

# Consultation submission form

## Building Code update 2021

## Building Code operating protocols



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## How to submit this form

### How to submit this form

This form is used to provide feedback on proposals found within the consultation documents:

- › Building Code update 2021 – Issuing and amending acceptable solutions and verification methods
- › Building Code operating protocols – Referencing standards and a tier framework to support standards in the Building Code system

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, Friday 28 May 2021 by:

- › email: [buildingfeedback@mbie.govt.nz](mailto:buildingfeedback@mbie.govt.nz), with subject line Building Code consultation 2021
- › 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: Helen Topham

Email address: Helen.topham@huttvalleydhb.org.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.

Regional Public Health

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

- |  |  |
|--|--|
| <input type="checkbox"/> Architect   | <input type="checkbox"/> Engineer (please specify below)         |
| <input type="checkbox"/> BCA/Building Consent Officer  | <input type="checkbox"/> Residential building owner              |
| <input type="checkbox"/> Builder or tradesperson (please specify below)  | <input type="checkbox"/> Commercial building owner               |
| <input type="checkbox"/> Building product manufacturer or supplier<br>(please specify the type of product below) | <input checked="" type="checkbox"/> Other (please specify below) |
| <input type="checkbox"/> Designer (please specify below)   | <input type="checkbox"/> Prefer not to say                       |

Please specify here.

Senior Public Health Advisor

## Proposal 1: Energy efficiency for housing and small buildings

### Proposal 1. Energy efficiency for housing and small buildings

To make buildings warmer, drier, healthier and more energy efficient, we are considering options to increase the minimum insulation levels for roof, windows, walls and floors for new housing and small buildings. The options for minimum insulation levels vary across the country so that homes in the coldest parts of New Zealand will need more insulation than those in the warmest parts. As part of this, we are proposing to issue new editions of Acceptable Solution H1/AS1 and Verification Method H1/VM1 for housing and small buildings.

#### Questions for the consultation

**1-1.** Which option do you prefer? (Please select one)

- Status quo
- Option 1. Halfway to international standards
- Option 2. Comparable to international standards
- Option 3. Going further than international standards

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

Option 2 and 3 could each provide significant health gains and energy savings. RPH consider that option 2 should be the minimum approach and would also support option 3 if feasible. RPH also strongly support the inclusion of the new climate zones that better reflect New Zealand's climate conditions.

**1-2.** For your preferred option, how quickly should this change come into effect?

(Please select one)

- 12 months       24 months       36 months or more       Not sure/No preference

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

There are significant health as well as energy saving gains from the proposed changes.

## Proposal 1: Energy efficiency for housing and small buildings

**1-3.** If there are factors we should consider to progressively phase in your preferred option, please tell us below.

These factors may include material availability or affordability, regional differences in the requirements, different building typologies or other considerations.

No comment

**1-4.** Do you support issuing the new editions of H1/AS1 and H1/VM1 as proposed?

H1/AS1:  Yes, I support it

No, I don't support it

Not sure/no preference

H1/VM1:  Yes, I support it

No, I don't support it

Not sure/no preference

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

No comment

**1-5.** What impacts would you expect on you or your business from the proposed options?

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

We expect the changes to result in improved health outcomes, in particular for lower income households living in private rentals which will eventually need to be insulated to the new standards. Improved insulation in these homes, will reduce the cost of heating for householders, reducing fuel poverty, and will result in warmer dryer homes, reducing housing related illnesses e.g. respiratory conditions.

However, it should be noted that the policy will not impact existing buildings outside of the residential rental market and so inequities in the levels of housing insulation between low income home owners, those in the private rental market and new builds could increase. Actions to support homeowners to meet higher standards of insulation in privately owned existing housing will be necessary to address this.

## Proposal 1: Energy efficiency for housing and small buildings

**1-6.** Is there any support that you or your business would need to implement the proposed changes if introduced?

Yes

No

Not sure/no preference

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

No comment

**Proposal 2: Energy efficiency for large buildings**

**No comment**

**Proposal 3: Energy efficiency for HVAC systems in commercial buildings**

**NO COMMENT**

## Proposal 4: Natural light for higher-density housing

### Proposal 4. Natural light for higher-density housing

We are proposing to issue new acceptable solutions and verification methods for G7 Natural Light to adopt new compliance pathways for higher-density housing. The new pathways are more suitable for these types of buildings. As a consequence of the change, the scope of the existing documents are proposed to be limited.

#### Questions

##### 4-1. Do you support issuing the new G7/AS1, G7/AS2, G7/VM2 as proposed?

G7/AS1:  Yes, I support it  No, I don't support it  Not sure/no preference

G7/AS2:  Yes, I support it  No, I don't support it  Not sure/no preference

G7/VM2:  Yes, I support it  No, I don't support it  Not sure/no preference

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

Current building code standards do not provide sufficient access to sunlight for all building types. With an increase in residential intensification the issue of sunlight access becomes more important. Accessing safe levels of sunlight is very important for both physical and mental health, and also for people's ability to heat their homes sustainably (e.g. through passive design). The latter has a flow on impact on reducing people's potential expenditure on power (reducing fuel poverty) and helping to create dryer, warmer, healthier homes which in turn has physical and mental health benefits.

##### 4-2. What approach do you think we should take for G7/VM1?

It should be revoked  It should remain as is

It should be amended  Not sure/no preference

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

## Proposal 4: Natural light for higher-density housing

### 4-3. What impacts would you expect on you or your business from the new editions of G7/AS1, G7/AS2, G7/VM1, and G7/VM2?

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

Access to adequate sunlight within higher density residential development will positively contribute to improved mental and physical health and will enable residents to more effectively heat their homes through passive means, reducing fuel poverty.

### 4-4. Do you agree with the proposed transition time of 12 months for the new G7/AS1, G7/AS2, G7/VM1, and G7/VM2 to take effect?

- Yes, it is about right  No, it should be shorter (less than 12 months)  
 No, it should be longer (24 months or more)  Not sure/no preference

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

**New look for Building Code documents**

**NO COMMENT**

## Thank you

### Thank you

Thanks for your feedback, we really appreciate your insight because it helps us keep pace with modern construction methods, the needs of New Zealanders and ensure buildings are safe, warm, dry, healthy and durable.

To help us continue to improve our Building Code update programme, we would appreciate any suggestions or comments you may have on what's working and how we can do better.

Please leave your feedback below:

