

23 December 2022

Via email: amy.strawbridge@mbie.govt.nz

To whom it may concern

FEEDBACK TO THE MINISTRY OF BUSINESS, INNOVATION AND EMPLOYMENT ON THE TARGETED REVIEW OF THE BUILDING (ACCREDITATION OF BUILDING CONSENT AUTHORITIES REGULATIONS) 2006

Thank you for the opportunity to present our feedback on the targeted review of the Building (Accreditation of Building Consent Authorities) Regulations 2006.

The Queenstown Lakes District Council (QLDC) supports the work by the Ministry of Business, Innovation and Employment (MBIE) in this area. In general, QLDC is in favour of the proposed changes to the frequency of competency assessments for its building control officers and the matters for which a building consent authority must notify MBIE and IANZ. The proposed increase in fees for accreditation of building consent authorities would ultimately need to be met by consumers via an increase in building consent fees. The attached form provides more specific feedback to the questions raised.

Please note that this submission reflects the position of officers and has not been ratified by full Council.

Thank you again for the opportunity to comment.

Yours sincerely,



Tony Avery
GM – Planning & Development

Amending the frequency of competency assessments for building control officers (Regulation 10(2))

<p>1. Do you agree with the problems identified regarding the frequency of competency assessments? Are there other issues or problems with the frequency of competency assessments that we have not identified?</p>
<p>QLDC agrees that the current annual frequency of competency assessments is too onerous for staff.</p>
<p>2. In regard to the status quo:</p> <ul style="list-style-type: none"> • How much time is currently spent per employee preparing for and undertaking an annual competency assessment? • Do you employ external people to carry out the competency assessments, and if so, how much does that cost? • What is the total average cost of a competency assessment per employee?
<p>Approximately five hours per employee is spent preparing for and undertaking an annual competency assessment. This includes recording of training throughout the year, preparing for the competency assessment and the competency assessment interview. More time is spent for the assessment of inspectors as they are usually also shadowed for at least half a day of inspections. QLDC engages an external competency assessor to undertake its annual assessments. The total average cost per employee to undertake an annual competency assessment is approximately \$2,000.</p>
<p>3. Do you agree with the proposal that the frequency of competency assessments for building control officials under Regulation 10(2) should be reduced to two years instead of annually (with the ability to carry out assessments more frequently if needed)? Please explain your views.</p>
<p>Yes, QLDC agrees with the proposal to reduce competency assessments for building control officials to two years. However, Council supports carrying out more frequent assessments of newer staff, as well as if a staff member is ready for an assessment to potentially increase their competency.</p>
<p>4. What do you think might be the risks of reducing the frequency of competency assessments? Do you think these risks could be mitigated and, if so, how?</p>
<p>The risks of reducing the frequency of competency assessments include:</p> <ul style="list-style-type: none"> • a reduction in training throughout the two year period, as compared to the current annual review • a reduction in the increase of staff competency, as compared to the current annual review. • the potential to fail to recognise if staff have not been processing or inspecting enough consents throughout a two year period to provide sufficient evidence for their competency assessment. <p>The first risk could be mitigated by ensuring there is an expectation of the same level of training that would normally be undertaken within two one year periods. The second risk could be mitigated by including the option to carry out more frequent assessments if required. The third risk could be mitigated through internal staff management and supervision, by setting appropriate targets to ensure a range of consents or CCC are processed and inspected leading up to a competency assessment.</p>

5. Do you have any other feedback about annual competency assessments?
QLDC has no further feedback regarding annual competency assessments.

An addition to the matters for which a building consent authority must notify MBIE and IANZ (Regulation 6A(1)(b)) and a change to the drafting of Regulation 7(2)(f).

6. Do you agree with the issues identified with Regulation 6A(1)(b) and 7(2)(f)? Are there other issues or problems that we have not identified?
QLDC agrees that these are issues that need to be addressed and supports the proposed changes to the regulations. No further issues or problems have been identified.
7. Do you agree with the proposed change to Regulation 6A(1)(b)?
Yes, QLDC agrees with this proposed change.
8. Do you agree with the proposed change to Regulation 7(2)(f)?
Yes, QLDC agrees with this proposed change.
9. What impacts will these proposals have on your organisation?
The impacts on QLDC of these proposals will be no more than minor.
10. Do you have any other feedback?
QLDC has no further feedback at this time.

An increase to the fees for accreditation of building consent authorities

11. How would these fee changes impact your building consent authority? For example, what would the total cost impact of accreditation reviews be for your building consent authority?
An increase in accreditation costs would ultimately need be met by consumers via increased building consent fees. It is difficult to calculate the exact total cost impact of the proposed fee increases, however an approximate fee/hourly rate increase of 25% would correspondingly increase QLDC building consent authority accreditation costs by \$10,000.
12. Do you have any other feedback?
QLDC has no further feedback at this time.