

21 July 2026

Ref: OIA26-TW16

s9(2)(a)
Via email: s9(2)(a)

Dear s9(2)(a)

Thank you for your email of 30 June 2026 requesting information under the Official Information Act 1982 (OIA) as follows:

"I request the following information held by Te Waihanga:

- 1. Any analysis, modelling, reports, briefings, or advice prepared since 1 January 2022 that compares or assesses the costs, benefits, risks, or long-term fiscal implications of major infrastructure investment (such as flood protection, drainage upgrades, stopbanks, or pumping stations) versus managed retreat or property acquisition pathways in flood-prone or coastal hazard areas.*
- 2. Any work Te Waihanga has done on the long-term Crown or ratepayer liabilities associated with managed retreat, property acquisition, or loss of ratepayer base in high-risk flood or coastal areas.*
- 3. Any advice or input provided to the Ministry for the Environment, Treasury, or other agencies regarding the comparative outcomes of infrastructure-led approaches versus retreat-led approaches in the context of the National Infrastructure Plan 2026 or related adaptation work."*

On 13 July, we responded with an email explaining that the information you are seeking is publicly available on the New Zealand Infrastructure Commission/Te Waihanga ("the Commission") website, and as a result your request is likely to be refused pursuant to section 18(d) of the OIA.

You responded on the same day with the following note:

"While the documents you have listed are relevant background material, they do not appear to fully address the scope of my request, particularly:

- 1. Direct comparative analysis of the costs, benefits, risks and long-term fiscal implications of major infrastructure investment (flood protection, drainage, stopbanks, pumping) versus managed retreat or property acquisition pathways; and*
- 2. Analysis of long-term Crown or ratepayer liabilities associated with managed retreat or loss of rateable base.*

I therefore ask that you continue to process the request. If your final decision is to refuse under section 18(d), please issue a formal decision letter setting that out clearly."

I have considered your request under the OIA. Please find my decision on your request set out below.

Response

The information identified in scope of this request, and my decision on release is provided in the table appended to this letter.

As noted in our follow up correspondence to you on 13 July 2026, the information listed is publicly available on the Te Waihanga website and as a result provision of the documents is refused pursuant to section 18(d) of the OIA.

However, in order to provide further context and address the matters raised in your subsequent email of 13 July, I advise the following:

Part 1 – The Commission has not prepared any direct analysis of the costs, benefits, risks or long-term fiscal implications comparing infrastructure investment relative to managed retreat. The *“Invest or Insure”* report (item 1 in the table) addresses the issue, but more as a framework for considering options as an infrastructure provider using illustrative case studies, rather than specific analysis for the country or a specific project.

Part 2 – The Commission has not undertaken analysis of long-term Crown or ratepayer liabilities associated with managed retreat or loss of rateable base. The figures identified in the report *“Estimating National-Scale Losses to Infrastructure from Natural Hazards”* (item 3 in the table) and our most recent publication *“When Water’s Rise”* (item 4.1 in the table) provide some evidence of the financial loss potential from natural hazard events to infrastructure and private homes over the next 70 years, but they are not specifically Crown or ratepayer liability estimates.

Part 3 – No information was identified in scope of this part of your request, and this part is refused pursuant to section 18(e) of the OIA as the information does not exist.

I trust this response addresses the information you requested. You have the right to ask the Ombudsman to investigate and review my response.

Please note that this letter (with your personal details removed) may be published on the Commission’s website.

Yours sincerely



Peter Nunns
General Manager, Strategy

Appendix: Information identified in scope of request OIA26-TW16

Item	Title/Description	Weblink	Decision
1	Invest or Insure? - Preparing infrastructure for natural hazards	https://tewaihanga.govt.nz/our-work/research-insights/invest-or-insure	Refused under s18(d) of the OIA, publicly available
2	Forward Guidance – Results and Modelling Technical Report	https://media.umbraco.io/te-waihanga-30-year-strategy/bwjdsnj3/ina-model-technical-report-for-final-plan.pdf	Per item 1
3	Estimating National-Scale Losses to Infrastructure from Natural Hazards	https://media.umbraco.io/te-waihanga-30-year-strategy/eqohx2n5/cr2025-10-national-scale-loss-estimates-to-infrastructure-final.pdf	Per item 1
4	Web page titled: When waters rise: Climate change, regional risk and infrastructure investment [Includes reference to items 4.1 to 4.3]	https://media.umbraco.io/te-waihanga-30-year-strategy/1qpbqo4v/te-waihanga-research-insights-series-flood-protection-cover-report.pdf	Per item 1
4.1	When waters rise: Climate change, regional risk and infrastructure investment	https://media.umbraco.io/te-waihanga-30-year-strategy/1qpbqo4v/te-waihanga-research-insights-series-flood-protection-cover-report.pdf	Per item 1
4.2	Estimating National-Scale Losses to Infrastructure from Natural Hazards: Phase 2 – Future Climate Scenarios, Regional Disaggregation and Flooding Impacts on Buildings	https://media.umbraco.io/te-waihanga-30-year-strategy/0bweckkr/cr2026-07-national-scale-loss-estimates-to-infrastructure-phase-2-final.pdf	Per item 1
4.3	Databook	https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fmedia.umbraco.io%2Fte-waihanga-30-year-strategy%2Fqdlpk14g%2Fesnz_flood_risk_databook.xlsx&wdOrigin=BROWSELINK	Per item 1
5	Infrastructure Priorities Programme – assessment of resilience proposal in Westport	https://insights.tewaihanga.govt.nz/insights/all/181b3e19?ipp-id=IPP-PR2-0003440	Per item 1