

FIELD NOTES · FOR ARCHITECTS & PMS

The 2025 *NCC Reforms.*

4 reform packages. 8 jurisdictions on different timelines. The headline is commercial energy and waterproofing. The risk is version control. Here is what to act on now.

By Chiang Ning

CHIANGNING.NET

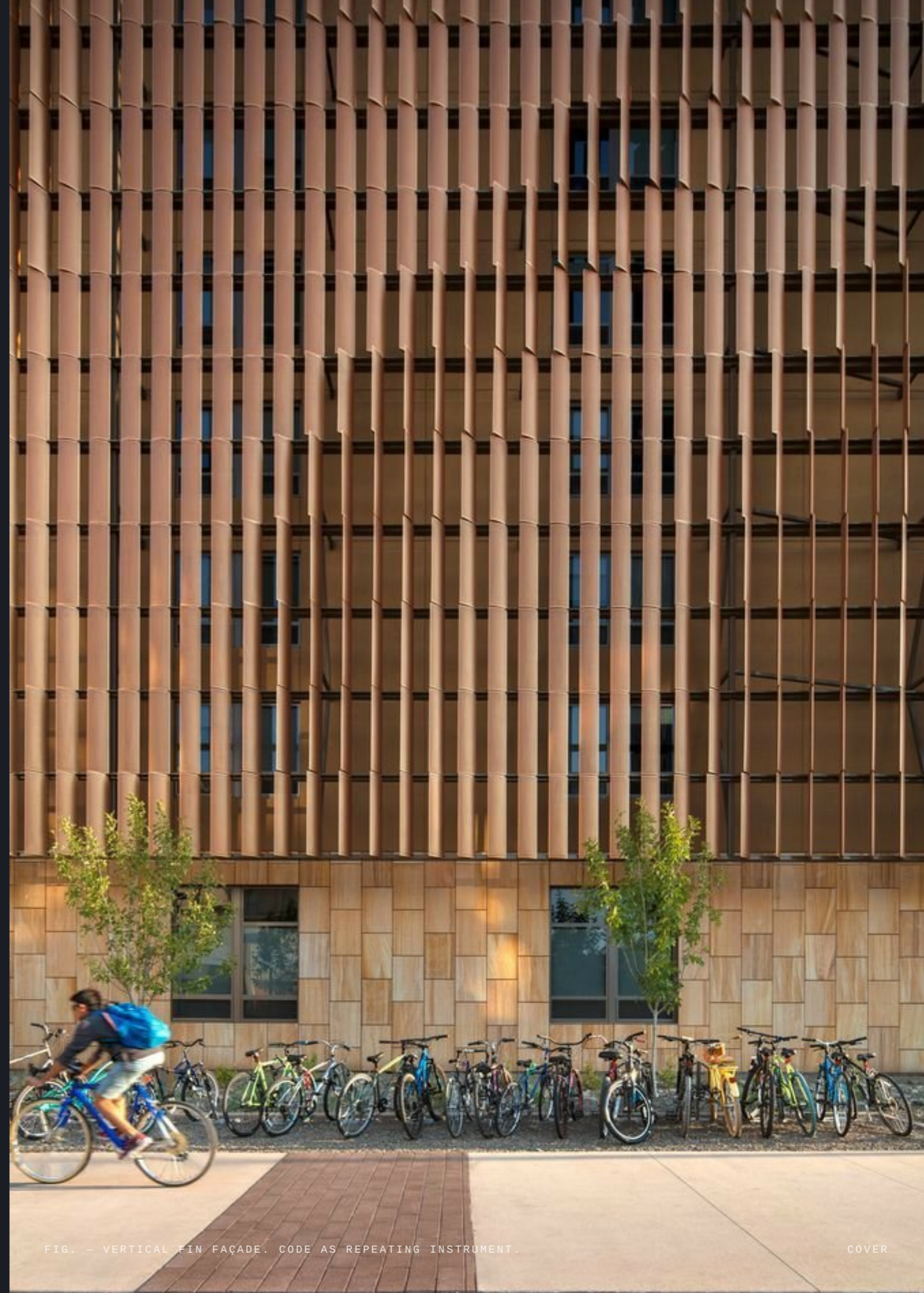


FIG. — VERTICAL FIN FAÇADE. CODE AS REPEATING INSTRUMENT.

