

**Submission  
No 160**

**INQUIRY INTO REGULATION OF BUILDING  
STANDARDS, BUILDING QUALITY AND BUILDING  
DISPUTES**

**Organisation:** Sustainable Living Armidale, Subcommittee on Energy

**Date Received:** 12 August 2019

---



9 August 2019

**Submission from the SLA Subcommittee on Energy  
NSW Regulation of Building Standards, Building Quality, and Building Disputes.**

First, I apologise for the lateness of the submission. We only had our monthly meeting of the SLA energy subcommittee today.

The comments below reflect the concerns of a rural community on the New England Tablelands where both very cold winter temperatures and severe drought are in the forefront of our thinking.

Many of the houses in this region were built with little consideration of the climate and, in particular, the impact of heating on the environment. At the time of construction, wood stoves and fireplaces were the primary mode of heating. This has created three main problems: (1) air pollution from wood heating has contributed significantly to the emission of greenhouse gases such as methane and black carbon; (2) many times during the winter, air pollution, measured in PM2.5, exceeds the National recommended maximum level, thus affecting health, (3) we have depleted the supply of available firewood in the region, impacting negatively on biodiversity and on the degradation of the environment.

What is shocking is how many new houses in the region will require extensive heating to be comfortable. They ignore passive solar design, double glazing, sufficient wall, floor and ceiling insulation and they include large open spaces impossible to zone. There are significant private exceptions that demonstrate the reality that houses can be constructed that require almost no heating.

It is obvious BASIX is not sufficient to ensure developers are forced to adopt designs, construction and materials that will ensure comfort and low energy and water costs for future dwellers.

Nor is the regulation of wood stoves adequate. While this is a national issue, NSW should be lobbying the Federal Government to demand more rigorous standards that reflect real life usage, not just laboratory testing. And wood fires should be prohibited in new, urban homes, because they should be unnecessary. By the time a wood fire reaches its steady output, a well designed new home will overheat requiring opening windows.

In approving materials, it is time to include not only the safety of materials, as we have learned from the current catastrophes, but also to publicise the embedded energy in different kinds of building materials and their impact on insulation. This might be similar to the evaluation and star rating of appliances, which should also be strengthened so that the stars are determined not by what is available but what is currently technically possible.

BASIX must be made more rigorous. But it is also imperative that local Councils have the power and are encouraged to increase requirements to adjust the regulations to suit the local climate. Best practice construction and design in New England is different than it is in the North Coast, for example.

While our energy Group has focused primarily on ways to improve the internal comfort of regional homes and to lower electricity use, the current drought has reminded us all that water efficiency and water tanks, where appropriate, should be a significant and more rigorous aspect of BASIX. In areas like ours, recycling of grey water is one significant option to provide water for playing fields and gardens. While it is difficult to retrofit old buildings, siphoning grey water in new houses is doable.

Finally, and perhaps most significant, is the impact of poor housing quality on those with low or no income. While the problem in our region may be less severe than in larger urban areas, it is the people living in public housing that generally end up with the most expensive heating bills because they live in ill-designed and under insulated housing. Both the *availability* of public housing, which we all know is woefully inadequate, and the *quality* of housing must be addressed to avoid more and more people becoming homeless or having to choose between heating and food.

In addressing the severe public housing shortage, we must regulate construction to ensure that the homes built will be comfortable in the future. This should include consideration of the impact of possible climate changes on heating, cooling and water use not only by requiring adequate insulation and where possible orientation, but also cross ventilation, zoning, efficient appliances and shower heads, taps and toilets etc. We need to ensure that cutting corners to save a few dollars today doesn't create ill-adapted housing stock in the future.

Patsy Asch  
For the Sustainable Living Armidale Energy Subgroup