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National Online Consenting Team  
Building and Housing Group  
Ministry of Building, Innovation and Employment  
Box 10729  
Wellington 6011

28<sup>th</sup> November 2012

Dear Sir

### National Online Consenting System

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The New Zealand Institute of Architects Incorporated (NZIA) is a professional organization representing a membership of over 2830 which includes some 90% of Registered Architects in New Zealand. We welcome the opportunity to make comments and suggestions on the above proposal. However we believe that the 14 days allowed to review what is an incredibly important and complex issue affecting the entire building industry and our members in particular, is totally insufficient.

The NZIA is a shareholder in Construction Information Limited. Given that we have not been able to canvass widely with our members because of the limited time, we have reviewed their submission which is attached and endorse it as the NZIA position.

We would add that we need to understand the bigger framework if we are to be in any position to understand the IT. We also believe that assumptions made in the document are not detailed enough to understand the consequences.

Extra comments on the document as follows:

### Re item 1.1 - Integration with GeoBuild Strategy

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We note that "the Consenting System must be able to receive BIM files and store them in a manner and format that permits retrieval" – we would suggest that exact file type and format be clarified and expanded. Poor interoperability of software is an issue regarding the take-up of BIM in both NZ and overseas, and the lack of standardization as well as fragmented industry archiving standards need to be redefined into a neutral, non-proprietary, open standard, with guaranteed backwards and forwards readability. It should include PDF and JPG at a minimum, possibly the DOC file format, and clarification on exactly what sort of BIM files it needs to take. Restriction to just BIM files will mean that no hand drawn or hand annotated files can be submitted, whereas PDF and JPG will still permit that to happen.

## **Re Item 2 Glossary**

Should include definition of:

CCC (the NEW definition, as well as this older definition),

NZRAB (as the registrar for Architects),

LBP (and explain difference between Design and Site/Trade

## **Re Item 3 Overview of the National Online Consenting System**

This is the area that the document is lacking the most.

There appears to be no awareness of the principle of Acceptable Solutions, and the equally valid principle of Alternative Solutions. Both are permitted under the NZ Building Code, but very different procedures are needed for verification for the two different systems. Most small houses and dwellings will fall under the scope of NZS3604 and a reference to E2/AS1 and other Acceptable Solutions is important. Yet nearly all larger buildings, more complex buildings, and other buildings especially those produced by Architects and Engineers, will by necessity fall under the scope of Alternative Solutions.

There needs to be much more investment in a system that readily identifies and can deal with buildings that are not Acceptable Solution based. Currently different BCA's have different ways of dealing with buildings that exhibit Alternative Solutions – some BCA's cope well with them, but other, often smaller BCA's react badly and refuse them. What needs to happen is that the BCA's, or in this case, the NOCS, needs to build up a data base of where the Alternative Solution has been utilized satisfactorily before, and permit simple reference to those situations. At present the drive to have an Alternative Solution accepted as a reasonable response is a lengthy and uncompromising paper trail that only disadvantages all participants.

## **Re Item 5.3 Features – Consent Application Features**

The MBIE needs to clarify if the Government permits just individual persons, companies, or both.

We suggest that “The system will link to the Licensed Building Practitioner Register” is problematic. The system will actually need to link to at least three different systems, i.e. LBP, NZRAB, IPENZ, and possibly also others such as Plumbing and Drainlaying. The chances of this system automatically referencing several different systems in possibly several different formats area could prove to be problematic.

## **Re Item 10 Features – Code Compliance Certificate**

The author of the NOCS document should know that MBIE / DBH has changed the meaning of CCC to Consent Completion Certificate, which has a similar, but not exactly the same meaning as previous. This change was made under Building Amendment Bill (No 3) 2010.

The Bill repeals the definition of “code compliance certificate”. That term is replaced throughout the Act by the term “consent completion certificate” under Section 95 of the Act (*Part 1, Clause 6; part 1, Clause 32, amending Section 95 of the Act*).

Re Item 11 **Monitoring Performance and Evaluation Module**

**Administrative Data** – needs reference to Architects and Engineers as well.

**Benchmarking** – We suggest that the NCOS system also takes into account the concept of the Competent Persons Scheme (UK: Department for Communities and Local Government, 2009), Certified Professionals scheme (Canada: City of Vancouver, 1999), Consistently Prepared Applicant (USA: Seattle, WA, Department of Planning and Development, 2010), whereby properly vetted, well-prepared and consistently reliable applicants can be exempted from certain bureaucratic hurdles.

Please feel free to contact the writer if you require any further information.

Yours Sincerely



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