

17 July 2025

Honourable Sam O'Connor MP
Minister for Housing and Public Works and Minister for Youth
Email: housing@ministerial.qld.gov.au

Dear Minister

Additional Support for NCC 2022 Changes

On 2 April 2025, I wrote to you about the barrier the livable housing and energy efficiency changes introduced as part of NCC 2022 are having to the delivery of housing. They are adding cost, complexity and restricting consumer choice.

As such, Master Builders proposes that complying with the NCC 2022 energy efficiency and livable housing requirements be made voluntary, which could be achieved through amending the Queensland Development Code 4.5.

We believe this will address the issues in the implementation of NCC 2022 (livable housing and energy efficiency requirements) and give homeowners the choice.

As further evidence of the additional costs required to achieve compliance with NCC 2022 (accessible and energy efficiency housing requirements), we have engaged the services of a quantity surveyor to assess the cost impacts on three typical housing types; single story slab on ground construction; double storey slab on ground construction; and raised 'Queenslander' dwelling. In each case, costs were provided by builders based on their actual experience of costs and then analysed by the quantity surveyor. This analysis found that compliance with NCC 2022 (livable housing and energy efficiency requirements) added between \$22,450 and \$44,600 to the cost of these dwellings.

This information adds further support to our appeal for the requirements to be made voluntary.

We look forward to continuing our work together.

Kind regards

Paul Bidwell
CEO
enc.

NCC 2022 Review

NCC 2022 Cost Implication Review

Prepared for: Master Builders

Report Contact:
Title:
Phone:
Email:
Date:
Issue:

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Associate
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30 June 2025
3.0

Introduction

Mitchell Brandtman has been engaged by Master Builders to undertake a cost review to assess the cost impacts of key elements of The National Construction Code 2022 (NCC 2022), to include liveable housing, energy efficiency falls to waste etc on various building types. (See below).

Master Builders provided supporting documentation to highlight the scope changes introduced by NCC2022 along with indicative pricing from volume/specialist builders and related sources.

Mitchell Brandtman have reviewed this information and supplemented it with our own independent cost assessments. In the absence of any specific design details, we have set aside a reasonable 'allowance'.

1) Single storey:



2) Double Storey:



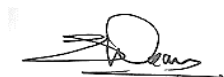
3) Raised Dwelling - Queenslander:



We welcome the opportunity to discuss any part of this estimate with you. Please contact Andreas Louverdis or myself on 07 3327 5000 should you have any queries or require further information.

Yours Sincerely

MITCHELL BRANDTMAN

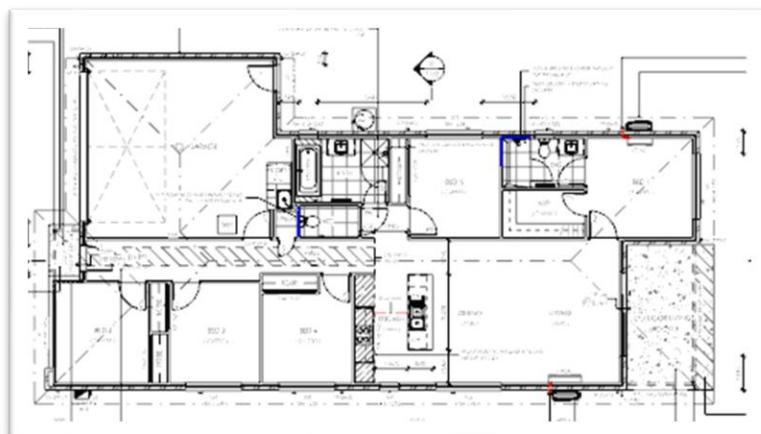


Stuart Wearn (Associate)

Single Storey Slab on Ground Option

Documentation received from Master Builders:

- Drawing set for single storey dwelling.
- Bill of Quantities from volume/specialist builder.
- NCC 2022 cost increases document, prepared by specialist builder.
- Climate Zone 2



Design requirements to meet NCC2022 Compliance (As provided by Specialist Builder)	Builder Assessment	Mitchell Brandtman Assessment
Increased Energy Assessment cost for more detailed analysis.	\$5,200.00	Included
Increased R value to R2.5 in ceilings.		\$2,500
Increased R value to R2.5 in walls and vapour permeable sarking.		\$1750
Upgrade to all glazing to address increased SHGC solar heat gain coefficients.		\$3,000
Additional requirements for ceiling fans (allowance – 6No fans).		\$1,500
Additional contour surveying required to identify exact reduced levels for option of front door entry or alternative garage door access (allowance).	\$6,128.10	\$500
New detailing for a purpose made aluminium entry threshold door sills from the garage area (allowance).		\$1,000
Modification of transition heights for access to all habitable rooms.		EXCL
Increased product cost for wider doors throughout (allowance).		\$3,000
Recessing of concrete slab and additional engineering to wet area to allow step free access and provision for new graded finishes to the disconnecter trap and shower drain outlet (allowance).		\$1,500

