



Report on the Performance of the

National Code of Practice

for

Utility Operators' Access to Transport

Corridors

2024/25

NZUAG

May 2026

1. Introduction

This report provides an analysis of the National Code of Practice for Utility Operators' Access to Transport Corridors (the Code) for the 2024/2025 reporting year. It presents an interpretation of the Key Performance Data required under section 8.2.2 of the Code, collected from industry during late 2025 and early 2026.

The report also explains the implications of changes to the information-gathering approach introduced between the 2023/24 and 2024/25 reporting periods, and how these changes affect the interpretation of trends and performance outcomes.

2. Background

The National Code of Practice for Utility Operators' Access to Transport Corridors is a mandatory Code of Practice established under the Utilities Access Act 2010. It governs all corridor managers and utility operators seeking access to transport corridors.

The New Zealand Utilities Advisory Group (NZUAG) is the industry-approved guardian of the Code and is responsible for its oversight, implementation, and review. As part of this role, NZUAG is required to report annually to the Minister for Infrastructure on the performance of the Code.

To support monitoring of the Code's effectiveness, a set of key performance measures is specified in section 8.2.2 of the Code. Corridor managers and utility operators are required to report annually against these measures, as follows:

- **Corridor Managers** are required to report on:
 - The number of Corridor Access Requests (CARs) submitted each year;
 - The number of completed Works Completion Notices (WCNs) received each year;
 - The number of non-conformance notices (NCNs) issued each year;
- **Utility Operators** are required to report the number of known third party damages incidents during that year.

Additionally, during the reporting period, the Minister for Infrastructure requested NZUAG investigate options to improve the planning, delivery and management of work in Infrastructure Corridors, with a focus on the Code, and the respective roles of government and the network infrastructure sector.

This review was undertaken by Martin Jenkins and Harrison Grierson and shared with the Minister in early 2026.

3. Methodology

All corridor managers and utility operators were contacted to provide data relating to the mandatory reporting requirements, the questions used to collect the data are set out in **Appendix 1**.

Corridor Access Requests (CARs)

To allow a comparative analysis between Territorial Local Authorities (TLAs), and to account for variability between respondents and the fact that the number and identity of responses vary between years, a derived measure of *Total individual utility operator CAR equivalents per 1000 network km's* is used. This is an amalgamation of:

- a) the reported number of single utility operator CARs submitted.
- b) respondent estimates of the number of individual CARs that would have been required had utility operator global cars not been available or multiple street CARs issued.

These numbers were then divided by the centre-line length of each Corridor Manager's road network to allow comparability between different Corridor Manager's.

Works Completion Notices (WCN)

While the analysis of CARs used a measure of total equivalent CARs, (including allowances for Global CARs and Multiple Street CARs), reported WCNs that relate to individual CARs have been used as there is a 1:1 correspondence between CARs and WCNs. This comparability is difficult if Global CARs and multiple street CARs are included in the analysis.

Strikes

Utility Operators of water, electricity, gas and telecommunications assets were asked to provide the total number of strikes on their assets for 2024/25. These numbers are normalised by dividing total strikes by the total network length for each utility sector, allowing cross-utility sector comparisons.

Liaison meetings

Liaison meetings are a mandatory requirement in the Code, Corridor Managers must hold them, and Utility Operators must attend. There is a growing level of evidence that these Liaison meetings are not being held and/or attended with a significant number of submissions either not reporting or reporting zero liaison meetings for the period. It is difficult currently to assess whether this is an under reporting of liaison meetings (ie liaison meetings are occurring through other forums).

4. Survey Findings for 2024/25

This 2024/25 report on Code performance represents the seventh consecutive year of formal reporting with tabulated information provided in **Appendix 2**.

Information-gathering approach and response behaviour

NZUAG has historically relied on voluntary participation, issuing requests via company-nominated or generic corporate email addresses.

Under this approach, overall response rates have been variable and generally modest, typically ranging between 15% and 55%, (refer **Figure 1**) with marked differences between sectors.

