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Via email: [building@mbie.govt.nz](mailto:building@mbie.govt.nz)

## SUBMISSION TO MINISTRY FOR BUSINESS, INNOVATION AND EMPLOYMENT (MBIE) ON PROPOSED CHANGES TO THE BUILDING CODE CLAUSE H1 ENERGY EFFICIENCY

Thank you for the opportunity to present this submission on insulation requirements in housing and other buildings.

The Queenstown Lakes District Council (QLDC) wishes to provide feedback on a number of proposed changes, based on its experience as a Building Consent Authority (BCA).

QLDC does not support removing the schedule method from the H1 Acceptable Solutions and Verification Methods. This is because removing the schedule method may not achieve the objective of lowering building costs as designers could still default to the schedule method as an alternative solution. The BCA would accept it as compliant due to it being the baseline for the calculation method.

The calculation and modelling options and associated opportunities for cost saving already exist, as outlined in the consultation documents. The schedule method is likely the most consistently accepted path to demonstrate compliance, therefore removing it from the acceptable solutions goes against the stated goal of achieving consistency across BCAs.

For the calculation method, QLDC recommends that a table of R values for opaque doors is created for the most common door types such as cedar, aluminium, and uPVC. The same should be done for skylights. The reason is that without ready access and an understanding of the ISO or B standards the default option is to use the schedule method minimum required R values, as BRANZ have done in their technical analysis. However, the chosen material may not meet the minimum R value, and the schedule method minimums will no longer be available if the schedule method is removed.

MBIE is welcome to contact QLDC to discuss any of the above in more detail.

Thank you again for the opportunity to comment.

Yours sincerely,



David Wallace  
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