

## **AACA Review of National Competency Standards in Architecture (NCSA) 2013**

### **General**

This submission is prepared jointly by the New Zealand Registered Architects Board and by the New Zealand Institute of Architects.

The NZIA and the NZRAB thank the AACA for the opportunity to provide initial feedback on the current NCSA.

The NCSA document, as you will be aware, is an important resource for the profession in New Zealand as, in common with Australia, it forms the basis of our competencies for initial registration. In New Zealand architects are required to submit for a continuing registration assessment every 5 years. The NCSA document also forms the basis of the competencies required for continuing registration. As a result it forms the basis for the evaluation of Continuing Professional Development events required to be completed by architects as part of their continuing registration submission.

In addition, the NZ schools of architecture are using NCSA as a basis for their curriculum development.

Because under our Trans-Tasman Mutual Recognition Agreement, architects have reciprocal registration in each country, the consistency and applicability of this document in both jurisdictions is of paramount importance.

NZIA and the NZRAB have canvassed feedback from a number of entities, including members of the Institute, the NZRAB's initial registration assessors, members of the New Zealand ANZ APAP standing panel, the past and current presenters of the Graduate Development Programme, the New Zealand Architects Co-operative Society (an architect owned PI insurance provider) and the Ministry of Business, Innovation and Environment, the government department with responsibility for the New Zealand Registered Architects Act.

We note that the Review Group intends to undertake an extensive review of the NCSA. We are of the view that this is required. We are also pleased to be included in the review process at this initial stage. During the previous review completed in 2008, the New Zealand parties were only consulted towards the end of the process, which resulted in the New Zealand situation not being adequately considered or reflected in the final document.

## **Feedback**

With respect to your feedback questions, generally our view is that were AAC of a mind to retain the existing document, it satisfactorily meets our requirements for the initial registration process except as identified in relation to specific questions where we comment as follows:

**Question 4.** *Are the fundamentals of architectural practice as reflected in the NCSA still relevant for the purposes of registration as an architect?*

Generally, we are of the view that the answer to this is yes, however we are mindful that as practices are becoming increasingly specialised, it is becoming increasingly difficult for graduates to gain experience and knowledge across the broad range of experience set out across the framework. This is especially so of some elements of Context 3.2 & of Context 3.3.

**Question 6.** *Is the terminology clear, consistent & appropriate?*

In a number of areas, no.

**Unit 1** - the terminology used to describe the design stages in New Zealand varies from that used in Australia. The following table compares those stages:

Australia	New Zealand
Design Concept	Concept Design
Schematic Design	Preliminary Design
Detailed Design	Developed Design

In our view given the significance of the document the NZ terminology should acknowledged in both the definitions and content of unit 1, for example “Schematic Design (preliminary and developed design in NZ)”.

**Context 3.2** bundles procurement and contractual arrangements of the architect, consultants and construction contractors together. It would be clearer if the engagement / commissioning of architects & consultants under Agreements for Services was separated from procurement of contractors for construction under Construction Contracts.

**Context 3.1** follows on from Element 3.2.1. The current disjoint of these two considerations adds to the confusion.

**Question 9.** *Can you identify omissions from the current NCSA that prevent them from reflecting current and future practice?*

Yes, in the following areas.

**Structure** - as a result of the devastating earthquakes in Christchurch in 2010 & 2011, a Royal Commission into the earthquakes has identified a lack of collaboration between architects and engineers at the very early stages of the design as a contributing factor to the failure of some buildings; particularly where structural efficiencies were severely compromised by design requirements committed to before structural consultants became involved.

The topic also extends to existing buildings and an understanding of issues concerning seismic upgrading of buildings. This is a significant body of work now and into the future for NZ architects.

The earthquakes have dramatically changed the practice environment in NZ and will continue to do so as the Government responds to the Royal Commission recommendations through policy, regulation and standard changes.

It is our position therefore that consideration of structural systems should be addressed at an *Element* level at the Design concept stage, rather than where it first currently appears at the detailed design stage

### **Building conservation / Historic places**

Greater consideration should be afforded the identification of heritage values of existing structures or places affecting the generation of the design, and the value of the retention of built heritage.

