



**NATIONAL HOUSING AND  
HOMELESSNESS PLAN**

**Issues Paper Submission**



**October 2023**

████████████████████ is pleased to provide responses to the questions raised in 3.7 of the National Housing and Homelessness Plan Issues Paper.

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### **3.7 The impact of climate change and disasters on housing security, sustainability and health**

#### ***1. How can governments improve housing and accommodation service coordination to better support individuals affected by hazards?***

Consideration is required for all new social housing to ensure that they are energy efficient which would make them healthier during periods of high heat and low cold climatic conditions.

All new social housing must be required to meet 7-star energy efficiency and provide occupants with a way to live comfortably despite extremes of climate.

For locations where extremes of temperature are common (and are expected to increase) each dwelling should have one “climate safe room” where the occupants can gather during extreme conditions. The room should be designed to moderate the temperature using a combination of all possible methods including insulation, energy efficient windows, external coverings for openings, secure and safe methods of heating and cooling as well as air movement.

Where housing has bedrooms with the finished floor level above 2 metres from the ground the windows are required under the National Construction Code (NCC) to have the opening restricted to 125 mm. It has been documented that low socio-economic families are more likely to have children falling from windows due to a number of factors however they also need to have sufficient ventilation to provide comfort. With sliding, casement and awning windows there is no way to increase the airflow without disabling the restrictor. Our suggestion is that windows in these bedrooms are fitted with screens that meet the requirement for the NCC. This would allow maximum ventilation while preventing children falling from the windows.

#### ***2. How can governments support hazard resilient housing and housing modifications for new and existing housing, in particular within rural and remote locations that are more likely to be impacted by extreme weather events?***

Again, the provision of a climate safe room that provides relief from climate extremes is very important. While a climate safe room is not a control that can be used for extended periods it does provide short term relief during climate extremes.

#### ***3. How can governments better encourage the uptake of energy efficient housing modifications and design?***

All governments need to support energy efficient upgrades using a number of measures:

- a) Require all new windows to be made with a minimum pocket size that would allow easy retrofitting of double glazing if required down the track. While it is likely that many dwellings will meet this requirement to comply with NCC2022 we are concerned that without these policy initiatives further increases in thermal performance will be unable to be supported by the existing building stock for well beyond 2050 if pragmatic policy measures are not adopted.
- b) Rebates and incentives for standalone window upgrades in existing dwellings used as social or low rent housing can provide greater accessibility and efficacy for household energy use. The development of a subsidy program by government would make meaningful and considerable improvements in residential energy demand using a lever that improves energy performance without costly building work or structural changes.
- c) While there are a number of other levers available to the owners of social and low rent housing (to improve their home energy performance sometimes collective action will have the biggest impact (in the most cost-effective way) the three most effective measures are upgrading the windows, the wall and ensuring they are airtight and free from draughts. By undertaking these items in tandem there is not only an improvement through the upgrade but they, according to the report Energy Efficiency Upgrade Potential of Existing Victorian Houses (Sustainability Victoria, 2015) (p31), provide a combination of improvements that represents 70% of the increase of 3.4 stars for increased performance of the entire building shell.
- d) Require that all **existing** government housing meets a minimum of 5.5 stars by 2028.

#### ***4. How can housing policies and programs support people who have been displaced due to climate disasters?***

There is a great need for more social housing and/or ways for people to be able to afford to purchase or rent. More affordable housing is needed urgently.

#### ***5. What options should be explored for improving the energy efficiency of rental properties?***

Many low rent investment properties are not energy efficient with many being assessed as offering the equivalent of 2-star or less NatHERS energy performance.

In order to increase the performance of those buildings in a measured way over time it is suggested that the Federal negative gearing policy be amended so that it is only made available in the future for houses that are or would become at least 5.5-stars within the twelve months after purchase. If this policy were implemented together with requirements for mandatory disclosure at point of sale or rental, we believe we would see meaningful changes in the energy efficiency of the current housing stock and, by proxy, the wellbeing of renters.

We believe this policy would:

- Drive landlords to invest in upgrades to access negative gearing.
- Incentivise the seller when their poor performing homes are on the market

to upgrade key items to reach the energy requirements and maximise the chance of selling to an investor and thus to a broader market.

- Not affect new home investor sales as they would all meet the current energy compliance levels. This policy change could increase the amount of new rental stock as a new house would be more attractive to an investor.
- Help reduce rental stress and poor outcomes for the disadvantaged, through reduced utility costs and increase health and wellbeing outcomes.
- Provide a means to drive increases in building quality in social housing stock.
- Be a policy measure that would resonate particularly with under 30-year-olds as it could have the potential to reduce competition from investors for entry level home that often require improvements and investment over time rather than just being released as rentals without adequately addressing poor health and energy performance.
- Provide savings on renters' utility use and therefore costs.

***6. How can hazard resilience and thermal performance of housing in regional and remote locations be improved?***

See 3 above.

