

Executive Summary

Wellington Free Ambulance (WFA) appreciates the opportunity to provide feedback on the Draft Wellington Region Civil Defence Emergency Management (CDEM) Group Plan 2026–2031.

WFA supports the intent of the Group Plan and its focus on strengthening regional resilience, improving coordination, and enhancing readiness, response, and recovery arrangements.

However, from an ambulance and prehospital care perspective, there are several critical areas where the plan requires further clarity, alignment, and strengthening to ensure it accurately reflects operational realities and supports effective emergency response.

Recognition of Ambulance Services as an Emergency Service

WFA strongly recommends that ambulance services be formally recognised as an emergency service within both the CDEM framework and the Group Plan.

Ambulance services are a critical front-line component of New Zealand’s emergency response system and are uniquely responsible for:

- Out-of-hospital clinical care
- On-scene triage and treatment
- Patient transport and distribution
- Medical coordination during emergencies and mass-casualty incidents
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Despite this, ambulance services are not consistently or explicitly recognised alongside Police and Fire and Emergency New Zealand within the plan.

This creates ambiguity, particularly where:

- The plan defines “Emergency Services” as Police, Fire and Emergency New Zealand, and Health
- Ambulance services are instead indirectly referenced under the health sector
- The glossary identifies ambulance services as a statutory response agency, creating inconsistency

As outlined in the National Health Emergency Plan (2015), ambulance services:

Lead the operational health response at incident scenes during mass casualty events, including triage, treatment, and transport of patients.

Recommendation:

- Explicitly recognise ambulance services as an emergency service throughout the Group Plan
- Align definitions across all sections (including glossary, roles, and governance structures)
- Reflect the operational leadership role of ambulance at incident scenes

Role Clarity Within the Health and CDEM Frameworks

The current plan places ambulance services within a broad “health” umbrella without clearly defining the prehospital care function.

This does not adequately reflect:

- The operational independence of ambulance services
- Their leadership role in field-based clinical response
- Their interface between community, incident sites, and hospitals
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Additionally, there is no clear alignment with existing sector frameworks such as AMPLANZ (2016).

Recommendation:

- Clearly define ambulance roles within both:
 - The CDEM structure
 - The health response framework
- Distinguish prehospital emergency care from hospital-based services

Coordination and Representation (ESCC and ECC)

The plan assumes broad emergency service representation across Emergency Services Coordination Committees (ESCCs).

However, WFA notes that:

- It is not operationally feasible to provide liaison officers to each ESCC during an event
- Ambulance coordination will be prioritised at the **Regional Emergency Coordination Centre (ECC)**

Recommendation:

- Acknowledge ambulance resourcing constraints
- Define a **regional coordination model** for ambulance representation
- Ensure ambulance input into decision-making is maintained at the ECC level

Capacity Constraints and Scalability

Ambulance services operate with **finite resources** and have limited ability to scale during major or prolonged events.

Within the Wellington region:

- Demand will increase significantly during emergencies
- Business-as-usual demand will continue concurrently
- Workforce and fleet capacity are constrained

Recommendation:

- Recognise ambulance services as a **capacity-limited resource**
- Include realistic assumptions about:
 - Service prioritisation
 - Reduced response capability during major events
- Incorporate ambulance constraints into regional planning assumptions

Lifelines, Fuel, and Supply Chain Dependencies

Ambulance operations are critically dependent on:

- Fuel availability
- Transport networks
- Medical supply chains

The current plan does not explicitly recognise ambulance services as:

- Priority fuel users
- Critical customers within lifeline utilities planning

Given current and emerging fuel supply risks, this is a significant gap.

Recommendation:

- Identify ambulance services / emergency services as **critical lifeline customers**
- Include priority fuel allocation provisions
- Strengthen integration with fuel and logistics contingency planning

Training and Exercising

WFA notes that:

- Exercising to date has largely been **theoretical rather than operational**
- Participation is not consistently mandated

Effective emergency response requires **practical, multi-agency exercising**.

Recommendation:

- Mandate regular, multi-agency exercises
- Include realistic operational scenarios involving ambulance services
- Ensure exercises test:
 - Coordination
 - Communication
 - Resource constraints

Intelligence Sharing and Common Operating Picture

Ambulance services are not fully integrated into regional intelligence and situational awareness systems, including **ArcGIS-based platforms**.

This limits:

- Shared situational awareness
- Real-time decision-making
- Cross-agency coordination

Recommendation:

- Fully integrate ambulance data into the **Common Operating Picture (COP)**
- Ensure access to and participation in shared intelligence platforms
- Standardise data-sharing frameworks across agencies

Consistency of Frameworks and Accountability

WFA supports the need for:

- Clear accountability
- Transparent reporting
- Consistent operating frameworks

Emergency services already utilise the **Coordinated Incident Management System (CIMS)**, and alignment across agencies is critical.

Recommendation:

- Standardise use of CIMS across all agencies
- Ensure consistent methodologies for:
 - Reporting
 - Coordination
 - Decision-making

Emma Ridley Feedback

Draft Wellington Region CDEM Group Plan 2026–2031 feedback

Ambulance services should be formally recognised as an emergency service under the CDEM Act and the Wellington Region CDEM Group plan because they are a critical, front-line component of New Zealand's emergency response system.

The ambulance service is the only agency responsible for providing out-of-hospital clinical care, triage, and medical coordination during disasters, mass-casualty incidents, and severe weather events, yet its role is not explicitly reflected in the current legislation. The ambulance sector in New Zealand, unlike many services internationally, does not have its own legislation that guides and regulates the provision of ambulance services. Recognition would strengthen national resilience by ensuring the ambulance service is fully integrated into planning, governance, and decision-making structures, enabling clearer lines of authority, more consistent resourcing, and faster, more coordinated responses.

It would also acknowledge the reality that ambulance services already operate as an essential emergency function, protecting life and supporting communities during the country's most complex and high-risk events.

The group plan outlines

Roles of key agencies in response

- Emergency Services as Police, Fire and Emergency New Zealand and Health

Emergency Service Coordination Committees

- Emergency Services Coordination Committees operate at local and regional levels to support joint planning, interoperability, and coordination between Police, Fire and Emergency New Zealand, Health.

Yet the glossary section includes 'Ambulance Services' as a statutory response agency under 'Emergency Services'

It's important to note that although Ambulance have responsibilities within the Health Sector, under the National Health Emergency Plan 2015 its states:

- The role of the ambulance sector in response to a major incident is to deliver and maintain appropriate pre-hospital clinical care and, in most cases, to make inter-hospital transfers. In a mass casualty incident, ambulance will lead the operational health response to the incident at the scene/s by managing the triage, treatment, and transport of patients.

Katie Wilson Feedback

Coordination of ESCC's

In an event WFA will not be able to provide individual liaison officers to each ESCC WFA will concentrate / operate at the Regional ECC.

Health Umbrella

Ambulance have been defined as its own emergency service but seem to be placed in the Health bucket / umbrella as part of a response. The plan doesn't define the prehospital care functions of ambulance services.

Health Frameworks

There is no relationship to AMPLANZ 2016 and how our role within the CDEM structure.

Community

Speaking for WFA only contained within the Wellington Region, ambulance resources are finite and limited in ability sustain to a scalable response.

Lifelines

Given the current fuel situation there is no reference to ambulance services or other emergency services agencies being listed as critical customers. The same applies for supply chain logistics.

Clear accountability and transparent reporting & Best practice modelling and sharing network— should all use the same framework and methodology i.e. emergency services utilise CIMS.

Training

Exercising to date has been theoretical not practical and is not mandated.

Intelligence Sharing

Ambulance are not included as part of the ArcGIS system. Need to fully flesh out the COP across all agencies.

NEMA Technical Feedback on the Wellington Group Plan 2026-2031

ID Number	Paragraph heading/Topic	Comment	Suggested Change	Page Number
1	Strategic Objectives	Strategic Objectives and their flow through the planning is very good. In places the flow-through could be clearer if they are numbered or named consistently, as it changes in places. For example 'Strategic Objectives' on p.26 become 'Priority Strategic Objective' on p.28, and the description is shorter and hard to correlate between pages. The P.21 table gives a good example of numbering that could be used consistently throughout the document.	Consider consistent numbering or wording for the Strategic Objectives as they are used in multiple places in the document slightly differently.	General Comment
2	General comment	Sometimes CDEM is used as a collective term for NEMA and CDEM Groups, such as p.70 with 'CDEM as lead agency'. Under the Act 'CDEM' is the activity rather than the agencies.	Review the use of 'CDEM' and where possible refer to CDEM Groups and/or NEMA.	General comment
3	Partnership with iwi/Māori	While it's positive to see workstreams lead and supported by mana whenua, the Plan's content is relatively light on te ao Māori compared to other recent Group Plans.	The plan would benefit from: - a clearer description of which iwi constitute mana whenua and which iwi the Wellington CDEM group hold relationships / work with - a reference to how the CDEM Group Plan gives effect to Te Tiriti - noting how iwi / mana whenua were engaged in the development of the plan.	General comment
4	Supporting documents	Limited detail on which of the other regional / local level plans / strategies this plan gives effect to, or conversely how this plan supports other plans strategies e.g. resilience / climate change adaptation.	Consider including links or references to any other key plans or strategies.	Page 8
5	Group Plan development and consultation process	The first paragraph refers to 'lifeline utility agencies' which is different from elsewhere.	Change wording to 'lifeline utilities'.	Page 9
6	Risk profile	The final paragraph notes that the Wellington Region faces risk as a connected system. However, the plan does not note the other initiatives	This could be strengthened by noting that risk reduction / building resilience is a whole of society effort and that there are activities underway to strengthen resilience at central, local government and community / individual level then noting any	Page 10

ID Number	Paragraph heading/Topic	Comment	Suggested Change	Page Number
		underway across the region to reduce risks / enhance resilience.	particularly relevant regional or local level plans / strategies e.g. climate change adaptation, river management programmes, Wellington Lifelines Project.	
7	Summary of risk analysis	One of the listed hazards is 'Lifelines', which is referred to as 'Infrastructure failure' in the National CDEM Plan.	For consistency change the hazard from 'Lifelines' to 'Infrastructure failure'.	Page 17, 18 and 71
8	Geographic characteristics of the Wellington Region	Good summary of the region and implications for emergency management. This could also include comment on levels of community readiness, similar to the 'Biggest System Challenges' identified in the 10 Year Strategy.	Include information on levels of community readiness and implications for emergency management.	Page 10 onwards
9	Lifeline dependency will shape the scale and duration of impacts	This is a good consequence to identify. It could also note the interdependency of infrastructure leading to greater impacts, which is identified later as a key consequence.	Include a mention of the interdependency of infrastructure leading to greater impacts.	Page 15
10	Lifeline dependency will shape the scale and duration of impacts	The list of lifeline examples has a different scope and list from those on p.71.	Include fuel as a lifeline on p.15, and review the examples against those under 'CDEM agencies roles in response' on p.71 to see if further consistency is appropriate.	Page 15
11	Key consequences to be managed	There has been good work to identify the consequences. As the capital city the impact on government services could also be reflected in these consequences.	Add the impact to government and public services in this section, possibly under 'Erosion of public confidence and trust' or 'Compounding and cascading system failures'.	Page 19
12	Governance, Resourcing and Accountability	"Delivery of projects in this plan will be actively monitored through established governance arrangements."	Suggest amending to clarify that you will be using the CDEM governance arrangements for monitoring of the Plan.	Page 24
13	Goal 3: Community Resilience	The first sentence "Community Resilience is about weather people, whanau, business and communities can meet their own needs and support each other in the first days of an emergency reducing harm and pressure on response agencies" reads as if the harm and pressure is on response agencies.	Suggest changing to reducing harm on communities and pressure on response agencies".	Page 38
14	Monitoring and evaluation	States that external monitoring will be undertaken primarily via the NEMA Capability Assessment Tool.	Please refer to the NEMA Assurance Programme instead of the NEMA Capability Assessment Tool.	Page 39
15	Lead and support agency roles	This section on lead and support roles is understandably described from the Group perspective. However, it might be useful to begin	Include a general description of what a lead agency is and their responsibilities.	Page 70

