

Lakes and Waterways Action Group Trust oral submission to TDC PC 38

Introduction

Lakes and Waterways Action Group Trust (LWAG) is a leading advocate for the protection of Lake Taupo, its waterways and other local catchment environments.

LWAG participated in the Lake Taupō Protection Project including submitting on Waikato Regional Council (WRC) Regional Plan variation, now Chapter 3:10 and relevant Taupo District Council processes aimed at reducing the nutrient loading to Lake Taupo.

We are fully supportive of the Lake Taupo Protection Strategy.

We continue to actively seek the enhancement of water quality within the Lake Taupo catchment and firmly advocate for “Sustainable Development Thinking” with regards to any development within the Lake Taupo area.

LWAG has been advocating on environmental issues in the Taupo area, but particularly water quality issues, since about 2000. We have over 100 members.

Lakes and Waterways Action Group Trust would like to thank the Council for the opportunity to comment on the draft District Plan changes.

RE: STRATEGIC DIRECTIONS PC 38

- **LWAG support ‘2.2 STRATEGIC DIRECTION 2 FRESHWATER QUALITY / TE MANA O TE WAI’**

As with past submissions on water quality and quantity LWAG have sought that LID principles be incorporated into subdivision and land use change. We have seen considerable advances in their inclusion in local greenfield developments.

Comment:

TDC’s PC 38 Section 42A Report 4.4.3 Issue SD2.3 states: *‘Implementation 101) “Submissions by Lakes and Water Action Group (OS101.1 and OS101.2) seek the addition of implementation methods, such as application of Low Impact Design methods and use of rainwater harvesting systems.*

The objectives and policies in PC38 set high level direction on key matters within Plan Change 38 Strategic Directions - S42A Report 23 the district.

Specific and detailed methods for the implementation of these provisions are more appropriately considered through the wider Plan and not within the Strategic Directions chapter.”

- **LWAG disagree with this as Strategic Directions policy would give weight to detail in the wider plan if it included wording specific to water conservation and supply.**

- **LWAG believe water efficiency measures are essential in planning a resilient and sustainable District and these should be broadly outlined in the Strategic Directions chapter towards inclusion in the wider Plan.**

As per our original submission “*potable water is an expensive resource for this community and our per capita water use remains high compared to other districts. While understanding government changes to water supply are pending, LWAG are concerned that TDC has not included specific planning provisions relating to rainwater collection - either retrofitting or for new builds.*”

When requesting the specifications for the Waiora House build at an Annual Plan submission round we received this information as part of the list of sustainability principles incorporated into the design:

‘Rainwater harvesting system – With hot dry summers, and a large external area to maintain, we have designed a rainwater harvesting system to feed the irrigation of the site, as well as the toilet facilities – so these do not draw on the mains water supply. A 30,000-litre water tank will capture over half the roof area and provide ample irrigation and plumbing to those linked services.’

Waikato Region’s Strategic Priority for Water/Wai states: ‘Protecting water is not just about reducing contaminants. The changing climate is affecting the availability of water. In the 10 years to 2020, the region recorded the lowest average rainfall in more than 50 years. Less rain and more evaporation has resulted in decreased river flows. At the same time, water use has increased.

We need to use water strategically to ensure there is enough to go around. Our communities need to know how to make the most of every drop using smart ways of capturing, storing, using and recycling water.’

<https://www.strategicdirection.waikatoregion.govt.nz/>

Their accompanying report outlines the issue and solutions in more detail:

*‘3. The challenge of water scarcity and the future availability of water
The availability of water is a critical area of concern for the region as it faces the future.*

More frequent and more extreme weather events, higher density of populations and reduced quality are all contributing to water scarcity.’

And ‘Trends that we might see in the future to conserve and better manage water resources include:

- *focused spatial planning for land and water resource use*
- *adapting industrial and agricultural water use*
- *water meters more widespread*
- *flood water capture, such as water tanks in urban homes*
- *recycled/grey water capture*
- *incentives/subsidies for the use of water tanks and grey water*
- *normalised water restrictions in summer*

Further detail on water security is in WRC’s Draft Water Security Strategy for the Waikato Region, citing evidence of a regional warming trend, (Li et al 2021), rainfall reduction – including in relation to the value of Lake Taupō to the region regarding water security and, declining trends in river flows.

