

Our Reference: A1314818

6 August 2025

Infrastructure Commission



### ***Environment Southland's Submission on Draft National Infrastructure Plan***

#### **Introduction**

1. The Southland Regional Council, trading as Environment Southland (Environment Southland), welcomes the opportunity to provide feedback on the Draft National Infrastructure Plan.
2. As a regional authority, Environment Southland plays a significant role in determining where and how infrastructure develops within Southland's land and coastal areas. Under the Resource Management Act 1991, it is responsible for preparing and implementing regional policy statements and regional plans which contribute to effective management of the various environmental impacts associated with infrastructure development.
3. As mandated under the Land Transport Management Act 2003, Environment Southland also prepares the Regional Land Transport Plan and works in collaboration with territorial authorities to ensure that transport infrastructure operates efficiently for the benefit of local communities. While some regional councils directly own and manage public transport assets and services, public transport services in Southland are managed by territorial authorities.
4. Furthermore, operating under the Land Drainage Act 1908 and the Resource Management Act 1991, Council directly owns and manages a substantial amount of flood resilience assets, in collaboration with landowners, to minimise the impact of natural disasters on local residents. These assets include various flood banks, drainage channels, floodgates, and pump stations. Environment Southland currently manages a drainage network spanning 1,400 kilometres, with the total value of its flood resilience infrastructure, including pump stations, exceeding \$460,000,000. A significant portion of this Council's resources is dedicated to ensuring these assets are reinforced, well-maintained, and function effectively to safeguard the community against flood risks.
5. The key points of this submission are outlined below.
  - a. Support the intent of the Infrastructure Plan, including the drive to enhance efficiency and transparency in the development and maintenance of infrastructure across New Zealand.
  - b. Strongly support effectively using spatial planning as a critical tool guiding development of infrastructure, ensuring developments occur in the right places

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- maximising cost efficiency and preventing conflicts between incompatible activities.
  - c. Recommend advocating for alignment between the approaches outlined in the National Infrastructure Plan and the National Policy Statement on natural hazard decision-making, currently under development, to ensure that resilience is integrated into future infrastructure.
  - d. Recommend the inclusion of flood resilience assets as key components of the National Infrastructure Plan, recognising their current importance and the growing significance they will hold in the future.
6. This Council endorses the submission from the Transport Special Interest Group of Te Uru Kahika. This submission should, therefore, be read in conjunction with that submission.
  7. Council notes that while the content of this submission has been approved, it is yet to receive the endorsement at a formal meeting, which will be sought as soon as possible. As such, this submission is provided on a without prejudice basis.

***Support for enhancing efficiency and transparency***

8. Council fully agrees that, given New Zealand's demographic and economic context, the development and management of infrastructure must become more efficient and more integrated in the future. Council expresses support for the intent of the various recommendations included in the Draft National Infrastructure Plan ('the Plan') that aim to address this need, particularly those focused on enhancing efficiency and transparency in infrastructure development and maintenance across New Zealand.

***Support for the integral role of spatial planning***

9. Council strongly agrees with the Commission's view that effective and comprehensive spatial planning must guide the development of infrastructure. The draft plan notes that new resource management legislation is underway, with the Commission contributing to its design. Council requests that the Commission advocate for clear national direction to support early and ongoing investment in high-quality spatial planning processes, involving key stakeholders and communities to produce robust, widely supported plans.
10. When done well, spatial planning is likely to provide a consolidated and coherent picture for the developments in the region, facilitating the right development in the right places. This could contribute to the creation of a more enabling regulatory environment while offering greater certainty to both investors and the community.
11. It could also help prevent costly issues arising from poor site selection, such as placing incompatible activities too close together or locating high-impact activities in environmentally sensitive areas. In Southland, it is very important to ensure that infrastructure development in unique and pristine areas such as Fiordland and Rakiura is carefully managed so that this does not detract from significant and fragile environmental values.

***Support for building resilience into NZ's Infrastructure***

12. Council fully agrees with the view expressed in the draft Plan that building resilience into infrastructure is critical, especially given that, as highlighted in the draft Plan, New

Zealand is in the top three OECD countries for reported natural hazard damage.<sup>1</sup> However, Council expresses concern that, while the draft Plan emphasises building resilience into infrastructure, this focus does not seem to be reflected in the proposed approach of the ongoing resource management reform.

