

4 September 2024

Hon Meaghan Scanlon MP  
Minister for Housing, Local Government and Planning; Public Works  
1 William Street  
BRISBANE QLD 4000

Dear Minister Scanlon,

## **RE: ENSURING CERTAINTY IN NATIONAL CONSTRUCTION CODE (NCC) ADOPTION IN QUEENSLAND**

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation representing approximately 14,500 members across Australia and overseas. Approximately 2,400 of these are based in Queensland and supported by the Queensland Chapter.

Following the announcement from the South Australian Government<sup>1</sup> effectively freezing the adoption of future revisions of the NCC after NCC 2022 for a decade as part of the *Housing Roadmap*, we are proactively writing to highlight the importance of timely NCC adoption in Queensland.

The NCC, which all states and territories sign up to in their building legislation and regulation, is revised every three years. It establishes a minimum requirement for all Australian Buildings.

The Institute supports the timely and entire implementation of each revision of the NCC in Queensland. We have long advocated<sup>2</sup> for the implementation of NCC 2022 in its entirety and have keenly embraced the end of the transition period in May 2024.

Timely and systematic NCC adoption provides many benefits:

1. Improved building quality and safety:  
The 2025 Public Comment Draft of the NCC has already been released by the Australian Building Codes Board for consultation<sup>3</sup>.

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<sup>1</sup> Refer Media Release dated 02/08/24: <https://www.premier.sa.gov.au/media-releases/news-items/national-construction-code-certainty>

<sup>2</sup> Refer correspondence:  
17 October 2022: <https://www.architecture.com.au/wp-content/uploads/De-Brenni-NCC-Oct-22.pdf>; 23 August 2022: <https://www.architecture.com.au/wp-content/uploads/NATIONAL-BUILDING-MINISTERS-MEETING-ON-THE-CONSTRUCTION-CODE-2022.pdf>

<sup>3</sup> Refer ABCB consultation website to read proposed draft: <https://consultation.abcb.gov.au/engagement/ncc-2025-public-comment-draft/> and the Institute's and ACA's joint submission response: [https://www.architecture.com.au/wp-content/uploads/240701\\_Aust-Inst-Arch\\_ACA\\_joint\\_2025NCC\\_Consultation.pdf](https://www.architecture.com.au/wp-content/uploads/240701_Aust-Inst-Arch_ACA_joint_2025NCC_Consultation.pdf)

Next year's NCC 2025 will contain important new or strengthened provisions to address:

- Condensation: to address issues of mould which can lead to serious health impacts and is often an uninsurable building defect.
- Water-proofing and water-shedding: to address prevalent problems of leaky homes and apartments - water ingress through roofs, balconies and bathrooms.
- Stronger measures to improve reliability for the predicted performance of our housing's structural requirements, fire-safety and provision charging facilities in apartment developments given Australia's rapid take-up of electric vehicles.

A study commissioned by the Australian Building Codes Board in 2021 and prepared by the Centre for International Economics<sup>4</sup> estimated the cost per annum of building defects in 2022 in Queensland seen in 27,000 free-standing houses, 9,000 townhouses and 14,000 apartments to be \$421 million. From the study's survey of 1,605 homeowners, the most common defect types of all reported defects in free-standing houses in Queensland, for example, are classified to structural (18%), plumbing and drainage (23%), and roof and rainwater disposal (16%). For Queensland townhouses, almost one-fifth of defects (19%) reported in the study related to waterproofing/weatherproofing. Queensland apartments reported almost one-quarter of defects (24%) related to roof and rainwater disposal, 22% to plumbing and drainage and 17% to waterproofing/weatherproofing. Adopting the 2025 NCC is critical in the reduction of building defects resulting in improved health, safety and cost of living for Queenslanders.

2. Lowering the cost-of-living pressures with more energy-efficient buildings:

Residential buildings are responsible for around 24% of overall electricity use and more than 10% of total carbon emissions in Australia.<sup>5</sup> This means energy efficiency in residential buildings can have a significant impact on Queensland's economy and the reliability of the energy grid.

