



the architectural centre inc.
PO Box 24178 Wellington

9 November 2017

Hon. James Shaw
Minister for Climate Change
Parliament
New Zealand
james.shaw@parliament.govt.nz

Tēnā koe Minister

Congratulations on your new role as Minister for Climate Change. As you know the Architectural Centre has a long history of advocating for a better environment through good design and we see sustainability as a vital part of this. We look forward to you making great achievements in this area.

In this context, we would like to see your new government provide incentives for more sustainable practices, including lower energy-consumption, in the building sector. We consider that the following built environment issues will significantly reduce climate change:

(a) **Maintain existing buildings, and support the adaptive re-use of buildings.**

Increasing the longevity of the existing building stock is vital to maximise the use of embodied energy. In terms of housing, maintaining existing buildings will also reduce the need for new houses to replace deteriorated stock. We also consider aspects of maintenance and re-use as important to discussions regarding earthquake-prone buildings and heritage buildings. Incentivising good maintenance practices could prevent structural deterioration. For example, simple maintenance - such as cleaning spouting - can prevent timber structure in unreinforced masonry buildings from rotting, assisting with the structural integrity, and seismic viability, of a building.

Likewise, investing in detailed and indepth engineering assessments can mean a better understanding of buildings initially considered to be earthquake-prone, preventing needless and ill-informed demolition. We also note that the current earthquake-prone regime for buildings is significantly more sensitive to risk than other activities, including car and aeroplane travel. The NZ Society of Earthquake Engineering has equated the risk of "occupying a building performing at 33% NBS" (the current threshold defining earthquake-prone buildings) with "the risk of flying in a commercial aircraft, or travelling 10,000 km or more by road per annum."¹

These are activities that the majority of New Zealanders routinely participate in without any hesitation and without significant government constraint, and contrast the cultural anxiety and regulatory costs associated with the term "earthquake-prone building." Given our tolerance of over 300 deaths on the road each year, in contrast to about 465 deaths due to earthquakes over our entire recorded history, we suggest that relative regulation of these risks, including the current definition of earthquake-prone and the negative

¹ Hamilton East Community Trust v The Hamilton City Council [2014] NZ EnvC 220. para [10]

consequences of this (in terms of costs to building owners, demolition of heritage buildings, evacuation of state housing), needs reassessing.

- (b) **Building net zero-energy buildings.** The knowledge to do this is available, and includes constructing appropriately-sized buildings (smaller buildings being easier and cheaper to heat), maximising natural resources (e.g. the orientation of buildings to the sun), and high levels of insulation, as much as any application of specialised building technology.
- (c) **Sustainable urban design.** This includes smart land-use, where development and transport infrastructure are mutually-supportive, and water sensitive urban design, as well as investing in sustainable infrastructure, including public transport and active transport modes (specifically walking and cycling). We support car-sharing as a way of reducing car ownership and to reduce significant amount of land used for car parking. However we do not consider that substituting fossil-fuelled vehicles with electric vehicles will have any significant benefit because this will continue to dedicate a majority of road space to private cars.

To support the above we also recommend that a more pro-active stance is taken with respect to evaluating the causes of climate change in the Resource Management Act. In this regard we note that Part 2 of the RMA requires decision-makers to "have particular regard to ... the effects of climate change" (s7(i)), but nowhere does the RMA require decisions regarding development to take into account activities which will exacerbate or cause climate change. We also suggest that it would be appropriate for s32 reports - which require an assessment to "identify and assess the benefits and costs of the environmental ... effects that are anticipated" (s32(2)(a)) - to be required to include a climate impact assessment (including assessments of energy use and carbon emissions). Similarly we ask that the RMA be amended to also require a climate impact assessment to form part of an adequate consideration to alternatives (e.g. ss171, 168A).

In addition, we have examined the coalition and confidence and supply agreements between Labour and its support partners. We strongly support the following commitments these documents have made:

- (a) a Net Zero Emissions Economy by 2050.² We strongly recommend that emission-reduction targets for the building sector (including building operation) be included in the proposed Zero Carbon Act.³
- (b) a reprioritising of the National Land Transport Fund to better achieve higher use of sustainable and active transport modes,⁴ and we stress the need to also support car sharing to reduce car ownership, and to target single-occupancy motor vehicle use.
- (c) the promise to work "on light rail from the city to the airport in Auckland."⁵ We jealously note this and eagerly look forward to your government also achieving light rail to the airport in Wellington.
- (d) the Billion Trees Planting Programme⁶ and in this regard note the potential of establishing urban green corridors for carbon sequestration and to provide habitat for native wildlife.

² New Zealand Labour Party & Green Party of Aotearoa New Zealand "Confidence & Supply Agreement" (2017) p. 3; para 1.

³ New Zealand Labour Party & New Zealand First "Coalition Agreement" (2017) p. 5; New Zealand Labour Party & Green Party of Aotearoa New Zealand "Confidence & Supply Agreement" (2017) p. 3; para 1a.

⁴ New Zealand Labour Party & Green Party of Aotearoa New Zealand "Confidence & Supply Agreement" (2017) p. 3; para 2a.

⁵ New Zealand Labour Party & Green Party of Aotearoa New Zealand "Confidence & Supply Agreement" (2017) p. 3; para 2d.

⁶ New Zealand Labour Party & New Zealand First "Coalition Agreement" (2017) p. 2.

(e) the statement that "[a]ll new legislation will have climate impact assessment analysis."⁷ With respect to this, we refer again to our note above regarding the need to better address issues of climate change in the RMA, and further recommend that the RMA require District Plans to identify areas of highly fertile land, that are particularly beneficial for horticultural production, and protect them from development. The National Policy Statement on Urban Development Capacity could be amended to protect fertile land from development.

Thank for you considering our comments above.

Finally we wish you really well in this extremely important role, and if we can assist in anyway please let us know.

ka nui ngā mihi


Christine McCarthy and Daryl Cockburn
Co-presidents, Architectural Centre
arch@architecture.org.nz

⁷ New Zealand Labour Party & Green Party of Aotearoa New Zealand "Confidence & Supply Agreement" (2017) p. 3; para 1b.