WHY THIS MATTERS NOW

2 packages already binding in *Victoria*. 6 jurisdictions on different clocks.

NCC 2025 is not a broad three-year rewrite. It is a targeted code cycle aimed at the areas regulators thought were hardest to defend: water ingress, carpark fire safety, commercial operational energy, and condensation. Building Ministers explicitly decided that **no further residential energy uplift** and **no new EV-charging mandate** would be introduced in NCC 2025, while confirming stronger commercial energy reforms including **mandatory on-site solar PV**.

The practical point for architects and PMs is simple. Commercial, mixed-use, and apartment-adjacent work gets more front-loaded. Carpark fire strategy, podium waterproofing, Section J, and façade evidence all move earlier in the program. Late substitution gets harder. Version control becomes a delivery risk, not a documentation chore.

This guide is for architects and PMs who need to act, not for those who need policy commentary. Each section is a single proposition with the evidence beneath it. The legal text remains in the Code itself; this is the field reading.

WHAT CHANGED FOR YOU, IN PLAIN TERMS

Carpark sprinklers now apply at *40 vehicles or one stacker*, not the older concession. Balconies, podiums and concrete roofs have explicit falls, set-down and substrate rules. Section J is materially stronger for commercial buildings — mandatory PV, lower fan power, tighter envelope — and Class 2 stays on NCC 2022 settings.

External wall fire classification under AS 5113 and fire-hazard testing must come from an *Accredited Testing Laboratory*. The exact *edition and publication date* of every referenced standard should appear in your permit and project records. Substitution governance is now contractually meaningful.

01

In Force · *Vic.*

Victoria adopted NCC 2025 on **1 May 2026**. Projects already in design or construction may continue under the standards in place when work commenced.

02

Dual Code · *ACT, Tas.*

ACT runs both editions until **1 May 2027** but forbids mixing. Tasmania commenced with major variations: housing stays at 6 stars, F4 not adopted.

03

Deferred · *NSW, Qld, SA.*

All three deferred building-code adoption to **1 May 2027**. WA has selected commencements; the NT has declared NCC 2025 does not apply at all.

WHAT SITS ON EVERY PROJECT NOW

Eight numbers *that govern your code strategy.*

| | | | |
|--|--|--|--|
| <p>SUBSTRATE FALL</p> <h2>1:80</h2> <p>Minimum gradient to floor waste at substrate level for concrete roofs, balconies and podiums under the new F1 rules.</p> | <p>SET-DOWN</p> <h2>70 mm</h2> <p>Minimum set-down from internal floor level, measured from the structural substrate. Coordinated architect / structural / waterproofing.</p> | <p>DEFLECTION ALLOWANCE</p> <h2>10 yr</h2> <p>Structural action B1D2(b) now requires substrate movement to be considered over a ten-year design horizon for water-management interfaces.</p> | <p>CARPARK TRIGGER</p> <h2>40 cars</h2> <p>Sprinkler exemptions removed where car stackers are installed, or more than forty vehicles are present, in carparks under S5C19 / S5C22.</p> |
| <p>SECTION J CLASS</p> <h2>Cl. 2 out</h2> <p>Class 2 apartments are carved out and continue under NCC 2022 settings. All other commercial classes face the stronger Section J package.</p> | <p>MANDATORY PV</p> <h2>On roof</h2> <p>On-site solar PV is part of the final commercial energy package. Reserve usable roof area at concept stage; do not let plant or balustrades take it.</p> | <p>TEST LAB</p> <h2>NATA only</h2> <p>External-wall classification (C1V3, AS 5113) and fire-hazard properties (S7C4) now require testing by an Accredited Testing Laboratory.</p> | <p>RECORD</p> <h2>Edition + date</h2> <p>Permit, occupancy and project records should identify the exact edition and publication date of every referenced document. A4G1 register applies.</p> |

These are not the only numbers in NCC 2025. They are the ones that decide concept-stage geometry, plant strategy, contractual evidence, and the cost of a late change. If your specification does not name them by stage, somebody downstream will.

