

Talking Points: Julie Alexander, Representation for WWL for PC1 (HS2)

Wellington Water

1. Wellington Water's job is to deliver safe and healthy drinking water, collect and treat wastewater and ensure the stormwater network is well managed. We are owned by Wellington City Council, Hutt City Council, Upper Hutt City Council, Porirua City Council, Greater Wellington Regional Council and South Wairarapa District Council.
2. Councils own the water assets in the region and set the level of funding. They then task us to manage the infrastructure and deliver water services to communities. This is all set out in a Management Services Agreement.
3. Wellington Water has a Board of Directors and is overseen by the Wellington Water Committee which is made up of representatives from each council.
4. But, ultimately, as a Council Controlled Organisation, Wellington Water does not have the same power as councils.

Infrastructure challenges for the Wellington Region

5. The Wellington region faces significant challenges with aging infrastructure. Many water assets are near, or at the end of their operational lives, and the cost and effort to maintain and replace them is growing. This is a symptom of historical underinvestment and means that water assets in the region are aging at a rate faster than they can be replaced.
6. We are working with our client councils to develop a sustainable level of renewals to address the backlog of work we are facing across the region, and implement a proactive programme to replace these aging assets. This requires a substantial increase in the rate of renewals over a period of 25 years plus.
7. We estimate that at least 100km of pipe needs to be replaced every year for the next 30 years to address the renewals backlog and meet future needs of the region. The current rate of pipe renewals is approximately 20km per year.
8. Along with the renewals backlog, other water infrastructure challenges faced by the region are well canvassed:
 - a. Ensuring an adequate supply of drinking water over the short, medium and long term
 - b. Reducing the risk of failure of critical assets in the network as well as in the treatment plants
 - c. Reducing the environmental impacts of discharges from the network and the treatment of wastewater
 - d. Ensuring the region can grow and this is not limited by capacity in the water networks
 - e. Meeting the expectations of mana whenua and customers.

Improving environmental water quality is a strategic objective but a workable regulatory framework is required

9. Wellington Water acknowledges the need for environmental improvements, but it seeks to ensure that the targets put in place are not so aspirational that they can never be met. Fixing the aging infrastructure will go some way to achieving the proposed Target Attribute States (TAS) and Coastal Water Objectives (CWO).
10. However, as signalled in the technical evidence of Mr Foster and Mr Hutchison, additional investment will be required to achieve environmental improvements over and above the renewal program. The scale of investment required informs what can feasibly be achieved, and therefore the workability of the regulatory framework that Change 1 seeks to put in place.

Wellington Water's position for Hearing Stream 2

11. As Wellington Water advised in Hearing Stream 1, it is not actively pursuing the relief sought regarding timeframes for achieving the proposed TAS or CWO. This was on the basis that Wellington Water considers that these are essentially value judgements or political choices that would be more

appropriately addressed by Wellington Water's client councils, who decide what is affordable for their communities.

12. Wellington Water's evidence sets out practical workability challenges associated with achieving the proposed TAS and CWO.
13. Although it is not seeking changes to the timeframe associated with the TAS and CWO, Wellington Water is seeking amendments to the provisions proposed in Change 1 to provide for appropriate recognition of stormwater and wastewater discharges and to enable these activities.

Network Discharge Consent applications

14. Wellington Water applied for global discharge consents in mid-2023 from the wastewater networks and stormwater networks across the Wellington, Porirua, Upper Hutt and Lower Hutt areas. The proposed approach in the consent applications was to undertake improvements sub-catchment by sub-catchment, as network improvements cannot be made all at once.
15. The global consent applications were lodged before Change 1 was publicly notified, and therefore did not consider the amended provisions. We are now reviewing the consent strategy.

Uncertain environment for the delivery of water services

16. Proposed changes to New Zealand's regulatory framework include:
 - a. Local Water Done Well – policy settings to improve NZ's water challenges that will impact how water services are funded and delivered;
 - b. Resource Management Act 1991 system reform;
 - c. Revision of national direction – which in particular signalled changes to the National Policy Statement for Freshwater Management; and
 - d. Taumata Arowai (water services regulator) – Proposed Wastewater Environmental Performance Standards.
17. In relation to the Local Water Done Well reform program, the region is currently consulting on arrangements for new water companies, with respective Water Service Delivery plans due to DIA in September 2025.
18. It will be the new water companies, rather than Wellington Water, that will be responsible for undertaking activities that will contribute to achieving the TAS and CWO.

Rebuttal Evidence of Mr James Blyth

19. I agree with Mr Blyth that there is no readily available tool at Wellington Water's discretion to assess stormwater loading and receiving environment concentrations around PC1 in respect of the TAS.
20. In response to Mr Blyth's further comments that Wellington Water has had sufficient time to develop its own tool, I disagree. For Wellington Water to develop its own tool, Wellington Water modelling staff requested approval to use the regional council's recent contaminant models in order to align the base assumptions.
21. Wellington Water staff have sought approval and confirmation of assumptions from regional council officers on several occasions over the last few years, to no response. So whilst Wellington Water has in theory had sufficient time to develop its own model, the lack of approval has not allowed Wellington Water to proceed.
22. The only exception where approval was given is one sub-catchment, the Black Creek contaminant model that Wellington Water built as a pilot study to assess the methodology set out in the 2023 consent applications. This has been correctly pointed out by Mr Blyth.
23. Wellington Water would welcome working more closely and collaboratively with the regional council so that we proceed with the development of a model which aligns to the work GWRC have undertaken across the metropolitan area.