### **Indigenous cultures**

Greater consideration should be afforded the identification of how the built response demonstrates, where appropriate, an understanding of and response to indigenous cultures specifically, and cultural considerations generally. In our view this should be elevated to *Element* level.

We have received a number of comments that the document is variously *excessively wordy, repetitive and is in some cases ambiguous*.

For example, the list of competencies is far too long, and could be substantially reduced to make it simpler to understand, and for applicants to address. This could be done without losing any of the content, as there is currently huge overlap.

One way of achieving this would be to remove the “Context” layer completely. Its inclusion demands a rather arbitrary allocation of the elements at the next level (particularly in Unit 1). In many cases this arbitrary allocation is addressed by repetition. As an example, Element 1.1.4 (and its subsidiary performance criteria) is virtually identical to Elements 1.2.3 and 1.4.2. This is necessitated by the separation of the design process into “design concept”, “architectural design”, “schematic design” and “detailed design”, which then each have many of the same criteria listed against them. This subdivision, however, is not necessarily

valid for any particular architectural project, which may legitimately omit or amalgamate various of these stages in a rational progression from the receipt of a brief to the point where detailed design can commence. This is in fact acknowledged in the second paragraph of the description of the design process on page 6.

If the “Context” level was removed, the Elements could then be rationalised. Similarly, the Performance Criteria could also then be rationalised.

When seen from the point of view of the various users – applicant, assessor, NVP member etc, many of the Performance Criteria are unnecessary, as they are adequately covered under the broader expectations of other criteria.

As an example, criteria 46 and 49, “Specialists are consulted as necessary”, which relate to structural and services consultants, are implicit in the preceding criteria in each Element. It is inconceivable for instance, for a design or designer that adequately addressed Criteria 47 and 48 to be found wanting under Criterion 49.

Similarly, when considered from this point of view some of the criteria are of doubtful utility, as performance would be almost impossible to demonstrate or verify. It would be a useful exercise to ask of each of the Performance Criteria, “is this significant, distinct and verifiable”, and remove or amalgamate any that cannot answer yes to all three tests.

## **Competency Standards**

In our view calling the NCSA, “competency standards” is something of a misnomer. Competency is about ability; whereas these standards recognise a skill set peculiar to the architect and are the body of knowledge that defines the architect from other professional groups. An applicant for registration should also be considered against other attributes when assessed for suitability to join the profession. These attributes are those that define any professional and include professionalism, communication, collaboration, management, advocacy and scholarship.

There are a number of other international examples of competency standards for professionals, and the following link is to those for the Canadian Royal College of Physicians and Surgeons, which in our view provide a compelling example when considering professionalism.

<http://www.royalcollege.ca/portal/page/portal/rc/canmeds/framework>. These are currently also under review.

We strongly encourage the Review Panel to consider competency in the broader context of the professional architect.

## **Continuing Registration and CPD**

With respect to continuing registration we find that the NCSA has some limitations in that it assumes a generalist architectural practice and does not acknowledge the specialisation that practitioners gain with maturity in the profession. We are aware that there is increasing specialisation in architectural practice with the traditional client/architect relationship no longer the norm. For example, a number of architects specialise in Urban Design and Planning. When they undertake CPD activity on these subjects, the 4 Contexts of Design, Documentation, Project Management and Practice Management are not particularly relevant because they relate to a complex building and not the wider urban environment.

It should also be noted that in New Zealand the Ministry for Business Innovation and Employment is working with the Institutes' of architects and engineers to develop rapid building assessments, which will be undertaken post a disaster (e.g. flood, tsunami, landslip, earthquake, etc.). Again, this specialisation area is a significant body of work now and into the future for New Zealand architects.

Whist we appreciate that, unlike in New Zealand, Australian registered architects do not yet have CPD and revalidation requirements. We are aware that this is a conversation that is currently being undertaken in other professions in both countries and beyond. It is only a matter of time before it becomes common practice. We would, therefore, encourage the Review Panel to bear this in mind when preparing the revised NSCA. We would be happy to advise further on the issues we have encountered in this area.

Please do not hesitate to contact us should the Review Panel require clarification on any of the matters raised in this feedback.

The NZIA and the NZRAB welcome the opportunity to comment further on the NCSA as the review process proceeds.

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