and private sector asset owners. INZ's position is that central and local government should lead by example.

5. Code for resilient infrastructure

5.1 We will be interested to see how the proposal to 'Scope a resilience standard or code for infrastructure' develop and we would like to see further information before we take a position on this. We understand this will be developed 2022-2024 so there will be time for further shaping of this initiative. There is an opportunity here to support leading-practice risk reduction and resilience planning in New Zealand. INZ would be open to further discussion with Te Waihanga as this is developed.

6 Funding our infrastructure deficit

6.1 Many of the identified actions may create further costs to funding infrastructure. Given this, it is important to consider how the existing infrastructure deficit will be funded and financed.

6.2 INZ notes that New Zealand already faces a significant infrastructure deficit and we have been vocal on the need to address this. While the dollar amount of the deficit varies, Treasury's 2022 Investment Statement puts the figure at \$210billion.

6.3 The New Zealand Infrastructure Commission: Te Waihanga has stated the nation would need to spend \$31 billion on infrastructure each year, for the next 30 years, if we are to build our way out of current and future infrastructure challenges. That puts into context the severity of the situation New Zealand is in, and it is simply not sustainable. We must make better use of the infrastructure we have and find better ways to pay for future infrastructure projects, including using the range of funding and financing tools we already have, which include public-private partnerships, special purpose vehicles under the Infrastructure Funding and Financing Act 2020, lease structures and development contributions and developer agreements used by local government. We must also prioritise the infrastructure we need to build, and enable the project and skills pipeline required to deliver it; this has been recommended by Te Waihanga and we support it.

6.4 We understand the intention is that the final National Adaptation Plan will be accompanied by proposed legislation. The resulting legislation from the National Adaptation Plan will need to enable sustainable development to continue. We look forward to the opportunity to comment on specific legislative proposals at that time and to submitting on these in due course.



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7. Conclusion

7.1 I thank the Ministry for the Environment for giving INZ the opportunity to make this submission.

7.2 If you have any queries or require further information, please feel free to reach out to me at Claire.Edmondson@infrastructure.org.nz.

Claire Edmondson
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