

27th June 2025

Attention: Bill Nicoll

By email: Bill.Nicoll@parliament.govt.nz

Dear Queenstown Lakes Councillors and officials,

Thank you for the opportunity to feedback on the Draft Queenstown Lakes Climate and Biodiversity Plan 2025 - 2028

Who we are

The New Zealand Green Building Council was created by the property and construction sector to help improve the health and efficiency of New Zealand's buildings. Our members include construction firms, architects, building owners, energy companies, engineers, banks, product suppliers, government departments, local authorities and many others.

We're passionate advocates representing over 700 members who believe that better buildings can deliver a country that has lower running costs for families and businesses, greater resilience in our energy system and less climate pollution.

To aid the sector in its green transformation, we develop and administer several sustainability rating tools that can be used by planners, builders, owners, and operators to identify opportunities to reduce waste, energy use, and emissions. Our team and the networks that support them have extensive knowledge on reducing the environmental impact of buildings and property.

Of particular relevance to this consultation, NZGBC develops and operates the New Zealand specific Green Star, Homestar and HomeFit rating systems on behalf of the sector. They also administers the NABERSNZ energy use rating system on behalf of central Government.

Submission summary

Our submission is a response to the Built Environment chapter of the plan.

We commend the council for prioritising *"investment in buildings and infrastructure that minimises their impact on the environment, whilst being resilient to a changing climate."*

It is great to see the Council wants to *"Implement eco-design principles, low-impact construction methods, and renewable energy integration in Council-led building projects to minimise environmental impact, enhance resilience, improve long-term efficiency, and reduce operation costs."*

Areas where the plan could be strengthened

- 1) *Ensure action will take place* - Currently the much of the built environment chapter

focuses on steps the council is taking with their own building projects (which is tiny fraction of total building projects in the district) or "promoting" or "education" campaigns - which will see some builders gain increased knowledge.

We are facing a climate crisis. The construction sector is 20% of New Zealand's emissions. It was six years ago that Queenstown Lakes declared a climate and ecological emergency. Six years. I am not sure there is a great deal to show for in terms of change in the construction sector in that time. There has very little reduction if any in the emissions of the built environment.

Significant tangible steps are needed. The plan needs to have a greater focus on how to drive tangible change in the broad majority of buildings being built. The most effective way for Queenstown Lakes to drive change would be to incentivise the private sector to deliver buildings that have far less impact. This will also be the most effective way to reduce the strain on resources that Queenstown so suffers from.

Robust green buildings standards, with proven certification methods such as Green Star, Living Building Challenge and Homestar deliver less waste to landfill, substantially lower running costs, improve air quality, deliver significant water savings, improve biodiversity and lower emissions. These can deliver benefits for Queenstown Lakes's infrastructure projects, by, for instance delaying the infrastructure needed to create new landfill or water provision for housing.

The plan states *"The scientific evidence is clear: we must act decisively to reduce emissions, restore biodiversity, and strengthen our resilience to the changes ahead."*

The plan therefore needs amending to include actions that deliver the scale of the change that equates to those rallying words. The following are steps the NZGBC recommends Queenstown Lakes takes forward.

- Creating a differential in development contributions for homes. If the current development contribution is, say \$18k per house a suggestion is increasing this to \$19k for homes and reducing it to \$17k for homes that use less water, use less energy and reduce surface water run off (Homestar homes can offer this). Queenstown Lakes would then have created a differential of \$2k per house
- Providing quicker consenting for homes that are energy efficient. The Minister for Construction and Property recently announced that homes with solar panels will gain consent in half the time of homes that do not have solar panels. It makes sense to extend the logic. Queenstown Lakes could provide energy efficient homes the same benefits.
- Provide a height or density advantage for those building to lower carbon healthier standards.

Builders are busy. They very rarely move without real incentives. All the steps above would help galvanise the private sector towards actually delivering lower carbon healthier building practices. These incentives will actually encourage builders to take the steps to reduce impacts on building sites.

The more these practices are taken up, the more they are normalised. Then other builders want to take them up. Finally councils and community groups and others are able to advocate that greener buildings are standard practise and well understood by the sector. This enables the building code to change meaning all regions of New Zealand benefit.

Providing an incentive for building lower carbon healthier homes or buildings will be very effective at building momentum. This is likely to engage more of the sector so that when workshops or training is provided, as set out at page 73, builders and others are more likely to take up the training and, most importantly, they are more likely to execute the training when they are on the building site.

2) *Set a clear target* - Council has a great deal of mana. Where the Council sets a clear unambiguous target this provides real clarity to the sector. Other builders, engineers and owners read about it and want to learn. This helps to create market transformation. It normalises building to that standard.

The NZGBC recommend that Queenstown Lakes District Council set 4 Green Star certification as the standard on all projects that cost over \$9m. This is what Auckland Council has done. This will provide clarity to the sector and encourage other local authorities and developers to take this step also.

A new standard will be launched by the NZGBC by October 2025. This will provide an opportunity for smaller buildings to gain certification for reducing embodied and operational carbon. It will be lower cost and quicker to obtain. This maybe of use for smaller buildings Queenstown Lakes are building.

3) *Useful references* - Page 71 of the draft plan has a focus on whole of life carbon and embodied emissions. The NZGBC has spent two years working with industry to write three new useful resources on embodied emissions

a) A new Embodied Carbon Methodology. This methodology subsequently been endorsed by MBIE, Engineering NZ and the NZ Institute of Architects. MBIE wrote the following.

"MBIE Building System Performance welcomes the release of the NZGBC Embodied Carbon Methodology. This methodology builds on MBIE's Whole-of-life Embodied Carbon Assessment: Technical Methodology, published in 2022, further supporting consistency in the assessment of embodied carbon in Aotearoa New Zealand.

A common approach to assessing embodied carbon of buildings is vital for improving the robustness and credibility of assessment results, so they can be used to inform decisions at all

stages of the construction process. MBIE is pleased to support sector-led initiatives that work towards reducing emissions from the building and construction sector in Aotearoa New Zealand"

b) The embodied carbon data base may also be of use. This provides robust carbon data on thousands of products used in NZ construction. It may be of use to reference these resources for others to use nzgbc.org.nz/embodied-carbon

4) *Draw linkages between objectives* – page 75 focussed on promoting water efficiency. This has an objective to "Investigate other policy interventions to support and incentivise responsible water usage across the district".

Homestar has mandatory water efficiency requirements in it, delivering around 20% less water relative to standard homes.

Homestar, Green Star and Green Star Communities all have specific tangible areas focussed on improving biodiversity and reducing surface water run off. Extensive work was undertaken to ensure that the guidance and deliverables incorporated leading thinking on how to reduce surface water run off. Deliverables are checked at the built stage. This is available for Queenstown Lakes to use.

The Queenstown Lakes objective of promoting responsible water use (page 75) and strengthening storm water resilience (page 76) would be significantly delivered by where Queenstown Lakes provides incentives for green certified homes, buildings or communities as we set out in our first recommendation.

Thank you

The NZGBC commends Queenstown Lakes for the creation of the draft Queenstown Lakes Climate and Biodiversity Plan 2025 – 2028.

There is a huge amount Queenstown Lakes could achieve where they step up to take bold action to incentivise the construction sector to reduce emissions, save water and improve biodiversity. This will deliver better quality of life for Queenstown residents, lower bills and reduced infrastructure costs.

I hope this feedback is useful. We look forward to seeing the plan evolve and to working with you to deliver it, helping ensure an even more amazing district for the people of Queenstown.

Nga mihi nui,



Andrew Eagles CEO, NZGBC



