

Submission

Feedback on the Draft Wellington Regional Policy Statement

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1 Beacon Pathway

Beacon Pathway is a research consortium, established in May 2004 with the aim of encouraging and improving New Zealand's sustainability in the residential built environment. In accordance with Beacon's goal of achieving a high standard of sustainability in 90% of New Zealand homes by 2012 the organisation is researching all aspects of sustainable homes and neighbourhoods, including energy use efficiency, water demand management and integrated water management and indoor environmental quality. The research results provide input into developing and trialling sustainable features in new and renovated homes.

2 Overall Impressions:

The draft regional Policy Statement is strong on vision and objectives. However, in some cases the policies as stated would not give effect to the meaning of the objectives. They need to be strengthened and more effective methods developed.

3 Chapter 2

Stormwater management is too important an issue to not be clearly identified in the objectives. For example the objective could be that: "Stormwater flows should be minimised to prevent freshwater contamination and flooding".

Beacon suggests another objective relating to the abstraction of water for use only within the main catchment boundary and the need for the efficient use of mains water.

4 Chapter 3

Policy 4. The wording of the policy could encourage the destruction of natural habitat so that it becomes more suitable for development; it could have perverse outcomes and needs to be more carefully defined.

Policy 12. Beacon strongly supports the promotion of energy efficient design, small scale renewable energy and the provision for energy efficient alterations. However the methods 12 and 57 do not go far enough to achieve the policy outcomes. Other methods will be required.

Policy 13 in addition to policy 17 needs to mention minimum flows.

Policy 16 and 17. Environmental flows requires definition, how will you decide, measure and monitor, that isn't clear from the draft.

Beacon supports policy 17 (b) to establish groundwater levels and abstraction limits that takes into account environmental flows.

Policy 19 should ensure that environmental flows are not compromised by abstraction. Should be able to articulate what an individual's "reasonable" domestic water needs are.

Policy 26. Consider updating the "100 year risk areas" based on recent modelling of climate change and other hazards.

Policy 27. In addition to achieving integrated and high quality developments, Beacon suggests that structure planning should also aim to provide for the following:

- Affordable homes which generally do not cost more than 30 percent of the incomes of low and moderate income households to own or rent, and
- have low operating costs because they are well-designed, resource efficient and positioned in neighbourhoods that are well serviced and connected, and
- Have thermal, energy and water performance that promotes health, well-being and resource use efficiency.

Policy 37 An infrastructure plan with targets is required to guide the application of this policy.

Policy 41 As an objective to guide this policy you could state that water should be used within its natural catchment boundary. 41 (c) requires the consent holder to demonstrate that water is to be used efficiently. How will you do this? Are you intending to meter water use, an n approach beacon would thoroughly support.

Policy 42. Beacon supports the suggestion that water reuse, rainwater collection and other water efficient approaches should be considered. It strongly urges that a demand management plan is

developed and policies investigated to ensure that those suggestions are adopted. Otherwise, without good policies in place, previous experience in New Zealand and elsewhere would suggest that they will be ignored.

Policy 65. Beacon considers that it is excellent that there is an objective to reduce water demand. However, without water metering, how will Council know what its leakage rate is and how will households know how efficient or otherwise their water use is. Beacon strongly urges WRC to implement water metering with volumetric pricing to:

- Better understand its unaccounted for water and where the water goes
- Have residents understand their water use and help them determine whether they have in-house leaks
- Send a signal that water has a cost to treat and supply

There don't appear to be any specific methods identified which will promote domestic water use efficiency other than "information and guidance on water conservation and efficient use. More need to be developed as education alone will not, based on the results of our research, have any noticeable effect.

As part of the outreach of its research in demand management, Beacon has held demand management workshops with many councils to assist them in the initial development of a demand management plan. Beacon would be pleased to provide similar assistance to WRC and their TA's on request.