

Feedback on the Draft Ballarat Housing Strategy 2023 - 2041

BREAZE Inc. October 2023

Thank you for the opportunity for BREAZE Inc. to comment on the Draft Ballarat Housing Strategy. Clearly there is a big job ahead to plan and oversee the growth of housing at the scale which is anticipated in Ballarat and surrounds. BREAZE Inc. is pleased to note that the strategy considers housing affordability and prioritises accessibility. We support the approach to diversification of housing stock that makes houses more affordable and allows people to age within their communities. It makes sense to increase housing density in areas close to accessible transport and amenities rather than continually expand into greenfield areas, maximising use of available resources and infrastructure. We also support consideration of active transport for its health benefits and climate impact.

Our primary concern:

As an advocacy organisation whose primary concern is climate change, we feel the strategy misses a really important opportunity to put climate change front and centre of all planning for new housing.

Let's have 100% Net Zero New Homes!

There is a golden opportunity to design all new homes and suburbs in a way that ensures homes are comfortable, light, efficient to heat and cool from the outset, and do not require polluting gas for water, cooking or heating. Building net zero new homes in Ballarat would make a huge and ongoing difference to the carbon footprint of the city. The potential impact is probably the biggest contribution Ballarat can make to reducing the impact of climate change.

The key to such efficient homes is:

- Good design of suburbs and houses, including correct orientation of houses on the block, high quality insulation and double glazing.
- Building smaller homes with more efficient use of internal space.
- Installation of efficient electric appliances for heating, cooking and hot water and the addition of solar panels.

Homes can have net zero emissions instead of the current average of 7 tonnes of carbon per year for Victorian homes (it will be higher in Ballarat's cooler climate). **Considering that the average home has a life span of 70 years, based on existing housing, that would save 420 tonnes of carbon emissions per new house over the lifetime of the house** and would significantly contribute to the implementation of the Net Zero Emissions Plan. They will also be significantly cheaper to run.

Whilst understanding that the interrelationship between planning controls is complex and that State Government has a large sway: we would like to see the City of Ballarat articulate a commitment to, as far as possible, support the construction of new homes that are net zero and gas free.

The Housing Strategy relies on implementation of the Environmentally Sustainable Design (ESD) policy to meet its environmental objectives. Whilst the introduction of this comprehensive policy is to be praised, our understanding is that a significant proportion of new homes being built are not covered by ESD. How can the Housing Strategy ensure that ALL new homes are built to these standards?

Net zero homes and affordability go hand in hand:

Australians have the biggest houses in the world, and this is contributing to the lack of housing affordability as well as greenhouse gas emissions – created from the building materials used and ongoing in the consumption of fossil fuels for energy.

The Draft Housing Strategy expresses a commitment to building more affordable housing. Renters and households on low incomes too often miss out on the benefits of thermally efficient buildings and are particularly vulnerable to rising costs of heating and cooling. If thermal efficiency is a requirement at the outset, then the Housing Strategy could not only address low cost in the construction, but also ensure ongoing low maintenance costs.

Housing affordability could also be promoted by:

- Encouraging developers to design smaller houses
- Encouraging developers to look at new ways of building - such as clusters of apartments, units or houses, that have shared facilities such as grounds and gardens, laundries, communal kitchens, and carshares. These have the added benefit of encouraging social cohesion. Communal gardens also provide the opportunity for better use of green space and tree cover.

Infill development

There is a tension between infill development and the preservation of green space. Whilst supporting infill development, BREAZE Inc. recommends consideration be given to maintaining existing well-established trees and protection of access to light and passive heating for north facing windows.

Alignment with City of Ballarat plans:

The Housing Strategy could be better aligned with key strategic documents in particular:

The City of Ballarat Council Plan. We do not feel that in its current form it adequately responds to the first and third goals -of “An environmentally sustainable future,” and: “A city that fosters sustainable growth”.

Net Zero New Developments is the third outcome of the **City of Ballarat Net Zero Emissions Plan** yet there is no reference in the Draft Housing Strategy to this plan.

Item 3.2 of the Net Zero Plan: *“Future-Proof New Developments”, outlines the intention that: “Developers have the ability to actively engage with builders and owners to develop precincts to futureproof new developments from future change in the energy supply. The design and development of new areas should follow the below key requirements to ensure they are compatible with this plan:*

- *Implement actions in Victoria’s Gas Substitution Roadmap to support electrification*
- *Integrate net zero design standards within the construction*
- *Ensure the construction and development process eliminates waste to landfill*
- *Design includes resilience to extreme weather and climate-related events”*

We would like to see better alignment of the Housing Strategy and commitment to these actions.

Appendix 6: Implementation Plan identifies the following action:

Action: 1.16 Insert a new Local Policy that refers to Environmentally Sustainable Development and The City of Ballarat's adopted policy approach to ensure best practice ESD principles are incorporated into the Planning Scheme. Make the Ballarat Net Zero Emissions Plan 2022, Carbon Neutrality and 100 Per Cent Renewables Action Plan, the Urban Forest Action Plan and the Ballarat Cycling Action Plan 2017-25, background documents in the Ballarat Planning Scheme.

We support this action but would like to see a greater sense of urgency reflected in a shorter timeline. We would also like to see this accompanied by a plan to communicate the changes to the building industry and where training updates are needed to support implementation, provide advice on where this is available and/or provide sessions to industry.

Recommendations:

1. That the City of Ballarat Housing Strategy, in keeping with The City of Ballarat Council Plan, puts climate change at the forefront. We would like to see the commitment from the City of Ballarat that: *All new homes constructed in Ballarat will be designed according to best practice environmentally sustainable design principles.*
2. That in consideration of the natural environment and heat island effect:
 - a. There are planning specifications on the ratio of building envelope to land for greenfield developments and infill sites that enable sufficient space for established trees.
 - b. That median strips are sufficiently wide to allow planting of substantial shade trees.
 - c. That well-established trees are not removed for the purposes of infill.
3. That council undertake advocacy that encourages developers to design and build smaller homes.
4. That the concept of housing diversity be expanded to include new and innovative models of community housing where there are shared facilities. These would have the benefit of being cheaper to build and run, providing better opportunities for community building and would also have a lower embodied and operational carbon footprint.
5. That the Housing Strategy explicitly references the Net Zero Community Plan
6. That Action 1.1.6 of the Implementation Plan (Appendix 6) is given a definite timeline of policy adoption within 1 year of finalisation of the Strategy.

Thank you again for the opportunity to comment.

Kind regards,

Sally Missing, Coordinator Building Better Homes for the Future
On behalf of BREAZE Inc.