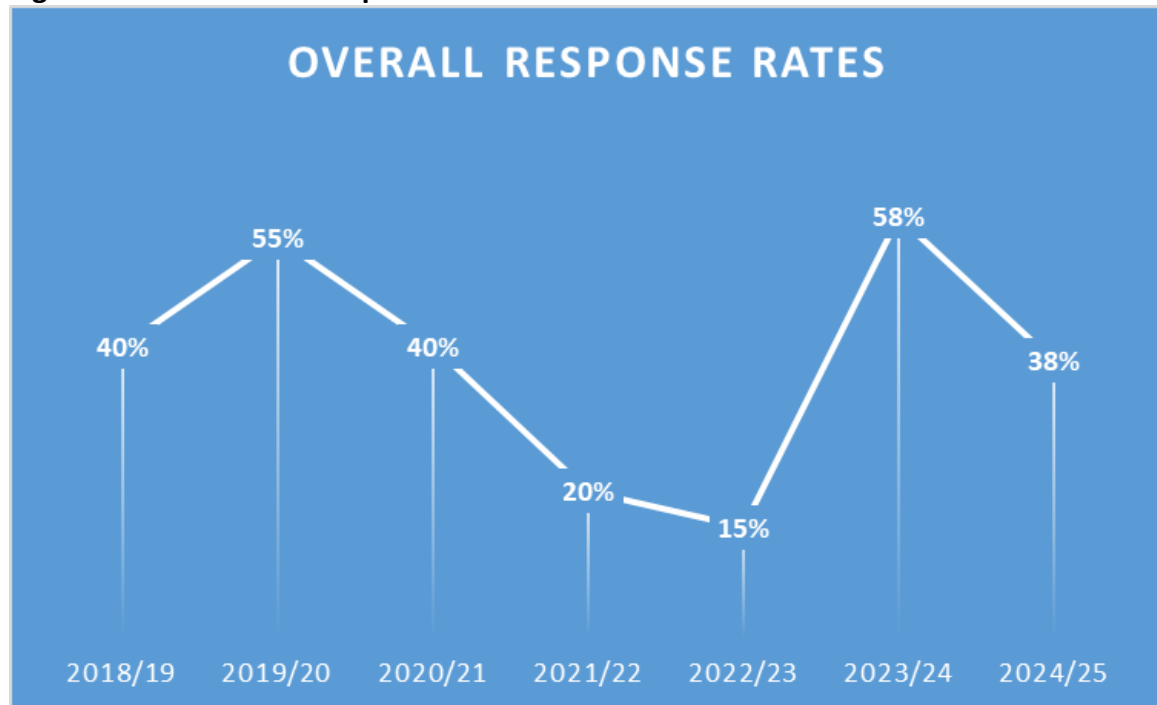
In 2023/24, following several years of declining participation and concern about data representativeness, utilisation of the Local Government Official Information and Meetings Act (LGOIMA) powers were trialled to obtain responses from corridor managers and water utility operators.

This resulted in a material increase in participation, with the overall response rate rising to 58%, and historically low-responding sectors (notably 3 Waters) showing significant improvement.

However, a complaint was received by the NZUAG regarding the use of the LGOIMA powers to collect sector information.

In response to that complaint, and to ensure proportionality, NZUAG returned to the voluntary approach in for this 2024/25 survey, issuing requests via publicly available corporate email addresses without statutory compulsion.

Figure 1 Overall Sector Response Rates



As illustrated in Figure 1, overall response rates collapsed across 2021/22–2022/23, rebounded sharply in 2023/24 (LGOIMA), and then fell again in 2024/25 suggesting sector reporting maturity is not yet stable or institutionalised. The overall response rate for 2024/25 reduced to 38%, with participation falling most noticeably in Telecommunications and 3 Waters, broadly aligning with pre-2023 patterns.

The evidence demonstrates a clear relationship between the method of information collection and participation levels. Use of statutory tools materially increase response rates, voluntary engagement alone results in lower and less consistent participation. NZUAG’s 2024/25 approach reflected a conscious decision to balance data completeness with proportional use of regulatory tools.