13. Council is aware that a national policy direction on managing natural hazard risks is currently being developed under the Resource Management Act 1991 to require decision makers to adequately consider natural hazard risks in processing resource consent applications. However, the current proposal by the relevant Ministry is to exclude infrastructure from the scope of this national policy. Council strongly recommends that the Infrastructure Commission advocates against this exemption, ensuring that the upcoming resource management system contributes to, rather than undermines, the goal of embedding resilience into infrastructure.

#### ***Providing for flood resilience assets as infrastructure***

14. Council submits that flood resilience infrastructure must be explicitly recognised in the National Infrastructure Plan as critical national infrastructure, on par with roading, water supply, and energy networks. The proposed draft Plan discusses investments in various infrastructure networks, including land transport, water supply, and telecommunications, as well as social infrastructure such as schools, hospitals, and social housing. However, there is a significant gap in addressing flood resilience assets, which should be treated as an urgent priority.
15. Council highlights that adequately developing and maintaining flood resilience assets such as stop banks, dams, drainage networks, as well as the broader floodplains, is critical to safeguarding lives, properties, and livelihoods, particularly in areas prone to flooding. Numerous public and private properties of substantial value are protected by flood protection schemes. By increasing focus on the effective management of flood resilience assets, the government could contribute to prioritising and adequately resourcing their ongoing development, and future maintenance. With climate change intensifying the frequency and severity of extreme weather events, failure to effectively address these needs could leave communities exposed to costly and damaging impacts.

#### ***Need to provide ongoing national funding support for managing flood infrastructure***

16. Proactive planning for and effectively funding the management of these assets are essential to ensure they remain functional and fit for purpose. Maintenance requires ongoing substantial investments, as these assets typically have long service lives but require staged, planned renewals and upgrades, especially as climate change alters flood frequency, intensity, and sea level.
17. Council notes that the current local government rating base is insufficient to meet the escalating costs of maintenance, renewal, and climate adaptation - particularly in predominantly rural regions like Southland with low populations but extensive asset networks. Council therefore recommends the establishment of a dedicated national co-investment programme for flood resilience infrastructure, modelled on the successful cost-sharing arrangements used for the roading network. Relevant national

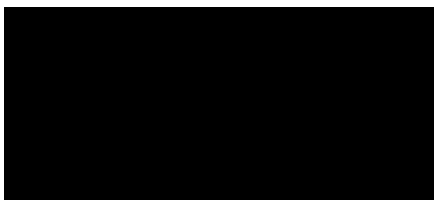
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<sup>1</sup> Page 19 of the Draft National Infrastructure Plan. It has also been noted that central government spent at least \$33 billion on natural hazards between 2010 and 2025, and many public assets are uninsured.

design standards should also be climate-adjusted, providing consistency across regions and ensuring long-term resilience.

***Adopting a broader definition of flood infrastructure is crucial for delivering outcomes***

18. Council also highlights that the identification and management of flood resilience infrastructure require a sophisticated, multifaceted approach, as the term 'flood infrastructure' should indeed encompass a broad range of components, including both hard and soft engineering solutions, as well as the broader floodplains. All natural features within the floodplains, such as gravel deposits, river bends, willows, flood banks, wetlands, and dams, play a significant role in shaping the outcome of flooding events. Considering this, Council recommends that the National Infrastructure Plan define flood resilience assets to include all artificial and natural systems within designated floodplain areas - for example, the 3km-wide zones adjacent to rivers of a specified size.
19. However, this recommendation is contingent upon the understanding that the extensive responsibility for managing the broad range of assets should be shared among relevant stakeholders, including both central and local government agencies. Local governments have been playing a crucial role, but they lack the resources to bear the expanded responsibility alone, particularly given the limitations on rate collection.
20. Effectively undertaking flood mitigation through a broader perspective on flood infrastructure is a long-term endeavour that demands not only technical solutions but also public education and active engagement of all stakeholders to ensure effective and sustainable outcomes. While it is a challenging task, the effective management of broadly defined flood resilience infrastructure will deliver substantial national cost savings, particularly in disaster relief, and pave the way for more effective climate adaptation.
21. Council thanks the Commission for considering this submission and looks forward to future opportunities for collaboration.



  
**Chairman**