

To New Zealand Infrastructure Commission Te Waihanga,

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Tēnā koutou,

Thank you for the opportunity to submit on the 'Draft National Infrastructure Plan' (the Plan).

The Natural Hazards Commission Toka Tū Ake (NHC) broadly supports the Plan.

In summary, we recommend the following changes to strengthen the Draft National Infrastructure Plan, to achieve its purpose and intent, as follows:

1. Ensure infrastructure does not encourage or enable development in areas of high natural hazard risk.
2. Ensure infrastructure investment follows an 'all-hazards' approach.
3. Ensure the Plan follows a holistic risk management approach.
4. Ensure the Plan consistently promotes resilience to natural hazards.

About the Natural Hazards Commission Toka Tū Ake (NHC)

The Natural Hazards Commission Toka Tū Ake (NHC) is a Crown Entity responsible for providing residential property owners (who have a current contract of fire insurance for their residential property) with insurance against damage from natural hazards covered by the Natural Hazards Insurance Act 2023 (NHI Act). NHC provides limited cover for:

- building and land damage from earthquakes, landslides, tsunamis, volcanic and hydrothermal activity, and fire following these hazards, and
- land damage only from storm or flood, and fire following these hazards.

Why NHC is providing this submission

NHC's functions, as set out in the NHI Act, include: facilitate research and education, and contribute to the sharing of information, knowledge, and expertise (with the Crown, public and private entities, and the public generally), including in relation to:

- natural hazards and their impacts,
- community resilience to natural hazards, and
- planning for, and recovering from, natural hazards.

We invest in research and education about natural hazards and are using and translating this information to support evidence-based, risk-informed policy and planning.

As NHC is the ‘first loss’ insurer for residential damage resulting from natural hazards listed in the NHI Act, NHC also carries significant financial risk on behalf of the Crown. This means that NHC has a strong interest in reducing risk from, and building resilience to, natural hazards across New Zealand.

Our focus is on ensuring long-term resilience by encouraging building in areas that will remain safe and sustainable for future generations. Developing in zones at high risk from natural hazards exposes future owners to complex and potentially hazardous situations, which could compromise the longevity and safety of these developments.

Climate change is increasing the occurrence and severity of natural hazards covered by the NHC Scheme. Therefore, we support clear, risk-based policy frameworks that reduce natural hazard risks, allow for resilient and sustainable land use planning to manage risk, and support community education and resilience towards natural hazards.

National infrastructure plays a critical role in the natural hazard resilience of New Zealand communities; therefore, the coordinated delivery of infrastructure and housing can be a powerful mechanism to ensure communities live in areas with lower natural hazard risks. New Zealand’s future is intricately connected with its infrastructure; therefore, we support infrastructure investment decisions that focus on sustainable land use planning and resilient buildings.

Our advice and recommendations are focussed on ensuring the reduction of natural hazard risk on people, property and the community when planning infrastructure investment, supporting New Zealanders to prepare for and recover from natural hazard events in the future.

We would be happy to discuss our submission. Please feel free to contact us at any time.

Yours sincerely,



Sarah-Jayne McCurrach

NHC generally supports the intent of the Draft National Infrastructure Plan

We support the intent of the Plan and its emphasis on understanding natural hazard risks to support infrastructure investment, including advocating for investment in national hazard risk models and accounting for the potential costs of natural hazard impacts in infrastructure investment planning. This will directly support resilient infrastructure, and will have co-benefits for other decisions, including for residential property.

NHC recommends the following changes to the Draft National Infrastructure Plan

We recommend the following changes to strengthen the Draft National Infrastructure Plan, to ensure it achieves its purpose and intent, and reduces the impacts of natural hazards on people, property and the community.

Recommendation 1: Ensure infrastructure does not encourage or enable development in areas of high natural hazard risk

The Plan focusses on maintaining and increasing the resilience of existing infrastructure assets. The Plan should ensure risk assessments are a requirement for new infrastructure and infrastructure upgrades to account for natural hazard risks, both directly to the infrastructure assets and to the areas they are enabling development in. This will ensure infrastructure does not enable (increased) residential property development in areas with high natural hazard risk.

The investment of infrastructure in high-risk areas can encourage or enable residential building demand, resulting in exacerbated high natural hazard risk for those communities. The Plan must ensure that its approach to infrastructure investment prioritises safer communities and does not enable (increased) residential property development in high-risk areas.

Recommendation 2: Ensure infrastructure investment follows an ‘all-hazards’ approach

The Plan focuses on specific hazards and does not explicitly advocate for all natural hazards to be considered in infrastructure decision-making. Climate change and extreme/severe weather and flooding are prominent, and earthquakes and coastal hazards are also mentioned. The supporting document that covers preparing infrastructure for natural hazards¹ contains some detail on natural hazards not in the Plan, briefly referencing tsunami and volcanic activity. Notably, landslides are not mentioned in either document.

Risk-based infrastructure investment decisions should consider all natural hazards equally, to avoid perverse investment outcomes. For example, moving infrastructure from an area of high flood risk to an area of high landslide risk.

Recommendation 3: Ensure the Plan follows a holistic risk management approach

Box 17 (P. 106) outlines ‘risk management approaches’, but this does not align with the ‘4 Rs’ approach in the CDEM Act 2002: Reduction, Readiness, Response, and Recovery. We recommend readiness, response, and recovery are included.

¹ New Zealand Infrastructure Commission Te Waihanga. (2024). *Invest or insure? Preparing infrastructure for natural hazards*. URL: <https://media.umbraco.io/te-waihanga-30-year-strategy/p3mpugxj/invest-or-insure.pdf>

Recommendation 4: Ensure the Plan consistently promotes resilience to natural hazards

In several places, the wording in the Plan could be improved to ensure the Plan is consistently promoting resilience to natural hazards. We recommend the following changes:

- P. 18: Change “...unforeseen events, like earthquakes and pandemics...”. Both events are well understood risks, so it is incorrect to describe these as “unforeseen”. We recommend this wording is changed to “...unpredictable events, like earthquakes and pandemics...”.
- P. 26, P. 109: Change “natural disaster” to “natural hazard[s]”. While still frequently used, the term “natural disaster” is widely recognised as implying that natural hazard impacts are “natural”; inevitable and not able to be reduced. We therefore discourage the use of this term, to support the view that natural hazard impacts can, and should, be avoided and reduced through risk reduction and resilience-building measures.
- P. 26: Refine the wording “building back from shocks and natural [hazard events is uncontroversial]”. Building back in high-risk locations remains a highly controversial activity, and this should be reflected in this commentary.