The Telecommunications and 3 Waters sectors are least reliably “reachable” via survey mechanisms. Corridor Managers show the same volatility as overall: 73% (2023/24) then 46% (2024/25).

The list of this year’s respondents is presented in **Appendix 3**.

Confidence and limitations of survey findings

The move away from using LGOIMA in this survey has very likely impacted response rates. The lower response rate this year reduces the statistical representativeness of the survey results and, accordingly, the confidence that can be placed in the reported findings, particularly for sectors with historically low participation. The NZUAG will look to again trial the use of LGOIMA tools for next year’s (2025/26) survey, to seek to achieve the quality of response rates achieved in 2023/24.

Corridor activity and completion trends

Corridor Access Requests (CARs)

Corridor access demand remains consistently high, with total CAR volumes in 2024/25 comparable to recent years. A significant feature of 2024/25 is a substantial reduction in “single CAR” submissions, while total equivalent CAR volumes remain relatively stable. This suggests a change in how work is packaged or recorded, rather than a fundamental reduction in corridor activity.

Works Completion Notices (WCNs)

Historically, the ratio of WCNs to CARs has ranged between approximately 0.4 and 0.6, increasing to 0.80 in 2023/24, refer **Figure 2**. However, in 2024/25, the ratio reduced sharply to 0.26. This represents a material reduction in recorded completion relative to consents issued. While this may reflect reporting practices or timing effects, NZUAG considers it a clear assurance signal requiring further examination.

Potential Long-term trends

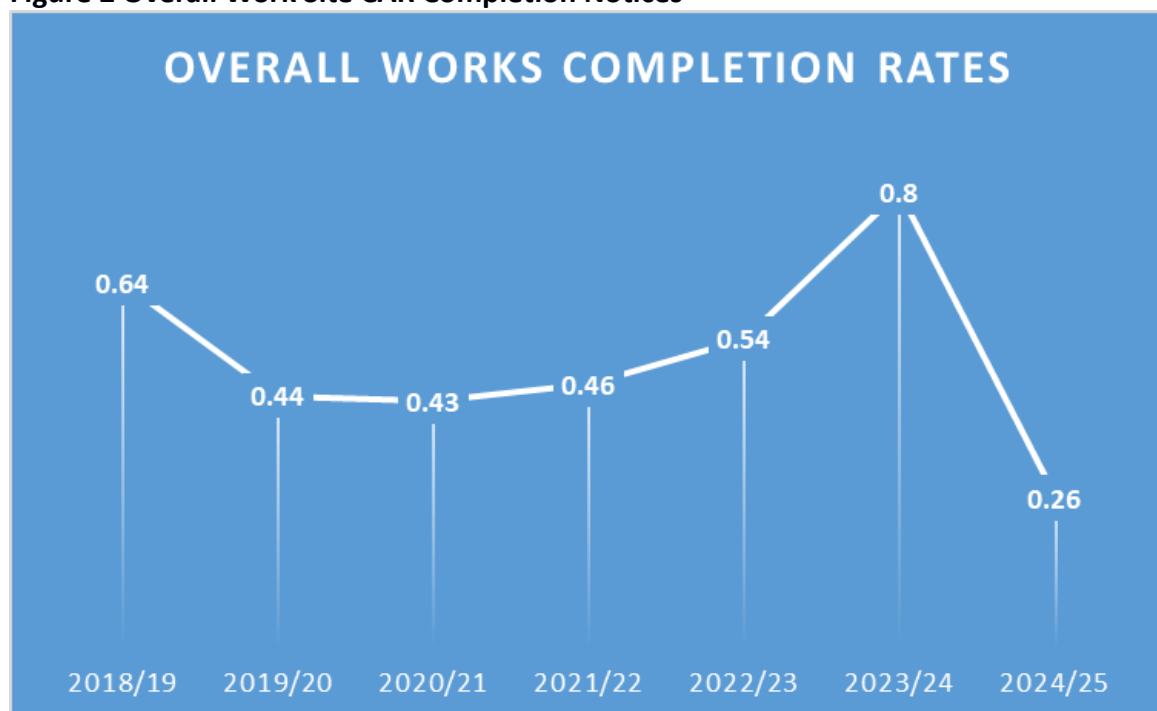
Over the long term, the road corridor continues to accommodate very high volumes of utility activity. In 2024/25, overall corridor access demand remains substantial; however, there is a notable change in how that activity is being recorded. Specifically, the number of “single” Corridor Access Requests (CARs) has reduced sharply, while the volume of equivalent CARs remains high. This suggests a change in application practices—such as increased bundling or altered reporting—rather than a proportional reduction in overall activity.

