



Hon Minister di Brenni,
Minister for Energy, Renewables and Hydrogen and Minister for Public Works and Procurement
Via email OADG.BP@epw.qld.gov.au

Re: QDC MP 4.1 and resilient sole occupancy units in Class 2 Buildings

8 November 2023

Dear Hon Minister di Brenni,

The Australian Institute of Architects is the peak body for the architectural profession in Australia. It is an independent, national member organisation which exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and good design/architecture to the sustainable growth of our communities, economy, and culture.

The Queensland Chapter of the Institute previously wrote to you (27th July 2023) in support of improving the energy efficiency standards for new homes in National Construction Code (NCC) 2022. We also support the Queensland Government's proposed amendments to the *Queensland Development Code (QDC) MP 4.1 — Sustainable Buildings* to better align with the NCC 2022 provisions.

We acknowledge the delay in implementation of the amendments to 1 May 2024. However, we wish to note that every delay in implementation affects future building resilience and mitigation of the effects of climate change, requiring greater future efforts and expense as the climate crisis increases.

As a result of the delay, we have taken the opportunity to review the amended *QDC MP 4.1 Sustainable Buildings*. We have a specific concern about performance criteria and acceptable solutions for *Energy efficiency - class 2 buildings*.

While we support the incentivising of well-designed outdoor living areas associated with sole-occupancy areas, through applying nominal credits to the calculated NatHERS software rating, we are seeking further clarity on the role of these *outdoor living area* credits in averaging. Specifically,

- is each sole-occupancy unit in a building required to be rated 7 stars including any credits (our preference and recommendation),
- or,
- does the 7 star NatHERS minimum rating only pertain to the average rating of all sole-occupancy units in a single Class 2 building?

We recommend that the minimum 7 star rating (with applicable credits as specified in A2 (2a), (2b), (3) and (4) of the amended MP 4.1) be applied to **each** sole-occupancy unit in a class 2 building. To do otherwise would disadvantage the future occupants/owners of such units that will inevitably fall below the minimum energy efficiency standards enjoyed by others, including indoor climate comfort and lower energy bills.



We think it is important that all new class 2 buildings be as resilient as possible in the face of natural hazards to protect their residents from natural hazards such as heatwaves, cyclone, and flood - especially if such events coincide with power outages. Outdoor living areas and at least the minimum energy efficient envelopes for every dwelling unit in a class 2 building, not just some, are essential in Queensland to mitigate the effects of these experiences on the population.

Doing so, will be a positive move towards the Government's zero-carbon by 2050 trajectory.

It will further resolve and exemplify the Government's commitment to "*strong, coherent and consistent policy drivers in response to climate change*" and to "*prepare the state for the inevitable transition that it will have to make*"¹.

While the QDC and the NCC 2022 are the key regulatory tools for our construction industry, this is a further opportunity for the QDC to allow for innovation and creation of higher, specific standards for buildings within Queensland.

We recommend the Queensland Chapter and the DEPW engage and coordinate to develop stronger policy outcomes for the implementation of QDC MP 4.1.

We look forward to your response.

Regards,

A handwritten signature in black ink, appearing to read 'Amy Degenhart', with a long horizontal flourish extending to the right.

Ms Amy Degenhart LFRAIA
Queensland Chapter President

A handwritten signature in black ink, appearing to read 'Anna Svendsdotter', with a long horizontal flourish extending to the right.

Dr Anna Svendsdotter
State Manager Queensland

¹ Queensland Climate Transition Strategy: Pathways to a Clean Growth Economy.
<https://cabinet.qld.gov.au/documents/2017/Jun/ClimChg/Attachments/TransitionStrategy.PDF>