PART ONE

4 packages. 1 procedural shift.

Building Ministers retained four technical packages and dropped two. Embodied carbon moved to ABCB guidance. EV charging and residential energy were excluded. What stayed is a tighter compliance chain — quantified structural reliability, accredited testing, and an explicit referenced-document register.

The deeper change is procedural. A2G2(5) removes the older structural-Performance-Solution path that relied on demonstrating compliance with all Performance Requirements, and instead requires **equivalence to the Deemed-to-Satisfy** provisions. A4G1 introduces the Register of Alternative Referenced Documents. A5G3 sharpens evidence of suitability. None of these are clauses you read on site. All of them decide whether a substitution survives audit.



FIG. 1 — TESSELLATED FAÇADE. REPEATING RULE, DELIBERATE VARIATION. THE FOUR PACKAGES IN BUILT FORM.

01

WATER MANAGEMENT

Section F restructured. Old *F3 merged* into F1.

F1P1 consolidates Performance Requirements. F1V1 replaces F3V1. The defined term *Water* now includes ground moisture, rising damp and groundwater. Concrete roofs, balconies and podiums get explicit DtS rules.

02

CARPARK FIRE SAFETY

Open-deck concessions *narrowed*. Stacker triggers added.

S5C19 and S5C22 remove earlier reduced-FRL concessions for open-deck carpark in multi-class buildings unless sprinkler-protected. Sprinkler exemptions removed at 40 vehicles or one car stacker. Mixed-use podiums hit hardest.

03

COMMERCIAL ENERGY & PV

Section J *materially stronger*. PV is now in the package.

J1P1 tightens energy and emissions targets. J1V1–J1V4 toughen verification. J4 / J5 sealing and envelope rules; J6 lower fan-power and modulating-control. Specifications 40, 46, 47, 48 carry the methods. Class 2 stays on NCC 2022.

04

CONDENSATION & VENTILATION

Wall cavities, vapour control, *roof-space ventilation*.

F8D3 requires drained and vented cavities and a Class 4 vapour-permeable layer in specified build-ups. F8D5 / F8D6 clarify roof-space ventilation. F6D6 allows AS 1668.4 for natural ventilation. H4D7 mirrors for housing.