While this change in composition warrants further examination, it does not indicate a reduction in the underlying workload being managed within the corridor.

In contrast, the relationship between approved works and recorded completion has shifted materially.

The ratio of Works Completion Notices (WCNs) to CARs fell from 0.80 in 2023/24 to 0.26 in 2024/25. This is a significant departure from long-term trends and represents a clear assurance signal.

Figure 2 Overall Work Site CAR Completion Notices



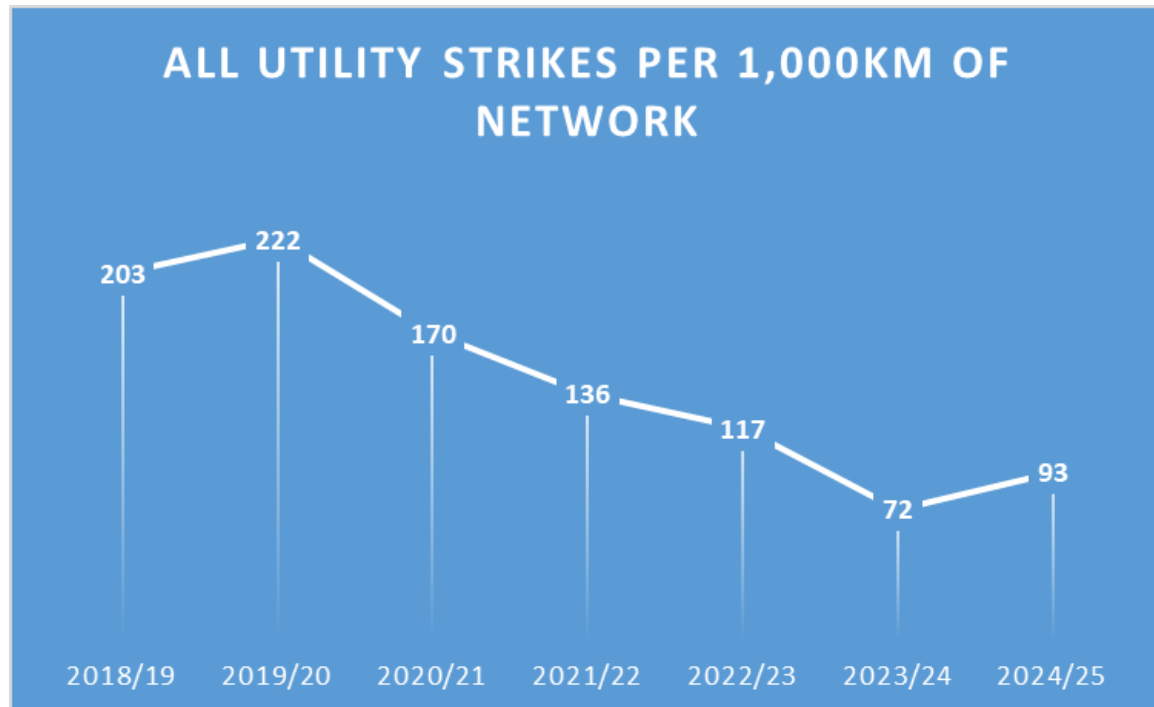
Such a change may reflect issues with completion reporting, timing effects within the reporting period, or a reduction in the proportion of works being formally closed out. Regardless of the underlying cause, the result indicates reduced visibility of work completion outcomes in 2024/25 and is the most significant performance concern identified in the data.

