



8 August 2024

Submission to
Ministry of Business, Innovation and Employment *Hīkina Whakatutuki*

Making it easier to Build Granny Flats

To: GrannyFlats@mbie.govt.nz

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Introduction

1. **Te Kāhui Whaihanga New Zealand Institute of Architects** wish to offer support in this submission on the Making it easier to Build Granny Flats discussion document.
2. **Te Kāhui Whaihanga New Zealand Institute of Architects** strives to promote excellence in architecture, the acquisition and dissemination of knowledge relating to architecture, ethical conduct in the practice of architecture and the interests of the profession of architecture in New Zealand and overseas.
3. We appreciate this opportunity to take part in the Ministry of Business, Innovation and Employment *Hīkina Whakatutuki* and the Ministry for the Environment *Manātu Mō Te Taiao* consultation process.

General comments:

1. **Te Kāhui Whaihanga New Zealand Institute of Architects** supports the outcome and principles set out in the Discussion document:
 - a) to reduce compliance to assist in producing housing more efficiently for the betterment of the wider community, hapori whānui.



2. We recognise differences ie: Urban/Rural; Heritage; Highrise and Suburban typologies.
3. We acknowledge the achievements of regulation to date and ongoing, eg: Lifemark Universal Design Principles and Homestar strategies.
4. We support strategies that address Climate Change: ie: stormwater and site permeability methodologies.

Comments on the Discussion document:

1. Issues need to be considered in this proposal

- a) Health and wellbeing of our communities:
 1. Mental, emotional, psychological: relationship with physical.
 2. Purpose of regulation/rules to make compliance clear for everyone.
- b) Fit with, and the relationship to, existing Building regulations and the effects of additional scheduling in the Building Act.
- c) Future implications and strategies to reduce “red tape” in the current consenting process to lessen the burden for applicants.
- d) Consideration of our past and future planning environment:
 1. Improving access to site records under the LIM process within all BCA’s.
 2. Improving access to current and future environmental considerations under the LIM process within all BCA’s available.

2. Recommended criteria in this proposal

- a) The application for a LIM to be required before design and construction commences to inform the landowner of the local conditions, planning regulations, and suitability of the site for the addition of a minor dwelling.



- b) LIMs to include information on environmental conditions relative to the site including, but not limited to, soil conditions, flood hazards, water supply and wastewater capacity. If this information is not available from the local territorial authority, it must be sought by the site owner before design and construction commences.
- c) Design and construction to be observed by an LBP to monitor site suitability, planning requirements and Building Act compliance.
- d) All documentation including as-builds, trade certificates and producer statements associated with the project be submitted to council within 24 months of the commencement and 3 months of the completion of the project.
- e) Development contributions to be assessed on lodged documentation and made payable within 6 months of an invoice raised by BCA's

3. Recommended controls to reducing risk in this proposal

- a) A trial period of 3 years to be established to enable additional unforeseen risks to be identified.
- b) All LBPs to hold a minimum of \$250,000 professional indemnity to undertake the design works associated with restricted building and schedule 1 works.

4. Recommended other strategies that could be implemented to improve the consents

- a) A review be undertaken of the New Zealand Building Act 2004 to enable a fit for purpose legislative oversight of building work.



- b) Consolidation of the 67 BCA's to larger regional authorities established to assist with increased consistency, access to training and resources.
- c) A nationwide digital technology solution that increases consistency.
- d) The removal of joint and several responsibilities from BCA's.
- e) Reintroduce Producer Statements to the Building Act for all aspects of the consent, including design, fire and services to relieve the BCA of the need to scrutinize Building Consent application in the detailed way we currently experience.
- f) Expand the LBP scheme to include more critical trades and commercial work.
- g) Develop a system for quick consent ie: VicSmart process in Victoria, Australia.
- h) Mandate the acceptance of Codemark certified products to reduce the reliance on monopolies, along with a review of the Acceptable Solution and Building Act to reflect current design principles and materials.
- i) Reduce the requirements to submit documentation that is already available to BCA's ie: BRANZ certificates, product data and typical detailing.

Summary

In summary, **Te Kāhui Whaihanga New Zealand Institute of Architects** welcomes the government commitment to make our housing more affordable, and achievable for all New Zealanders.

- a. **Te Kāhui Whaihanga New Zealand Institute of Architects** supports the **outcome** and **principles** set out in the Discussion document Making it easier to build granny flats



- b. **Te Kāhui Whaihanga New Zealand Institute of Architects** welcomes the opportunity to be part of the discussion to increase the productive streamlining of the current consenting process.

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Chief Executive
**Te Kāhui Whaihanga New Zealand
Institute of Architects**

Dated: 8 August 2024

A handwritten signature in black ink, appearing to read 'H. r. i. n. i.', written over a horizontal line.

Chair/President
**Te Kāhui Whaihanga New Zealand
Institute of Architects**

Dated: 8 August 2024