As of 1 July 2024, our name changed from the Earthquake Commission to the Natural Hazards Commission Toka Tū Ake. Find out more about our organisation and insurance scheme on www.naturalhazards.govt.nz

9 December 2024

resilience@naturalhazards.govt.nz

Infrastructure Commission,
Level 7, The Todd Building,
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Wellington 6011

Tēnā koe New Zealand Infrastructure Commission Te Waihanga,

SUBMISSION ON 'TESTING OUR THINKING: DEVELOPING AN ENDURING INFRASTRUCTURE PLAN'

Thank you for the opportunity to submit on 'Developing an enduring National Infrastructure Plan | He whakawhanake i tētahi Mahere Tūāhua ā-Motu auroa', which describes what the Infrastructure Commission Te Waihanga expects the National Infrastructure Plan will cover, the problem it's trying to solve, and the proposed approach to develop the National Infrastructure Plan.

The Natural Hazards Commission Toka Tū Ake (NHC) broadly supports the discussion document proposals.

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

1. ensure infrastructure does not encourage or enable development in high natural hazard risk areas;

About the Natural Hazards Commission Toka Tū Ake

NHC is a Crown Entity responsible for providing insurance to residential property owners against the impacts of natural hazards (building and land damage from earthquakes, landslides, tsunami, volcanic and hydrothermal activity, and fire following any of these hazards, and land damage only from storm or flood and fire following these hazards).

Why is NHC submitting on the 'Developing an enduring National Infrastructure Plan' discussion document?

The contingent liability associated with natural hazard risk in New Zealand is high. NHC carries much of this liability on behalf of the Crown, through its provision of 'first-loss' insurance coverage. NHC therefore, has a strong interest in reducing risk from, and building resilience to, natural hazards in New Zealand. We do this by investing in and facilitating research and education about natural hazards, and using and translating this information, knowledge and understanding to ensure evidence-based, risk-informed policy and planning.

New Zealand's natural hazard risk profile is becoming more complex as the effects of climate change become apparent. As a country, we will be exposed to more frequent and more severe weather events as a result. Managing the impacts of climate change and natural hazard risk can, and should, be complementary – mitigating the impacts of one can improve outcomes for both.

NHC supports clear planning frameworks that reduce natural hazard risks, and allow for resilient and sustainable land use planning to manage existing and future risks. Frameworks that effectively manage these risks will allow communities to become more educated and resilient towards natural hazards and lower the liability for NHC on behalf of the Crown.

Infrastructure plays a critical role in the natural hazard resilience of communities. Further, the coordinated delivery of housing and infrastructure can be a powerful mechanism to ensure communities live in areas with lower natural hazard risks.

NHC generally supports the proposals within the discussion document

We particularly support the emphasis on understanding natural hazard risks to support infrastructure investment, including advocating for investment in national hazard risk models and accounting of the potential costs of natural hazard impacts. This investment will directly support resilient infrastructure investment, but will also have co-benefits of enabling other decisions, including property development, to be informed by natural hazard risk.

NHC recommends the following change is included in the National Infrastructure Plan

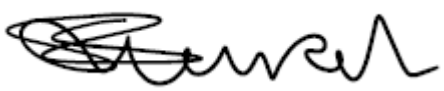
<u>Recommendation 1: ensure infrastructure does not encourage or enable development in high natural hazard risk areas</u>

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

In addition to reducing risk to communities, this approach would provide substantial reduction in potential life cycle embodied carbon costs, by avoiding widescale but periodic demolition and replacement impacts across the built environment.

Please contact us if you have any questions regarding our submission, or if we can be of help as this process continues.

Yours sincerely,



Sarah-Jayne McCurrach