



Department of Energy, Mines,
Industry Regulation and Safety



NCC 2025

Proposed State variations

Attachment 2

Feedback Template

Have your say!

Don't forget to include your name and contact details for each response you provide. Additional pages may be added if there is insufficient space for feedback.

Forward your feedback to be.consultation@demirs.wa.gov.au by cob Monday 28 October, 2024.

Enquiries

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VARIATION 1 – Eaves gutter overflows and valley gutters

Part H2 of Volume Two of the NCC – Damp and weatherproofing

Name	Beata Davey on behalf of Jonathan Speer
Organisation	Australian Institute of Architects
Email	wa@architecture.com.au

Do you support the variation? Yes No

If you answered no, please provide your reasons

Do you have any recommended changes?

Industry concerns about gutter capacities with the current practice for a rebated fascia making it difficult to achieve a fall on a gutter, appear addressed/mitigated by overflow and catchment area limit amendments.

Recommendation to provide more clarity on the separate codes for above ground stormwater to below ground stormwater - i.e. the downpipe connection to underground pipework.

VARIATION 2 – Windows installed in masonry walls

Part 8.2.2 of the ABCB Housing Provisions – Installation of windows

Name Beata Davey on behalf of Jonathan Speer

Organisation Australian Institute of Architects

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Do you support the variation? Yes No

If you answered no, please provide your reasons

Do you have any recommended changes?

We understand this as a low-risk variation for double brick construction, as brickwork generally grows over time rather than shrinks. This means that there is a lower requirement for clearance over the top of the window than for materials that may shrink in service such as timber framing.

VARIATION 3 – Energy efficiency, Elemental Provisions for climate zone 6

Parts 13.2 and 13.3 of the ABCB Housing Provisions – Energy Efficiency

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Do you support the variation? Yes No partial support

If you answered no, please provide your reasons

Do you have any recommended changes?

Partial support with the following recommendations/considerations:

- Issues of DTS model method of compliance accuracy – CSIRO AHD data demonstrates that the heating and cooling load pass limits in NatHERS climate zone 6 Albany shows for 5 to 5.9 stars, generally homes are falling short of the current pass limits.
- Albany has higher heating load than zone 5 (meaning cooler homes in cold months requiring heating); Albany need to upgrade U and SHGC value of windows to reach 7 stars.
- The outcome has to achieve a balance between building performance and cost.
- Recommendation for the blanket zone variation to be amended to reward better design:
 - o Where south facing view is not a priority on a site:
 - Reward north and north east facing combined kitchen/living/dining rooms
 - Reward East and Southern Bedrooms
 - o Reward isolation of garages regardless of orientation
 - o Ensure baseline average sqm of zones do not exceed the current limits to promote houses to remain the size they are or go smaller – include average limits into sustainability overlays
 - o Well-used thermal mass: reverse brick veneer works best in the climate zone
 - o Under-slab insulation: which anecdotally costs ~\$2K per home but can significantly improve energy efficiency performance of homes
 - o Reward offsets for solar PV systems
 - o Glazing to be designed based on day/night use and size of windows:
 - Bedrooms designed to be cooler with smaller windows, can get away with lower glazing performance levels
 - Living spaces designed to be warmer with larger windows, will require higher glazing specifications

*Refer to *RAIA Appendix 1* for further background information.

VARIATION 4 – Energy efficiency, requirements for alterations and additions

Part H6 of Volume Two of the NCC – Energy Efficiency

Name	Beata Davey on behalf of Jonathan Speer
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Do you support the variation? Yes No partial support

If you answered no, please provide your reasons

Do you have any recommended changes?

Partial support with the following recommendations/considerations:

- The extent of alterations and additions covered by this variation is not clearly defined in the proposal. It is unclear as to the delineation where NCC 2019 Amendment 1 v NCC 2025 would apply.
- The reliance on the discretionary judgement of building surveyors is an insurability risk.
- There is an opportunity to get older building fabric upgraded in regard to energy efficiency (noting that the average energy performance rating of Australia's 8m dwellings is ~1.7 stars¹).
- Recommendation:
 - o Pool addition – NCC 2019 Amendment 1 is acceptable;
 - o Where 10% or 20sqm min of conditioned floor space is added in the alterations and additions, this should be a trigger to upgrade the building fabric to NCC 2025 standard.

¹ See: <https://www.theguardian.com/australia-news/2024/feb/12/landlords-energy-efficiency-of-houses-revealed-power-bill-prices-across-report#:~:text=The%20average%20energy%20performance%20of.11%25%20of%20national%20greenhouse%20emissions&https://ahd.csiro.au/australias-still-building-4-in-every-5-new-houses-to-no-more-than-the-minimum-energy-standard#:~:text=January%2023%2C%202020-.Australia's%20still%20building%204%20in%20every%205%20new%20houses%20to.than%20the%20minimum%20energy%20standard&text=New%20housing%20in%20Australia%20must.set%20by%20many%20other%20countries.&text=There%20have%20been%20calls%20for.no%20need%20to%20raise%20these.>

VARIATION 5 – Swimming pool safety barrier requirements

Part G1 of Volume One and Part H7 of Volume Two of the NCC – Swimming Pool Access

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Do you support the variation? Yes No

If you answered no, please provide your reasons

Do you have any recommended changes?

The inspection requirement of the Building Regulations 2012 mitigates the risk of lack of upgrade to AS 1921.1 2024. The benefits of adopting the new standard is that it is deemed as more clarified and aligns with other jurisdictions in Australia.

We understand that DEMIRS: Building and Energy are working to develop means of compliance for glass pool fences to resist wind actions, which is expected to be ready for inclusion in NCC 2028, and this variation does not compromise that work.

VARIATION 6 – Remove the State variation for the design of buildings in wind regions B and D

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Do you support the variation? Yes No

If you answered no, please provide your reasons

Do you have any recommended changes?

We understand that:

- AS/NZS 1170.2 has changed to adopt wind region B2 as cyclonic. AS 4044 has been changed in parallel with AS/NZS 1170.2. Thus, the need for the variation for wind region B is no longer required.
- NCC 2025 has changed Annual Exceedance Probabilities for wind region D in line with the previous WA state variation. Thus, the need for the variation for wind region D is no longer required.