

Submission on the Draft National Infrastructure Plan

Date: 28 July 2025

From: [REDACTED]

1. Introduction

Thank you for the opportunity to provide feedback on the Draft National Infrastructure Plan (Plan). As a practitioner working in the field of flood risk asset management, I welcome the Plan's intent to improve national infrastructure coordination, funding, and long-term planning. I also acknowledge the reference the flood protection infrastructure in the Executive Summary (page 4).

The Plan demonstrates strong leadership, cross-party alignment, and a commitment to tackling infrastructure challenges. Particularly commendable is its emphasis on improving asset management maturity, sustainable investment, and transparency in decision-making. The aspiration to build an enduring strategy that transcends electoral cycles is a vital step forward and one that is welcomed by those of us operating at the regional level.

2. Positive Aspects of the Draft Plan

- Long-term investment planning: The Plan's emphasis on future-focused infrastructure planning and investment clarity is a significant step forward. The concept of "forward guidance" and recognition of the balance between renewals and new builds shows maturity in thinking.
- Sustainable funding models: The recognition that funding pathways must be fit-for-purpose and reflect asset type is a necessary shift. Not all infrastructure fits a user-pays model
- Enduring, bipartisan frameworks: By seeking to reduce the 'stop-start' nature of infrastructure policy, the Plan helps create certainty for local authorities and communities that manage critical infrastructure under constrained resources.
- Focus on climate resilience: The Plan acknowledges the growing impact of climate change and the need for resilient infrastructure to future shocks. This aligns closely with the purpose of flood protection infrastructure.
- Improving asset management maturity: The Plan rightly calls for uplift in asset management maturity. Central government should lead by example by addressing its own weaknesses in asset management planning.

3. Key Points for Consideration

A. Recognition of River Control and Flood Protection activity

Flooding is the most common natural hazard in Aotearoa, with a major flood event occurring on average every eight months (*Te Uru Kahika*, 2022). 1-in-7 people live in flood prone areas. Floods impose an annual cost to the nation of over \$160 million in direct economic damage and clean-up costs, and a much higher toll in wider economic, social, cultural, and environmental impacts. It is also one of the most avoidable hazards and can largely be mitigated through flood protection schemes that reduce the risk of flooding.

There are currently 367 flood protection schemes in place across the motu, representing a combined capital value of \$2.3 billion. While this accounts for only a small proportion of Aotearoa's total infrastructure value, these schemes directly protect around 1.5 million hectares of land and capital across the country, including billions in public and private assets - including schools, hospitals, housing, major transport routes and marae and urupā. Consequently, these tend to be areas with the highest levels of economic activity and are therefore central to New Zealand's economy.

Flood protection is mentioned only four times in the 160+ page Plan, often interchangeably with stormwater. This does not reflect the significant value and criticality of the river control and flood protection activity and associated infrastructure. While the same function is shared with the stormwater activity (flood protection), they are different and distinct disciplines and largely delivered by different organisations (except a few unitary authorities).

Stormwater systems manage urban runoff and are typically the responsibility of city and district councils, whereas flood protection focuses on managing catchment-scale river systems through assets such as stopbanks, floodwalls and detention areas, and is predominantly delivered by regional councils. This distinction is also embedded in New Zealand's legislative history, with the Soil Conservation and Rivers Control Act 1941 creating a clear mandate for flood protection as a specialist, catchment-based activity. Conflating the two risks underestimating the scale, complexity, and funding needs of flood protection infrastructure

Recommendation: Explicitly recognise 'river control and flood protection' as a distinct activity across relevant sections of the Plan, and do not use interchangeably with stormwater.

B. Sector-specific commentary

Flood protection infrastructure plays a critical role in safeguarding lives, property, livelihoods, and ecosystems across New Zealand. It underpins the resilience of many of our regional economies - particularly those with high-value agricultural land, critical lifelines, and growing urban areas located on floodplains. Despite this, flood protection continues to be underrepresented in national infrastructure planning and funding discussions.

The Plan acknowledges climate adaptation and resilience as priorities but fails to reflect the real and increasing exposure Aotearoa faces from riverine flooding - the most frequent and costly natural hazard in the country. Very recent examples in the top of the South Island, and we don't need to look too far back to remember Cyclone Gabrielle.

While the Plan includes sector-specific commentary for transport, energy, telecommunications, education, health, and water, it provides little substantive coverage of flood protection. Although flood protection nominally fits within the water sector, it is not well reflected in key sub-sections (e.g., 7.3.2, 7.3.3, 7.3.7, 7.3.8) — especially when compared to the attention given to drinking water and wastewater. This omission risks reinforcing historical underinvestment and obscures the role of flood protection infrastructure in national and regional resilience.

