

Brief comments received

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1	<p>The NCC 2022 reforms saw significant changes to homes with the introduction of accessibility features, improving the thermal building envelope and introducing whole of home analysis. Releasing these requirements together in the one NCC reform was poorly guided with the financial impact on the housing sector. Separation of these unrelated requirements should have been undertaken as combining these have muddied the waters from a cost perspective on the inclusion into future housing. This process coupled accessibility, which requires structural changes to the way the residential building sector designs and constructs, to make future housing more accessible for all Australians. Whilst this is a virtuous position the costs incurred in the design and construction sector are substantial and in some cases like small footprint housing lots is unrealistic. Research has clearly shown that we have a changing climate and that we need to design and build homes that should last for 80-100 years, when well built. Therefore, the thermal performance upgrade of housing from 6 stars to 7 stars and whole of home energy budget is designed to provide climate resilient housing for households, reducing energy consumption, electricity costs, improve the health outcomes and reduce cost of living pressures. The cost to upgrade the thermal building envelope is not about gold plating the home, it is about using the existing materials and labour that already install insulation to upgrade the current building envelope by upgrading insulation in the ceilings and the walls and underfloor. The material supply cost difference in upgrading the insulation from a 6 star to 7 star house is under \$5,000 for the average home across the States. The size of housing in Australia is again increasing with promotion of new homes in excess of 50 squares. This drives further pressure on the existing labour shortage in the building industry and will negatively impact the building of a targeted 1.2 million homes. The manufacturing sector producing energy efficient products for climate resilient homes is capable of delivering product to the market in the most cost effective and timely manner. However, designers and builders may need to review their designs to offer efficient and affordable design methods to achieve 7 star performance, this may mean altering some designs. The building supply chain that includes product manufacturers needs harmonisation of the National Construction Code, where builders, manufacturers and suppliers commonly have national markets and all Australians can benefit from climate resilient housing. In the absence of a national code and strong regulation, the industry has the potential to be the dumping ground for poor quality, lower-performance building products. Lastly the drive to focus on upfront embodied carbon on building products used in construction being explored in several national reporting programs is short sighted and may create unintended consequences</p>

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	<p>such as shorter building life. In time, and with more detailed research on how to achieve whole of building life cycle this could provide environmental benefits, but is not supported in a piecemeal manner.</p>
2	<p>I have made numerous submissions over more than 2 decades to NSW Parliamentary Inquiries, addressing the complete failure of private certification to improve the efficiency or effectiveness of development and building outcomes in NSW. As a former Chair of the NSW Building Professional Board's Disciplinary Committee, I witnessed many serious issues firsthand. I am more than willing to reiterate my concerns. For reference, this Dropbox folder contains a collection of relevant information and reports on this issue: Building Regulation NSW - https://www.dropbox.com/scl/fo/clq0csqsahcb2vxrtl8e5/ALVgTZqTzptQPobDX3nfCp8?rlkey=47lsxqlfgjw9zatlrzieytrp1&dl=0 In the Mahla Pearlman Oration, Sydney, March 2013, the Hon. Paul L. Stein, AM, QC, remarked, "The EPA Act was an elegant piece of legislation, and I pay tribute to the drafters and the Government of the day that steered it into law. As the Minister for Planning acknowledged in the 2012 Green Paper, the Act was reforming and innovative. However, it lasted intact only until 1985. Since then, there have been around 150 amendments, usually preceded by the claim that the amendment would make planning decisions speedier, cheaper, and easier, and, of course, 'cut red tape.' We all know the result was the opposite. The EPA Act has become such a complex web, such a mish-mash, that decisions have become more difficult, slower, and more expensive. The Act has become a statute as complex as the Income Tax Assessment Act. It is very difficult for participants and decision-makers alike to navigate. Kafka would be proud. Many consider the best path is to start again from scratch." The system has become so complex and inconsistent—not only between states but also between neighboring councils—that it is now a major driver of unregulated development and building work. The time it takes to obtain simple approvals or modification is disproportionate to the potential environmental harm, the lack of independent oversight means the quality of buildings is more often than not unacceptable, nowhere near compliant with the National Construction Code - Building Code of Australia. The solution is simple: we need nationally consistent development and building laws. These laws must be clear and straightforward, accessible to everyday homeowners, and supported by independent assessments at both the development application and building application stages. Assessment must be proportionate and timely</p>
3	<p>Technical efficiency is defined as the ability of firms and industries to produce as much output as possible, given inputs of labour and capital used and the level of technology. At maximum efficiency, to increase output requires adding another input. Data envelopment analysis (DEA) estimates efficiency by measuring the ratio of total inputs to total output for each member of a group. DEA identifies the most efficient provider of a good or service by the ability to produce a given level of output using the least number of inputs, then measures relative efficiency against that benchmark for the sample group. DEA was first applied to the construction industry in Hong Kong in the late 1990s, and over the last few years there have been DEA papers on construction in Spain, Sweden, Europe, Hong Kong, China, New Zealand and Australia. This research broadly found construction productivity has slowly</p>