ID Number	Paragraph heading/Topic	Comment	Suggested Change	Page Number
		with a general description on what a lead agency is based on the National CDEM Plan section 3.		
16	Operational Arrangements	The introductory paragraph lists several national level documents, and should also include the Strategic Planning for Recovery Director's Guideline (DGL 20/17).	Add the Strategic Planning for Recovery Director's Guideline (DGL 20/17) to the list of documents the section aligns with.	Page 70
17	Roles of key agencies in response	Community Emergency Hubs are mentioned, but could be further expanded on as a key feature of Wellington's community resilience approach.	Include additional information in the Plan about the nature of Community Emergency Hubs, their role in response, and how WREMO supports them with resources and training.	Page 72
18	Summary of the levels of response	The NCMC mode is listed for each level. However, at lower levels it is more likely to be NEMAs National Coordination Centre (NCC), so this can be listed alongside the NCMC. The NCMC Mode in the first column also makes it look like this is the focus of the table and levels. It could be moved to the last column to give priority to the ECC/EOC roles and Group/local response.	Change to 'NCMC/NCC Mode' as it will not always be the NCMC. Move the NCMC/NCC Mode information elsewhere in the table to give emphasis to the Levels relevant to the Group and the ECC/EOCs.	Page 72
19	Summary of the levels of response	The distinct EOC/ECC role at each level is important to highlight for operational purposes, but is easy to overlook in one column.	Consider splitting out the EOC and ECC roles visually, such as in separate columns.	Page 72
20	Roles of key agencies in response	This section is quite similar to the table on the next page.	Consider whether the information in this section and the table on the following page can be consolidated into one section.	Page 72
21	Roles of key agencies in response	The 'Local authorities' bullet point can include support for other local authorities within the Group as well as support to lead agencies.	Add a mention of local authorities providing support to other local authorities within the Group.	Page 72
22	Levels of response and escalation	Level 3 'Declaration status' can also include declaration for more than one territorial authority.	Change to 'Possible declaration for one or more territorial authorities'.	Page 72
23	Emergency Operations Centres (EOCs)	The focus of EOCs could be expanded to include several other key functions.	Change the second sentence to "EOCs should focus on operational management, multi-agency coordination, delivery of welfare services, enabling lifeline restoration and coordinating community response"	Page 73
24	National Warning System	The wording used on NEMA's website gives a useful summary of the system.	Expand the first sentence to explain what the National Warning System is based on NEMA's wording: "The National Warning System is NEMA's online tool used to issue hazard alerts and warnings. These alerts are then picked up by other agencies and relayed through a variety of channels."	Page 76

ID Number	Paragraph heading/Topic	Comment	Suggested Change	Page Number
25	Group Controller	Outlines the requirements for Group Controller as “suitably qualified”. Section 26 of the CDEM Act 2002 states ‘suitably qualified and experienced person ’.	Suggest updating text to read suitably qualified and experienced to align with the CDEM Act.	Page 78
26	Role of local Emergency Operations Centres	A reference to lifelines can be added given the key role of local authorities in lifeline provision and connections.	Include an additional bullet point “Working with local council counterparts and lifeline utility providers to enable restoration of lifelines (e.g. water, power, roading)”.	Page 78
27	Role of Group Emergency Coordination Centres	The final bullet point should also refer to the NCC, which is often activated instead of the NCMC.	Change wording to ‘Escalating requests/issues and reporting to the NCMC/ NCC (as required)’	Page 79
28	Volunteer management	This section could be strengthened to reflect the importance of volunteers and community participation, which Wellington does well.	Expand this section reflecting types of volunteers, and what Wellington already does in this space.	Page 81
29	Procedure for declaring a state of local emergency	This section notes who will be consulted before making a declaration. This can include the NEMA Regional Emergency Management Advisor (REMA).	Add the NEMA REMA to the list of people consulted before a declaration.	Page 82
30	Procedure for declaring a state of local emergency	For consistency across Group Plans and clarity for readers the sections on declarations could include a clearer statement on who can declare a state of emergency in the Group area. If alternates have been appointed it should recognise if there is a hierarchy of who can declare.	Include a clear section on who can declare states of emergency, including alternates if they have been appointed.	Page 82
31	Neighbouring CDEM Groups	This section is relatively light.	Consider updating to include which CDEM Groups you have relationships with and if there are any arrangements in place for mutual support in response and/or BAU activities for readiness.	Page 82
32	Recovery arrangements	There is good content in this section. It could be strengthened by an introduction to recovery and explaining the operational transition from response to recovery before moving into the formal statutory transition provisions. As written it is easy to confuse operational transition, which always happens, with formal statutory transition, which isn’t always required.	Add an introduction outlining what recovery is, what a transition from response to recovery is, and then what a formal notice of local transition is (which isn’t always needed).	Page 84
33	Recovery arrangements	There is good content on operational recovery arrangements, and earlier in the Plan there are good strategic objectives and priority areas of work. However, the recovery section should be	The recovery section can be strengthened by including any strategic planning for recovery already done with communities. This may include recovery principles, recovery planning	Page 84

ID Number	Paragraph heading/Topic	Comment	Suggested Change	Page Number
		strengthened by additional strategic recovery planning content if the Group has done this work already. That would include any recovery planning already done with communities, including shared vision or outcomes.	already done with communities and any shared vision or outcomes.	
34	Recovery arrangements	The first paragraph should also include reference to the s.49(2)(ca) requirement for strategic planning for recovery.	Include a reference to the s.49(2)(ca) requirement for strategic planning for recovery in the first sentence along with s.17(1)(e).	Page 84
35	Recovery arrangements	Recovery operational arrangements are detailed, but this section should also include exit from recovery.	Include an additional section on the exit from recovery, as in the current Wellington Group Plan.	Page 84 onwards
36	Notice of national transition period	The term 'Minister of Civil Defence' needs to be updated to 'Minister for Emergency Management and Recovery'.	Change 'Minister of Civil Defence' to 'Minister for Emergency Management and Recovery'.	Page 84
37	Transitional arrangements	The lists of bullet points refer to 'Declaration powers' and then 'CDEM Act powers'. The second is the more consistently used term.	Change 'Declaration powers' to 'CDEM Act powers'.	Page 84
38	Notice of transition period	This paragraph says transition periods may be extended once, but under s.94D they may be extended more than once.	Remove 'once', as they local transition periods can be extended multiple times.	Page 84
39	Notice of local transition period	As with the declarations section, for consistency across Group Plans and clarity for readers this section could include a clear statement on who has been authorised to give notice of a local transition period, and any alternates. The paragraph also says a Group Recovery Manager can be authorised to give notice of a local transition period, but under s.25(2) it can only be representatives of the Group (i.e. elected representatives).	Include a clear section on who can give notice of a local transition period, including alternates if they have been appointed. Remove the reference to Group Recovery Managers being able to be authorised under s.25	Page 85
40	Controller handover to Recovery Manager	The steps listed could also include preparing a Transition Report. Given the different levels it could also include a Group <u>or Local</u> Recovery Action Plan.	Include preparing a Transition Report as part of the handover. Change the reference to Group <u>or Local</u> Recovery Action Plan.	Page 85
41	Group Recovery Manager and Local Recovery Managers	These sections are accurate summaries of the statutory requirements but could be phrased in a positive sense to state that the Joint Committee has made the necessary appointments.	Phrase the two sentences in a positive sense to state what appointments the Joint Committee has made for a Group Recovery Manager, alternates, and Local Recovery Managers.	Page 85 - 86

ID Number	Paragraph heading/Topic	Comment	Suggested Change	Page Number
42	Roles and responsibilities in recovery	There is some overlap between the two sections on Group and Local Recovery Managers on pages 87-88 and their similar sections on pages 85 and 86.	Consider combining the two sections about Group and Local Recovery Managers with similar sections on pages 85 and 86.	Pages 85 to 88
43	Wellington CDEM Group Recovery Structure	The diagram seems to simultaneously show possible Group and local recovery arrangements, though they would potentially be hierarchical in a significant recovery. Consider whether to separate the possible local and Group recovery structures, or include additional explanation of the diagram	Give further clarity on how the diagram shows Group and Local Recovery structures, either by separating them or providing more narrative to work with the diagram.	Page 87
44	Wellington CDEM Group Governance	Joint Committee membership is not listed whereas CEG membership is. It is unclear who the mana whenua representative are. The Joint Committee's role is not described whereas the CEG's is.	Outlining Joint Committee membership and clarifying who is eligible to be a mana whenua representative. Expand the description of the Joint Committee so the Plan gives a clear overview of their role to the reader.	Page 91
45	Administering authority	The section about the WREMO is conflated with the administering authority section and is very brief.	Consider giving WREMO its own title to make this a separate section and providing more detail about the role of the Group Office. For example, consider Nelson Tasman Group Plan , page 27.	Page 93
46	Delegated Authorities	This CDEM Act sections provided for some powers are incorrect.	Update Act sections to correct numbering. Power to require information – S76 Group Controller powers – S86 - S94	Page 93 - 94
47	Administering Authority	This section notes the funding of WREMO by Group members, but could provide additional information on the apportionment to meet s49(2)(e).	Include an explanation on the basis for apportionment of costs between councils, similar to what is in the current Group Plan on page 108.	Page 93
48	Cost recovery and reimbursement	This section can refer to the Guide to the National Plan which includes further detail.	Add a reference to section 33 of the Guide to the National CDEM Plan for additional information.	Page 95
49	Definitions	Lifeline Utilities omits some lifelines captured under the CDEM Act.	Use the examples from the CDEM Act.	Page 109

Submission on the Draft Wellington Region CDEM Group Plan 2026–2031

From Inner City Wellington (ICW) Residents' Association
for Te Aro and Wellington Central

Introduction

More than 17,000 people now live in apartment buildings in central Wellington, making high-density living an important part of the region's emergency preparedness landscape.

Inner City Wellington (ICW) is the residents' association for Te Aro and Wellington Central. Our inner-city community includes more than 17,000 residents, the majority of whom live in the over 125 multi-storey apartment buildings in 'our patch'.

ICW is a volunteer organisation working to support a safe, resilient and connected inner city. We appreciate the opportunity to comment on the Draft Wellington Region Civil Defence Emergency Management (CDEM) Group Plan 2026–2031.

Summary of Submission / Recommendations

Inner City Wellington recommends that the final CDEM Group Plan:

1. **Recognise the importance of high-density residential communities**, including multi-storey apartment buildings, within regional emergency preparedness planning.
 2. **Support initiatives that strengthen building-level preparedness** and neighbour-to-neighbour resilience within apartment buildings.
 3. **Incorporate support for the planning of designated areas** - reflecting the possibility that many apartment residents will not be able to shelter in place following a major disaster.
 4. **Recognise Inner City Wellington as a stakeholder** representing apartment residents in central Wellington.
 5. **Consider trialling a small pilot programme**, such as the Lifeboat Buildings concept, to test practical ways of strengthening preparedness within apartment communities.
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Key Recommendation

Inner City Wellington (ICW) recommends that the final CDEM Group Plan explicitly recognise the role of high-density residential communities, including multi-storey apartment buildings, in community preparedness and early response during emergencies.

A single apartment building can be home for several hundred residents. As Wellington grows upward, emergency preparedness planning must also adapt to support the resilience of the thousands of people living in inner-city multi-storey residential buildings.

