

**SUBMISSION**

**On the Draft New Zealand Energy Efficiency and  
Conservation Strategy**

**MARCH 2007**

### 1. Introduction

Wellington City Council ('the Council') welcomes the opportunity to make a submission on the draft New Zealand Energy Efficiency and Conservation Strategy (NZECS). It is also making a separate submission to the Ministry for Economic Development on the draft New Zealand Energy Strategy (NZES). These documents are critical for the future economic, social, and environmental well-being of New Zealand.

This submission supports the forthcoming submission from Local Government New Zealand (LGNZ) and highlights some key areas of concern from the Council's perspective.

### 2. Background

The draft NZECS is an important piece of central government policy direction, supporting the NZES and replacing the previous National Energy Efficiency and Conservation Strategy (NEECS), which did not achieve its targets. The NZECS provides a framework for local government action on the important issues of energy efficiency and conservation, renewable energy and climate change.

Within the existing central government policy framework, WCC has prioritised its own work on energy and climate issues. The highest three-year priority from the Council's Environmental Strategy is:

*Increasing the Council's promotion of water and energy efficiency and conservation, energy security, and the use of renewable energy sources, and taking a more active leadership role in these areas.*

The Environmental Strategy is one of seven strategies guiding the Council towards thirteen shared outcomes<sup>1</sup> as set out in the 2006/2016 Long-Term Council Community Plan (LTCCP). This strategic framework supports the Council's long-term vision: to achieve global competitive advantage by positioning our city as *Creative Wellington – Innovation Capital*.

The Council is also a participant in ICLEI's Communities for Climate Protection – New Zealand (CCP-NZ) and has set its corporate targets as stabilising greenhouse gas emissions at 2003 levels by 2010 and reducing emissions 20% by 2020. It will be developing community emission reduction targets this year in consultation with the public.

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<sup>1</sup> Wellington City Council outcomes: More liveable, Stronger sense of place, More compact, More eventful, More inclusive, More actively engaged, Better connected, More sustainable, Safer, Healthier, More prosperous, More competitive, More entrepreneurial and innovative.  
Wellington City Council strategies: Urban Development, Transport, Economic Development, Environmental, Cultural Well-being, Social and Recreation, Governance.

### 3. Comments

#### 3.1 *General*

While careful consideration has clearly been given in the NZEECS to which Government agencies are involved in delivering the action plans, the role of local government and corresponding resource implications has been inadequately considered. Local government is both a significant user of energy, and a co-regulator of activities that contribute to energy systems.

Due to the high-level nature of the NZES, it is critical that the NZEECS provide detail on how energy efficiency, energy conservation, and renewable energy targets will be achieved. But given that the NZEECS action plans mostly represent a continuation of the existing government work programme, it is not clear how increased momentum towards a sustainable low emissions system will be achieved. Many of the actions are only to “investigate” certain issues or options.

#### 3.2 *Specific proposals*

The Council strongly supports government efforts to improve the energy efficiency of the movement of people and goods, through the promotion of quality urban form and investment in public transport, walking and cycling. As an area which is largely dependent on the local government sector for implementation and delivery, this area should be the subject of detailed discussions between central and local government.

The Council also supports development and implementation of measures which improve the health, comfort and efficiency of the housing and commercial building stock through energy use improvements. The Council would like more engagement between central and local government on many of these measures. For example, the delivery and administration of the Home Energy Rating Scheme either as a voluntary or mandatory scheme would have significant consequences for local government. The Building Code also needs to be strengthened.

The Council supports the transport-related objectives of getting further on a full tank, efficient freight movement, and introducing renewable transport fuels. A mixture of information provision (e.g. mandatory fuel consumption labelling) and economic instruments (e.g. differential transport-related fees) is required. The Council supports a mandatory biofuels sales obligation at a level comparable with successful overseas experience.

The Council supports the target of installing 15,000 to 20,000 new solar water heating units nationally by 2010, and it is interested in the process for national allocation of these.

The Council supports a government leadership and best practice approach, and therefore encourages the application of lessons learned from the Govt3 sustainable procurement programme to the local government sector.

The Council also supports the following proposals:

- the government work programme to improve the energy efficiency of appliances
- government efforts to improve the responsiveness and demand-side control of the electricity system
- ongoing guidance and information provision (for example, the expansion of the regional renewable energy resource assessments) to assist councils with respect to their role in the promotion of renewable energy
- the development of aggressive renewable energy targets, supported by clear actions

#### **4. Conclusion**

Wellington City Council is generally supportive of a number of specific proposals in the draft NZEECS and of the Government's proposed direction on energy and climate change. This direction is consistent with the Council's Environmental Strategy, which prioritises energy efficiency and conservation because of the economic benefits as well as environmental issues like climate change.

Notwithstanding this general support, the Council is concerned that significant critical work has yet to be undertaken. A number of specific areas of concern to the Council have been raised. It is unclear how the high-level Strategy is intended to achieve its intended outcomes, and the local government sector needs to be actively involved in ongoing discussions with respect to the further development and implementation of the proposals.