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	<p>increased over time, but it is pro-cyclical and follows rises and falls in the volume of work. There are two other findings. The first is larger firms are more efficient than small ones and there is a significant within-industry difference between the best and worst firms. The second, these DEA studies find the overall level of technical efficiency in construction is high, and for the best firms very high. Like productivity, technical efficiency is strongly pro-cyclical, rising and falling as the volume of work increases and falls. Periods of full technical efficiency coincide with periods of the strongest productivity growth. In countries where construction has been analysed with DEA it is efficient. This is an explanation of the productivity problem. When the level of work is high and increasing, productivity improves until the industry is approaching the efficiency frontier, where more workers are needed to increase output. Therefore productivity stops growing. As the volume of work falls during the contraction phase of the building cycle and firms retain workers in the expectation of future work, the level of productivity falls, ending up where it started. Australian construction illustrates this pattern. Between 2007 and 2022 the volume of construction work done increased by 29%, and construction employment by 26%. This indicates that, over this period, the industry has turned inputs into buildings and structures using current production technology (machinery, materials, management etc.) at a high level of technical efficiency. It also identifies the strong relationship between an increase in work done (output) and employment, which will also increase. In construction, an increase output requires more workers, productivity as output per worker doesn't change. At a high level of technical efficiency, productivity growth is no longer possible. If productivity growth is no longer possible with the technology currently used in the system of production, which in construction of housing has been developing for well over one hundred years, industry will focus on efficiency and getting the most out of the labour and capital available. Efficiency trumps productivity in construction.</p>
4	<p>Looking at the industry today and the way we have moved further away from the ability for simplicity, we have caused a quagmire of costs for all concerned. We need to reflect on all these from inception to completion of housing. Local Governments should look at the planning schemes and the ability of planners to approve the application including employing building surveyors and building inspectors to ensure work is approved and carried out in accordance with the, BCA and regulatory requirements. Look at the services required to construct dwellings and the costs, these out way the actual building basic cost of construction. in order to develop a subdivision and install services, such as, storm water, potable water, sewage disposal, electrical power and wifi, these are now upfront major cost. let us reflect on what we are trying to achieve go back to basics and review our system today for tomorrow and onward.</p>
5	<p>The implementation of AAC blockwall residential construction as a far more preferable alternative to stick framing is stymied by the excessive cost of units manufactured by one company in Australia, marketed by big box warehouses and most significantly.....general ignorance of the work practices associated with use of AAC blocks throughout the construction industry. yourhome.gov.au provides some general insights into the benefits of AAC blocks but drifts off into usage of AAC wall panels which are poorly suited to sustainable construction. I was site manager for Citra Const with a contract</p>

