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From: Martin Fallding [lep@calli.com.au]
Sent: Tuesday, 16 August 2011 11:14 AM
To: DCCEE - Residential Disclosure
Subject: Submission - Mandatory disclosure of residential building energy, greenhouse and water performance

Categories: forwarded for the scribe

Dear Sir/Madam

Land & Environment Planning has reviewed the Consultation Regulation Impact Statement (RIS) for the mandatory disclosure of residential building energy, greenhouse and water performance.

We have experience in energy efficient and environmentally sustainable dwelling and urban design and management. While the disclosure of energy, greenhouse and water performance of buildings is potentially a useful initiative, we have some reservations about the application of mandatory requirements across the full range of residential accommodation in Australia.

Specific comments relating to the proposals are as follows:

- 1 The 'problem' is not really one of information disclosure or market failure. It is a reflection of often inappropriate building design culture and standards which fail to effectively address issues of ecological sustainability.
- 2 The proposed options for disclosure are highly simplistic. The proposals appear to ignore the fact that locational issues and the inherent energy in construction are often more important in terms of energy cost and impact than the dwelling construction. Furthermore, there are a multitude of factors which people value when purchasing or renting houses, including size, building durability, appearance, views and healthy building materials.
- 3 While thermal assessment of buildings is useful, it is the way these buildings are operated by occupiers that is most important. For example, by leaving windows and doors open and leaving lights and appliances on it is possible to operate the most thermally efficient building wastefully. Energy 'inefficient' buildings can be operated extremely efficiently. Individual written guides to how to most effectively operate each building would be a useful initiative.
- 4 Many thermally efficient buildings are extremely poorly ventilated which causes indoor air pollution and adverse health effects. It is suggested that any mandatory disclosure of residential building energy, greenhouse and water performance should be extended to include disclosure of health, noise and ventilation parameters since these are directly related.
- 5 Each building site and location is different (eg prevailing winds, aspect, microclimate, etc) and therefore it will be difficult to have a meaningful uniform assessment system across the country. The extent to which a building is comfortable to occupy is related to an extremely wide range of issues, of which thermal efficiency is only a small part.

A useful approach would be a very simple system to rate buildings according to size (floor area), whether they have mechanical ventilation or air conditioning (and openable window area), whether they have lifts or stairs, whether they are oriented correctly (long axis east - west), the expected life of the building (eg 30 years, 50 years or 100 years), proximity to public transport, extent of shading to living areas, and whether an occupier guide to how to operate the building is available. This would avoid the cost of what are likely to be

meaningless assessments or checklists, and could easily be undertaken by any purchaser or prospective tenant.

It would be most sensible to apply any mandatory disclosure only to multi dwelling residential buildings since there is much less flexibility in how these are operated, when compared to the diversity of single dwellings.

It is hoped that these matters are carefully considered in reviewing the whether or not disclosure of residential building energy, greenhouse and water performance should become a mandatory requirement.

Thank you for the opportunity to comment. Can you please acknowledge receipt of our submission?

Martin Fallding (Principal)

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