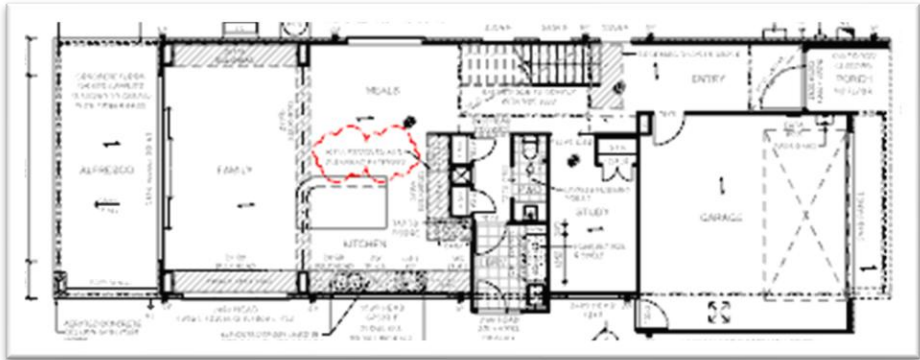
Provision of auto shut off valves to all braided lines in two wet areas (allowance).		\$500
Installation of ply sheeting for future handrail installs (allowance).		\$500
Increased detailing of water stop angle and D mould at the enclosed shower threshold (allowance).		\$1,500
Survey audit of all threshold heights, doorway widths, hallways and record keeping at the completion of those works (allowance).		\$500
Change to Shower screens to meet QDC (allowance).		\$1,200
Ramps at doorways (allowance). The cost is dependent on the specific design, including considerations such as the ramp gradient and whether handrails or balustrades are necessary for compliance.		\$3,000
Increased labour across for all aspects noted above.		Included
Whole-of-home assessment package (additional cost allowance).		\$500
	\$11,328.10	*\$22,450

* Where noted we have made an 'allowance' in the absence of any specific design details.

Double Storey Slab on Ground Option

Documentation received from Master Builders:

- Drawing set for a double storey dwelling.
- Commentary from volume/specialist builder.
- Climate Zone 2



Design requirements to meet NCC2022 Compliance (As provided by Specialist Builder)	Builder Assessment	Mitchell Brandtman Assessment
Low E Glass to windows and sliding doors. (over and above standard glass, typically).	\$24,000	\$9,000
Anticon blanket to the roof, including external alfresco roof area (if applicable).		\$4,000
Wall wrapping to all external walls (Excluded – See item below).		Excluded
R2-0 Batts to all external walls of brickwork or Aerated concrete and R2.7 Batts to external lightweight walls.		\$5,000
White ceiling fan to internal living areas and one external fan the alfresco area (allowance).		\$1,500
280 litre Heat Pump Hot Water System (Extra over allowance against instant Gas system).		\$1,500
Install 4kw Solar system – will require strengthened roof trusses (allowance).		\$1,000

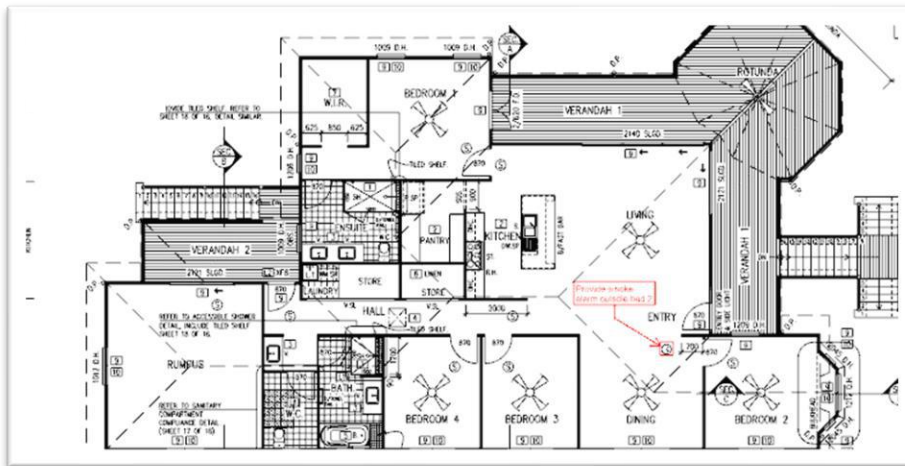
Provide recessed floor to lower-level powder room shower (allowance).	\$15,000	\$1,500
12mm ply reinforcement (allowance).		\$350
Delete floor waste to comply with the National Construction Code (NCC) requirements.		\$0
All water vessels to have overflows within the vessel. (allowance)		\$500
Install Flood stop restrictors (allowance).		\$500
Waterproofing changes include change of angles, puddle flanges, wastes, etc (Included above).		EXCL
All showers to have strip drains to meet min and max fall requirements (allowance).		\$2,000
Change to Shower screens to meet QDC (allowance).		\$1,200
Drop all floor joists so the floor is seamless (allowance).		\$1,000
Additional tile bedding installed (we typically use tile underlay) (allowance).		\$500
Design changes for hallway and door minimum requirements (allowance) Note* This allowance has been included to accommodate any necessary increase of the building area resulting from a loss of liveable space or other design limitations.		\$5,000
Ramps at doorways (allowance). The cost is dependent on the specific design, including considerations such as the ramp gradient and whether handrails or balustrades are necessary for compliance.		\$3,000
Floor coverings are now mandatory for us to ensure we meet the step requirements (allowance).		\$0
Install a drainage system outside the front door that complies – if garage is not the entry point (allowance).	\$2,500	\$2,500
Whole-of-home assessment package (additional cost allowance).		\$500
	\$41,500	*\$40,550

