

30 September 2020

Ministry of Business, Innovation and Employment (MBIE)  
15 Stout Street  
Wellington 6011

By email: [BfCC@mbie.govt.nz](mailto:BfCC@mbie.govt.nz)

## **DCC SUBMISSION ON BUILDING FOR CLIMATE CHANGE**

### **Introduction**

1. The Dunedin City Council (DCC) appreciates the opportunity to provide comments to the Ministry for Business, Innovation and Employment (MBIE) on the proposed Building for Climate Change programme.
2. The DCC supports the Government's aim for a carbon neutral future for New Zealand, a strong low emissions economy and the role the building sector can play in supporting these objectives.
3. The DCC has been progressing work on climate change mitigation and adaptation since 2009. Having a high degree of exposure to sea level rise, Dunedin is particularly aware of the consequences of inaction on emissions reduction. In June 2019, the DCC declared a climate emergency, and brought forward the DCC's city-wide net carbon neutrality target by 20 years, adopting a two-part emissions reduction target as follows:
  - a. net zero emissions of all greenhouse gases other than biogenic methane by 2030; and
  - b. 24% to 47% reduction below 2017 biogenic methane emissions by 2050, including 10% reduction below 2017 biogenic methane emissions by 2030.
4. The DCC has approached its submission from this policy position, and therefore generally supports further exploration of measures that are likely to drive emissions reduction. However, it is certainly the case that many of the proposed approaches risk introducing greater complexity and cost into building design, consent and construction processes. Significant Government support will be required, both for the construction sector and Building Consent Authorities, as changes are implemented. The DCC may revisit its position on any given element of the proposed changes when the Government makes more specific proposals, considering in particular the degree of Government support that might be available.

## Submission

5. The first comprehensive snapshot of Dunedin's emissions profile as a city was produced in 2016 using the Global Protocol for Community Scale Greenhouse Gas Emissions (GPC) methodology and data from the 2014/15 year. An updated emissions profile for the city has just been completed, using data for the 2018/19 year. At the same time, the profile for the 2014/15 year was re-run incorporating updates to the methodology, to enable direct comparisons between the two profiles.
6. Like the methodology used for mandatory reporting at an international level, GPC reporting is production-based, rather than consumption-based, so excludes embodied emissions relating to products produced elsewhere but consumed within Dunedin. In addition, it must be noted that application of the methodology is limited by the availability of data - in some cases, there is a reliance on national data, which is then applied to Dunedin on a per capita basis. Within the inventory, emissions ultimately attributable to the construction, use and end-of-life of buildings are spread across a number of emissions categories, including Stationary Energy, Transportation and Waste. For this reason, it is difficult for the DCC to comment with certainty on the contribution of buildings to the city's emissions profile. However, in 2018/19, emissions from stationary energy used in the residential and commercial sectors alone totalled 5% of the city's footprint. The DCC commends the focus in the Building for Climate Change programme on whole-of-life. A 2018 report\* found the built environment is responsible for 13% of New Zealand's gross carbon footprint when the full life cycle of emissions is taken into account (and up to 20% if a more consumption-oriented view of emissions is employed). In light of this, a focus on reducing emissions from this sector is clearly warranted.
7. As part of its commitment to emissions reduction, the DCC is actively working to mitigate emissions from existing building stock in its own ownership. As well as insulation upgrades across the 950 units that make up the DCC's social housing portfolio, the DCC is working in partnership with other major Dunedin institutions to displace use of LPG (in the case of the DCC) and LPG/coal (in the case of other agencies) for heating in major CBD buildings and facilities. New social housing units are being built to passive house principles, and a focus on minimising emissions is being built into planning and design for all new DCC building projects.
8. The DCC also has a number of initiatives in place to support improvement of the city's existing housing stock: through support of the Cosy Homes Trust, the Council promotes improvements such as insulation and clean heating; an eco-design advisor role provides free advice to homeowners wishing to improve the health and efficiency of their home; and the Warm Dunedin targeted rates scheme has supported 1600 landowners to insulate their homes since its inception. Through our support of the EnviroSchools programme, we are also involved in investigating alternatives to coal use in local schools.
9. However, retrofitting existing buildings and their heating systems is ultimately far less satisfactory than ensuring they are built to align with good social and environmental outcomes in the first place. As a medium-growth city, ensuring that new buildings are aligned with the city's low carbon ambitions will be important in achieving emissions reduction targets.

10. The DCC does wish to note that a focus on emissions from buildings themselves will not be enough to achieve substantive emissions reductions from the built environment. In Dunedin, a 30% increase in emissions from the transport sector was the major driver in the city's overall 4% emissions growth between 2014/15 and 2018/19. Emissions from this sector now represent 43% of Dunedin's emissions, so it is clear that the form of the urban environment, as much as the quality of individual buildings, will determine emissions trajectories.
11. However, overall the DCC considers MBIE's Building for Climate Change programme to be an overdue intervention that will deliver a wide range of co-benefits. In the interests of achieving its Zero Carbon 2030 target, the DCC supports early and strong action from the Government in this direction.

## **Conclusion**

12. The DCC commends the Government's forward-thinking in considering emission reduction in the building sector.
13. The DCC supports the continued efforts to shift towards a carbon neutral economy by 2050, noting DCC's recent commitment to being a net carbon zero city by 2030.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Aaron Hawkins', with a stylized, flowing script.

Aaron Hawkins  
**MAYOR OF DUNEDIN**