Recommendation: Include dedicated commentary on the river control flood protection activity in the sector-specific section. Useful insights and analysis can be drawn directly from:

1. [Before the deluge: Building flood resilience in Aotearoa \(2022\)](#).
2. [Before the Deluge 2.0 \(2023\)](#).

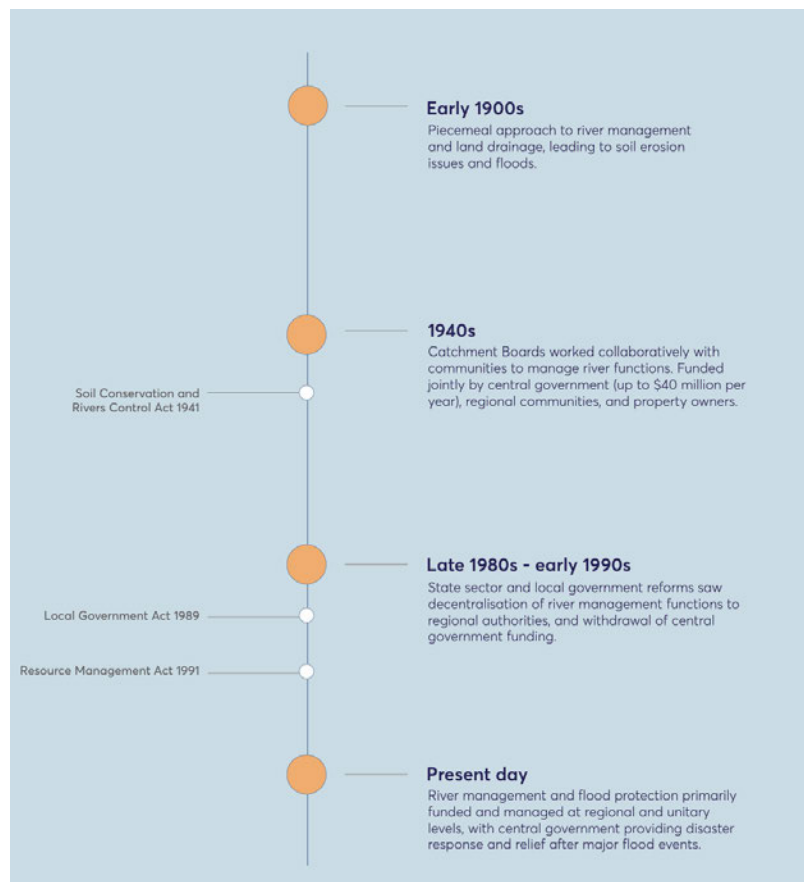
https://www.gw.govt.nz/assets/Documents/2022/12/Upload_20221207-210351.pdf

<https://www.teurukahika.govt.nz/media/mera2wa4/before-the-deluge-20.pdf>

C. Sustainable funding pathways

The total value of flood protection benefits to Aotearoa is estimated at \$11 billion annually, reflecting a benefit-to-cost ratio of around 5:1. These schemes are largely funded through targeted rates and managed by regional councils. However, their value extends well beyond regional boundaries - they protect nationally significant infrastructure including state highways, rail, three waters, energy, and telecommunications networks, and Crown-owned land that contributes no local rates revenue.

Yet, despite these widespread benefits, central government investment in flood protection has sharply declined over the past century. In the early 20th century, flood risk was recognised as a matter of national concern, prompting the creation of dedicated catchment boards under the Soil Conservation and Rivers Control Act 1941. Through this framework, central government routinely co-funded flood protection works 50:50 alongside local communities, recognising the shared responsibility and strategic importance of risk mitigation. Central Government contributed between 50-75% of capital expenditure and 33% of ongoing maintenance costs, equating to a \$40 million per (the equivalent of \$114 million in present day terms) annually.



The majority of river control and flood protection schemes we see today were built during this co-investment era between the 1940 and 1980s. By the late 1980s, however, this arrangement was dismantled. Funding responsibility shifted almost entirely to regional councils, with only sporadic central government contributions since — typically in response to major flood events or one-off climate resilience programmes.

In short, the current model is outdated and inadequate. It relies too heavily on local ratepayers, despite the national-level risks being managed locally. At a time when flood hazards are intensifying due to climate change and asset renewals are looming, New Zealand lacks a sustainable, long-term funding framework for one of its most critical risk management services.

The sector needs access to stable, long-term investment mechanisms that reflect the national importance of the assets and the risks they mitigate. The current absence of consistent long-term funding mechanisms for flood protection remains a strategic vulnerability.

Recommendation: Establish long-term, sustainable funding models for the river control and flood protection activity that comprise co-investment between Central Government and Local Government.

Yours faithfully,

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]