From a system-wide perspective, while activity levels remain high and stable over time, the 2024/25 results highlight emerging challenges in process closure and assurance that warrant focused attention.

Safety outcomes: strikes on utility assets

As part of the last Code Review changes an obligation was added for the NZUAG to 'report on how the industry is tracking toward zero Service Strikes by the year 2050 (8.2.3 Information Reporting). The **Figure 3** below highlights the reported general drop in strikes per 1000km over time.

Figure 3 Strike Rate Trend



Potential Long-term trends

Reported strikes have generally reduced over time, particularly in Telecommunications, and 3 Waters networks. When normalised by network length, all sectors show a downward trend, indicating sustained improvement in asset protection outcomes.

Telecommunications and 3 Waters show the strongest and most consistent improvement. Gas networks, while improved, continue to present a relatively higher residual risk compared to other sectors.

NZUAG cautions that these results are based on reported utility strikes. Reductions in this metric may reflect real improvements in safety outcomes and/or changes in reporting practices, and the current data does not distinguish between these effects. From a system-wide perspective, the trend indicates improving damage outcomes but also highlights persistent weaknesses in process closure (WCN ratios) and inconsistent engagement across the sector.

5. Conclusions

The results reported show improving safety outcomes in the road corridor but also confirm that voluntary reporting alone does not consistently provide the level of assurance required to fully understand the performance of the Code.

Based on this year's survey, and comparisons with past surveys, the NZUAG draws the following:

- Voluntary engagement alone does not consistently deliver comprehensive sector participation, particularly in Telecommunications and 3 Waters.

- Reported safety outcomes in the road corridor have improved over time, with sustained reductions in asset strikes across most sectors.
- Activity in road corridors remains high, reflecting ongoing infrastructure delivery and economic activity.
- The 2024/25 reduction in recorded work completion is a significant assurance issue that needs to be investigated by NZUAG.
- The 2023/24 experience demonstrates that statutory information-gathering powers are effective, while the 2024/25 results highlight the trade-off inherent in returning to a voluntary approach.

The corridor utility environment shows strong improvement in reported asset strike outcomes over time, but 2024/25 exposes a governance/assurance weakness: participation in feedback mechanisms has dropped again and, more critically, work closure evidence (WCNs) has fallen sharply relative to consents (CARs), creating a material risk that completion is not being consistently verified or recorded.

6. Recommendations

Based on the findings of this 2024/25 survey, the NZUAG recommends:

- A return to LGOIMA tools to support survey completion rates for future years
- The Minister consider and act on the findings of the February 2026 Martin Jenkins report into Options to Improve the Management of Works and Records in Network Infrastructure Corridors to support the future performance of the Code, noting the purpose of the Code is to enable access by utility operators to transport corridors to be managed in a way that—
 - maximises the benefit to the public while ensuring that all utility operators are treated fairly; and
 - ensures that disruptions to roads, motorways, and railways caused by work by utility operators are kept to a minimum, while maintaining safety; and
 - provides a nationally consistent approach to managing access to transport corridors.

Appendix 1: Information request

Road Corridor Manager Questions (in relation to Utility Operator CARs)

Number of Corridor Access Requests (CARs)

- How many CARs were submitted for the period 1 July 2024 - 30 June 2025?
- What percentage of these were submitted as Global CARs under the provisions of the National Code of Practice (s4.3.1.3)?
- Please estimate how many individual site CARs would have had to have been submitted instead of these Global CARs

Number of Works Completion Notices (WCNs)

- How many WCN's did you receive for the period 1 July 2024 - 30 June 2025?

Number of Non-Conformance Notices (NCNs)

- How many Non-Conformance notices were issued for the period 1 July 2024 - 30 June 2025?
- How many CAR inspections required remedial actions?
- How many liaison meetings did you facilitate for the period 1 July 2024 - 30 June 2025, in accord with the provisions of the National Code of Practice (s2.7.2)?
- What is the total centre-line km length of your transport corridor?