THE CHANGES THAT DECIDE CONCEPT-STAGE GEOMETRY

Where NCC 2025 *actually moves the lines.*

| AREA | NCC 2022 BASELINE | NCC 2025 SHIFT | WHAT TO DO NOW | CLAUSES |
|--|--|--|---|---|
| Waterproofing & exposed external slabs | Water-management logic split across Section F and the old Part F3. Substrate movement easier to treat separately. | Section F restructured. Part F3 merged into F1. Explicit DtS rules for concrete roofs, balconies and podiums covering falls, drainage, membrane placement, set-downs. Structural action must allow for ten-year deflection. | Freeze threshold, falls, membrane and drainage geometry in concept or early DD. Make balcony and podium details a coordinated architect / structural / waterproofing package, not a sequential one. | F1P1 F1V1 F1D2 / 4 / 5 F1D7 / 10 F1D15 B1D2(b) |
| Carpark fire | Open-deck carpark in multi-class buildings had broader FRL and sprinkler concessions. | Open-deck concessions removed unless sprinkler-protected. Sprinkler exemptions removed where car stackers are installed or more than forty vehicles are present. | Treat podium and open-deck carpark fire strategy as a schematic-design issue. Re-cost hydraulics, plant space, and FRL assumptions early. Don't assume an open-deck concession survives the redesign. | S5C19 S5C22 E1D2 |
| Section J & mandatory PV | Section J was less stringent and did not impose the same final-package PV requirement. | Materially stronger commercial energy rules, mandatory on-site solar PV, stronger envelope and sealing, tighter HVAC and lighting settings. Class 2 carved out and continues under NCC 2022 settings. | Reserve usable roof area for PV early. Lock façade, shading and HVAC assumptions earlier. Do not leave Section J as a late-stage consultant report; it now sets concept geometry. | J1P1 / P4 J1V1–V4 J4 / J5 / J6 Spec 40 Spec 46–48 |
| Ventilation, IAQ, condensation | Natural ventilation and kitchen-exhaust pathways narrower. Condensation controls left practical gaps. | AS 1668.4 now an option for natural ventilation. Kitchen exhaust aligned more closely with AS 1668.1. Wall cavities and roof-space ventilation tightened. Class 4 vapour-permeable layer in specified build-ups. | Use AS 1668.4 where it simplifies compliance. Review kitchen-exhaust schedules. Redesign wall and roof build-ups, particularly in higher condensation-risk climate zones. | F6D6 / D12 F8D3 / D5 / D6 H4D7 10.8.1 / 3 / 4 |
| Wayfinding signage | Signage requirements were dispersed and often deferred to fitout packages. | A new Performance Requirement for wayfinding signage with a DtS pathway requiring stairway, level, and SOU signage with tactile, Braille, and high-contrast visual elements. | Bring signage into the architectural set early. Treat tactile and contrast requirements as a base-build deliverable, not a tenant fit-out item, in mixed-use schemes. | D1P10 D3D31 |
| Sanitary & amenity | Sanitary-product dispensers not explicitly required. All-gender facility pathway less defined. | Sanitary-product dispensers required in female facilities. Optional DtS pathway for all-gender sanitary facilities in Class 3–9 buildings, up to 50% of required facilities, with privacy and hygiene rules. Increased female pan ratios in some Class 9b occupancies. | Plan amenities at concept stage with the all-gender option costed in. Coordinate signage and privacy partitioning early; don't leave dispenser provision to FF&E. | F4D4(6) F4D4(12–14) F4D8(1)(a) Table F4D4i |
| Structural Performance Solutions | Qualitative structural narratives were defensible. Performance pathway permitted compliance via Performance Requirements directly. | B1P1 now requires minimum reliability indices. B1V1 requires combinations of actions, not isolated loads. A2G2(5) requires structural Performance Solutions to demonstrate equivalence to the DtS provisions. | Quantify reliability early. Frame Performance Solutions in DtS-equivalence terms from the outset. Late narrative-only justifications will struggle. | B1P1 B1V1 A2G2(5) H1P1 / V1 |

EIGHT JURISDICTIONS, FIVE ADOPTION PATTERNS

The same code *is not in force everywhere.*

For national practices, the version-control problem now sits at the front of the project file. The same drawing can be lawful in one jurisdiction and not in another. The same product evidence can satisfy Victoria and fail Tasmania. The clearest single instruction: lock the jurisdiction and the code edition in writing on day one.

