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Tena Koe

Submission: Building Code Update 2021

Thank you for the opportunity to submit on the Building Code update 2021. Council's submission focuses on the proposed changes for energy efficiency for housing and small buildings, in particular:

- The proposed increased requirements for minimum levels of insulation.
- The proposed climate zone map.

Increased requirements for insulation

Council supports the need to ensure that new homes constructed within New Zealand provide a warm and dry environment for our communities. We acknowledge that current insulation requirements throughout New Zealand were set some of time ago and have not kept pace with international standards and that the housing market within New Zealand is complex, with housing affordability a key concern throughout the country, including for the Rangitikei District. When considering its recommended option Council has considered the matters outlined below:

- The impacts on housing costs. Option 1 creates additional cost implications for new dwellings (\$1,800 to \$16,000), and Option 2 creates slightly higher cost implications (\$15,000 to \$25,000), while the cost implications of Option 3 are the highest (\$19,000 to \$50,000). As noted below these costs are limited to insulation, and it will be important to also consider potential consequential changes to ventilation or internal moisture requirements that could be required.
- Positive impacts on health. Warm dry homes are a key contributor to healthy communities and Council supports the construction of homes that are warm and dry. MBIE identify that health outcomes would be increased with improved insulation as a result of healthier inside temperatures and a reduction in the risk of condensation. Option 2 provides an opportunity to increase New Zealand standards to a level consistent with international standards, supporting better health outcomes for our people.
- The need for increased ventilation. Council supports MBIE investigating the need to make changes to other parts of the Building Code impacted by increased insulation requirements. To ensure adequate airflow and dry homes, the relationship between insulation and ventilation is important.

While there are some challenges for increasing insulation requirements, the health of our communities and having warm and dry homes is important to Council, therefore, we recommend proceeding with Option 2, increasing to international standards. Option 1 does not provide sufficient change to support positive health outcomes for our communities, while the costs and changes to the building market required for Option 3 could be significant. Option 2 provides the best balance of improving health outcomes through improved insulation and costs.

Making this place home.

Recommendation: That increased requirements for insulation occur in accordance with Option 2: increasing to international standards.

Recommendation: That Council supports investigation into required changes to the Building Code for ventilation (G4) and internal moisture (E3) as a result of increased insulation requirements.

Recommendation: That the transition period is 12 – 24 months depending on the nature of the implications to other parts of the Building Code related to ventilation (G4) and internal moisture (E3).

Proposed climate zone map

The Consultation Document outlines that new climate zones are proposed to better recognise variations in climate around New Zealand noting that territorial authority boundaries were also considered when developing the proposed climate zones. Climate zone 4 is proposed to apply to the whole of the Rangitikei District. This approach differs from the existing approach where the district is split into two zones, Zone 3 for the northern portion of the district, and Zone 2 for the southern portion of the district.

Council supports the amendment of climate zones to better align with climate variations but does not support the desire to align climate zones with territorial authority boundaries. The proposal for the whole of the Rangitikei to be located within one climate zone does not reflect the significantly varied climate throughout our vast district, and we anticipate that the proposed changes would cause major challenges in practice. The difference in insulation requirements between climate zones 2 and 4 is significant. While it might make administration of the climate zones marginally easier, the wider logic of such an approach is lacking and contrary to the stated purpose of the proposed change.

The southern portion of the district contains a much milder climate due its proximity to the coast, being at sea level at Scotts Ferry/Koitiata. This compared with Taihape that has land at an altitude of 500m above sea level, and Moawhango hinterland with an altitude of 700m above sea level have vastly different climates and temperatures all year round. To treat these areas within the same climate zone is undesirable and illogical. Consideration should also be given to latitude and the influence that this aspect has on perceived temperature/climate. Currently, the existing split climate zones works well for the district and is reflective of the variable temperatures. It is recommended the district retains at least two climate zones.

Recommendation: That the Rangitikei District is provided with two climate zones, Zone 4 for the northern portion of the district, and climate Zone 2 for the southern portion of the district (with the split occurring in accordance with the existing climate zones).

Thank you again for the opportunity to submit on the Building Code Update 2021.

Yours sincerely



Andy Watson
Mayor of the Rangitikei