

Normandale Residents Association

*c/o 301 Normandale Road
Lower Hutt*

SUBMISSION

TO HUTT CITY COUNCIL On the Draft Environmental Sustainability Strategy

The Normandale Residents Association wish to make the following submission on the proposals in this draft.

We would also appreciate the opportunity to speak in support of our submission at the appropriate time.

Overall comment

We consider that environmental sustainability can only be effectively addressed through a systemic approach to all Council activities and should not be seen as isolated to specific areas of immediate concern. We also appreciate that many of the goals and actions suggested cannot be effectively addressed by HCC in isolation, and that alignment of local, regional and national policies is necessary.

We consider that the primary areas identified are appropriate, but re-iterate that we do not believe these can or should be considered in isolation from each other.

We are concerned however that the strategy does not explicitly consider and address the major prerequisite for sustainability, limits to growth.

We feel that it is important that HCC, in addition to actively initiating sustainable practices, should also promote, encourage and where necessary impose criteria on private activities that improves the social, economic and environmental sustainability of the area.

With regard to funding, the Normandale Residents Association has consistently argued that sustainable practices supported where necessary by appropriate capital investment should take precedence over debt reduction and rate minimisation. Nonetheless we have not commented on the proposed expenditure as we lack the data necessary to consider or evaluate them.

Our detailed comments on the individual sections follow.

1. Vision and goals

We support the vision on the basis that 'environment' is intended to be used in its widest sense and not restricted to the natural environment.

We also support the stated goals with the exception of that relating to Water. In this case we consider that a goal of a 'valued resource' whilst admirable, lacks specifics. Water is the most fundamental of necessities and any goal for sustainability must

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recognise the necessity for rationing usage and the ability to apportion supply to those areas of most benefit to the community rather than on any historic resource allocation or ability to purchase.

2. Waste

We applaud the goal of zero waste and also that the objectives and actions suggested address all three of the Reduce, Reuse and Recycle triumverate, although we are concerned that the emphasis remains on recycling.

We strongly support Objective WO2 and consider that segregation of waste streams to allow greater re-use should be a major initiative of this strategy. We would suggest that a transfer station within or close to the CBD should be established to encourage and facilitate waste segregation by both individuals and businesses. We note that this approach, and the application of severe cost penalties for unsegregated commercial waste is widely and successfully applied overseas.

We are concerned that successful implementation of objective WO1 would appear to be inimical to achieving objective EO3 and action E6 in particular since any reduction in organic waste will inevitably impact methane production at the Silverstream land fill. Whilst we strongly support the commercial production of compost from organic waste, we believe that this can best be achieved in conjunction with a sewerage treatment regime that also employs methane digestion process and the utilisation of the residual solid waste in conjunction with green waste for composting.

We note that objective WO4 does not include any proposals for the creation of financial incentives, negative and positive, to achieve waste minimisation and suggest that this should be primary mechanism in pursuing these objectives.

KPI

We are concerned that the KPI of waste to land fill is based on a denominator of GDP. This measure is known to be deeply flawed for most community wide evaluation. We recognise that it has the advantage of being readily available, but would prefer to see a formal justification for its use by comparison with other potential denominators such as population.

Time frame

If the initial costs of action W3, supporting objective WO3 is as low as indicated, there seems no reason for this to be delayed. Initial steps to introduce segregation of waste should be implemented in year 09/10

3. Transport

We support the objectives noted, and in particular objective TO1. Lower Hutt CBD and the residential areas on the valley floor provide an ideal opportunity for a city wide cycle and walking network. We believe that the timescale for action T1 should be shortened to 'within 5 years', and that the use of motor vehicles within the CBD be

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actively discouraged by a regular annual reduction in parking facilities over this period. We note that this strategy has been successfully employed in Europe to eliminate cars for city centres.

We similarly support objective TO2 and in particular action T5. We also suggest that the timeframe for action T7 is set for completion within five years.

We are also concerned with the road safety effects of parents driving children to school. We note that all research undertaken confirms that these parents create the hazards they profess to be protecting their children from. We therefore strongly support action T3 and suggest that in addition a blanket ban on parking within 250m of a school entrance at opening and closing times would provide a disincentive for parents to drive to school.

We also support objective TO5 and consider that development of a Gracefield to Dowse interchange dual carriageway should be given priority.

KPI

We support the KPI noted although we would wish to see the targets for public transport and kilometres of cycleway set more aggressively.

4. Energy

We note that New Zealand has to date, enjoyed very low cost energy, in particular electricity. We also note that the increasing reliance on generation capacity constructed to maximize short term financial return rather than long term sustainability can only increase the abruptness and size of cost increases when these occur. We recognize that HCC can in isolation do little to influence the supply side of energy production and we therefore applaud all objectives that seek to minimize demand. We feel however that once again HCC could profitably learn from overseas experience where grants and zero interest loans for insulation of homes has been the norm for many years. We recognize that such a policy would be a cost to ratepayers, but believe that besides creating a public good, such a policy would directly contribute to the economic and social sustainability of the City by making it a desirable place to live and work, and reducing health care costs and work days lost through sickness.

KPI

Again we support the KPI noted, but are concerned at the targets set. Those for solar hot water heating are ludicrously low and should be based on a requirement that this technology is mandatory in all new dwellings.

For housing insulation we suggest that the target for 2018 should be 100% and interim figures based on a Council funded grant scheme.

5. Water

It has been predicted for many years that future major global conflicts will be over access to water. Whilst Lower Hutt is not threatened in this way, it emphasizes the

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importance of access to water, and the principles driving this concern are as applicable on the local scale as they are internationally.