<https://www.waikatoregion.govt.nz/council/policy-and-plans/waikato-regional-freshwater-strategy/water-security-strategy/>

We refer also to our Oral Submission to the draft TDC’s Water Supply Strategy in June 2021:

Example : Hamilton City Council (HCC) District Plan Rules

<https://www.hamilton.govt.nz/our-council/council-publications/districtplans/ODP/chapter25.13/Pages/25-13-4-Rules-General-Standards.aspx>

1. 25.13.4.5 Water Efficiency Measures

<i>Where required</i>	<i>Water sensitive techniques</i>
<i>i. New residential units</i>	<ul style="list-style-type: none">• <i>Detention of stormwater to 80% of pre-development runoff by an appropriate means</i>• <i>Permeable surfaces protected to achieve at least 20% above the minimum standard of the zone</i>
<i>ii. Other new buildings containing a kitchen, laundry or bathroom</i>	<ul style="list-style-type: none">• <i>Rainwater tank for non-potable reuse system</i>• <i>Other equivalent feature</i>

THREE WATERS MANAGEMENT PRACTICE NOTE HCC 02: Rainwater Reuse System: 2. RESIDENTIAL APPLICATIONS (abridged)

2.1 Description: Rain Tanks are above or below ground tanks which are used to store rain that falls on roofs and can be collected for non-potable use inside and outside the building. These tanks have two functions. They reduce the total volume of stormwater which runs off your site, especially from the frequent small rainfall events, and they reduce the demand for potable water from the council water supply system (Rain Tanks)

Rain Tanks are an important tool for reducing average water use. In most homes, toilet flushing and clothes washing account for around 50% of the total water used.

By plumbing the Rain Tank to the toilet and laundry, rainwater can replace nearly half of your annual water consumption.

2.3 What if I want to provide stormwater attenuation as well? Refer to “Three Waters Management Practice Note - HCC 05: Rainwater Reuse and Detention System” for guidance on the design and sizing requirements for dual purpose rain tanks. You are expected to demonstrate that soakage is unsuitable for your site before detention is considered.

2.4 Advantages of a Rain Tank: Rain Tanks provide the following benefits:

- *They reduce the use of potable water from the public water supply system.*
- *They reduce the annual volume of water which runs off from your site.*
- *Improves runoff water quality by filtering out contaminants*

- LWAG seek mandatory water tanks for all new builds in the Taupō District with relevant provisions in the District Plan
- LWAG ask that council consider subsidising water tanks in the next LTP round
- **LWAG ask that, as with the above, and our original submission, Strategic Directions include clearly worded direction towards provision for all new builds to incorporate rainwater harvesting systems.**
- **Ideally strategies promoting designs incorporating the use of rainwater water for on-site irrigation and toilet facilities would also be incorporated (as per Waira House above).**

REF: 2.4 STRATEGIC DIRECTION 4 CLIMATE CHANGE

- **LWAG support the inclusion of 2.4 Strategic Direction 4 Climate Change including the proviso that: ‘The Strategic Directions for climate change are consistent with the Government’s obligations to achieve net zero carbon emissions by 2050 and accords with the target for 100% renewable electricity generation by 2030.’**

However, LWAG ask how this translates into the DP changes 38-43?

We note for instance that, PC 40 relating to Taupō Town Centre Precincts does not include objectives or policy relating to ‘2.4 STRATEGIC DIRECTION 4. CLIMATE CHANGE’ or ‘3. Urban and built development must be designed in a manner which considers the need to reduce greenhouse gas emissions associated with that development and resulting land use’

- **LWAG seek an objective be included to this effect**

Comment: We understand that Strategic Direction 4. Likely relates to the recently adopted Emissions Reduction Targets & Directives. However, we feel that further detail would be helpful in the DP Strategic Direction and specific Chapters under review.

- We feel that if TDC is committed to their Emissions Reduction Targets & Directives then the District Plan is an opportunity to give clear direction to the goals of the District to reduce emissions.

TDC directives state: ‘1. We will be a climate change responsible organisation including consideration of emissions impacts into decision making’

And ‘Reducing construction emissions and building energy efficient buildings and infrastructure.

Council will implement measures to ensure that emissions reduction opportunities are considered early in the planning and design of large building and infrastructure projects, including use lower emissions design, low carbon building materials, low energy

construction methods, waste minimisation, and the energy efficient design for buildings and infrastructure.'