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	<p>to supply and lay around one million concrete masonry blocks on the New Parliament House project and it was no easy task for block layers to lay solid 390x190x190 concrete masonry blocks to achieve a four hour fire rating and I might add that most of the masonry block utility walls were sheathed with plasterboard. There's no doubt in my mind that if AAC blocks were commonly available at the time they would have been the preferred product in lieu of the concrete masonry block. Over the last ten or fifteen years I have witnessed the demise of 230x110x55 hand made sun baked bricks fired beneath layers and layers of coconut shells in Java Indonesia having been replaced by readily available, cost beneficial, energy efficient and more sustainable AAC blocks which are being produced widely throughout the island. The adaptation and utilization of AAC blocks has been amazing to observe and this is in a country where natural hazard events are more likely to occur than we in Australia are prepared for. I propose the Federal Government offers rebates to homeowners choosing AAC Blockwall construction vs timber/steel framing as a means for promoting this much more environmentally friendly product while at the same time giving more attention to educating the masses of ignorant builders who are out there doing the same old thing over and over again.</p>
6	<p>Having just built a 250m2 house in fnq as an owner builder, and 40 years experience in all trades related to housing construction. The main issue is da requires plumbing design and a plumber to sign on to submit a building application. Delay trying to find a plumber with time took additional 90 days. I am legally building 5 homes over 3 years all to code. Plumbing could quite easily be a standard check list, instead of requiring licensing just to submit da.</p>
7	<p>I believe it would be very relevant to include some statistics from other countries over the past 50 years showing the percentage of total housing that has been built as social housing by the various Governments public funds. Today I think Denmark has around 16% and Australia 3% so blaming ABNB, landlords and immigration seems like a total coverup by the current Labor government.</p>
8	<p>Apprentices need to be paid more. The training system needs a more regional focus, reflecting the housing demands in the area of employment. We need paid mentors on building sites to provide the guidance needed. Hadrian is Australia's greatest innovation in the last 10 years.</p>
9	<p>Housing construction in Oz is chronically inefficient, time wasting and expensive. A simple process map starting at building approval (or before) to handover will strongly confirm this. Check out Sekisui House in Japan. They follow Lean Thinking principles and factory build houses in a matter of hours. I have toured this factory, spent 40 years in the housing and construction industries and view their approach as the best answer.</p>

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10	<p>The current regulation changes are massively inhibiting to progress on the work site, both in productivity and cost which are passed onto the final purchaser and owner. The new accessibility and water proofing code conflict with each other and make no sense to a practice out come. A simple example is the requirement for falls to all floor waste at a ratio of 1: 50 - 1:80. The removes the possibility of large tiles with out cutting the floor up with different angles to achieve falls to floor wastes, and also conflicts with access code with a maximum 1:40 fall allowed. Another simple example is the accessibility code requires minimum 820 clear opening with unrestricted space, causing bathrooms to be made much larger and the fact that you have a shower screen door with no size requirement so ends up 720 mm wide opening. Because the water proofing code requiring falls to floor waste, the only way to combat this is by having an enclosed shower with no threshold and door fitted to shower so there goes the ability to have a open shower with a blade of glass which in turn makes the room smaller in a tight bathroom. None of these codes have been written with consideration to other codes, or more importantly the end users being both the construction team and once again the owner who wears the increased costs.</p>
11	<p>For a building permit for a 30sqm detached granny flat I needed:. Architectural & engineering drawings and specifications. Energy assessment. Soil report. Cladding specification. ba1 form. cTF form + letters from the owner & builder giving me authority to lodge on their behalf. Way too much bureaucracy for a project worth under \$100 000</p>
12	<p>More needs to be done for workers rights and conditions ie superannuation,sick pay, holiday pay,inclement weather pay etc. Apprentices being used as cheap labour then discarded. No wonder people get out of the industry at the first opportunity and never return.</p>
13	<p>Over regulation and control on the mundane issues, quality control needs to be improved overall. And personal building permits need to be implemented for own builds...ie let us get on with it.</p>
14	<p>I am not a registered builder, I have owner built in the past & will do so again as soon as I can get through local government rules, regulations & barriers . The difference of regulations from when I last built (15 years ago) is purely mind boggling & a pocket explosion . Eg , I need to demo the old dwelling to get a start ! Truly , it's uninhabitable Riddled with asbestos & rotten to the core (1950's commission) but to get the start I need reports, I need tests , & now they want a demolition plan ! So I'm looking at approximately \$25,000 B4 I even start , probably more ! . Local council are too hungry , It's all about revenue, ... what new rule can they apply & connect a charge too , if you don't pay the fee , no building . Let The inspectors be the regulator's , Rules</p>

