

**Submission
No 29**

**INQUIRY INTO FURTHER INQUIRY INTO THE
REGULATION OF BUILDING STANDARDS**

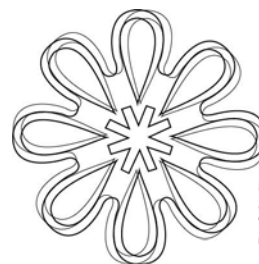
Organisation: Citrus ID Pty Ltd

Date Received: 27 August 2021

Submission to the Parliament of NSW Public Accountability Committee on:

Further inquiry into the regulation of building standards

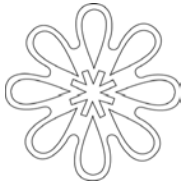
27th August, 2021



citrus id pty.ltd.
224 crown street
darlinghurst 2010
new south wales

t 02 8356 3777
f 02 8356 3733
w citrusid.com.au
info@citrusid.com.au

ABN 27 099 342 364



Scope of this Submission:

This submission outlines Citrus ID Pty Ltd's concerns that the new system of building designer registration in NSW is having unintended detrimental impacts on our firm and on the interior design industry as a whole.

Citrus ID Pty Ltd (CID)

CID is an NSW based interior design/interior architecture firm that has been operating for 20 years.

For almost two decades CID have been providing the following services, without incident across Australia: layout planning and spatial concepts, interior fitout design, construction drafting and approvals, tender, sourcing and procurement, project management, construction supervision and defects reports.

Our Principal, Nicole Keane holds a Certification of Architectural Drafting and Diploma of Interior Design. She has been practicing in interior fitout design and delivery since 1990, without incident and has been employed by some of Sydney's leading architecture and interior design firms prior to starting CID in 2002.

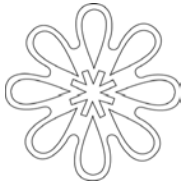
The Role of Interior Design and Interior Architecture – CID's work

We recognise that the differences between the role of interior decorators vs. the role of interior designers/interior architects, in building design and construction, is not always well understood.

Interior decoration is generally how a space looks rather than how it functions. Interior decorators focus on the art and décor of the building. Interior decorators are not consulted on the structure of the space, and usually come into the project towards construction completion. CID are NOT interior decorators.

Interior Designers are usually responsible for the aesthetics, finishing, function and planning of the spaces we inhabit. Interior Architecture is the design of the technical aspects of building. CID's business centres around offering both interior design and interior architectural services for fitout and building master planning.

On building Class 2 to 9 fitout projects across Australia, we designers working in the interior design/architecture category are usually the lead design consultant responsible for coordinating a team of engineers and consultants including structural, services, fire and accessibility. Our scope of design coordination may include changes to building use, services, lighting, internal walls, ceilings, shopfronts, signage, egress, layouts, fire protections, finishes and compliance with the National Construction Code, Australian Standards, Food and Disability codes etc. These works are always designed in conjunction with the structural and services engineers, fire safety consultants and other qualified and licensed third parties, which the designer coordinates under the current regulatory consent system. All designs are then lodged (by the designer) to Council and/or Private Certifier before our client Development Approval, Construction Certificates and Occupation Certificates are issued by these bodies. We prepare, lodge and coordinate all these regulatory approval applications on a daily basis.



Interior Designer is included as an occupation under the Australian & New Zealand Statistical Classification of Occupations (ANZCO) 23 Design, Engineering, Science and Transport Professionals |2321 Architects, Designers, Planners and Surveyors |2325 Interior Designers |232511 Interior Designer.

Restriction of Trade Incurred under the New Registration System

Under the framework in effect from 1 July only registered building design practitioners can lodge fitout design regulatory compliance documentation.

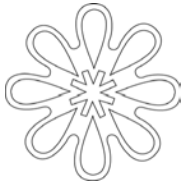
Despite having spent 4 yrs in tertiary education in architectural drafting and interior design and 32 years working in the field, without incident, our Principal appears to be ineligible to meet the requirements for registration. As we are not an architectural or building design firm, no one else on our team appears eligible either. This is not because we don't have the appropriate skills and experience but because the registration system specifies qualifications rather than competencies, and the qualifications are drawn only from architecture, building design and the building trades. Interior design/interior architecture qualifications have been omitted entirely.

In regards to our current work, designing the public and common areas in Class 2 buildings, we now potentially have a new obligation to find a registerable individual to take responsibility for compliance declarations on our behalf. This is already causing clients to question our capability and represents an increased cost to be passed on to our clients. Once the regulatory phase-in period concludes, even this suboptimal approach will not be available, and we will no longer be able to trade as we have done to date.

To our knowledge, none of the building faults that this Act and Regulation were set up to address were caused, or contributed to, by any act or omission by an interior designer or interior architect. Rather, the building faults have occurred as a result of the acts or omissions of the architects, building designers, certifiers, engineers and builders that the Act and Regulation recognise and seek to regulate and/or protect.

We, at CID, would support the introduction of a registration or licensing system for interior designers/interior architects and formal regulation by government, through a framework created in consultation with ourselves and our industry. We would expect a qualified and registered interior designer/interior architect to hold at least a 4-year tertiary degree (minimum B. Design majoring in Environments, B. Interior Design, B. Interior Architecture, plus presentation of a professional portfolio showing several years of postgraduate experience, references and a competency assessment.

Please also note that we are currently insured for the work we do, but that the Act and Regulation exert a prohibitive influence on our ability to renew this insurance in full, and thereby also restrict our trade in this fashion.



Conclusion

Ineligibility to register as Design Practitioners or Principal Design Practitioners unnecessarily restricts the trade of our firm and others. Under this new regulatory framework, as it stands, we are unable to independently perform the work we are skilled, qualified and experienced to do. The new rules are already tarnishing our reputation and causing unfounded client hesitation in engaging our services.

The building reforms remove highly skilled and experienced practitioners from the industry. The new registration framework needs to be urgently reassessed to address the exclusion of interior designers and interior architects like ourselves.

We would welcome the opportunity to discuss further.

Nicole Keane MDIA

Director

Citrus ID Pty LTD