- **LWAG ask that these directives should also be included in the District Plan as Strategic Directions to allow for energy reductions in all of the district's developments**

The Waikato Region is taking a lead on Climate Change, stating in its introduction to their Strategic Direction 2023 – 2025 document that:

'A focus on wellbeing and how we respond to climate change is woven through all our priorities.'

In their accompanying report they state that *'Climate Action is increasingly important'* and *'Public concern about climate change is growing'*

They note that; *'Financial and policy responses are important levers in responding to a changing climate and can help reduce the scale of impact.'*

Outlines 6 priorities including:

Transition to a low emissions economy

What we want to achieve: Work with others to transition to a competitive low emissions economy that's fair for everyone and enhances community wellbeing for the future.

Goals for success: By 2025

Work with iwi partners and stakeholders to agree options and equitable pathways to help guide industries and communities to reduce use of fossil fuels and increase energy efficiency in our transition to a resilient, low emissions economy.

- **We seek Strategic Direction objectives relating specifically to concrete outcomes for emission reductions in PC42 Rural, PC 40 Taupo Town Centre and the forthcoming Urban and Built Environment Chapter.**

Comment: *Ref: PC 38 Section 42A Report (TDC) 4.6 Matters Raised in Submissions on Strategic Direction 4 – Climate Change 4.6.1 Issue SD4.1: Implementation 182) LWAG has asked for clarity on how the reduction of greenhouse gas emissions are to be measured and monitored.*

The implementation of the proposed provisions will support positive change in some aspects of reducing greenhouse gas emissions associated with built development. There will be other non-regulatory measures instigated by local and central government as well as private initiatives which will be part of this reduction effort.

LWAG are concerned that the wording; *'considers the need to reduce greenhouse gas emissions'* (2.4.4) and; *'proposed provisions will support positive change'* in the Section 42A Report in relation to greenhouse gas emission reduction, offers no substantive clarity either for TDC's Strategic Direction or the associated policy for town centre, urban and rural development.

Energy ratings for buildings and waste minimisation plans, are ways to ensure the reduction of greenhouse gas emissions (as indicated by Ministry of Business & Enterprise's proposed amendment to the building act due in 2024)

We understand from MBIE's website that 'these amendments set the stage for wider work through the Building for Climate Change Programme that will focus on reducing carbon and improving operational efficiency in new buildings.'

The proposed amendments will:

- *make it mandatory for new and existing public, industrial and large-scale residential buildings (such as multi-storey apartment buildings) to hold energy performance ratings*
- *require those intending to undertake certain building or demolition work to have a waste minimisation plan*
- *change the principles and purposes of the Building Act, to clarify that climate change is a key consideration.*

<https://www.building.govt.nz/getting-started/building-for-climate-change/proposed-amendments/>

As per our original submission LWAG ask that clarity be provided on how reduction of greenhouse gas emissions will be measured and monitored for the planning, implementation and outcome of built environment

In the Waikato Region Report informing their Strategic Directions 2023-25

WRC outline their potential for green infrastructure including:

Further expansion of renewable energy sources, such as solar and wind energy, will further reduce pollution and carbon emissions from fossil fuel use.

Urban centres and urban development offer rich potential for green infrastructure, including:

- *use of green spaces in new urban developments*
- *expanding community initiatives for tree planting and community gardens*
- *green corridors*
- *use of living building approaches (a green building certification programme and sustainable design framework that visualises the ideal for the built environment).*

Re: 2.4.2 Objective 1. Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes.

- **As per above we ask that direction is given clarifying how greenhouse gas reduction and/or emission budgets will be incorporated into a change of land use or for new developments in the urban and built environment and Taupo Town Centre**
- **Objectives relating to required energy ratings for buildings and waste minimisation plans including for construction and procurement are sought to give clarity to the wider plan and the accompanying building code.**

Further comment as per our original submission – we noted: ‘*Allowing increased vehicle movements from intensified Rural Lifestyle zone does not fit with Strategic Direction 1. Subdivision, use and development of land in the Taupo District will result in positive climate change outcomes.*’

- **We have asked in our submission to Plan Change 42, that Rural Lifestyle subdivision be limited to the periphery of existing urban areas, not those identified in the Rural areas.**