

Ministry of Business, Innovation and Employment's consultation on Building Code Update 2021

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry of Business, Innovation and Employment's (MBIE) consultation on the Building Code Update 2021.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH.

General Comments

4. Safe, healthy and affordable housing is an essential prerequisite for individual and community wellbeing. NMH congratulates MBIE for initiating this review that will lift the standards of buildings and will result in warmer, drier and healthier homes for families.

Specific Comments

Proposal 1: Energy efficient for housing and small buildings:

5. *Question 1.1. Which option do you prefer?*

Option 3. Going further than international standards

6. *Question 1.2 For your preferred option, how quickly should this change come into effect?*

36 months. The timeframe could be subject to a bi annual review based on an assessment by MBIE of the adaption of the building sector.

7. *Question 1.3 If there are factors we should consider to progressively phase in your preferred option, please tell us?*

NMH would like to see a staged approach adopted where *Option 2 (NZ standards are comparable to international standards)* is adopted within 24 months and then *Option 3 (Standards that would go further than international standards)* are adopted within five years (Nov 2028).

NMH supports Option 3 to adopt standards that would go further than international standards however, as Option 3 is reliant on adopting new ways of designing and constructing buildings, it must be phased in over time to enable

the construction sector to adapt. NMH notes that Option 3 will increase construction costs but these will be offset over the energy savings over the life span of the house.

NMH supports lifting minimum levels of insulation to make homes more comfortable and easier to heat and cool. NMH supports increasing the number of climate zones used in the insulation requirements from 3 to 6 to better reflect the different temperatures experiences in each zone. The availability of healthy, affordable housing of people is a major concern for NMH. People who live in warmer drier homes tend to be healthier, with fewer GP and hospital visits and fewer days away from work due to illness¹. Poor quality housing widens inequities. Maori, Pacifica and low income people are more likely to live in homes with dampness and mould². Whilst NMH recognises that additional insulation requirements will add initially to housing costs, it is anticipated that this will be offset against reduced heating/energy costs along with additional health benefits.

8. Dilapidation and cold damp conditions have all been found to adversely affect health. Poor housing exacerbates existing health conditions and heighten the impacts of impairment and this can result in dislocation from their communities, admission to an unnecessarily high level of care and support and shift the cost of what is primarily a housing problem onto the health and social services sectors.³
9. An analysis conducted by the World Health Organisation found that those over 65 years of age showed increased respiratory problems when living in cold dwellings in winter and children 0 to 17 years of age showed twice the prevalence of respiratory problems in poorly heated homes.⁴ Energy efficient homes result in reduced energy costs, which is important for low income households on fixed incomes. Given that our population is ageing, it is important that housing does not exacerbate health issues.
10. Improving the energy efficiency of houses also lowers the environmental footprint in terms of requiring less energy to heat or cool the building.

¹ <https://www.stats.govt.nz/reports/housing-in-aotearoa-2020#:~:text=Inequalities%20in%20New%20Zealand%27s%20housing,rates%20of%20crowding%20and%20homelessness>

² Ibid

³ Saville-Smith, K. & Saville, J., (2012) *Getting Accessible Housing: Practical Approaches to Encourage Industry Take-up and Meeting Need*, Centre for Research, Evaluation and Social Assessment for the Office for Disability Issues and the Ministry of Business, Innovation and Employment

⁴ Community and Public Health, (2013) *Fuel Poverty and Home Heating*, Canterbury District Health Board
<http://www.healthychristchurch.org.nz/media/16229/fuelpoverty.pdf>

11. *Proposal 2: Energy efficient for large buildings: 2.1 Which option do you prefer?*

Option 3 for a 25% reduction in energy use for heating and cooling.

12. *Question 2.3 If there are factors, we should consider to progressively phase in your preferred option, please tell us?*

NMH notes that the consultation document states that the current standards lag behind other countries with similar climates. Option 3 is likely to bring the standards in line with the insulation levels in other parts of the world with similar climates.

NMH recommends that the time frame for adoption of Option 3 is three years to allow for the construction industry to prepare for implementation.

13. *Proposal 3: Energy efficiency for heating, ventilation, and air conditioning (HVAC) systems in commercial buildings*

Question 3.1 NMH supports issuing the new edition of H1/VM3 as proposed. NMH supports Option 4: the introduction of a simplified verification method for heating, ventilation and air-conditioning system in commercial buildings based on existing MBIE guidelines and international frameworks.

Questions 3.2 NMH notes that H1/VM3 does not appear to have any statements regarding HVAC and health. HVAC Systems can become contaminated by dust and mould and this has been implicated in health conditions such as aspergillosis and legionella. These matters need to be factored into consideration when installing, using and maintaining HVAC systems.⁵

14. *Proposal 4: Natural light for higher-density housing:*

Question 4.1 NMH supports issuing the new G7/As1, G7/As2, G7/VM2 standards to provide a new means of compliance for higher density buildings and limit the scope of the existing standards as proposed. The current requirements do not provide sufficient natural light for all types of buildings whereas NMH supports the proposed new standards insofar as they provide for the design of higher density buildings with sufficient high quality ambient natural light to benefit the health and wellbeing of residents. Given the amount of time spent at work, the growth of multi-purpose buildings that combine residential, business and office spaces and the trends towards working from home this is an essential pre-requisite for healthy buildings

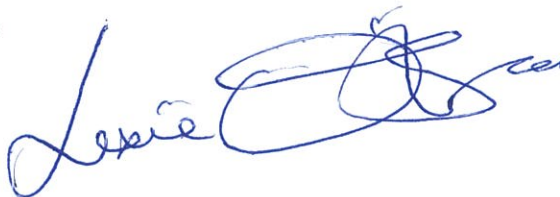
⁵ <https://www.canada.ca/en/employment-social-development/services/health-safety/prevention/legionella.html> https://academic.oup.com/mmy/article/44/Supplement_1/S33/1747652

that are both primarily focussed on habitation and those that are primarily to be used as workplaces.

Conclusion

15.NMH thanks the Ministry of Business, Innovation and Employment for the opportunity to comment on the Building Code Update 2021.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Lexie O'Shea', with a stylized flourish at the end.

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