Through our **“Lifeboat Buildings” initiative** — an approach that encourages apartment communities to strengthen neighbour-to-neighbour preparedness and self-reliance during the initial period following a disaster — Inner City Wellington has been exploring this issue for several years.

Recognising ICW as a key stakeholder in the CDEM Group Plan process would enable this work to inform the development of practical initiatives and accelerate progress on improving preparedness within apartment communities.

Context: High-Density Living in Wellington

Wellington’s exposure to significant natural hazards, particularly earthquakes, means that ensuring apartment residents are prepared to support one another in the immediate aftermath of an event is an important part of regional resilience planning.

We believe that central Wellington has one of the largest concentrations of apartment living in New Zealand. Thousands of residents live in multi-storey buildings where daily interaction with neighbours may be limited. Their emergency readiness will directly affect the safety and wellbeing of their community of residents. As well, this readiness could also support assistance planning for those visiting the central city at the time of a major incident.

Apartments as small community hubs

When considering apartment living, in a major emergency such as a large earthquake, many residents may be unable to leave their building immediately due to:

- damaged stairwells
- loss of lifts
- blocked streets
- building safety checks
- limited mobility of some residents

In these circumstances, the apartment building itself may temporarily function as a **small community hub** where residents rely on each other for support. This should be recognised and supported.

Short term evacuation and distribution planning

However, there may also be situations where apartment residents are **unable to safely shelter in place**. Following a major disaster, it may be necessary for some residents to evacuate their building due to structural damage, fire risk, or loss of essential services. They may then need to wait for a period of time for their building to be inspected and assessed as suitable for their return.

To support advanced planning for this issue, ICW can contribute local knowledge from its inner-city residents networks to assist in identifying **potential designated locations** where residents are likely to gather to receive assistance, advice or for the distribution of supplies.

We have incorporated this into our **Lifeboat Buildings** initiative by including the surveying of the immediate area around an apartment building to consider aspects such as local businesses that might be able to assist with shelter or supplies, locations capable of providing shelter for a period of time, and local skills that may be needed in an emergency.

This pre-emergency and evacuation planning could support pro-active CDEM actions such as supporting the installation of water storage containers and the pre-positioning of essential tools in large sites such as inner-city churches and halls.

Building human and social resilience

Wellington has invested significantly in improving the **resilience of buildings** through earthquake strengthening and building safety programmes. Supporting preparedness within apartment communities would complement these efforts by strengthening the **human and social resilience** of the people living inside these buildings.

This ensures that physical building resilience is matched by community preparedness.

While the draft plan discusses community preparedness in general terms, we believe it does not yet clearly recognise the unique characteristics and needs of high-density residential environments.

Building-Level and Hyper-local Resilience

Apartment buildings can function as **units of resilience**, where neighbours are able to support each other and share information and resources in the immediate aftermath of a disaster. Challenges may include:

- limited interaction between residents
- lack of established communication channels within buildings
- varying levels of preparedness among residents

For emergency services, additional challenges may include:

- the lack of a key contact register for apartment buildings
- inability to enter buildings controlled by security-access doors
- no information about residents who may require specialist assistance

Simple initiatives can significantly improve resilience, such as:

- encouraging residents to know their neighbours
- establishing basic building contact list
- identifying residents who may require assistance
- maintaining small shared emergency supply kits within buildings
- encouraging the building of internal communication groups (for example using WhatsApp or similar)
- providing guidance on preparedness for apartment residents
- Initiating hyper-local surveying for support opportunities
- supporting evacuation preparedness and practice.

To achieve this we believe a co-ordinated approach is needed that includes Inner City Wellington as a grassroots-level organisation.

Proposed Pilot Programme: “Lifeboat Buildings”

Inner City Wellington has been developing a concept known as “**Lifeboat Buildings**.”

The concept is simple: in a major emergency, apartment buildings may temporarily function as “lifeboats” for their residents during the period immediately following a disaster when communities may need to rely on their own resources before wider assistance becomes available.

Strengthening neighbour-to-neighbour connections within apartment buildings can play an important role in supporting residents during this early period.

In addition, the immediate area around an apartment building might be able to support its residents. Our **Lifeboat Buildings** model includes exploring locations, businesses, expertise and resources that could potentially support a hyper-local neighbourhood response.

Under a potential pilot programme, participating buildings could trial simple preparedness measures such as:

- encouraging residents to meet neighbours on their floor
- developing basic communication methods within the building
- identifying residents who may need assistance
- placing Per Floor Emergency Kits in common areas (the kits could, for example, include basic emergency tools, torches, gloves, water purification tablets, masks, basic first aid items, rope, a wind-up radio, a power bank, and large size strong plastic bags) to acknowledge and respond to the fact that many inner-city apartments are too small to store all the items recommended by WREMO
- surveying local businesses and locations, and initiating conversations, to explore and identify potential emergency-related locations and assets in the immediate area.

A pilot programme would align closely with the plan's emphasis on strengthening community resilience and supporting locally led preparedness.

The lessons from such a pilot could help inform future guidance for apartment communities across the Wellington region.

Suggested Implementation Approach

A practical way to begin could be for Inner City Wellington and regional emergency management staff to work together with one or two volunteer apartment buildings in central Wellington to trial small-scale preparedness initiatives and identify practical lessons.

Insights from such a pilot could then inform future guidance for apartment residents across the Wellington region.

This work may also complement initiatives underway with colleagues in inner-city residential Auckland who are exploring similar preparedness approaches.

Suggested Addition to the Plan

ICW suggests that the final plan include a brief acknowledgement such as:

- *In high-density urban areas, multi-storey residential buildings can function as important community units for preparedness and early response during emergencies.*

Including such a reference would help ensure that future resilience initiatives appropriately reflect the needs of Wellington's growing apartment communities.

Partnership with the Community

Inner City Wellington would welcome opportunities to work collaboratively with regional emergency management staff on initiatives that support preparedness in apartment communities.

As the residents' association for central Wellington, ICW regularly engages with apartment residents, building committees and local community networks, providing a practical channel for communication and collaboration with inner-city communities.

Our organisation has strong connections with residents and apartment buildings across the inner city and is well placed to assist with community engagement and pilot initiatives.

Conclusion

The Wellington Region faces significant natural hazard risks, particularly from earthquakes. Ensuring that all communities are well prepared is therefore critical.

Recognising the role of high-density residential communities within emergency preparedness planning will help ensure that the growing number of people living in apartment buildings are better equipped to support each other when it matters most **and help protect the safety and wellbeing of inner-city residents.**

ICW appreciates the opportunity to contribute to the development of the CDEM Group Plan and looks forward to ongoing engagement on strengthening resilience within Wellington's inner-city communities.

As Wellington continues to grow as a high-density city, ensuring that apartment communities are well prepared will be an increasingly important part of building a resilient region.

Rev Stephen King

Chair

Inner City Wellington Residents' Association

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submission 4

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Respondent

6 Anonymous

59:13

Time to complete

About You

1. Please provide your full name *

Rae Hughes (on behalf of South Wairarapa Whenua Action Group aka SWWAG)

2. Please provide the name of your organisation (**only** if you are submitting in their behalf)

SWWAG

3. Do you wish to make an oral submission to the Committee (The hearings are scheduled for 24 April)

Yes

No

4. Please provide either an email address or contact phone number to schedule the oral submission *

swwagcontact@gmail.com

Overall Direction and Clarity

5. Overall, the purpose and direction of the Group Plan is clear? *

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

6. Does the Plan clearly explain why the region is shifting to a consequence-based, "most likley plus" approach? *

- Yes
- No

7. The 10 key consequences (from the Risk section of the Plan) identified reflect the most significant risks facing the Wellington Region? *

- Strongly Agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

8. Any further comments relating to the questions in this section?

Your proposed consequences are extensive and complete as it refers to our natural environment. What we are struggling to see in these is how these consequences consider the risks and hazards arising from new technologies as well as existing used or moth-balled infrastructure. Examples are: industrial solar generation power schemes, fertilizer plants, Battery Energy Storage Systems (BESS).

Although we totally support this being "Wellington" focused, but we need to take into account overseas experience with these newer and refreshed technologies.

Strategic Goals and Priorities - Goal 1 Managing Risk

9. How practical do you find the proposed initiatives (e.g. Regional Hazards and Consequence Risk Register, Shared Risk Communication) *

- Very Practical
- Somewhat Practical
- Not Practical

10. Do you have an specific thoughts on the **Table: Managing Risk - Priority areas of work** (allocation of lead agency, timing etc.)

We would recommend a priority area is reviewing how emergency management can work within the review of new technologies and other localised issues around existing built environment or proposed extensions.

Strategic Goals and Priorities - Goal 2 Effective Response and Recovery

11. Does the Plan clearly describe how response and recovery will work across agencies and boundaries? *

- Yes
- Mostly
- No

12. How confident are you that the proposed initiatives will achieve the desired outcomes (e.g. Improve interoperability, strengthen workforce) *

- Very Confident
- Somewhat confident
- Neutral
- Not so confident
- Not confident

13. Do you have an specific thoughts on the **Table: Effective Response and Recovery - Priority areas of work** (allocation of lead agency, timing etc.)

To beat our own drum, emergency management is going to need to work with the impact on new technologies and other localised existing built environment or proposed extensions. This should be part of the original design so that, when the "big one" hits or another Cyclone Gabriel hits, emergency responders can respond effectively and efficiently with minimal damage to the environment.

Strategic Goals and Priorities - Goal 3 Community Resilience

14. Does this Plan strike the right balance between community-led action and formal emergency management? *

- Yes
- Mostly
- No

15. How well does the plan reflect the desired outcomes (e.g. Māori partnership, support for disproportionately affected communities, household and neighbourhood preparedness)? *

- Very well
- Adequately
- Poorly

16. Do you have any specific thoughts on the **Table: Community Resilience - Priority areas of work** (allocation of lead agency, timing etc.)

Please see our previous comments.

17. What barriers do you see for communities being able to fulfil the role described in the Plan? *

Cost and engagement with WREMO. Recognition that their voice - regardless of how experienced - does have a voice. A volunteer should be welcomed even just as hands and feet - but too often coordinators and officers just see the inexperience. Having effective training processes - with clear explanations as to "why", "what", "how" - with progression through various tasks to gain proficiency.

18. Any further comments relating to the questions in this section?

No answer provided.

Roles, Responsibilities, and Delivery

19. Are the roles and responsibilities across governance, lead agencies and supporting partner agencies clear? *

- Yes
- Partially
- No

20. Are the priorities and timeframes realistic given current capacity and resourcing? *

- Yes
- Somewhat
- No

21. Any further comments relating to the questions in this section?

No answer provided.

Equity, Te Ao Māori, and Trust

22. How effectively does the Plan embed: *

	Very effectively	Somewhat effectively	Somewhat ineffectively	Not effectively
Te Ao Māori and mātauranga Māori	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Equity and disproportionate impacts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trust, transparency and accountability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

23. Any further comments relating to the questions in this section?

No answer provided.

Monitoring, Learning and Improvement

24. Are the monitoring and evaluation approaches sufficient to track progress and outcomes? *

- Yes
- Partially
- No

25. Does the Plan support a learning culture? *

- Yes
- Somewhat
- No

26. Do you have any specific feedback on the proposed indicators?

No, these are clear.

27. Any further comments relating to the questions in this section?

No answer provided.

Final Reflections

28. What do you see as the greatest strength of this Plan?

Thank you for this opportunity to comment on your draft Wellington Region CDEM Group Plan 2026-2031.

We would first compliment the team who have developed this draft document. It is well laid out and easy to follow as to scope and intentions. SWWAG would support these aims and objectives.

