

Robinson, Renee

From: Michael Lewin [lewin.michael@yahoo.com.au]
Sent: Friday, 19 August 2011 10:33 AM
To: DCCEE - Residential Disclosure
Subject: Submission - Residential Building Mandatory Disclosure - M. Lewin
Attachments: Submission to Mandatory Disclosure RIS - M Lewin.doc

Categories: forwarded for the scribe

Please accept this submission to the RIS.

Mick Lewin
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Submission to “Residential Building Mandatory Disclosure RIS”

By: Michael Lewin 19/02/2011 ABSA: 32289

I believe that you have totally over costed the Option1, that is the full thermal assessment. I attended the Consultation in Melbourne on August 18, 2011.

I raised the over costing and would support other points made by the assessment industry and building industry representatives. I will try to keep my submission to brief points that can easily be digested.

- An increasing number of homes will have a 4, 5 or 6 star rating already by the time this scheme comes in. If the average life of a house before major renovation is about 15 years, then we would expect more than half of the homes being put for sale or lease would already have a thermal assessment.
- The impost of a new overlapping assessment with a different coding system would be unreasonable. There should be complementary set of questions, assuming a 4 , 5 or 6 star rating is in place. If it is not then a full thermal assessment should be done.
- Thermal Performance assessors already have to do additional adjustments outside the software for 6 star. This would just add to them and should become part of the new BCA standard.
 - Currently breaks in the insulation, such as with downlights, need to be totaled and the ceiling insulation adjusted to compensate.
 - Heating and cooling fixtures should be in the BCA standard anyway.
 - Other items that have a life shorter than 20 years should be excluded from the BCA standard and also the Mandatory Disclosure assessments.
- The cost of a thermal assessment on an existing house is greatly exaggerated. I, like many Thermal Performance Assessors, do many of these. Where an addition to a house exceeds 50% of the volume of the existing house we have to assess the whole house. This does not involve preparation of a new set of architectural drawings. The information we require is a small subset of this. Considerations we require are:
 - Orientation to North
 - Approximate internal room dimensions only
 - Ceiling heights
 - Roof, wall and floor types and materials
 - Approximate window opening dimensions and types
 - Approximate eaves and awnings dimensions
 - Floor coverings
 - Insulation information. However we can generally make assumptions based on the age of the house for walls and a flat roof .
 - Breaks in the insulation, e.g. exhaust fans and recessed lights.

I can generally get these off the householder or builder without visiting the house. I recognize in the sale or lease situation there will often not be anybody with these skills so a visit may be called for. I get this information for a typical 3BR house in less than an hour. There are software tools available to help but I

believe they are overkill for the requirement. FirstRate 5 and BersPro expect the zones, generally rooms, that are mapped in the software are not to precise dimensions, varying by 100mm one way or the other typically.

If information is provided by the householder or builder I insist on it in writing, generally in email form, so that I can trace the authorization, and this is logged on the Certificate.

I believe a simple spreadsheet based form could be provided on the web or in hard copy that would enable a householder to complete these in 90% of cases. No physical drawing is needed as I just replicate it in the software.

In the 10% of cases where I needed to attend, a charge of \$100 should be sufficient. My assessment charge for a 3BR is typically \$200 to \$250.

- Summary:
- 1. Option 2 means a separate assessment that is a burden on new homes and the large % of homes with recent upgrades. In effect this will be the most expensive option.
- 2. Option 3 and 4 have no real value and will be seen as an unnecessary burden by the householder.
- 3. Option 5 is a cop out. Doing next to nothing will score best if this model is acceptable.
- 4. Option 6 makes sense with Option 1 or 2 only. In my view Option 1 will prove the least cost to the community of these two and so an Option 1/6 could be acceptable.
- 5. Option 1 should be taken (with an opt out) and if a 6 star rating exists under the then current BCA (say 2012), then this will suffice. If a star rating exists from an earlier BCA standard, then it must be topped up to the current BCA.
- 6. Assessment at Lease, given it will be held until a major renovation is done and is not required to be renewed at the next lease, will be acceptable. If a Thermal Performance rating exists at this time then this may meet the requirement or will be a minor adjustment as per 5.