

8 July 2023

Greater Wellington Regional Council submission to the Department of Prime Minister and Cabinet regarding the discussion document “*Strengthening the resilience of Aotearoa New Zealand’s critical infrastructure system*”

Greater Wellington Regional Council (Greater Wellington) welcomes the opportunity to provide comments on the Department of Prime Minister and Cabinet (DPMC) discussion document “*Strengthening the resilience of Aotearoa New Zealand’s critical infrastructure system*”.

We note that our submission is focused directly on providing feedback at a high level on the issues that directly impact Greater Wellington.

However, Greater Wellington supports the submissions made by Taituarā – Local Government Professionals Aotearoa, Te Uru Kahika – River Mangers SIG, Wellington Lifelines Group, and the Wairarapa Engineering Lifelines Association (including Wellington Region Emergency Management Office Group organisations) on issues outlined in the discussion document.

Who is Greater Wellington?

Greater Wellington represents a region that makes up three percent of New Zealand’s total land area, covering 8,111km of the lower North Island. The nonurban environment comprises approximately 80 percent of the region and approximately 525,000 people call this great Wellington Region home. The northern boundary extends from north of Ōtaki on the west coast across to north of Castlepoint on the east coast. We have a coastal marine area of 7,867km with almost 500km of coastline and 320km of rivers and waterways.

At Greater Wellington, our role is to work together for the greater environmental good to create an extraordinary region with a thriving environment, connected communities, and a resilient future. Greater Wellington is guided by legislation, including the Local Government Act 2002 (LGA) which directs local authorities to meet the current and future needs of communities for good-quality infrastructure, services, and performance of regulatory functions, in a way that is most cost effective for households and businesses.

Greater Wellington has roles in the following areas:

- Leadership in responding to climate change
- Working with our mana whenua partners
- Provision and management of regional infrastructure and services including flood protection assets to protect urban populations and productive rural land; management of regional parks; harbour management and navigational safety
- Sustainable management of natural and physical resources (land, air, biodiversity, and water) and control of pests to protect the resources on which our primary sector, export economy and quality of life are based

- Design and delivery of Metlink public transport services to the regional population; as well as owning the train fleet and maintaining public transport assets including railway stations, bus and ferry shelters, signs, and Park & Ride facilities

Flood and Erosion Protection schemes

Greater Wellington agrees with the Te Uru Kahika – River Rangers’ SIG submission that:

- The definition of critical infrastructure must include the infrastructure associated with flood and erosion protection schemes. This is separate to or additional to that which might be considered under “water services”
- A change to the regulatory environment to permit Flood and Erosion Risk infrastructure to be maintained to provide agreed levels of service in the long term would help secure infrastructure that enables sustainable productive growth into the future
- Confirmed, substantial and immediate Government co-investment into a ten-year pipeline of river flood-risk resilience-improving infrastructure, when coordinated with other flood resilience strategies, is the priority means of ensuring Aotearoa New Zealand has a secure ‘infrastructure’ platform for a productive, sustainable, and inclusive economy
- The absence of clear departmental leadership and accountability has compounded the challenge of achieving the necessary alignment of infrastructure resilience investment. There is no clear agency mandate to partner with LGNZ and Te Uru Kahika to achieve enduring resilience outcomes
- Government investment priorities in other infrastructure such as road and utilities need to align with investment in flood resilience infrastructure to optimise outcomes, for example, investment in new bridges needs to improve flood capacity as well as transport safety

As the 2023 rain events and Cyclone Gabrielle have emphasised, the infrastructure associated with river control and flood protection protects economic, environmental, and social wellbeing. This infrastructure is essential to the functioning of our society, the economy, public safety and security, and the provision of public services. Flood risk management infrastructure is an integrated risk approach including emergency management, planning and regulatory, physical infrastructure including nature-based tools.

Loss, damage, or disruption to this infrastructure has a significant impact on the lives and livelihoods of New Zealanders – as demonstrated by the recent storm events that severely prejudiced the provision of other essential services. Moreover, river control and flood protection infrastructure play a vital role in protecting other lifeline utilities. Simply stated, flood and erosion protection schemes provide infrastructure that protects other vital infrastructure.

Including river control and flood protection scheme infrastructure in the definition of critical infrastructure will enable all New Zealanders, and the communities that they reside in, to have a much higher probability of being able to continue to participate in our society and the economy, with confidence that their essential needs will be met.

Including flood and erosion protection scheme infrastructure will ensure that the strategy is consistent with:

- The Local Government Act 2002. This Act requires local authorities to develop financial and infrastructure strategies to address flood protection and river control works, along with water services and roads and footpaths, and to address asset management funding in their respective Long-Term Plans
- The Infrastructure Funding and Financing Act 2020. In this Act, eligible infrastructure includes 'environmental resilience infrastructure' for 'managing risks from natural hazards, including by avoiding or mitigating those hazards and reducing those risks' (section 8 (3) (a)). In this Act, environmental resilience infrastructure has the same legislative standing as water services infrastructure, with the latter identified as critical infrastructure in the discussion document. On that basis alone, river control and flood protection scheme infrastructure should be classified as critical infrastructure.