* Where noted we have made 'allowances' in the absence of any specific design details

Raised Dwelling Queenslander Option

Documentation received from Master Builders:

- Drawing set for Raised Dwelling Queenslander.
- Cost increase commentary from volume/specialist builder.
- Contract specification from Brisbane based builder.
- Climate Zone 2



Design requirements to meet NCC2022 Compliance (As provided by Specialist Builder)	Builder Assessment	Mitchell Brandtman Assessment
Floor structure modifications to suite set down shower & lifted up entry. (allowance).	\$13,850	\$1,000
Door openings widened to 870mm (allowance).		\$2,700
Larger space to toilets due to larger door clearance required (allowance).		\$2,000
Channel grate in lieu of round chrome waste to showers (allowance).		\$1,000
Ensure bedding and tiling is installed to facilitate correct falls to showers (allowance).		\$600
Replace standard shower waterproofing angles with those that comply with set down requirements (allowance).		\$250
Hot water system, upgrade to heat pump from an electric storage unit		\$4,000
Install mushroom stop over join to tiles to protect waterproofing (allowance).		\$350
Install 12mm ply wall supports at frame stage and deal with service clashes (allowance).		\$500
Install 12mm ply wall supports to toilet		Included
Change to Shower screens to meet QDC (allowance).		\$1,200

Install ramps in all passage doorway threshold frames to code. The cost is dependent on the specific design, including considerations such as the ramp gradient and whether handrails or balustrades are necessary for compliance (allowance).		\$3,000
NCC2022 energy assessor report fees	\$2,500	\$500
Install hi performance ceiling insulation and upgrade wall insulation (allowance).	\$24,392	\$13,000
Supply and install underfloor insulation (allowance).		\$7,500
Upgrade glazing standards to windows, doors, cedar doors and door sidelights (allowance).		\$6,500
Whole-of-home assessment package (additional cost allowance).		\$500
	\$40,742	*\$44,600

* Where noted we have made 'allowances' in the absence of any specific design details

Summary

It is important to note that the actual costs incurred may exceed initial allowances included within our report. Additionally, changes during construction can have consequential impacts on other consultants, including architects, engineers, certifiers, and the like. For example, a modification to the floor joists, such as those required by changes in bathroom levels, may necessitate revisions to structural, architectural, and plumbing drawings, as well as updates to project specifications.

General Estimate Clarifications

This report is provided solely for the client named on the cover of this report and cannot be relied upon by any other party.~ Mitchell Brandtman shall not be liable for any loss or damage of any kind, howsoever caused, whether direct or consequential, including but not limited to negligence, suffered or incurred by any such party.

Estimate Methodology & Limitations of Usage

Our report has been prepared to provide an indication in our opinion of the order of costs associated with NCC 2022 design requirements. Where possible we have calculated approximate quantities from the drawings provided. Appropriate unit rates have been applied to the relevant quantities. In the absence of any design information, we allocated a reasonable cost allowance.

Our indicative estimate for each building type is suitable for indicative budget purposes only and should not be used as a tool for tendering or a comparison to quotes received.

Exclusions

- Cost Escalation after the date of this letter
- Professional Consultant Fees (unless noted otherwise)
- DA works, Authority Fees, Charges and Contributions
- Design and Construction Contingency
- Preliminaries
- Margin
- GST