

6 August 2025

ROA0501
JK:MM

Draft National Infrastructure Plan Consultation
New Zealand Infrastructure Commission | Te Waihanga
DX SX33303
Wellington

To whom it may concern,

HORIZONS REGIONAL COUNCIL SUBMISSION – DRAFT NATIONAL INFRASTRUCTURE PLAN

Thank you for the opportunity to submit on the Draft National Infrastructure Plan. Horizons Regional Council (Horizons) is the regional authority for the Manawatū-Whanganui Region, extending from south of Levin to north of Taumarunui and from Whanganui across to the east coast, covering an approximate 22,000km² in total. Horizons' responsibilities include managing the region's natural resources, provision of flood control and land drainage infrastructure, monitoring air and water quality, pest control, facilitating economic growth, leading regional land transport planning and coordinating our region's response to natural disasters.

Over the last 35 years of our Council's work in this region, the landscape has changed and evolved. We continue to adapt and progress in the work we do through our relationships and the progression of best practice in the activities and work we undertake to achieve better outcomes for our communities and region.

Horizons is generally supportive of the Taituarā and Te Uru Kahika submissions. We especially support their submission points regarding the significant importance of flood infrastructure and flood infrastructure investment.

Please see our recommendations for the Draft National Infrastructure Plan (NIP) below.

Key recommendations

Significance of Flood Control Infrastructure

1. Horizons is concerned with the current lack of visibility in the draft National Infrastructure Plan (NIP) of flood control infrastructure. River management structures are critical to protect other infrastructure and communities.
2. Page 105 of the draft NIP states "Infrastructure needs to become more resilient because risks are intensifying...Costs from extreme weather events and flooding will increase due to climate change." Given the critical role that flood control infrastructure plays in safeguarding other essential infrastructure systems, the NIP should emphasise its importance.
3. Horizons recommends to reflect its true value, flood control infrastructure should be given the same level of visibility and priority as 'Water and Waste' infrastructure as shown

in Figure 1 on page 16 of the Draft NIP. Flood control infrastructure is significant and likely to have severe consequences for communities and regions if it fails or is not properly invested in. Elevating the visibility of this type of infrastructure alongside waste and water would better align with the goals of the NIP in investing in strategically planned, maintained and resilient infrastructure.

Horizons requests that:

The NIP elevate the profile and strategic significance of flood control infrastructure in the NIP given the role it plays in protecting other key infrastructure and given that the need for more resilient infrastructure is a goal of the NIP.

The NIP provides a stronger connection between infrastructure resilience and flood control infrastructure investment in the NIP.

Decommissioning Infrastructure Cost and Liability

4. Horizons is concerned that the NIP has not given sufficient consideration to the decommissioning of infrastructure. A central objective of the NIP is to establish appropriate tools and oversight for the strategic planning of infrastructure projects.
5. Decommissioning is a critical phase within the project lifecycle, and inadequate planning in this area can lead to significant financial costs and liability risks, especially considering the potential for significant financial and liability implications for future ratepayers and taxpayers.
6. The NIP places specific emphasis on maintaining infrastructure but does not recognise where it may be more cost effective and efficient to decommission infrastructure, which is a necessary part of some infrastructure projects.
7. Horizons sees examples of this in our region with the decommissioning of the Te Āpiti - Manawatū Gorge Road and the forgotten highway among other assets such as wind turbines and bridge infrastructure.

Horizons requests that:

The NIP fully consider in the "Start with maintenance" section how and where decommissioning infrastructure is an appropriate and necessary part of the complete lifecycle of infrastructure.

The NIP include explicit wording reflecting this consideration in the "Start with maintenance" section of the NIP.

Right Size New Investment

8. Horizons sees a clear opportunity within the 'Right-size New Investment' recommendations to adopt a more holistic approach from the outset of infrastructure projects. By integrating environmental management and cultural effects early in the readiness assessments rather than leaving them to the consenting stage, there would be a strengthening of business cases and improved advice on infrastructure investment proposals.

9. The current focus on timely infrastructure delivery prioritises cost and technical considerations, but overlooks the need for clear mechanisms to give equal weight to cultural values and environmental outcomes. It also appears to limit robust assessment of alternative locations and designs, especially in sensitive or high-risk environments, and may not adequately account for local-level risks or how conflict resolution will be addressed.

Horizons requests that:

The NIP fully consider the benefits of using the readiness assessments as an opportunity to consider a wider range of effects on an infrastructure project in the funding and approval stages to reduce inefficiency in the system and strengthen the reasoning and justification of projects that are approved.

Balancing Infrastructure Need and Cultural Value

10. Horizons notes that there is an opportunity for the NIP to more clearly acknowledge Māori rights and interests. Although Te Tiriti o Waitangi is referenced in the document and forms part of a continuing conversation, there may be scope for the NIP to more effectively reflect Māori representation and Treaty Settlement commitments. The NIP could consider a more balanced approach between infrastructure requirements and cultural values.

Horizons requests that:

The NIP fully considers where it can more clearly acknowledge Māori rights and interests, including a stronger reflection of Te Tiriti o Waitangi and Treaty Settlement commitments.

Ensure Māori representation is integrated meaningfully at all stages of infrastructure planning and delivery.

Supporting Rail Infrastructure Investment

11. Horizons supports the NIP's focus on rail infrastructure investment. Horizons recognises that there is an opportunity to place greater emphasis on rail as a critical component of New Zealand's national transport and freight system.
12. While the draft NIP currently treats rail infrastructure as a subset of land transport and suggests it should primarily be funded by urban transport users and local government, there is a greater opportunity for the NIP to recognise the critical importance of rail infrastructure as nationally significant and essential to support freight efficiency, regional connectivity, and national resilience.

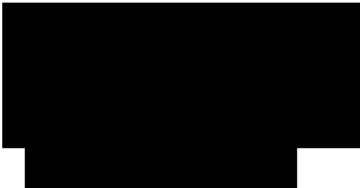
Horizons requests that:

The NIP explicitly recognise the national importance of rail infrastructure.

The NIP fully consider the opportunity to include provision for Crown Investment due to the critical importance of strategic investment.

Thank you again for the opportunity to submit on these proposals. Horizons would welcome the opportunity to discuss our feedback with officials and assist in the finalising of this NIP.

Yours sincerely,



CHIEF EXECUTIVE