The greatest strengths are that (1) there IS a plan, (2) recognizes the similarities and differences between the sub-regions in "Wellington" (3) this builds on a number of years of experience and (4) creating a more holistic view of risk identification, management and recovery.

29. What is the most significant risk or gap that still needs to be addressed?

SWWAG is a group of Wairarapa residents who have been opposing the proposed Far North Solar Farm Greytown industrial solar power scheme. This scheme is proposed for productive agricultural land and, after FNSF denying it in the Environment Court, a Battery Energy Storage System (BESS) is now proposed for near the same site.

(Please note that a consent application for this BESS has not been lodged but Transpower have been told it will be and have identified it in their "Generation and energy storage connection pipeline" with:

STATUS = Detailed Design

CONSENTED = Application Expected

ESTIMATED CONNECTION LIVENING DATE = 1/05/2028.)

The land under the proposed solar power scheme is typical of the Wairarapa as you have outlined in your draft Plan. There are significant aquifers and recently discovered fault lines that should have been considered in the proposal. Our group raised concerns around the management of risk and any emergencies arising from this proposed scheme in the Environment Court – including around contamination of the land and aquifers through damage to the solar panels through storms, winds, earthquakes, fire and general weathering through the years.

A BESS is of even more concern – with similar modes of contamination. Further, there is no real management of fires in these installations except to "let it burn" (containment) with little regard to the toxic smoke and other toxic particles that will contaminate the adjacent populations, land, and the conjoined aquifers under the Wairarapa. Both the schemes at Greytown and Masterton will have BESS neighbouring population centres.

These "new" technologies present risks to the environment – both built and natural – as well as to the people that live and work within those environments. This is not addressed in your framework.

30. Any other comments or suggestions?

We would consider that your framework should include assessing the risk (and how to manage and mitigate those) of new technologies taking into account the impact of the natural hazards that underlie the Wellington region. This should be based on international studies and be completed prior to any new technology being consented or adopted. The adequacy of fire fighting staffing, their training and equipment need to be considered.

About you

31. Which council area do you currently live in? *

- Wellington City Council
- Porirua City Council
- Kapiti Coast District Council
- Hutt City Council
- Upper Hutt City Council
- South Wairarapa District Council
- Carterton District Council
- Masterton District Council
- Other

32. What ethnic group do you belong to? *

- New Zealand European
- Māori
- Samoan
- Cook Island Māori
- Tongan
- Niuean
- Chinese
- Indian
- Collective group

33. What is your gender? *

- Male
- Female
- Collective group

34. What is your age group? *

Under 18

18-24

25-34

35-44

45-54

55-64

65+

submission 5

[View results](#)

Respondent

4 Anonymous

76:09

Time to complete

About You

1. Please provide your full name *

Leon Cassidy

2. Please provide the name of your organisation (**only** if you are submitting in their behalf)

Omega Networks

3. Do you wish to make an oral submission to the Committee (The hearings are scheduled for 24 April)

Yes

No

4. Please provide either an email address or contact phone number to schedule the oral submission *

[REDACTED]

Overall Direction and Clarity

5. Overall, the purpose and direction of the Group Plan is clear? *

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

6. Does the Plan clearly explain why the region is shifting to a consequence-based, "most likley plus" approach? *

- Yes
- No

7. The 10 key consequences (from the Risk section of the Plan) identified reflect the most significant risks facing the Wellington Region? *

- Strongly Agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

8. Any further comments relating to the questions in this section?

The consequence-based approach is sound and well-justified. However, Consequence #1 (prolonged loss of lifeline services) and Consequence #4 (breakdown of emergency coordination and situational awareness) are treated as parallel when in practice #4 is frequently a direct result of digital infrastructure failure within #1. The plan correctly identifies that when power, communications, or digital platforms are disrupted, coordination capacity degrades even when physical resources are available; but, it stops short of recognising that digital connectivity/infrastructure sits at a foundational layer beneath the other lifelines.

The question the plan should address: What does the region define as "telecommunications" in the lifeline context?

Does this capture only the physical network, or does it extend to the digital infrastructure. The platforms, services, data, and coordination tools that the emergency management system and community resilience actually depend on?

If it captures only the network, then there is a gap in how the plan accounts for the fabric of digital services that sits on top of that network. This is not a theoretical distinction. A community can have its telecommunications link restored and still be digitally isolated if the systems at either end cannot authenticate, process, or serve. This has implications for investment prioritisation, ownership models, and the plan's Goal 3 aspiration for community self-sufficiency - communities cannot be self-sufficient if their digital services layer is owned and hosted externally, beyond their control.

This is not a novel recommendation. Internationally, comparable frameworks have already made this structural shift. FEMA (US) treats Communications as a standalone lifeline with five defined sub-components (Infrastructure, Responder Communications, Alerts/Warnings/Messages, 911/Dispatch, Finance). The EU CER Directive (2022/2557) established Digital Infrastructure as one of eleven critical sectors with mandatory resilience plans. Canada established the Canadian Forum for Digital Infrastructure Resilience (CFDIR) after the 2022 Rogers outage brought down 911 and national payment systems. The ITU's National Emergency Telecommunication Plans, adopted across the Pacific including Fiji, structure digital/telecommunications across all disaster management phases. New Zealand's own experience in Christchurch 2011 demonstrated the gap: 111 went down, liquefaction destroyed buried fibre, and network congestion made communications functionally useless under our current framework.

We submit that digital infrastructure warrants consideration as a distinct lifeline category, or at minimum an explicit sub-category within the telecommunications lifeline, with its own resilience requirements and planning considerations, consistent with the direction taken by comparable international frameworks.

Strategic Goals and Priorities - Goal 1 Managing Risk

9. How practical do you find the proposed initiatives (e.g. Regional Hazards and Consequence Risk Register, Shared Risk Communication) *

- Very Practical
- Somewhat Practical
- Not Practical

10. Do you have any specific thoughts on the **Table: Managing Risk - Priority areas of work** (allocation of lead agency, timing etc.)

Digital infrastructure resilience is not represented as a project or cross-cutting enabler in this table, yet every project listed depends on digital systems to deliver its outcomes. We recommend recognising digital infrastructure as an intertwined layer that feeds all projects under this goal, with explicit governance for how systems are procured, managed, and supported across council services. On lead agency allocation: the digital infrastructure layer should be co-built by GWRC and WREMO, with individual territorial authorities able to co-build onto it, leverage it, and own and operate their own implementations. WREMO can then run its regional coordination services on top of that shared fabric. This is a disaggregated model - shared standards and templates, locally owned and operated, regionally coordinated. On the lifelines advocacy project specifically: we support the intent but question whether advocacy alone is sufficient. Rather than each council independently procuring solutions from the same vendors for the same outcomes, the region should collectively develop shared standards and templates that external utilities and councils validate against, test, integrate, and co-build. If one council (e.g. Porirua) develops and proves a capability, that work should be available for the region to extend, not replicated at full cost by each subsequent council. A copy-left approach to public infrastructure resilience would deliver better outcomes at lower collective cost, while still allowing individual councils to invest ahead of others where they choose to. We acknowledge this may be more technical than the scope of this document intends, but the principle should be established here: digital infrastructure needs its own governance, standards, and coordination as a cross-cutting enabler; even if the technical delivery sits in implementation plans beneath this Group Plan.

Strategic Goals and Priorities - Goal 2 Effective Response and Recovery

11. Does the Plan clearly describe how response and recovery will work across agencies and boundaries? *

- Yes
- Mostly
- No

12. How confident are you that the proposed initiatives will achieve the desired outcomes (e.g. Improve interoperability, strengthen workforce) *

- Very Confident
- Somewhat confident
- Neutral
- Not so confident
- Not confident

13. Do you have any specific thoughts on the **Table: Effective Response and Recovery - Priority areas of work** (allocation of lead agency, timing etc.)

On Community Emergency Hubs: The project is scoped as a governance and integration exercise - connecting hubs to community organisations and clarifying their role alongside formal emergency management. This is necessary but not sufficient. The plan should define minimum infrastructure standards for what a hub needs to be functional during prolonged community isolation: resilient connectivity, local processing capability, power independence, and critically, the functional capabilities that must be present. The plan describes community isolation as a top consequence and expects communities to be self-sufficient in the early days; but, a hub without defined digital capability is just a building with a sign on it. On the shared digital hub for training and workforce capability: This project is scoped as a content repository - a library of training materials. It should be reconceived as an operational platform that serves training and workforce visibility in peacetime and transitions to operational coordination during events. It should be built to withstand the region's specific vulnerabilities. For example, a water engineer outside the Wellington Region does not need access to local infrastructure plans, so why enable that access? Reducing the attack surface reduces both cyber threat and emergency exposure. Built for the emergency, running day to day. On the recovery transition systems and tools: This project should be explicitly aligned with NEMA's Emergency Management Sector Operating System rather than treated as a standalone local procurement. Without this alignment, the risk is that procurement briefs are written in abstract functional language: "a hub with improved access to training and visibility of regional capability", rather than specifying the technical architecture required: decentralised identity management, local processing, resilient data access. When technical requirements are absent from the governance layer, they arrive as afterthoughts and undermine the system they're meant to support. A concrete example: Under the Seven Islands scenario, each isolated area loses connectivity to centralised systems. Consider Johnsonville; a community facility like Waitohi, which would be a natural gathering point for isolated residents, could be activated as a Community Emergency Hub. But if the security access management platform is hosted in Thorndon and the link is down, no new access cards can be issued. Relief staff, contractors, and volunteers cannot be credentialed to enter the facility. The council must then resource physical security at every community site, competing for guards with banks, government agencies, and enterprises who face the same problem. The cost in recovery resources and time is significant, and it is entirely preventable through decentralised identity management within each island. This is not a fault of technology, it is a governance failure that manifests as an infrastructure failure that manifests as a recovery delay. Technical architecture must be addressed at the governance layer of this plan, or it will continue to be the silent dependency that determines whether these well-designed processes actually function under pressure.

Strategic Goals and Priorities - Goal 3 Community Resilience

14. Does this Plan strike the right balance between community-led action and formal emergency management? *

- Yes
- Mostly
- No

15. How well does the plan reflect the desired outcomes (e.g. Māori partnership, support for disproportionately affected communities, household and neighbourhood preparedness)? *

- Very well
- Adequately
- Poorly

16. Do you have any specific thoughts on the **Table: Community Resilience - Priority areas of work** (allocation of lead agency, timing etc.)

On "Connecting existing community networks": The plan uses "networks" to mean social networks - community organisations, NGOs, neighbourhood groups. But those social networks depend on actual networks to function during an emergency. The community organisation that coordinates volunteers needs communications. The neighbourhood group that checks on elderly residents needs information. The plan talks about making these networks visible and connected but does not address connected through what. What does digital self-sufficiency look like at the community level? It means being able to access essential services and information without depending on systems hosted outside your community. What does lifeline self-sufficiency look like? It means having visibility of lifeline status and the ability to act on it locally. Both require the same thing; local digital infrastructure that functions independently when external connections are degraded. We need to connect all the networks - water, council infrastructure, the digital backbone - through one platform for all applications to run on, decentralised across jurisdictions, with real-time compliance validated by both the lead agencies and the community. The "connecting community networks" project should explicitly address the digital infrastructure that makes social connection operationally functional under emergency conditions. The community-led action framework project is the most resource-intensive and broadest-scoped project in the entire plan. Its success depends entirely on whether communities have the infrastructure to actually exercise the agency the framework describes. A framework without infrastructure is an invitation without the means to attend.

