

**Australian Building Codes Board  
Submission through consultation hub**

15 October 2021

Dear Sir/ Madam

**Re: National Construction Code (NCC) 2022 public comment draft (stage 2)**

Thank you for the opportunity to provide feedback on the draft National Construction Code 2022 changes.

Strata is the fastest growing form of residential property ownership in Australia. Over half the new dwellings to be built in our metropolitan areas over the next decades will be strata titled. The growth of this sector raises increasingly important questions over property ownership and governance.

The Owners Corporation Network of Australia Limited (OCN) is the independent peak consumer body representing residential strata and community title owners and residents. As such, OCN is uniquely positioned to understand the impact that the legislative framework has on day-to-day machinations and community living.

To help address the cause and impacts of Climate Change we must construct and operate Net Zero Emission buildings, that are ready for the unavoidable impacts that climate change will cause and that are built to ensure the health and wellbeing of their occupants.

Whilst the OCN welcomes the COAG energy council's *Trajectory for low energy buildings*, that sets a pathway to Net Zero carbon emission buildings, the OCN is disappointed with the level of that ambition. The OCN believes that all Australian buildings built from 2030, at the latest, must be constructed and enabled to operate at Net Zero emissions if we are to play our part in reducing global carbon emissions in line with the ambition set out in the Paris agreement.

The OCN accepts that the Australian Building Codes Board is restricted to operate within the scope and ambition set by government and that the changes proposed to the 2022 National Construction Code are broadly in line with the *Trajectory*. However, we urge the ABCB to ensure that the provisions for Class 2 apartment buildings are as stringent as practical to the goal of achieving Net Zero apartment buildings at the earliest opportunity. That would include ensuring that the Regulatory Impact Statement that you are preparing uses the most recent forecasts based on updated climate science models for climate change impacts and for energy costs and fuel emission intensities.

Australia's recent experience with living through the Covid-19 pandemic has raised several insights related to building design and construction. New buildings must have better ventilation and filtration to ensure air is cleaned of any circulating viruses and does not allow entry of particulates - such as those from bush fires. In essence residential apartment buildings must be climate ready, comfortable, and healthy places to live in and work from. The OCN urges the ABCB to consider these requirements and make appropriate changes in the 2022 NCC to ensure that they are met.

[www.ocn.org.au](http://www.ocn.org.au)

Level 4, 95 Pitt Street, Sydney NSW 2000 Phone: (02) 8197 9919 Email: [eo@ocn.org.au](mailto:eo@ocn.org.au)  
Owners Corporation Network of Australia Ltd. | ABN 99 153 981 205

SUPPORTED BY



THANKS TO OUR PREMIUM SPONSORS



THANKS TO OUR MAJOR SPONSORS



Finally, the OCN believes that all vehicles will be electric within the lifetime of new residential apartment buildings and understands that the sales of electric vehicles are increasing rapidly. Consequently, we have requested detailed changes to *J9D4 Facilities for electric vehicle charging equipment* within draft NCC volume 2, that would ensure that all visitor car spaces within new buildings are equipped to support electric vehicle charging at occupation, and that electrical capacity within the building is sufficient for all other car spaces to be equipped with chargers as the new owners determine post occupancy.

Yours sincerely

A handwritten signature in black ink that reads "K Stiles". The letter "K" is stylized with a long vertical stroke and a short horizontal stroke.

Karen Stiles  
Executive Officer