Utility Operator Questions

- What utility type are you responding for? (Water if applicable)
- How many Utility Strikes did you record against your own underground assets within transport corridors for the period 1 July 2024 - 30 June 2025?
- In how many of these incidents had plans been requested?
- Did you or a member of your organisation attend any liaison meetings this year in accordance with s2.7.2?
- How long is your distribution network within transport corridors (total km)?

Appendix 2: Survey Results and Analysis

Table 1 Response Rate

	Response rate by year						
Sector	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Corridor Managers	55%	78%	49%	37%	34%	73%	46%
3 Waters	36%	46%	30%	5%	10%	49%	27%
Electricity	38%	77%	58%	39%	19%	58%	42%
Gas	100%	80%	83%	100%	60%	80%	60%
Telecommunications	40%	46%	33%	27%	17%	60%	31%
Overall Rate	40%	55%	40%	20%	15%	58%	38%

Table 2 Corridor Manager CAR numbers

	Year						
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Single CARs submitted	38,661	46,314	38,924	71,355	41,608	41,770	26,900
Equivalent No. CARs	112,365	78,386	162,887	204,674	148,189	159,256	145,569
Total	151,026	124,700	201,811	276,029	189,797	201,026	172,469

Table 3 Works Completion Notices (WCNs)

The following table provides a comparison of WCN to UO CARs submitted for the last seven years.

	Year						
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Ratio WCNs / CARs	0.64	0.44	0.43	0.46	0.54	0.80	0.26

Table 4 Strikes on Utility Operator Assets

The following tables shows the total number of strikes by sector

	Reported Utility Strikes						
Sector	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
3 Waters	2,084	2,435	1,102	158	210	387	1,466
Electricity	375	1151	456	1667	84	302	122
Gas	970	558	325	663	198	471	332
Telecommunications	10,133	8,501	7,265	4,992	3,751	3,699	2,656

Table 5 Strikes on Utility Operator Assets Relative to Network

The following tables shows the total number of strikes by sector normalising per 1000km of network

	Strikes per 1000km of network						
Sector	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
3 Waters	64	58	52	68	15	13	41
Electricity	34	14	17	8	32	6	6
Gas	40	73	43	24	46	34	32
Telecommunications	65	77	58	36	24	19	14

Appendix 3: Respondents to 2024/25 Survey

Respondent	Sector
Ashburton District Council	Local Government
Auckland Transport	Local Government
Carterton District Council	Local Government
Central Otago District Council	Local Government
Christchurch City Council	Local Government
Grey District Council	Local Government
Hastings District Council	Local Government
Horowhenua District Council	Local Government
Hurunui District Council	Local Government
Kaipara District Council	Local Government
Manawatu District Council	Local Government
Masterton District Council	Local Government
Matamata Piako District Council	Local Government
Nelson City Council	Local Government
New Plymouth District Council	Local Government
Otorohanga District Council	Local Government
Queenstown Lakes District Council	Local Government
Rotorua Lakes Council	Local Government
Selwyn District Council	Local Government
South Wairarapa District Council	Local Government
Stratford District Council	Local Government
Tararua District Council	Local Government
Tasman District Council	Local Government
Tauranga City Council	Local Government
Thames Coromandel District Council	Local Government
Waimate District Council	Local Government
Waipa District Council	Local Government
Western BoP District Council	Local Government
Whanganui District Council	Local Government
Whangarei District Council	Local Government

Respondent	Sector
Chorus	Utility Operator
EA Networks	Utility Operator
Electra Ltd	Utility Operator
Electricity Invercargill Limited (EIL)	Utility Operator
Firstgas	Utility Operator
GasNet Ltd	Utility Operator
Inspire Net Limited	Utility Operator
Lakeland Network Limited	Utility Operator
Marlborough Lines Limited	Utility Operator
Network Waitaki Ltd	Utility Operator
Northpower	Utility Operator
Orion	Utility Operator
OtagoNet Joint Venture (OJV)	Utility Operator
The Power Company Limited (TPCL)	Utility Operator
Vector Limited	Utility Operator
Watercare Services	Utility Operator