17. What barriers do you see for communities being able to fulfil the role described in the Plan? *

Ownership. If communities do not feel like they own the systems and infrastructure that serve them, if they feel like they are being extracted from rather than invested in, then engagement will not follow. The plan can design the most inclusive frameworks and the most well-intentioned programmes, but if the underlying infrastructure is owned externally, controlled by vendors, and operated as a service delivered to communities rather than by them, the result will be passive consumption rather than active partnership.

The community needs to build it. That is how you foster innovation, develop local capability, and create genuine accountability. The alternative is a top-down system that a few people control and everyone else disengages from. Community resilience requires community ownership - of the data, of the platforms, of the infrastructure. Without that, the plan's aspiration for communities as "system partners, not just recipients of support" will remain aspirational.

18. Any further comments relating to the questions in this section?

You cannot enable community resilience if the infrastructure itself is not resilient. The plan asks communities to prepare, respond, and recover with support from but not dependence on the formal system - yet every mechanism for community action described in the plan depends on digital infrastructure that the community does not own, does not control, and that is among the first things to fail in the scenarios the plan is designed for. The infrastructure must be resilient before the community built on top of it can be. This is the foundational gap in Goal 3.

Roles, Responsibilities, and Delivery

19. Are the roles and responsibilities across governance, lead agencies and supporting partner agencies clear? *

- Yes
- Partially
- No

20. Are the priorities and timeframes realistic given current capacity and resourcing? *

- Yes
- Somewhat
- No

21. Any further comments relating to the questions in this section?

The organisational structure on pages 40-47 describes governance layers from the Joint Committee through CEG to WREMO and territorial authorities - as human roles with human reporting lines. This is necessary but incomplete. These layers are also data flows and system interfaces. A lifeline utility coordinator's role, in operational terms, is to plumb into the lifeline utility agency's systems, aggregate status, and surface that to the coordination layer. Whether that is done by a person making phone calls or an AI agent querying a platform API, the underlying requirement is the same: a digital platform architecture that supports those flows.

As these roles scale from local to regional to national, each layer needs to tap into the digital platforms of the layers below and above - local body systems feeding regional coordination, regional coordination feeding national oversight, and vice versa depending on the dataset. The plan does not address this architecture at the governance level, which means it will be addressed ad hoc at the implementation level, council by council, with predictable interoperability failures.

On iwi governance:

The plan references Te Ao Māori principles and partnership with mana whenua throughout the document, yet iwi are not structurally embedded at the governance layer where decisions about data, systems, and long-term stewardship are made. Principles of data sovereignty, guardianship (kaitiakitanga), and intergenerational thinking should be foundational to the digital architecture, not an overlay applied after procurement decisions have been made.

This extends to digital generational thinking:

Councils routinely discard their digital infrastructure and rebuild every five years, with little continuity architecture and institutional memory carried forward. This is the opposite of intergenerational stewardship. If the plan is serious about embedding Te Ao Māori, it needs to address how digital systems are governed, owned, and sustained across generations - not just how iwi are consulted during the planning phase.

On monitoring:

The current model is inquiry-based, periodic reports generated through the governance chain on request. There is no live operational visibility of readiness, capability status, or lifeline health. If the plan's own monitoring cannot show what is working in real time, the systems built under it will inherit the same limitation. The plan should establish the expectation of continuous, always-on visibility as a governance requirement, not a technology feature to be added later.

Equity, Te Ao Māori, and Trust

22. How effectively does the Plan embed: *

	Very effectively	Somewhat effectively	Somewhat ineffectively	Not effectively
Te Ao Māori and mātauranga Māori	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Equity and disproportionate impacts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Trust, transparency and accountability	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

23. Any further comments relating to the questions in this section?

The plan describes itself as both a governance document and an operational foundation. The question this section raises is whether that foundation has actually been laid for equity, Te Ao Māori, and trust, or whether these are aspirational overlays on a structure that does not yet support them.

On the evidence across the document: there is limited embedding, and we acknowledge the region is getting better. But these principles are not yet advocated for and designed into the plan's architecture. The plan does not address data ownership at any point. It does not define how disproportionate impacts are measured or how resources are allocated when lifelines fail across diverse communities simultaneously. It does not establish trust as a design principle for the systems it proposes to build.

The plan's own framing asks four fundamental questions: what risks are we planning for, what outcomes are we seeking, what roles do partners have, and what work will we prioritise. A fifth question is missing: on what foundation will all of this be built? The plan claims to be an operational foundation, but the digital infrastructure that makes governance operational, that makes equity measurable, that makes trust verifiable, and that makes partnership with Māori meaningful at the systems level, that foundation is not addressed.

If Te Ao Māori is to be genuinely embedded, then intergenerational stewardship must extend to the digital layer. Councils routinely discard their digital infrastructure and rebuild every five years. This is fundamentally incompatible with intergenerational thinking. The plan should require that digital infrastructure decisions are made with a generational lens, governed with kaitiakitanga principles, and designed so that the knowledge and capability built today is available to the communities that inherit these systems tomorrow.

Monitoring, Learning and Improvement

24. Are the monitoring and evaluation approaches sufficient to track progress and outcomes? *

- Yes
- Partially
- No

25. Does the Plan support a learning culture? *

- Yes
- Somewhat
- No

26. Do you have any specific feedback on the proposed indicators?

We mapped all 30 indicators across Appendix 4 (pages 77–80) against their strategy objectives. The mapping exercise exposed significant gaps that warrant a larger review across all goals.

Goal 1 (Managing Risk): 10 indicators, all baselines "Establish 2026."

- Measured by post-event review, decision logs, annual review, AAR thematic analysis, periodic comparison, budget analysis, and community/stakeholder surveys.
- The measurement methods assume systems and processes that do not currently exist to capture this data systematically.
- Target examples: early protective action +20pp improvement, threshold-based decisions $\geq 80\%$, recurring failures $\geq 50\%$ reduction, near miss conversion $\geq 75\%$.

Goal 2 (Effective Response & Recovery): 10 indicators, all baselines "Establish 2026."

- Measured by event/exercise records, operational period review, tracking days to restoration, post-event review, responder surveys, stewardship review, staffing review, capability assessment, and community feedback surveys.
- Every single measurement method is retrospective - triggered by an event or exercise, not running continuously.
- Target examples: activation accuracy $\geq 90\%$, coordination speed 20–30% faster, lifeline stabilisation 10–20% reduction, role clarity $\geq 85\%$.

Goal 3 (Community Resilience): 10 indicators with some existing baselines from NZ-proxy survey data (35–85% ranges).

- All are self-reported through community or business surveys.
- Target examples: water self-sufficiency $\geq 50\%$ (baseline 35–40%), information access $\geq 85\%$ (baseline 70–75%), hub awareness $\geq 70\%$ (baseline $\leq 50\%$).

Key observations from the mapping:

- First, the indicators measure the right things conceptually but miss the infrastructure layer entirely. There is no indicator for digital infrastructure readiness, platform resilience, data governance effectiveness, or system interoperability across agencies. Every other indicator depends on digital systems functioning - from coordination speed to information access to community hub awareness - yet the health of those underlying systems is not measured. You cannot track what you do not monitor.

- Second, the cross-goal mapping reveals concentration gaps. Seven of ten Goal 2 indicators map to G2-O3 (coordination, activation, decisions). G3-O3 (culturally grounded iwi initiatives) has no direct Goal 3 indicator - it is only reached through Goal 2's iwi integration and governance effectiveness measures. G3-O5 (disproportionately affected communities) similarly has no direct Goal 3 indicator - it is reached only through Goal 2's lifeline stabilisation, iwi/community integration, and public confidence measures. The objectives most relevant to equity and Te Ao Māori are the least directly measured within their own goal.

- Third, Goal 3 indicators are entirely self-reported through surveys. Whether a community actually has access to emergency information is a different question from whether they say they do in a survey. Whether a household has seven days of water is measured by asking them, not by any system that could verify it. Objective, real-time measurement - "can the system actually deliver information to this community right now", "is this lifeline actually functioning" - would be more meaningful and more aligned with the plan's own aspiration for outcomes-based monitoring.

- Fourth, the EM Funding Rate indicator (G1-I7) has a target of "TBD." If the plan cannot define what adequate funding looks like, the indicator cannot drive the investment decisions it is designed to inform. This should be resolved before the plan is finalised.

27. Any further comments relating to the questions in this section?

The monitoring framework reinforces the plan's central pattern: defining what should happen without addressing how it will be operationalised. The plan sets 30 indicators, acknowledges that baselines don't exist, and defers the question of how those baselines will be established. But establishing baselines requires building monitoring systems - digital platforms that collect, aggregate, validate, and report data across agencies and jurisdictions. That build is the most urgent deliverable in the entire plan because everything else depends on it: you cannot manage risk you cannot see, you cannot improve a system you cannot measure, and you cannot demonstrate progress to communities you cannot show.

This is not a novel observation. NEMA is actively developing an Emergency Management Sector Operating System to provide exactly this kind of shared digital foundation at the national level. The Wellington Region should be building toward alignment with that national direction, not developing monitoring and reporting systems in isolation. The regional monitoring platform should be designed as a component of the national operating system from the outset - contributing data upward and drawing capability downward - rather than being retrofitted later.

The monitoring system itself should be the first thing built under this plan. It should be live and continuous - not inquiry-based, not biennial, not post-event. It should be designed with the same principles the plan espouses: community-visible (so trust is earned through transparency, not claimed through surveys), cross-jurisdictional (so the region can see itself as a system), and resilient (so it functions under the conditions the plan is designed for). Built for the emergency, running day to day.

If the plan is serious about being an operational foundation, the monitoring system is that foundation. Build it first. Everything else: the baselines, the learning culture, the accountability, the community confidence follows from having a system that can actually see what is happening.

Final Reflections

28. What do you see as the greatest strength of this Plan?

The shift from hazard-by-hazard planning to consequence-based, system-wide thinking is the most significant advance in this plan. By organising around ten recurring consequences rather than individual hazard scenarios, the plan enables the region to invest in capabilities that reduce harm across multiple events simultaneously. This is sound strategic thinking.

The deliberate sequencing - a 10-year Strategy setting direction, then a 5-year Group Plan translating that into coordination priorities - demonstrates mature governance. The plan is clear about where it sits in the hierarchy (page 8 framework diagram) and honest about being Phase One of a two-phase approach. The consequence-based framing, the "Most Likely Plus" planning assumption, and the recognition that emergencies are sustained disruptions rather than short events represent a genuine shift in how this region thinks about resilience.

The development process itself is also a strength. Thirteen workshops with 250+ participants across the system demonstrates genuine investment in shared ownership. The plan reads as a document written with its partners, not for them.

29. What is the most significant risk or gap that still needs to be addressed?

The plan positions itself as the delivery mechanism for the Strategy - translating strategic direction into five-year priorities, delivery programmes, accountabilities, operational arrangements, and measures of progress (CDEM Joint Committee order paper, paragraph 16). In practice, the plan delivers coordination priorities and governance direction but defers operational delivery to a Work Programme layer that is not part of this public consultation and does not yet exist.

The plan knows it sits between the Strategy and the Work Programme, and its page 8 hierarchy diagram says so. The gap is that the public is being consulted on the coordination layer without visibility into whether the operational layer beneath it can deliver. The sector's own pre-consultation feedback identified this: project scope and details have not been established, funding is not addressed, and some interpretations could cause friction between agencies (sector consultation gaps, order paper paragraph 37).

The most consequential expression of this gap is the absence of digital infrastructure as a foundational layer. Every project in this plan - from shared risk registers to cross-boundary coordination to community emergency hubs to the monitoring indicators themselves - depends on digital systems, platforms, and data flows to function. Yet the plan does not address the architecture, governance, procurement, or resilience of those systems. It describes who should coordinate with whom, but not through what. The coordination layer doesn't prioritise the architecture in which coordination will occur.