Energy efficiency in buildings can reduce the need for significant government infrastructure investment, lower household energy bills, improve occupant health and comfort (particularly in a warming climate), make building stock more resilient against weather extremes and reduce carbon emissions.

We note that South Australia is different to Queensland in that a very large part, and sometimes all of their energy supply, is from renewable resources. While Queensland transitions to renewable energy sources it is essential to ensure that household minimise their contribution to carbon dioxide emissions.

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<sup>4</sup> [Building Confidence Report - A case for intervention](https://www.abc.gov.au/sites/default/files/resources/2022/Building-confidence-report-case-intervention.pdf). Prepared for the Australian Building Codes Board July 2021 The Centre for International Economics. Sourced from:

<https://www.abc.gov.au/sites/default/files/resources/2022/Building-confidence-report-case-intervention.pdf>

<sup>5</sup> Australian Government, Department of Climate Change, Energy, the Environment and Water - Residential buildings <https://www.dceew.gov.au/energy/energy-efficiency/buildings/residential-buildings>

As Queensland's population increases quickly, it is also essential to maintain and improve energy efficiency to reduce the need for and future cost of supporting infrastructure.

We know household energy efficiency can be improved readily and simply with, in fact, improvements not only in household budgets, but in the quality of people's lives. Adopting the 2025 NCC is critical in improving the cost of living for Queenslanders.

3. Certainty of investment:

The CoreLogic daily home value index continues to rise, with an undersupply of housing being noted as the primary factor for keeping upwards pressure on home values. As of 14 August 2024, Brisbane (including Gold Coast) has experienced a rising home value index change, year-on-year of 15.2%<sup>6</sup>. The rising cost of home ownership coincides with greater mortgages, elevating the priority of building-in greater longevity, resilience, durability and sustainability in Queensland buildings to preserve the certainty of investment in home ownership.

Governments in all states and territories are struggling with fulfilling housing quotas. We know that the Queensland government is very committed to addressing the extraordinary and unprecedented need for housing for all Queenslanders<sup>7</sup>. This should not be a decision between building more housing versus quality housing. An intelligent solution focus is about delivering on all of these objectives without regrettable trade-offs such as building defects, dangerous mould and low energy performance which all quickly become manifest early in the life of any new home.

4. Improving productivity through standardisation:

Standardisation of designs and construction practices enables higher productivity though systemisation across the industry, including skills development and training to deliver rapid uplift in affordable housing outputs. Adopting the 2025 NCC enables better approaches to standardisation and modern methods of construction.

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<sup>6</sup> <https://www.corelogic.com.au/our-data/corelogic-indices>

<sup>7</sup> Referencing the Government's key policies focussed on affordable housing, social housing and affordable rentals:

- Queensland Housing Strategy 2017-2027
- Housing and Homelessness Action Plan 2021-2025
- QuickStarts Qld Program
- Help to Home
- Build-to-Rent Program
- Queensland Housing Investment Growth Initiative (QHIGI)
- First Home Owners' Grant
- Rental Reforms

Our profession has a deep commitment to the quality of the built environment in which we all live, learn, play and work. We know that all contributors to the building industry can work cleverly for people. We look forward to doing so.

We would appreciate arranging a meeting to discuss this in more detail, please contact Dr Anna Svensdotter, Executive Director, to arrange a suitable time.

Yours sincerely,



**Jane Cassidy** FRAIA  
National President  
Australian Institute of Architects



**Russell Hall** LFRAIA  
Chapter President, Queensland  
Australian Institute of Architects

CC: Hon Leanne Linard MP, Minister for the Environment and the Great Barrier Reef;  
for Science; and for Multicultural Affairs  
Hon Ali King MP, Assistant Minister for Housing, Local Government, Planning and  
Public Works  
Annisa Levy, CEO and QBCC Commissioner, Queensland Building and  
Construction Commission  
Jamie Merrick, Director-General, Department of Environment, Science and  
Innovation  
Mark Cridland, Director General, Department of Housing and Public Works  
Michael Whitehead, Program Director of the B2032 Sustainability Program Office