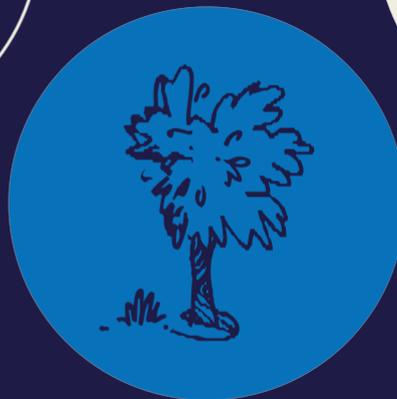
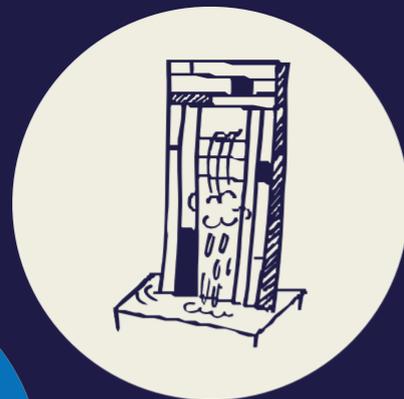


# HAMILTON CITY COUNCIL STAFF SUBMISSION

## Consultation Document (30 May 2022) - Building Code Update 2022 - Transition Period for the Energy Efficiency of Housing

Ministry of Business, Innovation and Employment



14 June 2022



**Hamilton  
City Council**  
Te kaunihera o Kirikiriroa

# Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this submission is aligned to the priority '**A green city**'.

## Council Approval and Reference

This submission was approved by Hamilton City Council's Chief Executive on 14 June 2022.

Hamilton City Council Reference D-4245097 - Submission # 688.

It should be noted that the following submission is from staff at Hamilton City Council and does not necessarily represent the views of the Council itself.

## Introduction

1. Hamilton City Council staff would like to thank the Ministry of Business, Innovation and Employment for the opportunity to make a submission to its 30 May 2022 **Consultation Document - Building Code Update 2022 - Transition Period for the Energy Efficiency of Housing**.
2. The response/feedback from Hamilton City Council staff is outlined in the Ministry of Business, Innovation and Employment's official submission form - copy attached.

## Further Information and Opportunity to Discuss Our Submission

3. Should the Ministry of Business, Innovation and Employment require clarification of the submission from Hamilton City Council staff, or additional information, please contact **Alister Arcus** (Principal Building Advisor - City Growth) on 07 838 6881 or email [alister.arcus@hcc.govt.nz](mailto:alister.arcus@hcc.govt.nz) in the first instance.
4. **Hamilton City Council staff would welcome the opportunity to discuss the content of this submission in more detail with the Ministry of Business, Innovation and Employment.**

Yours faithfully



**Lance Vervoort**  
**CHIEF EXECUTIVE**

# Consultation submission form

## Building Code update 2022

### Transition period for the energy efficiency of housing



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H1 Energy efficiency for housing and small buildings Transition period ..... **Error! Bookmark not defined.**

## How to submit this form

### How to submit this form

This form is used to provide feedback extending the transition period for the implementation of insulation settings in Acceptable Solution H1/AS1 and Verification Method H1/VM1.

When completing this submission form, please provide comments and reasons explaining your choices. Your feedback provides valuable information and informs decisions about the proposals.

You can submit this form by 5pm, Tuesday 14 June 2022 by:

- › email: [buildingfeedback@mbie.govt.nz](mailto:buildingfeedback@mbie.govt.nz), with subject line Building Code consultation 2022
- › post to: Ministry of Business, Innovation and Employment, 15 Stout Street, Wellington 6011  
or: Ministry of Business, Innovation and Employment, PO Box 1473, Wellington 6140

Your feedback will contribute to further development of the Building Code. It will also become official information, which means it may be requested under the Official Information Act 1982 (OIA).