New Zealand's lifeline framework has not been updated to reflect the structural shift that comparable international frameworks have made since 2022. FEMA, the EU, Canada, the UK, Japan, and the ITU all now treat communications or digital infrastructure as a standalone category with defined sub-components and resilience requirements. This plan inherits a flat definition of "telecommunications" from the CDEM Act with no internal structure, and the Wellington Region's coordination priorities replicate that gap.

This is compounded by the plan's treatment of the 4Rs. The plan integrates Risk Reduction, Readiness, Response, and Recovery across its three goals rather than structuring them as separate phases. This is presented as holistic, but the effect is that investment weighting across the 4Rs is invisible. When the resource signals in the project tables are mapped, the heaviest investment indicators lean toward Response (Goal 2), while Risk Reduction and Readiness receive more modest resource ratings. New Zealand's track record is well-documented: underinvestment in Risk Reduction and Readiness, with evidence internationally showing a \$4-\$10 return for every \$1 invested in pre-disaster mitigation. The plan should make the 4R weighting explicit so the region - and the public - can see where investment is being prioritised and hold governance accountable for the balance.

30. Any other comments or suggestions?

Omega Networks is a Wellington Region-based digital infrastructure company. Our platform Pulse - which enables cross-jurisdictional service visibility and lifeline monitoring - has been open-sourced and endorsed by local mana whenua for its alignment with kaitiakitanga and community ownership. We raise these themes not to seek procurement outcomes but because the governance-level principles must be established now to ensure the Work Programme delivers effectively.

Three recommendations for the final plan:

- First, recognise digital infrastructure as a distinct lifeline category, or at minimum a formally governed sub-layer within telecommunications, consistent with FEMA (US), the EU CER Directive, and ITU frameworks. The physical network and the digital services layer have different ownership models, resilience requirements, and failure modes. Restoring connectivity does not restore capability.

- Second, build the monitoring platform first. The plan's 30 indicators require baselines that do not exist and measurement systems that have not been built. Building those systems is the foundational deliverable - the act of building creates the baseline, generates the dataset, and establishes data sovereignty simultaneously. Designed from the outset to align with NEMA's Emergency Management Sector Operating System. Built for the emergency, running day to day.

- Third, embed procurement-as-strategy.

Resilience should not compete for discretionary funding. Every infrastructure upgrade, software system, and service contract across the region's nine councils should align with this plan's resilience objectives and build upon shared, interoperable frameworks. When resilience is embedded in how councils buy and build, the cost becomes incremental and sustainable. The plan should establish this principle so the Work Programme has a delivery model, not just a list of projects.

These recommendations share a design principle:

A templated platform that can be independently adopted by each council, iwi, and community organisation, built on open standards, locally owned, and designed to carry forward across generations. When you embed intergenerational thinking into how digital systems are governed, when communities own their infrastructure and data, when one council builds a capability and the region can extend it, you create a system that self-propagates value. This is not a procurement exercise. It is a design decision about what kind of region we want to be, and it must be made at this governance level before the Work Programme locks in dependencies incompatible with infrastructure sovereignty, kaitiakitanga, and the circular value flows that genuine community resilience requires.

This submission is offered constructively. The plan has the right intent - it needs to address the foundational infrastructure layer that determines whether that intent becomes operational reality.

About you

31. Which council area do you currently live in? *

- Wellington City Council
- Porirua City Council
- Kapiti Coast District Council
- Hutt City Council
- Upper Hutt City Council
- South Wairarapa District Council
- Carterton District Council
- Masterton District Council
- Other

32. What ethnic group do you belong to? *

New Zealand European

Māori

Samoan

Cook Island Māori

Tongan

Niuean

Chinese

Indian

Other

33. What is your gender? *

Male

Female

Other

34. What is your age group? *

Under 18

18-24

25-34

35-44

45-54

55-64

65+

submission 6

[View results](#)

Respondent

2 Anonymous

13:17

Time to complete

About You

1. Please provide your full name *

Brigid Grant

2. Please provide the name of your organisation (**only** if you are submitting in their behalf)

No answer provided.

3. Do you wish to make an oral submission to the Committee (The hearings are scheduled for 24 April)

Yes

No

Overall Direction and Clarity

4. Overall, the purpose and direction of the Group Plan is clear? *

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

5. Does the Plan clearly explain why the region is shifting to a consequence-based, "most likley plus" approach? *

Yes

No

6. The 10 key consequences (from the Risk section of the Plan) identified reflect the most significant risks facing the Wellington Region? *

Strongly Agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

7. Any further comments relating to the questions in this section?

No answer provided.

Strategic Goals and Priorities - Goal 1 Managing Risk

8. How practical do you find the proposed initiatives (e.g. Regional Hazards and Consequence Risk Register, Shared Risk Communication) *

Very Practical

Somewhat Practical

Not Practical

9. Do you have an specific thoughts on the **Table: Managing Risk - Priority areas of work** (allocation of lead agency, timing etc.)

No

Strategic Goals and Priorities - Goal 2 Effective Response and Recovery

10. Does the Plan clearly describe how response and recovery will work across agencies and boundaries? *

- Yes
- Mostly
- No

11. How confident are you that the proposed initiatives will achieve the desired outcomes (e.g. Improve interoperability, strengthen workforce) *

- Very Confident
- Somewhat confident
- Neutral
- Not so confident
- Not confident

12. Do you have any specific thoughts on the **Table: Effective Response and Recovery - Priority areas of work** (allocation of lead agency, timing etc.)

No

Strategic Goals and Priorities - Goal 3 Community Resilience

13. Does this Plan strike the right balance between community-led action and formal emergency management? *

- Yes
- Mostly
- No

14. How well does the plan reflect the desired outcomes (e.g. Māori partnership, support for disproportionately affected communities, household and neighbourhood preparedness) *

- Very well
- Adequately
- Poorly

15. Do you have any specific thoughts on the **Table: Community Resilience - Priority areas of work** (allocation of lead agency, timing etc.)

No answer provided.

16. What barriers do you see for communities being able to fulfil the role described in the Plan? *

Complacency. People move around a lot and plans and roles get forgotten or reprioritised

17. Any further comments relating to the questions in this section?

No

Roles, Responsibilities, and Delivery

18. Are the roles and responsibilities across governance, lead agencies and supporting partner agencies clear? *

- Yes
- Partially
- No

19. Are the priorities and timeframes realistic given current capacity and resourcing? *

- Yes
- Somewhat
- No

20. Any further comments relating to the questions in this section?

I lived through the 2022 Napier flood and Cyclone Gabrielle. What was astounding was how quickly the crime rate rose. People took advantage of the situation to steal, pillage, intimidate and defraud others. The police were dealing with deaths and destruction. In any major emergency in Wellington, there must be an enhanced community police presence to keep the local people safe. It is essential that everyday community policing continues. This will require police from other areas coming, not to rescue - but to police.

Equity, Te Ao Māori, and Trust

21. How effectively does the Plan embed: *

	Very effectively	Somewhat effectively	Somewhat ineffectively	Not effectively
sub Te Ao Māori and mātauranga Māori	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Equity and disproportionat e impacts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trust, transparency and accountability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

22. Any further comments relating to the questions in this section?

No answer provided.

Monitoring, Learning and Improvement

23. Are the monitoring and evaluation approaches sufficient to track progress and outcomes? *

- Yes
- Partially
- No

24. Does the Plan support a learning culture? *

- Yes
- Somewhat
- No

25. Do you have any specific feedback on the proposed indicators?

No answer provided.

26. Any further comments relating to the questions in this section?

No answer provided.

Final Reflections

27. What do you see as the greatest strength of this Plan?

That you are doing it !

28. What is the most significant risk or gap that still needs to be addressed?

Community safety from increased crime

29. Any other comments or suggestions?

No answer provided.

About you

30. Which council area do you currently live in? *

- Wellington City Council
- Porirua City Council
- Kapiti Coast District Council
- Hutt City Council
- Upper Hutt City Council
- South Wairarapa District Council
- Carterton District Council
- Masterton District Council
- Other

31. What ethnic group do you belong to? *

New Zealand European

Māori

Samoan

Cook Island Māori

Tongan

Niuean

Chinese

Indian

Other

32. What is your gender? *

Male

Female

Other

33. What is your age group? *

Under 18

18-24

25-34

35-44

45-54

55-64

65+

submission 7

[View results](#)

Respondent

3 Anonymous

20:56

Time to complete

About You

1. Please provide your full name *

Peter Hughes-Hallett

2. Please provide the name of your organisation (**only** if you are submitting in their behalf)

No answer provided.

3. Do you wish to make an oral submission to the Committee (The hearings are scheduled for 24 April)

Yes

No

Overall Direction and Clarity

4. Overall, the purpose and direction of the Group Plan is clear? *

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

5. Does the Plan clearly explain why the region is shifting to a consequence-based, "most likley plus" approach? *

Yes

No

6. The 10 key consequences (from the Risk section of the Plan) identified reflect the most significant risks facing the Wellington Region? *

Strongly Agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

7. Any further comments relating to the questions in this section?

No answer provided.

Strategic Goals and Priorities - Goal 1 Managing Risk

8. How practical do you find the proposed initiatives (e.g. Regional Hazards and Consequence Risk Register, Shared Risk Communication) *

Very Practical

Somewhat Practical

Not Practical

9. Do you have an specific thoughts on the **Table: Managing Risk - Priority areas of work** (allocation of lead agency, timing etc.)

No answer provided.

Strategic Goals and Priorities - Goal 2 Effective Response and Recovery

10. Does the Plan clearly describe how response and recovery will work across agencies and boundaries? *

- Yes
- Mostly
- No

11. How confident are you that the proposed initiatives will achieve the desired outcomes (e.g. Improve interoperability, strengthen workforce) *

- Very Confident
- Somewhat confident
- Neutral
- Not so confident
- Not confident

12. Do you have any specific thoughts on the **Table: Effective Response and Recovery - Priority areas of work** (allocation of lead agency, timing etc.)

No answer provided.

Strategic Goals and Priorities - Goal 3 Community Resilience

13. Does this Plan strike the right balance between community-led action and formal emergency management? *

- Yes
- Mostly
- No

14. How well does the plan reflect the desired outcomes (e.g. Māori partnership, support for disproportionately affected communities, household and neighbourhood preparedness)? *

- Very well
- Adequately
- Poorly

15. Do you have any specific thoughts on the **Table: Community Resilience - Priority areas of work** (allocation of lead agency, timing etc.)

My concern is that there appears to be no indication of how multi-dwelling buildings (apartments, townhouses etc) are at greater risk, due to high population, greater reliance on electricity to provide 'power' to the functioning and safety of the building. This community needs special attention and emphasis in this plan, to 'force' body corporates to have a resilience plan and regular training for owners and residents. In these dwellings is probably a higher concentration of physically impaired people, as having elevators in dwelling may well have attracted them to buy into. There is also an issue of medication availability which needs to be featured in this plan, as the lack thereof will have significant consequences to this and other communities.

16. What barriers do you see for communities being able to fulfil the role described in the Plan? *

Lack of urgency and "she'll be right mate" attitude. Body Corporates or alike, may need to be required to have a resilience plan and training in place.

17. Any further comments relating to the questions in this section?

No answer provided.

Roles, Responsibilities, and Delivery

18. Are the roles and responsibilities across governance, lead agencies and supporting partner agencies clear? *

- Yes
- Partially
- No

19. Are the priorities and timeframes realistic given current capacity and resourcing? *

- Yes
- Somewhat
- No

20. Any further comments relating to the questions in this section?

Central government needs to step up and commit to funding.

