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**From:** Luke Joseph  
**Sent:** Sunday, 21 July 2019 11:47 AM  
**To:** Building Confidence Response  
**Subject:** Re: Submission on Building Regulation Reforms

I really can't see how requiring all building designers to have some kind of government registration will stop apartment buildings cracking. Only architects can design apartments, not draftsmen. This is typical heavy handed government regulation that destroys small business.

It doesn't take a genius to design a granny flat, shed, pergola or even a house. These people don't need to be registered and shouldn't have to pay thousands of dollars per year to join some clique of elites. This will just make small draftsmen leave the industry and push up the cost of drafting for everyone.

Please think carefully about what you're doing as it doesn't seem like your proposed regulations are targeted at the right people.

On Fri, 19 Jul 2019 at 10:36 am, Luke Joseph wrote:

The state is having trouble with apartments and townhouses. Not single dwellings and granny flats. Don't punish small draftsmen who do maybe five or six granny flats and single dwelling jobs per year by putting onerous regulations on them. Make the requirement to declare compliance with the BCA only apply to large multidwelling and apartment developments. Otherwise you will destroy the careers and livelihoods of thousands of small business people.

On Mon, 15 Jul 2019 at 10:08 am, Luke Joseph wrote:

Good morning

My submission is solely relates to the proposal to require building designers to declare that plans comply with the BCA, in particular draftsmen.

How is a building designer supposed to be able to declare that a proposed building declares with every aspect of the BCA? THIS IS THE CERTIFIER'S JOB!

Are you implying that every building designer must now gain accreditation in building regulation? This is insanity. Or will they now be required to engage a building surveyor for every job in order to make this declaration? This will be the reality of it – that liability for building compliance will pass from certifiers (whose job it is to certify buildings) to the building designer, whose primary role should be designing buildings. This will raise draftsmen's insurance premiums to unsustainable levels, or embroil them in public indemnity litigation.

This will have the effect of crushing small draftsmen and women, which is a very anti-competitive outcome. These people don't have a powerful lobby group, unlike the certifiers who seem to be always complaining that they are always blamed for everything. Ultimately it is the builders and developers that should be held accountable for unsafe buildings, not draftsmen. The apartment buildings that have been collapsing are not even designed by draftsmen; architects are required to design apartments.

I understand that specialists like engineers should be required to certify compliance with the relevant parts of the BCA, because their speciality relates to safety. However the requirement for draftsmen and women to certify that the building complies with the BCA is heavy-handed and unnecessary – it is not what these people trained for.

They trained to design buildings – not certify compliance with thousands of clauses, which is the certifier's job!

Kind regards

Luke Joseph

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