We believe that water resource management in microcosm encapsulates the dilemma facing society. In New Zealand it is undervalued by consumers, perceived as a free and unlimited resource, and historically allocated on an unsustainable basis that considered want rather than need. This has created a large body of vested interests in maintaining the status quo with concomitant political pressure against either rationing, allocation by need, or true cost imposition. Nonetheless it is apparent that even with the diverse sources available to Lower Hutt and the Wellington region, any increase in usage is unsustainable and short term measures currently under consideration (greater extraction from the Hutt River and draw down on the Upper Hutt Aquifer) can only exacerbate the problem in the medium term.

This is likely to be the area where Councils will first need to recognize and address the implications of reversing growth and we believe that this should be an explicit objective of this area.

We are also concerned that public expectations concerning flooding is predicated on prevention rather than management with an expectation of hard engineering solutions to protect existing private properties. Whilst we support the intent of WTO1, especially improving community awareness of stormwater issues, we are concerned that an objective of 'reducing flooding' is unrealistic and potentially counter productive. There is a growing acceptance internationally that hard engineering solutions – stop banks, canalisation etc can only be short term measures and lead to a greater level of impact when they fail. We consider that actions within WTO1 should emphasize soft management practices.

We are also concerned that action WT2 should recognize that a uniform City wide policy is not practical and that solutions must be appropriate to the area under consideration. For example we note that suggestions such as soft surface driveways and local soakaways are not practical on steep hillsides.

Whilst we also support objective WTO2, we are concerned at the proposed actions again concentrate on short term measures. For example, we consider that action WT6 whilst, admirable should be noted as a short to medium term measure. We consider that the ultimate objective should be for the fluid waste from the sewerage treatment plant to be capable of being utilized as a reticulated water resource.

We support objective WT03, but again feel that the actions proposed are not far sighted enough. When considering a finite resource, control of demand is essential to any concept of sustainability. Action WT10 is essential, but action WT11 should aim for a reduction in per capita usage, and education must be supplemented by financial incentives. For example, we believe that arguments advanced against metering are largely spurious and based on a specific costing model that seeks to differentiate between infrastructure costs (analogous to line charges for electricity supply) and consumption costs, creating a regime which is advantageous to high users. Clearly this model is not the only method of attributing costs.

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KPI

we are concerned that the suggested KPI do not include minimal levels for river flow and aquifer levels, with targets of increasing values for both.

With regard to residential water consumption we are appalled at the targets set. To contemplate an increase in the already excessive consumption, however minimal, is contrary to the entire philosophy of the proposed strategy. We suggest an annual reduction in per capita usage of 5% should be the minimum goal set.

6. Urban form

We support the objectives of this section and in particular the development of local and suburban centres rather than malls within the CBD and note that our comments on Transport apply to these actions where these are referenced.

We also consider that there should be a specific action recognizing that the conservation of the peri-urban landscape, specifically of the Western Hills is a key component of the socio economic sustainability of these communities. To this end, we consider that the wording of action U3 should be reversed to emphasize the socio-ecological advantages and their contribution to economic sustainability.

Whist we support the actions for objective UO3, we consider that on their own they fail to provide a long term solution. We suggest that whilst action U9 is to be applauded, the emphasis should be on the introduction of a rating system that reflects the sustainability of the property and its use, rather than the necessary initial investigation.

We do not consider that the objectives and actions proposed adequately address the issues noted under Planning and development in the preamble and propose the following additional objectives.

- UO4 Require all new construction within the City to utilize a minimum percentage of reused / recycled materials in support of objective WO2; and
- UO5 Require all new buildings to be energy neutral.

As an actions under the latter we suggest that local by laws be utilized to require best practice, as defined by BRANZ, in all new building consents rather than conformance with the NZ minimum standard, and that the Council should employ an eco-design adviser, possibly in conjunction with Upper Hutt.

KPI

We agree in principle with the KPI suggested although without any targets or even baseline figures, commenting on these becomes meaningless.

We would however draw your attention to our concerns regarding any blanket requirement for pervious surface coverage being applied to suburbs with steep gradients.

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7. Biodiversity

We applaud and support the objectives and actions under this heading. As the Western Hills remains an area at risk from wild fires both through the incidence of easily inflammable vegetation, especially gorse on areas retired from grazing and with a lengthy response time for the fire service we are particularly concerned that fire mitigation strategies are understood and maintained. We recognize that mature native species have a comparatively low inflammability, but we consider that where exotic species eg agapanthus, provide a greater degree of protection, these should continue to be used.

KPI

Again these KPI are meaningless in the absence of any baseline measures or indication of whether an increase or decrease is contemplated.

8. Council

We applaud the initiatives the Council has already undertaken to minimize energy usage such as the use of smaller more fuel efficient vehicles and the measures undertaken at Huia pool.

We are concerned at action C2 with its implication that 'branding' is either necessary or effective in promoting sustainability. We do not consider that such an approach will contribute to objective CO2 and may have a negative impact on those already committed to sustainability. We are also unclear as to the intention of action C3

We are also concerned at the implication in action C7 that biomass waste from parks, gardens, and reserves is not currently being utilized by composting. If this is indeed the case then we suggest that this action should explicitly specify its introduction, not an investigation.

Similarly under objective CO5 we suggest that a specific action should be the introduction of 'meadow' planting of grassed areas with only minimal mowing necessary to avoid a fire hazard.

KPI

We support the suggested KPI.

P. Matcham
President, Normandale Residents Association