Equity, Te Ao Māori, and Trust

21. How effectively does the Plan embed: *

	Very effectively	Somewhat effectively	Somewhat ineffectively	Not effectively
Te Ao Māori and mātauranga Māori	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Equity and disproportionate impacts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Trust, transparency and accountability	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

22. Any further comments relating to the questions in this section?

No answer provided.

Monitoring, Learning and Improvement

23. Are the monitoring and evaluation approaches sufficient to track progress and outcomes? *

- Yes
- Partially
- No

24. Does the Plan support a learning culture? *

- Yes
- Somewhat
- No

25. Do you have any specific feedback on the proposed indicators?

No answer provided.

26. Any further comments relating to the questions in this section?

No answer provided.

Final Reflections

27. What do you see as the greatest strength of this Plan?

People thinking about it.

28. What is the most significant risk or gap that still needs to be addressed?

Lack of urgency, accountability for delivery and local and central government resourcing commitment.

29. Any other comments or suggestions?

No answer provided.

About you

30. Which council area do you currently live in? *

- Wellington City Council
- Porirua City Council
- Kapiti Coast District Council
- Hutt City Council
- Upper Hutt City Council
- South Wairarapa District Council
- Carterton District Council
- Masterton District Council
- Other

31. What ethnic group do you belong to? *

New Zealand European

Māori

Samoan

Cook Island Māori

Tongan

Niuean

Chinese

Indian

Other

32. What is your gender? *

Male

Female

Other

33. What is your age group? *

Under 18

18-24

25-34

35-44

45-54

55-64

65+

submission 8

[View results](#)

Respondent

5

Anonymous

714:49

Time to complete

About You

1. Please provide your full name *

Richard Schofield

2. Please provide the name of your organisation (**only** if you are submitting in their behalf)

No answer provided.

3. Do you wish to make an oral submission to the Committee (The hearings are scheduled for 24 April)

Yes

No

Overall Direction and Clarity

4. Overall, the purpose and direction of the Group Plan is clear? *

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

5. Does the Plan clearly explain why the region is shifting to a consequence-based, "most likely plus" approach? *

Yes

No

6. The 10 key consequences (from the Risk section of the Plan) identified reflect the most significant risks facing the Wellington Region? *

Strongly Agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

7. Any further comments relating to the questions in this section?

Hazardous substances seems to be covering too much, some examples are more than moderate. E.g. Seaview tank spill would fit, but a tank fire can spread, toxic smoke could blow across Hutt Valley forcing mass evacuation, hospital overload, thousand of I'll people..

Strategic Goals and Priorities - Goal 1 Managing Risk

8. How practical do you find the proposed initiatives (e.g. Regional Hazards and Consequence Risk Register, Shared Risk Communication) *

Very Practical

Somewhat Practical

Not Practical

9. Do you have an specific thoughts on the **Table: Managing Risk - Priority areas of work** (allocation of lead agency, timing etc.)

Complexity of table makes it difficult to take in.

Strategic Goals and Priorities - Goal 2 Effective Response and Recovery

10. Does the Plan clearly describe how response and recovery will work across agencies and boundaries? *

- Yes
- Mostly
- No

11. How confident are you that the proposed initiatives will achieve the desired outcomes (e.g. Improve interoperability, strengthen workforce) *

- Very Confident
- Somewhat confident
- Neutral
- Not so confident
- Not confident

12. Do you have any specific thoughts on the **Table: Effective Response and Recovery - Priority areas of work** (allocation of lead agency, timing etc.)

Again, complex table. This looks more like a wish list than a practical plan.

Strategic Goals and Priorities - Goal 3 Community Resilience

13. Does this Plan strike the right balance between community-led action and formal emergency management? *

- Yes
- Mostly
- No

14. How well does the plan reflect the desired outcomes (e.g. Māori partnership, support for disproportionately affected communities, household and neighbourhood preparedness) *

- Very well
- Adequately
- Poorly

15. Do you have any specific thoughts on the **Table: Community Resilience - Priority areas of work** (allocation of lead agency, timing etc.)

Doesn't really bridge wanted outcomes to a process to get there.

16. What barriers do you see for communities being able to fulfil the role described in the Plan? *

Resourcing. All the work, training, public education needs first money, money, money. Then come the people and purchases to make it happen. My experience is people love the talk, but no significant funding is approved.

17. Any further comments relating to the questions in this section?

No answer provided.

Roles, Responsibilities, and Delivery

18. Are the roles and responsibilities across governance, lead agencies and supporting partner agencies clear? *

- Yes
- Partially
- No

19. Are the priorities and timeframes realistic given current capacity and resourcing? *

- Yes
- Somewhat
- No

20. Any further comments relating to the questions in this section?

Without funding we can only crawl toward the wanted outcomes.

Equity, Te Ao Māori, and Trust

21. How effectively does the Plan embed: *

	Very effectively	Somewhat effectively	Somewhat ineffectively	Not effectively
Te Ao Māori and mātauranga Māori	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Equity and disproportionate impacts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trust, transparency and accountability	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

22. Any further comments relating to the questions in this section?

No answer provided.

Monitoring, Learning and Improvement

23. Are the monitoring and evaluation approaches sufficient to track progress and outcomes? *

- Yes
- Partially
- No

24. Does the Plan support a learning culture? *

- Yes
- Somewhat
- No

25. Do you have any specific feedback on the proposed indicators?

No answer provided.

26. Any further comments relating to the questions in this section?

No answer provided.

Final Reflections

27. What do you see as the greatest strength of this Plan?

It identifies and documents what emergency planning needs.

28. What is the most significant risk or gap that still needs to be addressed?

As someone in the Wairarapa I think it misses the mark with hazardous substance fires at "rural" industrial sites. Two examples:
- fire or explosion at fertiliser plant south off Masterton. Outcome might be SH2 closed, mass Masterton evacuations and hospitalisations.
- fire at solar power scheme or battery system burns for days continuously pouring toxic smoke over nearby towns. Again evacuations but this they could be for days too.

29. Any other comments or suggestions?

No answer provided.

About you

30. Which council area do you currently live in? *

- Wellington City Council
- Porirua City Council
- Kapiti Coast District Council
- Hutt City Council
- Upper Hutt City Council
- South Wairarapa District Council
- Carterton District Council
- Masterton District Council
- Other

31. What ethnic group do you belong to? *

- New Zealand European
- Māori
- Samoan
- Cook Island Māori
- Tongan
- Niuean
- Chinese
- Indian
- Not saying

32. What is your gender? *

- Male
- Female
- Not saying

33. What is your age group? *

- Under 18
- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65+

submission 9

[View results](#)

Respondent

1 Anonymous

24:52

Time to complete

About You

1. Please provide your full name *

Robyn Tyler

2. Please provide the name of your organisation (**only** if you are submitting in their behalf)

No answer provided.

3. Do you wish to make an oral submission to the Committee (The hearings are scheduled for 24 April)

Yes

No

Overall Direction and Clarity

4. Overall, the purpose and direction of the Group Plan is clear? *

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

5. Does the Plan clearly explain why the region is shifting to a consequence-based, "most likely plus" approach? *

- Yes
- No

6. The 10 key consequences (from the Risk section of the Plan) identified reflect the most significant risks facing the Wellington Region? *

- Strongly Agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

7. Any further comments relating to the questions in this section?

The consequence-based framework is a sensible shift because many hazards result in similar impacts, particularly prolonged loss of lifeline infrastructure such as water, electricity and telecommunications. However, the plan could be strengthened by more clearly addressing how these consequences affect vulnerable populations differently. For example, prolonged disruption to water, food supply, shelter or communication can disproportionately affect disabled people, neurodivergent individuals, and families caring for children with complex needs. Including clearer planning assumptions around accessibility, sensory-appropriate welfare environments, and continuity of support services would help ensure the consequence-based approach truly reduces inequity in emergency impacts and recovery.

Strategic Goals and Priorities - Goal 1 Managing Risk

8. How practical do you find the proposed initiatives (e.g. Regional Hazards and Consequence Risk Register, Shared Risk Communication) *

- Very Practical
- Somewhat Practical
- Not Practical

9. Do you have any specific thoughts on the **Table: Managing Risk - Priority areas of work** (allocation of lead agency, timing etc.)

The initiatives such as a Regional Hazards and Consequence Risk Register and improved shared risk communication are useful for improving coordination across agencies. However, their practical value will depend on how clearly they translate into concrete risk-reduction actions. It would be helpful for the plan to more clearly describe how these tools will lead to measurable changes such as infrastructure resilience improvements, land-use planning decisions, or community preparedness initiatives. Without this connection, there is a risk that the work remains largely strategic or administrative rather than resulting in tangible reductions in risk. Clear accountability for implementation, timeframes, and measurable outcomes would strengthen this section.

Strategic Goals and Priorities - Goal 2 Effective Response and Recovery

10. Does the Plan clearly describe how response and recovery will work across agencies and boundaries? *

- Yes
- Mostly
- No

11. How confident are you that the proposed initiatives will achieve the desired outcomes (e.g. Improve interoperability, strengthen workforce) *

- Very Confident
- Somewhat confident
- Neutral
- Not so confident
- Not confident

12. Do you have any specific thoughts on the **Table: Effective Response and Recovery - Priority areas of work** (allocation of lead agency, timing etc.)

The initiatives aimed at improving interoperability, coordination, and workforce capability are important and align well with national emergency management priorities. However, it would strengthen the plan to provide more clarity on how these initiatives will translate into operational capability during large or prolonged events. For example, clearer detail on cross-agency decision-making structures, workforce surge capacity, and how coordination will function when multiple lifeline services are disrupted would improve confidence in the proposed approach. Greater emphasis on regular multi-agency exercises and measurable capability outcomes could also help ensure these initiatives deliver practical improvements in response and recovery.

Strategic Goals and Priorities - Goal 3 Community Resilience

13. Does this Plan strike the right balance between community-led action and formal emergency management? *

- Yes
- Mostly
- No

14. How well does the plan reflect the desired outcomes (e.g. Māori partnership, support for disproportionately affected communities, household and neighbourhood preparedness)? *

- Very well
- Adequately
- Poorly

15. Do you have any specific thoughts on the **Table: Community Resilience - Priority areas of work** (allocation of lead agency, timing etc.)

The focus on community resilience and neighbourhood preparedness is positive and reflects the reality that communities are often the first to respond during emergencies. However, the plan could provide more detail on how communities will be supported to build this capacity in practice. For example, clearer guidance on funding, training, and ongoing support for community-led preparedness initiatives would strengthen this section. It would also be helpful to outline how the plan will ensure that disproportionately affected communities, including disabled people and those with complex needs, are meaningfully included in resilience planning.

16. What barriers do you see for communities being able to fulfil the role described in the Plan? *

Several barriers may limit communities' ability to fulfil the role described in the plan. These include limited time and resources for volunteer-led preparedness activities, unequal access to information and training, and the varying capacity of communities to organise and coordinate themselves. In addition, some households face specific challenges such as disability, health conditions, financial constraints, or caregiving responsibilities that may limit their ability to prepare or respond in the same way as others. Ensuring that resilience initiatives are inclusive and well supported will be important.

17. Any further comments relating to the questions in this section?

The emphasis on community resilience is important and appropriate for the Wellington region given the potential scale of disruption following major hazards such as earthquakes or severe weather events. To strengthen this approach, the plan could provide more clarity about how communities will be supported over time through training, resources, and ongoing engagement. Ensuring that resilience initiatives are inclusive and accessible to all members of the community will also be important to achieving the outcomes described in the plan.