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	<p>need to be followed absolutely ! As an owner builder it's in my own interest to build to spec,, I'm not building for resale , I'm building for quality, Council are worried about Gerry built homes ! We'll have a look what's happening with the production builders , tons of non compliance but people moving in to these shoddy building's Get council out of my way so I , we , can get cracking . !</p>
15	<p>Lack of skilled people in the construction industry, not able to adapt to diverse skills, 7 star rating is limited just to a paper , not actually 7 star applies to the building real designers are unemployed , surveyors are designing the houses . Construction industry is transferred from father to uneducated Son . Today builder goes to administration and tomorrow open new business with brand new name, building contract safe guard builder than the owner . Real corruption due to consumer doesn't safeguard with law.</p>
16	<p>The emergence of profit driven skills assessment companies has led to a marked decline in the skill levels of tradesmen. I did a full carpentry apprenticeship and the TAFE training that went along with it. Previous work history can easily be faked , so the assessment business's are often qualifying people with little to know technical training or little understanding of the underlying principles of construction</p>
17	<p>The construction industry is stuffed, with more dodgy, greedy, shonky builders and subcontractors who haven't even completed basic training and yet somehow get registered by the governing bodies. With so many paid to pass training places, anyone can get a builder's licence. Non-compliance is rife and yet few builders get de-registered and certainly don't have to pay compensation for the non-compliant defective works. As for productivity, it's non-existent. People want to get as much money as possible for doing the least amount of work.</p>
18	<p>Council rules are ability to process in timely manner. Lack on businesses to train apprentices. Labour hire companies use apprentices as cheap labour. Not being able to give them full time work. Sub contracting sub trades framers roofers facial and gutters fixout fencers. Very hard to align su contractors to be on job as required. Consist delays materials and and suppliers. Building inspector who no practical experience on the job building a house</p>
19	<p>These comments will be limited to detached and medium density housing and the sector that delivers this type of housing. High rise apartments is another story and no doubt will be covered by others. Firstly, the planning schemes and planning system in Australia has constrained housing development by continually adding more and more layers of approvals and complicated processes. Planners like to leave codes and criteria in planning</p>

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	<p>schemes in such a vague manner so that the planning profession will require more and more of their profession to assess applications. The jury is creating a more complicated process so that planning approval is required rather than an assessment that could be done by the private sector against clear codes. Developers who also build the homes will be best positioned to deliver on the volume of housing required. Land developers who do not build are only interested in achieving the best returns for shareholders and so the release of land will be forever 'drip fed' to the market to keep prices high. It is not in their interests to flood the market with land. Even with Landcom controlling significant landholdings in NSW, the delivery method by partnering with land developers has seen land prices skyrocket over the years. Land developers also require such difficult design features in homes built on their land, it causes prices to soar as well. Productivity in housing construction has declined badly over the past 20 years. The use of mobile phones has taken away the need to be organised and the project management skills of the industry and contractors is very poor at the moment. Contractors are earning far more money than ever before and so the need to work longer hours has been removed to the point where some contractors can only work four days each week and earn the same money they were achieving before Covid. Communication is very poor and the knowledge of contractors and builders working in the industry is at an all time low. Much more is needed to boost the education and training of the sector. The skills of building designers and architects in relation to the quality and standard of plans and documentation is very poor and leads to duplication of work, errors and misunderstandings during construction which leads to a loss of productivity. In order to build more homes, the complication of the construction needs to be simplified to build faster. Back in the 1970s-90s, single story homes could be built in 40 working days (excluding any floor coverings and landscaping of course). The homes were simpler. The housing industry has over-complicated the building process by adopting a 'do you want fries with that' mentality to sales so that home buyers spend more money. Most of the innovation I have seen occurred in the 1980s and 90s with I beam joists, pre-fab frames and trusses. factory or modular construction has not taken off due to the customisation that has carpet into the industry making it difficult to develop any alternative to onsite 'brick by brick and stick by stick' approach. The Modern Methods of Construction (MMC) promises to deliver however it requires large amounts of capital to operate such businesses and the Australian housing industry is not capitalised to deliver that. MMC will work for rural and remote areas due to the lack of trades and builders in these areas. The additional requirements of the NCC are making it harder to deliver affordable housing but some of the new provisions are required to deliver better quality construction eg condensation management provisions.</p>
20	<p>I really hope this work results in significant change in the approval process for new housing. This has been tried many times before and failed or been wound back by successive governments. I believe we are at the point where Local Government has to be removed entirely from the planning and approvals process as they have shown utter contempt for all involved in the housing or development industry for many decades and caused the housing crisis we and our children are suffering today. Young people have a right to affordable well located housing which they have been denied for at least the last 15 years. Governments at all levels need to make this happen.</p>

