

## Submission: Draft National Infrastructure Plan

22<sup>nd</sup> July 2025

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Stronger together

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New Zealand Infrastructure Commission

Te Waihangā

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## **SUBMISSION TO THE DRAFT NATIONAL INFRASTRUCTURE PLAN**

<https://tewaihangā.govt.nz/national-infrastructure-plan/feedback-on-draft-national-infrastructure-plan>

### **Submission on the Draft National Infrastructure Plan**

**From:** Rosebank Business Association

**To:** New Zealand Infrastructure Commission

**Date:** 22 July 2025

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### **Introduction**

The Rosebank Business Association (RBA) represents one of Auckland's most important industrial and manufacturing precincts, located on the Rosebank Peninsula in west Auckland. With over 500 businesses contributing significantly to Auckland's GDP and employing thousands of workers, Rosebank is a vital part of the city's economic infrastructure.

We welcome the opportunity to submit on the Draft National Infrastructure Plan 2025 [Link](#) and support the Plan's intent to develop long-term, integrated infrastructure that supports climate resilience, productivity, and wellbeing. However, we believe the Plan does not go far enough to recognise or address the needs of industrial business districts like Rosebank, which are essential to national and regional economies.

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### **Key Points of Submission**

#### **1. Industrial Business Areas Require Tailored Infrastructure Investment**

The Plan focuses heavily on housing, urban centres, and national-scale infrastructure but overlooks the unique infrastructure demands of industrial precincts. Industrial areas like Rosebank need investment in:

- Heavy-duty road surfaces
- Resilient utilities (power, water, communications)
- Stormwater systems designed for impermeable surfaces
- Business continuity infrastructure during extreme weather events

These requirements differ from those of residential or commercial areas and must be acknowledged in infrastructure planning.

### 3. Support for Freight and Logistics Infrastructure

We support the Plan's goals for efficient freight movement, but it lacks clarity around regional freight corridors, access upgrades, or support for freight-dependent zones like Rosebank. Better west Auckland connectivity and freight movement infrastructure will improve supply chain efficiency, reduce emissions, and support business growth.

### 4. Digital Infrastructure Investment Must Reach Industrial Precincts

The Plan's commitment to digital connectivity and emerging technologies (e.g. fibre, 5G, IoT infrastructure) is welcomed. However, the deployment of digital infrastructure must include industrial zones such as Rosebank to unlock advanced manufacturing and smart logistics capability. Without this, the benefits of digital transformation will remain uneven.

### 5. Clarity Needed on Energy Transition Support for Business

While the Plan refers to decarbonisation, there is a lack of detail on how industrial businesses will be supported to transition to low-emission technologies. Businesses in Rosebank are exploring electric fleet transitions, on-site renewable generation, and energy efficiency upgrades but need more certainty around funding, guidance, and infrastructure upgrades to enable these shifts.

### 6. Stormwater and Flood Resilience Must Be Prioritised

Rosebank is a low-lying peninsula highly vulnerable to sea level rise and stormwater inundation. The absence of specific mention of business district climate adaptation, including flood protection and stormwater infrastructure, is an oversight. We urge the inclusion of a national programme of climate adaptation funding specifically targeted at at-risk industrial zones.

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## Recommendations

We recommend the following changes or additions to the Draft National Infrastructure Plan:

1. **Explicitly include industrial precincts as infrastructure priorities**, particularly in relation to climate adaptation, energy resilience, freight movement, and digital infrastructure.
2. **Create a funding stream for climate-resilient infrastructure in at-risk business areas**, such as Rosebank, including investment in stormwater upgrades and flood protection.
3. **Include regional freight and logistics infrastructure priorities** that support industrial precincts' connectivity and efficiency.
4. **Ensure digital infrastructure rollout includes industrial zones**, not just residential and commercial centres.
5. **Develop an energy transition roadmap and co-investment model** tailored to industrial and manufacturing businesses.

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## Conclusion

Rosebank is a nationally significant employment and manufacturing area that must be factored into long-term infrastructure planning. The Draft National Infrastructure Plan is a welcome step toward integrated and future-focused investment, but it must recognise the unique needs of industrial business

communities. We urge the Ministry to strengthen the Plan to ensure industrial precincts like Rosebank can continue to thrive in a changing climate and economy.

We welcome the opportunity for continued engagement as the Plan is finalised.

Yours sincerely,

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Executive Engagement Manager

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