The OIA specifies that information is to be made available upon request unless there are sufficient grounds for withholding it. If we receive a request, we cannot guarantee that feedback you provide us will not be made public. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

## Submitter information

### Submitter information

MBIE would appreciate if you would provide some information about yourself. If you choose to provide information in the “About you” section below it will be used to help MBIE understand the impact of our proposals on different occupational groups. Any information you provide will be stored securely.

#### A. About you

Name:

Alister Arcus

Email address:

alister.arcus@hcc.govt.nz

#### B. Are you happy for MBIE to contact you if we have questions about your submission?

Yes

No

#### C. Are you making this submission on behalf of a business or organisation?

Yes

No

If yes, please tell us the title of your company/organisation.

Hamilton City Council

#### D. The best way to describe your role is:

Architect

Engineer (please specify below)

**BCA/Building Consent Officer**

Residential building owner

Builder or tradesperson (please specify below)

Commercial building owner

Building product manufacturer or supplier  
(please specify the type of product below)

Other (please specify below)

Designer (please specify below)

Prefer not to say

Please specify here.

## Submitter information

### E. Privacy information

- The Privacy Act 2020 applies to submissions. Please tick the box if you do **not** wish your name or other personal information to be included in any information about submissions that MBIE may publish.
- MBIE may upload submissions or a summary of submissions received to MBIE's website at [www.mbie.govt.nz](http://www.mbie.govt.nz). If you do **not** want your submission or a summary of your submission to be placed on our website, please tick the box and type an explanation below:

I do not want my submission placed on MBIE's website because... [insert reasoning here]

### F. Confidential information

- I would like my submission (or identifiable parts of my submission) to be kept confidential and **have stated** my reasons and ground under section 9 of the Official Information Act that I believe apply, for consideration by MBIE.

If you have ticked this box, please tell us what parts of your submission are to be kept confidential.

### Transition period for the energy efficiency of housing

We are proposing to extend the transition period for adopting new insulation requirements for housing in Acceptable Solution H1/AS1 and Verification Method H1/VM1. The proposed change would extend the transition period for 6 months to 1 May 2023. This proposed change considers feedback received in the 2021 consultation, changing circumstances in New Zealand's building and construction sector, and the importance of New Zealand's obligations under the Climate Change Response Act 2002.

#### Questions for the consultation

**1-1.** Do you agree with the proposed extension of 6 months to the transition time so that the previous lower insulation settings can be used until 1 May 2023?

- Yes, I support the extension of 6 months (1 May 2023)
- No, the transition period should remain the same (2 November 2022)
- No, the extension should be longer (12 months to 1 November 2023)
- Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

We are of the opinion that the industry faces significant challenges of which we are all probably familiar with. These are making it really hard on the industry with increasing costs and complexities of supply chains etc. It is vitally important that we address the poor state of housing construction and bring the minimum level of insulation up to world industry standards as soon as practicable, but think it is reasonable to give the industry a reasonable amount of time to do this. We believe that one year is a reasonable amount of time to prevent these changes being rushed.

**1-2.** What impacts would you expect on you or your business from the proposed change to the transition period?

These impacts may be economic/financial, environmental, health and wellbeing, or other areas.

The proposed extension of the timeframes will allow us to gear up for the changes. This includes training, discussions with industry experts and presentations by industry suppliers. This will allow us the necessary time to familiarise ourselves to support the industry and building owners.

The proposed changes do not change the fact that applicants can design and construct to the proposed higher requirements of H1. We would support any applicant's desire to do this but will need appropriate knowledge so that we can assist our clients to the best of our ability.

**1-3.** What support would you or your business need to implement the changes by 1 May 2023 if introduced?

- Information about what the insulation changes are or what buildings they apply to
- Education material on how the new documents can be used to comply with the Building Code
- Webinars from MBIE technical experts
- Other types of support (please specify below)

If there anything else you would like to tell us about the reason for your choice(s)?

As much training and discussions with industry experts/product suppliers as possible is vital to allow us to have the knowledge to review these designs and support the proposed changes.

Hamilton City Council  
Garden Place, Private Bag 3010, Hamilton

 /HamiltonCityCouncil

 @hamiltoncitycouncil

 07 838 6699

**hamilton.govt.nz**