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21	Not making use of old tradesman with a lifetime of knowledge but who's bodies won't let them work flat out with the tools Still can train, supervise, and do maintenances work But know one what's to hire people over 45
22	The quality of new builds is atrocious. There is non compliance everywhere and regulators do not appear to be doing their job. Never building again and know lots of people thinking the same. May as well throw your money down the loo!
23	The purpose of this submission is to outline Cladding Safety Victoria's (CSV) research insights on non-compliance and defects in Victorian residential buildings impacting on occupant health and safety. CSV is responsible for delivering the Victorian Government's Cladding Rectification Program. As of September 2024, CSV has overseen the completion of works on government-owned buildings and has resolved a remediation approach for over 1,100 privately owned apartment buildings comprising over 50,000 apartments. This includes funded cladding rectification work for more than 430 privately-owned apartment buildings affected by combustible cladding, with more than 350 private rectification projects now complete. CSV's program has provided a unique opportunity to collect and examine data which has provided an evidence base for the development of research reports providing insights into the quality standards of building in Victoria. Two research reports currently published on CSV's website are: • Issues and risk
24	The current building regulations do not mention repairs, so when assessing a damaged house, insurers, engineers and surveyors treat eepairs the sane as extensions, forcing victims of natural disasters at their moment of greatest vulnerability to pay enormous extra amounts to upgrade the undamaged parts of the house to later building standards, which is not covered by insurance. This is a criminal oversight on the part of incompetent drafting of the rules, compounded by the god-like narcissism of the state building authorities.
25	In Vic, I had commercial and domestic registrations, but not aligned, so had to re new every 5 yrs for both, but at different times. I am the same person for both. Installation of steel Roofing has to be by a plumber, but in other states can be by a carpenter. Many years ago carpenters could install steel roofing in Vic. Need a licence/ registration scheme that is Australia wide, not state based - ie electrician has one licence to work in Albury and Wodonga, as well as all other states. We are one country!

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26	<p>Having led one of Australia's largest trade suppliers in the construction industry it was very clear that existing builder systems are siloed with every builder operates independently. All connectivity of value was via email so managing builder projects is very costly. Further to this, Builder systems have limited capacity, the only information in them is that the builder enters. BuiltGrid has been developed to connect builder projects to their supply chain within a framework to increase capacity, improve supply chain visibility and reduce costs for both builder and supplier.</p>
27	<p>We have addressed the question regarding productivity with queries and statements for consideration as dot points. * How is the productivity measured and is it relevant when reporting on housing completion no's * We believe the complexity of Builds has had an impact to the number of homes able to be delivered. * Has there been any surveys and subsequent comparisons done into the number of trades working in the Industry now compared to 1, 2, 5 & 10 years ago? * Suggest there be a review into training and the number of parties clipping the ticket for low level training. * There is a disconnect between the entities working with National construction standards and the Industry. This will need to be addressed sooner rather than latter as the flow on affect is likely to create larger long term maintenance issues</p>
28	<p>Is there a piece of kit, building technology, or a change in process, that has impacted the way you work? The ability to make building applications online. Have you been waiting for a DA? What's it costing you and how is it impacting your business? Yes, Currently have a application that has been with Local Government for 6 months How have the quality and design of the homes you're building changed over the years? Quality has dropped because the complexity of the NCC has increased and the training of trades has not kept up with the changes. The ABCB are not very helpful when it comes to providing advice. How have changing rules and regulations affected your ability to build homes? Yes. The time it takes to build has increased by 2 months. There has been a complete redesign of most of our existing floor plans costing us approximately 2 million dollars. What would make it easier for you to build more homes? A statewide or National housing code that covered the planning approval side. Currently every council has different requirements for houses, this means only some house plans will work in certain local government areas. Consistency is key for ease of building. Increase the NCC changes to once every 5-10 years (allowance to be made for corrections and amendments). Trades to be held accountable for their work (not just builders) as this will ensure they keep up to speed with NCC requirements. Individual trades should be the experts in their field.</p>