06 August 2025

New Zealand Infrastructure Commission Te Waihanga

Dear Sir/Madam

Bay of Plenty Regional Council's submission to the Draft National Infrastructure Plan

Thank you for the opportunity to comment on the above submission. The Bay of Plenty Regional Council does not wish to be heard on this submission.

For matters relating to this submission, please contact [redacted] at [redacted]

Our Organisation

The Bay of Plenty Regional Council is responsible for the sustainable management of resources within the Bay of Plenty region. Our role is determined by Central Government through statutes such as the Local Government Act and the Resource Management Act and is different from that of territorial authorities (district and city councils).

Please find our detailed comments as two attachments (1. Bay of Plenty Regional Council and 2. Emergency Management Bay of Plenty). We trust you find them constructive.

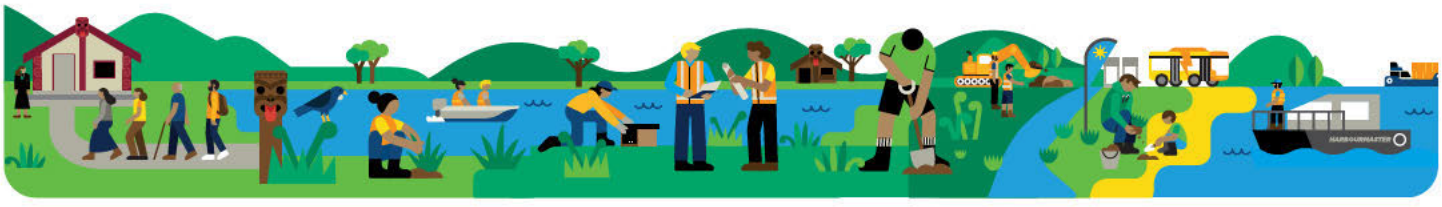
Yours sincerely

[redacted]

[redacted]

General Manager Strategy & Science

A PO Box 364, Whakatāne 3158, New Zealand P 0800 884 880 E info@boprc.govt.nz W boprc.govt.nz



Attachment 1

Bay of Plenty Regional Council appreciates the comprehensive scope of the Draft National Infrastructure Plan, which addresses key sectors such as transport, energy, education, health, and water.

The place of flood management/protection infrastructure

Across several developing infrastructure policies (such as the National Policy Direction package for the Resource Management Act) flood management/protection infrastructure (which includes stopbanks, floodgates, floodwalls, spillways and "green infrastructure) is often grouped within broader water system categories, such as wastewater and stormwater.

Figure 38 in the draft document appears to continue this categorisation – placing flood management between water/wastewater networks and solid waste infrastructure.

Flood management/protection infrastructure are central to local and regional resilience strategies, helping communities withstand and recover from extreme weather events. The role this infrastructure plays in protecting high-value and vulnerable assets appears somewhat understated in the current draft – a role that is increasing in prominence given the increasing frequency of weather events.

Appropriately identifying flood management/control infrastructure as a critical type of infrastructure will assist with a maintaining a consistent view across Central Government policy development.

"Sector" definition

From Page 129 the draft document (and later at section 7.3.1 page 135) looks at seven "sector summaries" – reflected in Figure 38.

The categorisation of "flood management" under "Waste and Water" highlights that perhaps a further sector would be useful to identify. It would be incorrect to categorise flood management as being about water management. The driver for this infrastructure is about safeguarding people, property, livelihoods, and long-term public investment.

Alongside flood protection (that manages impacts on significant areas of rural and urban areas), water storage, irrigation and drainage schemes – at different scales – create substantial value and resilience across wide areas of New Zealand. In this regard consideration could be given to introducing an 8th "sector" – see Figure 38 – that acknowledges the importance of these infrastructure types to NZ Inc export performance. A term such as "Safeguarding productivity" could identify this sector.

Benefits of infrastructure

It's great to see 'the wellbeing of future generations' is included as one of the benefits of infrastructure that should be recognised and provided for. However, more clarity and guidance on what domains of wellbeing are covered in this context are needed to avoid different interpretations of the term. The Treasury's Living Standards Framework lists12 domains of wellbeing that can be used to guide how the wellbeing of future generations can be defined.

The intent of policy P1 is to achieve objective OB1 by addressing the issue that plans and resource management decisions often do not fully recognise and enable all the benefits (including national benefits) of infrastructure and adequately weigh these up relative to local adverse effects. The benefits and local adverse effects are often measured in different metrics; therefore, more clarity and guidance on how these can be "objectively" weighted up are needed.

https://www.treasury.govt.nz/sites/default/files/2019-12/lsf-as-poster.pdf

Assessing and managing adverse effects of infrastructure

A qualifier 'where practicable' is added to the requirement for avoiding, remedying, or mitigating the adverse effects of an infrastructure proposal. The term 'practicable' can be subject to different interpretations. For instance, a measure to avoid, remedy, or mitigate an adverse effect can be considered 'practicable' by the affected people or consent planners, but 'not practicable' by infrastructure providers due to its high cost. Therefore, more clarity and guidance on how the term 'practicable' is interpreted are needed.

