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**Architectural Centre
submission on
The Canterbury Earthquakes Royal Commission Discussion Paper:
Roles and Responsibilities**

To The Local Government and Environment Committee

This submission is from the Architectural Centre, an incorporated society dating from 1946 which represents both professional and non-professionals interested in the promotion of good design. We make the following points:

(1) In addressing issues of the current Building Code (in the context of the Canterbury earthquakes), the Architectural Centre considers that it is important to recognise that the Building Code was designed in anticipation of earthquakes of a much lower magnitude than the largest Canterbury quakes, and that the code was designed for the preservation of life, rather than the preservation of buildings. In this respect, the majority of buildings in Christchurch performed at a level which far exceeded that anticipated by the Building Code. We consider that recognition of the exceptional performance of the majority of buildings in the quakes needs to be communicated to the public, along with a realisation of the cost required to maintain any higher level of building standard, in particular the current public expectation that buildings should remain operational post-earthquake.

(2) We consider that the Standards Council (pp. 21-22) is an important part of the building regulatory system, and as such should be supported by government/public funding. We consider that support for the Standards Council will contribute to increasing the levels of resilience in the Building Code.

(3) The regulatory system requires establishing a minimum standard. That designs are built to the minimum standard should be expected as the norm within a market economy with no incentives to provide a higher quality product. The building code must hence set standards which are resilient and provide a buffer for the desires of developers to maximise profits, and homeowners to minimise expenses. The Architectural Centre strongly believes that resilience is an important idea to introduce into the philosophy of the New Zealand Building Code.

(4) The Architectural Centre is less convinced regarding the suggestion that a national body with regional representation (p. 24) ought to administer building consents. We consider that it would be preferable for any identified problems to be addressed locally. In addition we are concerned about comments regarding the RMA's efficiency. An important role of the Resource Management Act (RMA) is to ensure community participation and meaningful consultation, and we believe that this ought to be prioritised over aims for efficiency.

(5) We consider that the current building regulatory framework has several anomalies beyond those directly related to earthquake concerns:

(a) The Building Act credits registered architects and engineers as having qualifications which allow them to do the work of Licensed Building Practitioners (LBP) Design Class 3, yet, because they are excluded from being LBP Design Class 3, they are not allowed to appear on the public LBP register. This anomaly means that the public is likely to be confused regarding whether registered architects and engineers are appropriate design professionals for Class 3 work, despite their qualifications requiring a higher level, than that required for the LBP Class 3, to be attained.

(b) Multi-storey, multi-unit residential developments are not adequately acknowledged within the current building regulatory framework. These are an important building type as demands on city land within city limits, and the need for more sustainable developments, suggest that medium- and high-density residential work will become an increasingly greater mix of New Zealand's domestic architecture. Because these buildings are residential, they involve Restricted Building Work (RBW) carried out by LBP trades, and yet they often are not covered by the E2/AS1 / NZS3604, hence requiring the use of Alternative Solutions. The standards of both the design and construction of multi-storey, multi-unit residential developments therefore vary considerably across the country, and we believe this building type requires better inclusion in the residential framework.

Thank you again for this opportunity to make a submission on the Canterbury earthquakes Royal Commission Discussion Paper: Roles and Responsibilities.

Yours faithfully

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