



Draft National Building Energy Standard- Setting, Assessment and Rating Framework

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ABOUT UDIA

The Urban Development Institute of Australia (UDIA) is the peak body representing the property development industry throughout Australia. Established at a state level in 1963, the Institute evolved to become a national body with a number of state-based divisions in 1970. UDIA aims to secure the economic success and future of the development industry in Australia, recognizing that national prosperity is dependent on our success in housing our communities and building and rebuilding cities for future generations.

Our members cover a wide range of specialist and industry fields, including: Developers, Valuers, Planners, Engineers, Architects, Marketers, Researchers, Project Managers, Surveyors, Landscape Architects, Community Consultants, Environmental Consultants, Lawyers, Sales and Marketing Professionals, Financial Institutions, State and Local Government Authorities, and Product Suppliers.

The property development industry is one of the major drivers of the Australian economy, directly accounting for 7.3% of Australia's GDP and employing 975,700 Australians.

INTRODUCTION

The UDIA welcomes the opportunity to provide this submission on the Draft National Building Energy Standard-Setting, Assessment and Rating Framework. The development industry has increasingly produced housing with greater levels of energy efficiency through mandatory obligations and voluntary initiatives, such as EnviroDevelopment.

UDIA is committed to working with all levels of government to achieving high standards of energy efficiency. However, the Institute is committed to delivering affordable housing and energy efficiency needs to be pursued while achieving the triple bottom line of sustainability.

THE DRAFT NATIONAL BUILDING ENERGY STANDARD-SETTING, ASSESSMENT AND RATING FRAMEWORK

UDIA does not support the proposed implementation of consistent a ten-star rating scale. While the existing system has its faults, further consideration needs to be given to how the current system of energy efficiency standards could be reformed.

The process of reform as proposed in the Framework is complex, convoluted and is likely to require significant financial and human resources for what the Institute believes will be a marginal benefit. Such resources should be dedicated to the establishment of a comprehensive community education campaign around selecting a house in an energy efficient community and considerations which can be made when designing and building an energy efficient house. UDIA's work with EnviroDevelopment in this field is a clear example of the industry playing a leadership role in establishing a performance-based

framework to rate and reward developments of all scales and types. EnviroDevelopment branding and collateral is then used to communicate the benefits and attributes of the new community or facility to the general public, offering a clear choice between a sustainable lifestyle and a development which has achieved mandatory compliance.

One of the key issues faced by the industry is the inability of energy rating tools to adequately measure energy performance across climatic zones and to inadvertently build a 'prototype' of accepted built form, regardless of the climate in each region. For example, the generally accepted form of housing under the BERS tool in Queensland has become slab-on-ground, because of issues around thermal mass with raised built form. However in some climatic zones in Queensland, raised housing represents a more climatic responsive design. Similarly, this also encourages greater cutting and filling of blocks (either at the masterplanning or lot scale) and significant alteration to the site's natural topography.

The Draft Framework notes that 'the use of a common rating scale would simplify the communication of building ratings to the general public and improve understanding of the relative performance of different types of buildings'. The Institute does not believe that the general public has a strong interest in consistency of scales across residential and commercial buildings. A one-size-fits all approach is likely to involve many compromises and generalisations in the rating process which may result in questionable built form outcomes in specific climatic regions.

The Institute supports the concept of investigating whole-of-house energy usage, rather than restricting measurement to the thermal performance of the building envelope.

The Draft Framework proposes in the later stages to investigate reducing the embodied energy and emissions in the construction and renovation of buildings. The Institute suggests that this is not feasible and if materials usage is an area of concern, any investigation should be around lifecycle energy, not embodied energy.

CONCLUDING COMMENTS

UDIA thanks the Department of Climate Change and Energy Efficiency for the opportunity to provide this submission. UDIA would welcome the opportunity to discuss any aspect of this submission in greater detail. For further information, please contact UDIA National on 02 6230 0255 or at udia@udia.com.au.

Yours sincerely,



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