



11th October 2020

Via email: BfCC@mbie.govt.nz

Dear Sir / Madam,

BUILDING FOR CLIMATE CHANGE – IN SUPPORT OF SOLGM’S SUBMISSION

Thank you for providing the opportunity to make a submission to the Building for Climate Change process. The Queenstown Lakes District is an area that has faced significant growth and the quality of its housing stock has not always been able to keep pace. In Vision Beyond 2050, our district has outlined the desire to pursue community outcomes that speak to sustainable building practices, zero waste and zero emissions.

In June 2019 our district declared a climate change emergency, which was rapidly followed by the development of QLDC’s Climate Action Plan. This tackles a wide range of challenges, including our built environment and construction industry. We are currently in the process of also finalising ‘A Place to Call Home’, our approach to the housing challenge in the district. We want to ensure that everyone in our community has a warm, affordable, secure place to call home. The construction industry (pre-pandemic) is second only in size to tourism in the district, highlighting that practices in this sector will be instrumental in helping the district to achieve its emissions and waste reduction goals.

Energy use and cost is also a significant issue for our district. Whilst the electricity supply is largely renewable, we are facing substantial challenges as we near the limits of line capacity, potentially reducing the reliability of our supply. When paired with the considerable price increases proposed by Aurora Energy over the next few years, the ability for our community to be resilient is severely limited. Energy efficient building practices that reduce the operational cost and improve the wellbeing of our community will be very welcome. The intersection of environmental and social wellbeing has never been clearer.

In light of the above, QLDC would like to offer its support for the majority of points raised by the SOLGM submission. There are two points for which we provide an alternative QLDC perspective, namely sections 25 and 26.

Yours sincerely,



Jim Boulton
Mayor
Queenstown Lakes District Council



Mike Theelen
Chief Executive
Queenstown Lakes District Council

QLDC ADDITIONAL COMMENT

25. What measures, if any, do you think should be put in place to increase building material efficiency? (Select all that apply)

- Update regulatory performance requirements to ensure they are appropriate
- Incentivise 'lean design'
- Remove barriers to the reuse of construction materials
- Other (please specify)

Construction and demolition (C&D) waste accounts for approximately 30 percent of the material sent to Victoria Flats landfill via the Queenstown Lakes District transfer stations. Recent analysis observed an average of 226 tonnes of construction and demolition waste being thrown away per week*. A large portion of this material could have been diverted from landfill through the implementation of the following measures:

1. Refine existing regulatory building compliance frameworks to enable mandatory waste minimisation planning through the design, deconstruction and construction phases for new and redevelopment of buildings. There are a range of established tools, standards and services available to enable this including:
 - Resource Efficiency in the Building and Related Industry (REBRI) resources and tools developed by Local Government, industry and the Building and Research Association of New Zealand (BRANZ).
 - Infrastructure Sustainability Council of Australia (ISCA) rating system for evaluating sustainability across the planning, design, construction and operational phases of infrastructure programs, projects, networks and assets.
 - Green Star ratings developed by the New Zealand Green Building Council, an internationally recognised system of rating tools that supports stakeholders in the property and construction sectors to design, construct and operate projects in a more sustainable, efficient and productive way.
 - Environmental Choice specifications developed by the New Zealand Ecolabelling Trust that assists waste collection providers and developers to track construction and demolition waste and its destinations.
2. Support central government's proposal to expand the waste levy to cover construction and demolition fills. Use revenue generated from the cost to dispose of construction waste to invest into an increase in construction waste recovery facilities across the country. Investment in community recovery and reuse facilities that stimulate local job opportunities and allow for localised processing and reuse of materials should be prioritised. Localised investment in resource recovery/reuse also presents an opportunity to reduce carbon emissions by minimising the need for raw/virgin materials and cartage of materials into or out of the district.
3. Review the use of materials that do not have an end of life pathway and move towards mandating materials that do not fit in a circular economy approach.
4. Mandate more durable building components and materials to reduce the frequency of their replacement. Windows, doors and building cladding are required by current building regulations to have a minimum life of 15 years, so this is the target for manufacturers of such products. If building components durability was increased to a minimum of 30 years they would be replaced half as often.

Building components with a 60 year life would reduce end of life carbon emissions, waste to landfill and emissions created from their replacement.

5. Establish waste diversion targets, monitoring and reporting for all public sector build projects. Ensure these requirements are integrated into contract documents.
6. Develop regulatory and educational support for Territorial Authority-level interventions. E.g. several councils have incorporated new waste management requirements into local bylaws for the purposes of promoting construction and demolition waste reduction. While bylaw standards vary, most require the submission of a site-specific waste management plan (SSWMP) prior to the commencement of any building work which outlines the proposed method of C&D material reuse, recovery, recycling and disposal associated with that project.

For regulatory mechanisms to become effective tools to reduce C&D waste, a network of locally accessible and independently viable C&D resource recovery facilities will also be needed. Critical to the success of any future C&D recovery facilities will be national governance and innovation to remove barriers that limit the reuse of construction materials, and refinement of the existing regulatory building compliance framework to stimulate the consideration of waste minimisation early on in the design process. Such measures would also work to provide confidence in the C&D reuse market.

It is also noted that Councils, especially smaller Councils, will be limited in their ability to enforce new C&D interventions such as bylaw standards. Lack of enforcement capacity will limit the overall effectiveness of interventions. This issue could be remedied through the refinement of existing regulatory building compliance provisions, the release of appropriate regulations pursuant to the Local Government Act and the Waste Minimisation Act, and the sharing of best practise, templates and processes.

7. Ensure that any regulated packaging product stewardship scheme is extended to include all packaging materials associated with the construction industry. Packaging materials that do not fit within a circular economy system should be phased out or banned.
8. Support for peer to peer sharing platforms such as CivilShare which allow trading of materials and resources should be provided to enable more immediate diversion of materials from landfill.

* QLDC Solid Waste Assessment May 2020 <https://www.qldc.govt.nz/services/rubbish-recycling/solid-waste-assessment>

26. What measures, if any, do you think should be put in place to reduce construction waste?

As noted in the above response, refinement of the existing regulatory building compliance framework, which incorporates the measures outlined above, will be necessary if we are to effectively change our existing C&D waste outcomes in New Zealand.

We have observed in our district that there is considerable willingness within the industry to work towards reducing the amount of C&D waste going to landfill however, lack of infrastructure, education and regulatory support are prohibiting substantial change. Central Government should also be leading by example within the C&D waste reduction area, and set clear C&D waste reduction targets and reporting requirements for public sector construction projects that are also linked with opportunities to move towards zero carbon goals.