Roles, Responsibilities, and Delivery

18. Are the roles and responsibilities across governance, lead agencies and supporting partner agencies clear? *

- Yes
- Partially
- No

19. Are the priorities and timeframes realistic given current capacity and resourcing? *

- Yes
- Somewhat
- No

20. Any further comments relating to the questions in this section?

The plan provides a helpful overview of governance structures and the roles of lead and supporting agencies. However, greater clarity on operational responsibilities during complex or prolonged events would strengthen this section. In particular, clearer description of how agencies coordinate decision-making, share resources, and manage overlapping responsibilities would improve transparency and public understanding. It would also be helpful for the plan to acknowledge the resource constraints many agencies face and outline how priorities will be sequenced if capacity or funding limits implementation.

Equity, Te Ao Māori, and Trust

21. How effectively does the Plan embed: *

	Very effectively	Somewhat effectively	Somewhat ineffectively	Not effectively
Te Ao Māori and mātauranga Māori	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Equity and disproportionate impacts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trust, transparency and accountability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

22. Any further comments relating to the questions in this section?

The plan appropriately recognises the importance of Te Ao Māori, equity, and trust in emergency management. However, these principles would be strengthened by clearer description of how they will be implemented in practice. For example, the plan could provide more detail on how Māori leadership and mātauranga Māori will inform decision making during both response and recovery. Similarly, further clarity on how the plan will address disproportionate impacts on vulnerable populations, including disabled people and those with complex needs, would strengthen the equity focus. Ensuring transparent communication, inclusive decision-making processes, and accountability mechanisms will also be important for maintaining public trust during major emergencies.

Monitoring, Learning and Improvement

23. Are the monitoring and evaluation approaches sufficient to track progress and outcomes? *

- Yes
- Partially
- No

24. Does the Plan support a learning culture? *

- Yes
- Somewhat
- No

25. Do you have any specific feedback on the proposed indicators?

The monitoring and evaluation approach provides a useful structure for tracking progress. However, it would be helpful to ensure that indicators measure not only activities (such as reports or meetings) but also real improvements in preparedness, response capability, and community resilience. Including indicators linked to practical testing, such as multi-agency exercises, community engagement outcomes, and lessons learned from real events, would strengthen the monitoring framework.

26. Any further comments relating to the questions in this section?

A strong monitoring and learning framework is essential for continuous improvement in emergency management. In addition to reporting on progress, the plan could benefit from clearer mechanisms for incorporating lessons learned from exercises and real emergencies into future planning. Regular public reporting of progress and lessons learned could also help strengthen transparency and public trust.

Final Reflections

27. What do you see as the greatest strength of this Plan?

A major strength of the plan is its shift to a consequence-based approach and its recognition that communities will often be the first responders during emergencies. This reflects the reality that in a major Wellington disaster, particularly an earthquake, formal emergency services may take time to reach many communities. The emphasis on community resilience, inter-agency coordination, and the protection of lifeline infrastructure is appropriate for the Wellington region given the region's exposure to earthquakes, flooding, and infrastructure disruption. The plan also demonstrates an understanding that emergency impacts are complex and interconnected, rather than hazard-specific.

28. What is the most significant risk or gap that still needs to be addressed?

One of the most significant gaps in the plan is the limited practical detail on how emergency planning will support people with disabilities, neurodivergent individuals, and families with complex needs. Many emergency response models, including welfare centres and evacuation environments, are designed around large, crowded spaces and rapid verbal instruction. These environments can be extremely difficult for autistic people, people with sensory sensitivities, and children who rely on predictable routines and specific foods. For families caring for autistic children or individuals with significant sensory needs, emergency environments can create additional risk rather than safety. Noise, crowds, unfamiliar people, and sudden changes can lead to distress, shutdown, or flight behaviour. The plan acknowledges disproportionate impacts but does not clearly outline how emergency shelters, communication systems, and support services will be adapted to ensure they are accessible and safe for neurodivergent people and others with complex needs. Without this planning, some of the region's most vulnerable residents may struggle to access emergency support during major events.

29. Any other comments or suggestions?

Emergency planning that relies heavily on community self-organisation must recognise that not all households have the same capacity to prepare or respond. Families caring for disabled or neurodivergent children, people with chronic health conditions, and single-parent households may face additional barriers to preparedness and response. The plan would be strengthened by more explicit inclusion of disability-inclusive emergency planning. This could include guidance for sensory-friendly spaces within welfare centres, improved communication methods that work for neurodivergent people, and stronger partnerships with disability and community organisations in planning and response. Building resilience across the region will require planning that recognises and supports the full diversity of community needs. Ensuring that emergency systems are accessible and inclusive will ultimately strengthen the resilience of the entire region.

About you

30. Which council area do you currently live in? *

- Wellington City Council
- Porirua City Council
- Kapiti Coast District Council
- Hutt City Council
- Upper Hutt City Council
- South Wairarapa District Council
- Carterton District Council
- Masterton District Council
- Other

31. What ethnic group do you belong to? *

- New Zealand European
- Māori
- Samoan
- Cook Island Māori
- Tongan
- Niuean
- Chinese
- Indian
- Other

32. What is your gender? *

- Male
- Female
- Other

33. What is your age group? *

Under 18

18-24

25-34

35-44

45-54

55-64

65+

submission 10

[View results](#)

Respondent

7 Anonymous

88:22

Time to complete

About You

1. Please provide your full name *

Carol Comber

2. Please provide the name of your organisation (**only** if you are submitting in their behalf)

No answer provided.

3. Do you wish to make an oral submission to the Committee (The hearings are scheduled for 24 April)

Yes

No

4. Please provide either an email address or contact phone number to schedule the oral submission *

[REDACTED]

Overall Direction and Clarity

5. Overall, the purpose and direction of the Group Plan is clear? *

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

6. Does the Plan clearly explain why the region is shifting to a consequence-based, "most likley plus" approach? *

- Yes
- No

7. The 10 key consequences (from the Risk section of the Plan) identified reflect the most significant risks facing the Wellington Region? *

- Strongly Agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

8. Any further comments relating to the questions in this section?

No answer provided.

Strategic Goals and Priorities - Goal 1 Managing Risk

9. How practical do you find the proposed initiatives (e.g. Regional Hazards and Consequence Risk Register, Shared Risk Communication) *

- Very Practical
- Somewhat Practical
- Not Practical

10. Do you have any specific thoughts on the **Table: Managing Risk - Priority areas of work** (allocation of lead agency, timing etc.)

Where the lead is Council (WREMO), I would like to understand what the communication channel is to update communities on progress. Thanks.

Strategic Goals and Priorities - Goal 2 Effective Response and Recovery

11. Does the Plan clearly describe how response and recovery will work across agencies and boundaries? *

- Yes
- Mostly
- No

12. How confident are you that the proposed initiatives will achieve the desired outcomes (e.g. Improve interoperability, strengthen workforce) *

- Very Confident
- Somewhat confident
- Neutral
- Not so confident
- Not confident

13. Do you have any specific thoughts on the **Table: Effective Response and Recovery - Priority areas of work** (allocation of lead agency, timing etc.)

I felt that a lot of these actions are foundational, rather than being specific to better response and recovery.

Strategic Goals and Priorities - Goal 3 Community Resilience

14. Does this Plan strike the right balance between community-led action and formal emergency management? *

- Yes
- Mostly
- No

15. How well does the plan reflect the desired outcomes (e.g. Māori partnership, support for disproportionately affected communities, household and neighbourhood preparedness)? *

- Very well
- Adequately
- Poorly

16. Do you have any specific thoughts on the **Table: Community Resilience - Priority areas of work** (allocation of lead agency, timing etc.)

Sanitation planning for people living in apartments is also a risk - there is a need for to work with body corps and building owners to mitigate this issue.

17. What barriers do you see for communities being able to fulfil the role described in the Plan? *

I think there is a risk of this being overwhelming for communities. There is great difficulty in effecting change, e.g. in having the authorities, including central government agencies, make changes, e.g. installing large water tanks in social housing precincts.

18. Any further comments relating to the questions in this section?

It has been acknowledged earlier in the document that emergency impacts are not experienced equally, and that disruption may well disproportionately affect some communities more than other communities. Loss to human life due to not being well-resourced is also a risk. Putting some extra assistance and resources into helping this group prepare would be welcome (this may necessitate involving other lead agencies who already hold relationships with these communities.)

Roles, Responsibilities, and Delivery

19. Are the roles and responsibilities across governance, lead agencies and supporting partner agencies clear? *

- Yes
- Partially
- No

20. Are the priorities and timeframes realistic given current capacity and resourcing? *

- Yes
- Somewhat
- No

21. Any further comments relating to the questions in this section?

No answer provided.

Equity, Te Ao Māori, and Trust

22. How effectively does the Plan embed: *

	Very effectively	Somewhat effectively	Somewhat ineffectively	Not effectively
Te Ao Māori and mātauranga Māori	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Equity and disproportionate impacts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Trust, transparency and accountability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

23. Any further comments relating to the questions in this section?

No answer provided.

Monitoring, Learning and Improvement

24. Are the monitoring and evaluation approaches sufficient to track progress and outcomes? *

- Yes
- Partially
- No

25. Does the Plan support a learning culture? *

- Yes
- Somewhat
- No

26. Do you have any specific feedback on the proposed indicators?

No answer provided.

27. Any further comments relating to the questions in this section?

No answer provided.

Final Reflections

28. What do you see as the greatest strength of this Plan?

No answer provided.

29. What is the most significant risk or gap that still needs to be addressed?

Inequity.

30. Any other comments or suggestions?

An executive summary? I felt that the document was more wordy than it needed to be.

About you

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Wellington Region CDEM Group Plan 2026–2031 – Feedback 10 April 2026

Thank you for the opportunity to comment on the Wellington Region CDEM Group Plan 2026–2031. I would like to comment on aspects that, in my view, are missing from the Plan, albeit missing from the Strategy as well as the Plan.

Lifelines

The lifelines in the Plan relate to water, roading, fuel, transport, electricity and telecommunications, broadly classified as infrastructure. In my view, there is a further class of necessary lifeline for many people, being medications accessed through their pharmacy. Pharmacists recommend that people store two weeks' of medication. In the case of a major crisis, this is unlikely to cover their need.

Designating pharmacies as a lifeline would not mean opening every chemist in the region, but it would be useful to have a network of pharmacies open. Some Wellington City pharmacies already have a plan for how they would work together in an emergency. By classifying the emergency pharmacy network as a lifeline, it would be easier to get priority assistance to become fully prepared and this would recognise the real need for medication by some members of society.

Hospitals

It seems odd that hospitals are not referenced in the Plan. At the very least it would be good to know that independent experts monitor hospital emergency plans and contribute to continual improvement of their emergency preparedness.

Community Water Tanks v Community Water Stations

Community Water Stations are the designated method of providing continuity of drinking water supply from Day 8 after an emergency. There are several flaws in this approach. The vehicles sent to set-up the Community Water Stations may not be able to use the roads. Not everyone has the strength or a wheelbarrow to carry heavy water containers. The 20 litre per person daily water allowance would need to be split over multiple containers. Wellington Water has planned for a limited number of water stations. Some journeys from the Community Water Station to home will include an uphill walk, or steps.

Community Water Tanks

Community Water Tanks need to be checked, cleaned and refilled, but even so they have advantages for some communities. In Te Aro where many people live in apartments there is limited space to store water. In the huge earthquake scenario people will be moving to higher ground away from the coast and are unlikely to be able to carry enough drinking water for a week. The Community Emergency Hubs have no stored water, or food. In areas where there is a high concentration of public housing the

apartments are small and bulk water storage is not likely. The 'get prepared' message will not have fully inspired everyone to be ready on the day. The alternative approach of maintaining a series of community water tanks may be a bore, but it may also be the only practical way to provide potable water for those who were unable to store enough water.

Thank you for the opportunity to comment on the Plan.

Ngā mihi,

Carol Comber



Mt Cook

Wellington