| OCT 2025 | 1 MAY 2026 | 1 MAY 2026 | 1 NOV 2026 | 1 MAY 2027 | FUTURE |
|---|---|---|--|--|--|
| ● | ● | ● | ○ | ○ | ○ |
| Ministers <i>finalise</i> | Vic adopts | NT excludes | ACT cut-off | NSW, Qld, SA | Next edition |
| Building Ministers' Meeting confirms NCC 2025 scope. Embodied carbon dropped to ABCB guidance. EV charging and residential uplift excluded. | Victoria adopts NCC 2025 in full. ACT begins dual-code period. Tasmania commences with major variations. WA confirms PCA 2025 and selected BCA 2025 commencements. | Northern Territory declares NCC 2025 does not apply at all until the next NCC edition. Any national assumption of automatic adoption is wrong for NT. | DAs and Works Approvals lodged before this date may preserve dual-code flexibility. After this, the runway to mandatory NCC 2025 in the ACT is six months. | All three deferred jurisdictions move to mandatory NCC 2025. ACT becomes mandatory on the same date. Single national alignment date for these four. | NT re-enters the cycle only at the next NCC edition. Watch for state variations being progressively narrowed as feedback from 2026 implementations flows back. |
| Victoria LIVE · 1 MAY 2026 | NCC 2025 applies in full. Projects already commenced in design or construction may continue under standards in place when work commenced. Lead-free plumbing starts in Vic on 1 May 2026 , ahead of the national extension. | | ACT DUAL CODE · UNTIL 1 MAY 2027 | Commences 1 May 2026 but not mandatory until 1 May 2027. Projects may comply with NCC 2022 or NCC 2025 — but cannot mix them. DAs lodged before 1 Nov 2026 may extend dual-code flexibility further. | |
| New South Wales DEFERRED · 1 MAY 2027 | Adoption deferred. Variations announced will include flexibility for remedial waterproofing and will exclude new energy-efficiency standards from apartment-building common areas. New-build / remedial scope distinction matters here. | | Queensland DEFERRED · 1 MAY 2027 | NCC 2022 remains mandatory until 30 April 2027. NCC 2025 mandatory from 1 May 2027. For Queensland projects in design now, the issue is preparation rather than legal adoption — but procurement language should anticipate the change. | |
| South Australia DEFERRED · 1 MAY 2027 | Building Code within NCC 2025 adopts on 1 May 2027. SA frames the delay as giving industry time to adjust and minimising disruption to projects already in design. Long-running schemes benefit. | | Tasmania VARIED · 1 MAY 2026 | Commenced with major variations: residential stays at 6 stars , condensation provisions do not change, sanitary-facility changes in F4 are not adopted, existing Tasmanian variations carry through. A trap for one-size-fits-all advice. | |
| Western Australia SELECTED · 1 MAY 2026 | PCA 2025 commences 1 May 2026. For new private swimming pools, BCA 2025 is mandatory from the same date — but WA retains AS 1926.1:2012 rather than the 2024 edition for private pools. Schedule 11 carries the local variations. | | Northern Territory EXCLUDED · UNTIL NEXT EDITION | NCC 2025 declared not to apply from 1 May 2026. The Territory does not re-enter the cycle until the next NCC edition is published. Any national NCC 2025 advice that assumes 2026 adoption is wrong here. | |

COORDINATION ISSUE FIRST. CLAUSE ISSUE SECOND.

8 stages. *What architects and PMs do at each.*

| STAGE | ARCHITECT | PROJECT MANAGER |
|---------------|--|--|
| BID · BRIEF | <p>Confirm the version applicable.</p> <p>Jurisdiction, building classes, mixed-use interfaces, climate zone, and likely code edition. Identify whether the project sits in a dual-code or deferred jurisdiction.</p> | <p>Add code edition as a day-one risk.</p> <p>"Applicable NCC edition and state appendix" goes on the project risk register at bid stage. The same design may be lawful under different code versions in one jurisdiction and not in another.</p> |
| CONCEPT | <p>Decide carpark and PV at scheme stage.</p> <p>Whether the project needs open-deck carpark concessions, major exposed balconies or podiums, or a Performance-Solution-heavy strategy. Reserve real roof area for PV before plant takes it.</p> | <p>Brief fire, water, structure, Section J together.</p> <p>Commission these consultants in parallel, not sequentially. Carpark sprinklers, waterproofing geometry, and Section J now drive concept geometry, not just compliance reporting.</p> |
| SCHEMATIC | <p>Draw the substrate explicitly.</p> <p>Substrate falls, threshold set-downs, membrane position and drainage paths. Identify signage and all-gender toilet implications in the planning grid before they become a fitout afterthought.</p> | <p>Freeze the compliance path.</p> <p>DtS or Performance Solution. Identify evidence packages needed from suppliers. Code is much less forgiving of late-submittal-stage coordination than it was.</p> |
| DESIGN DEV. | <p>Coordinate the build-up in one model.</p> <p>Façade build-up, vapour-control layer, cavities, roof ventilation, glazing, HVAC efficiencies, EV assumptions for the Section J reference building. Treat as a single package.</p> | <p>Issue a referenced-documents schedule.</p> <p>List exact standard editions and publication dates. A4G1 and the new record-keeping emphasis make version control a live compliance item, not a documentation footnote.</p> |
| DOCUMENTATION | <p>State the code edition on the drawings.</p> <p>Nominated NCC edition and state appendix on title block and permit documents. Identify all code-critical details in enlarged details and schedules.</p> | <p>Run a pre-lodgement code audit.</p> <p>Focus on version control, accredited testing, and state variations. ACT explicitly prohibits mixing codes; other jurisdictions assume clean records.</p> |
| PROCUREMENT | <p>Tighten product and test specifications.</p> <p>Fire testing, façade evidence, water-management assemblies, HVAC efficiencies, PV performance. "Equal approved" without an evidence test is a non-conformance argument waiting to happen.</p> | <p>Make accredited reports a contract deliverable.</p> <p>Product evidence and standards-edition compliance go in the contract, not just the spec. Substitutions require approval through the same code gate as original selections.</p> |
| CONSTRUCTION | <p>Inspect waterproofing geometry before finishes.</p> <p>Falls, set-downs and membrane sequencing must be inspected and documented before they are concealed. Carpark sprinkler scope and smoke-control interfaces verified against the as-built layout.</p> | <p>Maintain an evidence register.</p> <p>Force every substitution review through the same gate as the original specification. The highest-risk failures in NCC 2025 are physical interface issues, not abstract code arguments.</p> |
| HANDOVER | <p>Check as-built against the nominated edition.</p> <p>Verify the constructed work against the NCC edition and referenced-document set named at lodgement. Discrepancies surface here, not at occupancy.</p> | <p>Pack the evidence for retention.</p> <p>Occupancy / completion pack must include final evidence-of-suitability records and the referenced-document schedule. Official guidance expressly calls for those records to be retained.</p> |