Further, once a measure is considered not practicable after going through the hierarchy of effects management (avoid, remedy, mitigate), it effectively means infrastructure can be developed regardless of the magnitude or cost of residual effects. Adverse effects on the environment have an implication on private or public/economic costs in the sense that the affected community or the government (local, regional, and/or central) either now or in the future will have to pay to rectify or restore the affected environment. If the residual effects are worth more than the benefits of infrastructure, the decision to develop the infrastructure is economically inefficient, which is contrary to the intent of this national direction package. This accordingly reinforces the need to have more clarity and guidance on how adverse (residual) effects can be 'objectively' weighted up relative to the benefits of infrastructure as discussed earlier.

Council recommends the following:

- Clearly identify **flood protection** and **drainage schemes** as distinct components of national infrastructure, separate from stormwater systems, to ensure their functions are appropriately recognised and supported.
- Acknowledge the strategic importance of these systems in protecting Crown and community assets, particularly in the face of increasing climate-related risks.
- Recognise the importance of "primary sector" infrastructure (flood control, water storage, irrigation and drainage schemes by identifying a specific sector within the draft plan. "**Safeguarding productivity**" is suggested as a possible term.
- Clearly specify the domains of the wellbeing of future generations as a benefit of infrastructure that decision makers must consider.
- Provide more clarity and guidance on how the benefits of infrastructure can be weighted up relative to adverse effects.
- Provide more clarify and guidance on how the term 'where practicable' in the context of avoiding, remedying, or mitigating adverse effects can be interpreted.

Attachment 2

Emergency Management BOP: Key Risks and Observations

Increasing Exposure to Natural Hazards

The Plan acknowledges that maintenance and renewal are the largest drivers of investment, and that natural hazards such as earthquakes and extreme weather are amplifying these needs. However, we note that:

- New Zealand is among the top three OECD countries for reported natural hazard damage.
- Central government has spent over $33 billion on natural hazard events from 2010–2025.
- Many public infrastructure assets remain uninsured.

Recommendation: Infrastructure investment must integrate up-to-date hazard and risk assessments. Infrastructure should be positioned, designed, and maintained with a clear understanding of hazard exposure including flood risk, seismic risk, sea-level rise, and cascading failures from critical infrastructure interdependencies.

Infrastructure Resilience and Lifelines

Infrastructure failure during disasters can impact response and recovery operations. Critical lifelines must be resilient to disruption. The plan touches on the interdependence of infrastructure systems, but clearer prioritisation of lifelines and redundancy strategies is needed.

Recommendation: The final National Infrastructure Plan prioritise resilience in critical infrastructure by adopting a cross-sector lifelines approach, informed by the expertise of Lifeline Utilities and risk assessments of Civil Defence Emergency Management (CDEM).

This should include:

- Comprehensive resilience audits of essential infrastructure networks (e.g. power, water, transport, communications)
- Interdependency modelling to identify cascading risks and vulnerabilities across sectors
- Integrated regional planning that reflects the unique hazard profiles and emergency response requirements of each CDEM Group

Climate Change and Cascading Risks

Climate driven hazards including more intense rainfall and sea level rise are increasing. The Plan acknowledges this but does not go far enough in integrating climate adaptation and managed retreat into infrastructure planning.

Recommendation: Infrastructure investment decisions must account for projected climate risk over infrastructure lifespans (50–100 years). A national framework to guide local infrastructure adaptation, aligned with CDEM and regional hazard plans should be embedded.

Emergency Preparedness and Redundancy

The plan recognises that many emergency service assets such as police, fire stations, and hospitals are outdated or underfunded, with degraded infrastructure linked to deferred

maintenance. While it prioritises hospital investment, neglecting other emergency services will significantly limit the ability of responders to support communities during emergencies.

Recommendation: The Plan should ring-fence funding for upgrading emergency service facilities and ensuring continuity of operations during disasters, including back-up systems and regional coordination hubs.

Governance and Risk-Informed Investment

The Plan identifies the lack of robust asset management practices across central government, with over half of capital-intensive agencies lacking comprehensive asset registers. From a CDEM standpoint, this undermines our ability to prepare for, respond to, and recover from emergencies.

Recommendation: Central government must be held to the same (or higher) standards as local authorities for long-term asset management planning, including integration with regional hazard and resilience strategies.

Alignment with CDEM Principles

The Plan should better align with the four R's of emergency management, Reduction, Readiness, Response, and Recovery. Infrastructure decisions must not only reduce hazard exposure but also enable faster response and more resilient recovery.

Recommendation:

- Embed the four R's in infrastructure decision-making frameworks.
- Requirement for major infrastructure proposals to undertake resilience impact assessments to make sure they can withstand natural disasters, climate change and other long-term risks.

Include a Clear and Time-Bound Implementation Pathway

The Draft National Infrastructure Plan presents a comprehensive set of recommendations. However, we note that the plan does not currently include a detailed implementation pathway outlining how these recommendations will be delivered, who is responsible and when key milestones will be achieved. From a Civil Defence Emergency Management perspective, this presents a significant risk. The lack of defined timelines, accountable agencies, and mechanisms for monitoring progress could undermine the effectiveness of resilience and risk-reduction strategies.

Recommendation:

- A phased implementation timeline (short, medium, and long term)
- Lead and supporting agencies for each recommendation
- Timeframes or indicative dates for action
- Clear links to existing frameworks (e.g. National Adaptation Plan, Resource Management reforms)
- A transparent monitoring and accountability framework

Given the urgency of many infrastructure challenges, particularly in hazard-prone regions such as Bay of Plenty, it is essential that the plan moves beyond intention to action. A clear and time-bound implementation pathway will help ensure that the plan's ambitions translate into meaningful and measurable progress.