The current regulation environment limits the effective and efficient delivery of flood resilience to our communities. Two elements of service delivery are affected here.

Firstly, we are limited in the ability to maintain and operate critical flood risk management infrastructure. Defining this infrastructure as critical and enabling those activities required to maintain the agreed levels of service would significantly increase the security of the system to enable it to contribute to a more sustainable, inclusive and productive growth environment.

Secondly, we are limited in our ability to protect that infrastructure from inappropriate activity that reduces the ability of the flood infrastructure system to operate during an event without taking ownership of the land on which the infrastructure is located.

Changes to the regulatory environment that would be beneficial to both aspects of our activities.

Greater Wellington also agrees with and supports the additional points in Te Uru Kahika – River Mangers' SIG submission on river management and flood protections schemes.

Rail Infrastructure

Greater Wellington designs and operates the Public Transport network (through our Metlink brand) in the Wellington region. This includes train, bus and ferry public transport services. Our comments in this submission are restricted to a focus on the railway network that our public transport services operate on, which is owned and maintained by KiwiRail.

While we have an interest in the roading corridors that our bus public transport services operate on, these are owned and maintained by Waka Kotahi and the relevant local councils who are better placed to address the resilience of these corridors. We note that our bus public transport services operate on primarily local roads rather than State Highways.

Greater Wellington submits that the rail network should be specifically considered part of the critical transport infrastructure alongside roads, airports, and ports. Continued investment in the resiliency of the rail network in the Greater Wellington region and nationwide is needed to ensure that the needs of New Zealanders can be served by the rail network in the short and long term.

Greater Wellington submits that the following are resilience risks of concern for the Wellington Metro Network:

- failure of slopes and seawall assets on the Wellington Metro Network, which are not meeting modern engineering/risk standards (seismic, climate change)
- impacts of climate change/abnormal weather on the Wellington Metro Network due to lack of resilience on the network particularly - seawalls, slopes, culverts etc.
- the need to reduce speeds to manage the safety risks of structural (i.e., bridges) assets on the Wellington Metro Network, which are in poor condition, and not meeting modern engineering standards (seismic, access, climate change)
- certain assets reaching end of life – e.g., signaling and track assets

We note that these resilience risks could result in:

- discontinued rail services and/or increased poor rail services performance
- capacity constraints
- increased maintenance and renewal costs
- potential injury or death

We note that the resilience issues outlined above have been a result of a mixture of climate change/extreme weather events and historic underinvestment in good asset management practices (maintenance/renewal and improving assets to modern design standards).

Therefore, Greater Wellington submits that significant investment in the rail network by the Government (through KiwiRail) is urgently needed to mitigate these resilience risks and enable the rail network to provide the basis for a safe and reliable public transport service in the Greater Wellington region and to ensure continuation of both domestic and international freight supply chains for goods transiting the Wellington region via the Cook Strait link.

We also submit that the resilience of the rail network in the Greater Wellington region is critical to ensuring people can move around the region and are able to continue to participate in our society and the economy, with confidence that their essential needs will be met.

Electricity Network/Supply

Greater Wellington submits that the resiliency of the electricity network/supply/generation is of great importance regarding the operation of our public transport services. Greater Wellington is moving to a fully electric fleet so ensuring Aotearoa New Zealand's electricity network is resilient is crucial to allowing us to provide a reliable public transport service.

Water Infrastructure

Greater Wellington notes that we own and look after the bulk water supply network for Wellington, Porirua, Lower Hutt and Upper Hutt. This involves large water collection areas, four water treatment plants, 15 pumping stations and just over 180 kilometers of large-diameter pipelines.

Therefore, we would like to be part of any discussion/work involving improving the resiliency of water infrastructure/services in Aotearoa New Zealand.

Climate Change

Greater Wellington submits that climate change has correctly been identified as a global megatrend that is placing increasing pressure on critical infrastructure. As we have outlined above, climate change/extreme weather events are a major risk to the flood protection and rail critical infrastructure that Greater Wellington is either responsible for or provides services on. Resilience across critical infrastructure is a foundation for GW to adapt to and mitigate the effects of climate change – in particular, protecting our community from extreme flooding and encouraging our community to use low-emission public transport options.

In August 2019, Greater Wellington joined a growing community around the world by declaring a climate emergency. As part of this response, Greater Wellington set an ambitious target to be carbon neutral by 2030, which in this case means we will reduce our carbon emissions and balance the remaining emissions by establishing new forests. Alongside carbon neutrality, Greater Wellington set an even more ambitious target to be climate positive by 2035, meaning we will remove more carbon emissions from the atmosphere than we emit.

Therefore, we believe it is essential that the Government activities aimed at addressing climate change related resiliency challenges need to be coordinated by one central government agency to ensure a consistent approach is taken to relevant legislative and regulatory changes to introduce enforceable minimum standards and to clarify accountability.

Greater Wellington wishes to convey our support for DPMC work on addressing the resiliency of Aotearoa New Zealand's critical infrastructure systems and we look forward to seeing the result of this work. We are happy to discuss our submission or provide any clarification on the issues we have raised in this submission if that is useful.

Kind regards



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Greater Wellington Regional Council