

To: Planning Systems, Department of Transport and Planning

18 September 2024

ResCode deemed-to-comply provisions

As a member of the ESD Stakeholder Reference Group, we appreciate your invitation to provide feedback on the proposed ResCode deemed-to-comply provisions for Clause 54 and 55 of the Victoria Planning Provisions.

We support the proposed standards and the move towards deemed-to-comply

The proposed standards are sound and should result in more sustainable outcomes. In general, the move towards a deemed-to-comply format is clearer and less open to interpretation and their function should support the government's ambitious goals for new housing.

Opportunities for further improvements

Windows (Clause 54) – discouraging poor passive design

There is evidence¹ that in some cases builders are reducing window areas to very low levels to meet NatHERS rating requirements. This is occurring particularly for larger-sized single dwellings to compensate for NatHERS' area correction factor. Habitable rooms with small windows receive poorer natural light, ventilation, views and solar gain.

Ideally, builders would compensate for the area correction factor by improving orientation and other areas of design. This could be encouraged by including minimum window-wall ratios in Clause 54.

Air pollution – bushfire smoke

When areas are affected by bushfire smoke, residents are advised by public health bodies to turn on recirculating air conditioning systems to filter pollutants from indoor air. Bushfire smoke is a serious public health concern - the Black Summer bushfire event of 2019-20 caused \$1.95 billion in smoke-related health costs nationally.² Events such as these will inevitably reoccur and the updated ResCode is an opportunity to ensure that all new dwellings are prepared.

¹ CSIRO's Australian Housing Database contains detailed data to support this claim.

² RACGP, 'newsGP - Australia's "Black Summer" Caused Almost \$2 Billion in Smoke-Related Health Costs', NewsGP, accessed 4 September 2024, <https://www1.racgp.org.au/newsGP/clinical/australia-s-black-summer-caused-almost-2-billion-i>.

We recommend that the air pollution standard includes a requirement to provide the ability to recirculate and filter indoor air as part of normal HVAC systems.

Site services – room for compressors

The Victorian government's Gas Substitution Roadmap and proposed new rental standards are paving the way for greater use of efficient electric heat pump technology in homes. Heat pump hot water systems and reverse-cycle space heaters require outdoor space to install compressor units. Dwellings that cannot reasonably install heat pumps because of lack of space are locked into much less efficient options such as gas or electric resistance. This particularly affects renters (who have little say over services but pay the bills) and is a barrier to the effectiveness of the government's proposed new rental standards as well as other electrification policies.

We recommend that the site services standard includes a requirement to provide suitable space, including consideration of compressor noise, such that the installation of heat pump hot water and reverse-cycle heating and cooling is not precluded.

I would be happy to discuss any of the above in more detail should you wish.

Dr Kat Lucas-Healey
Senior Climate and Energy Advisor
Environment Victoria
k.lucashealey@environmentvictoria.org.au
0404 571 605