FIELD NOTES NO 03

A summary, *not legal advice.*

This guide is a practical summary written for architects and project managers practising across Australian jurisdictions. It is not legal advice. For specific situations — Performance Solutions in delayed-adoption states, façade evidence packages, structural reliability indices on heritage retrofits, or remedial waterproofing scope under the NSW variation — speak to a building surveyor or a construction lawyer.

Clause references draw mainly from official regulator summaries and state adoption materials, including the Building and Plumbing Commission Practitioner Education Series (Volume One, Volume Two, governing requirements). Direct ABCB-hosted NCC text was constrained in research; project teams should still verify the final adopted volume, appendix and referenced-document set that apply in the project jurisdiction before issuing permit, tender or construction documents.

The interpretations here reflect my reading. Disagreements welcome. Send notes to chiangning.net.

THE SINGLE BEST OPERATING RULE

Treat NCC 2025 as a *coordination issue first*, and a clause issue second. Lock the jurisdiction and code edition in writing on day one. Front-load fire, water, and Section J decisions. Make evidence of suitability a contract deliverable, not a project-close afterthought.



FIG. 3 — CURVED FAÇADE AT SCALE. THE CODE IS A COORDINATION INSTRUMENT, NOT A CLAUSE LIST.

PRIMARY SOURCES

| | |
|--------------------|--|
| MINISTERS | Building Ministers' Meeting communiqué, October 2025. The four retained packages and the explicit exclusions. |
| CODE TEXT | National Construction Code 2025, Australian Building Codes Board (ABCB). Volume One, Volume Two, Plumbing Code. |
| REGULATOR GUIDANCE | Building and Plumbing Commission Practitioner Education Series (Vic). Volume One, Volume Two and governing-requirements transcripts. |
| VIC ADOPTION | Victoria building standards and NCC 2025 commencement page; lead-free plumbing transitional notes. |
| ACT ADOPTION | ACT NCC adoption page. Dual-code rules and the 1 Nov 2026 cut-off for extended flexibility. |
| NSW ADOPTION | NSW media release on deferral. Remedial waterproofing flexibility; common-area energy carve-out. |
| QLD ADOPTION | QBCC Navigating the NCC page; NCC 2022 mandatory until 30 April 2027. |
| SA ADOPTION | South Australia Building Code updates page. 1 May 2027 mandatory date. |
| TAS ADOPTION | Tasmania NCC 2025 FAQ page. Material variations on housing energy, F4, and condensation. |
| WA ADOPTION | WA Industry Bulletins 173 and 175 on PCA 2025 and BCA 2025 state additions and Schedule 11 variations. |
| NT POSITION | Northern Territory Gazette S31 declaring NCC 2025 does not apply. |

FIELD GUIDE NO 03 · MAY 2026 · END · FOR NOW