

**OFFICE OF THE MINISTER
FOR BUILDING AND CONSTRUCTION**

The Chair
CABINET BUSINESS COMMITTEE

**QUALITY REGULATION REVIEW – RESOURCE / BUILDING INTERFACE STUDY
FINDINGS**

PROPOSAL

- 1 This paper seeks Cabinet's agreement to a set of actions necessary to address issues identified through the Quality of Regulation Review with the alignment and administration of resource and building consent regulatory functions.

EXECUTIVE SUMMARY

- 2 As part of the government's Quality Regulation Review, the Department of Building and Housing led a project with the Ministry for the Environment, the Department of Internal Affairs and Local Government New Zealand to identify and address issues for business in complying with resource, building and related regulations when building on land.
- 3 The main issues identified by the businesses spoken to in the study concerned:
 - Delays and unpredictable time frames in the processing of resource consents, building consents and code compliance certificates
 - Inconsistencies in the interpretation of regulatory requirements by those administering them
- 4 The causes of these issues were found to relate mainly to how the system is administered rather than to its policy and legislative underpinnings.
- 5 While there are already initiatives underway across central and local government to improve administration of resource and building regulatory requirements, it is the view of officials that more can be done to:
 - a. Improve access to information for users on all regulatory requirements
 - b. Improve connections between related regulatory requirements
 - c. Improve expectations and accountabilities for administrative performance
 - d. Improve consistency of administration and decision making across local authorities

- e. Address labour and skill shortages that are negatively impacting on administrative performance
- 6 The Minister for the Environment, the Minister for Local Government, the Minister for Commerce and the President of Local Government New Zealand were consulted on a draft of this paper and agree with the issues and solutions proposed in this paper.

BACKGROUND / CONTEXT

- 7 As part of the government's Quality Regulation Review, the Department of Building and Housing (DBH) led a project with the Ministry for the Environment (MfE), the Department of Internal Affairs (DIA) and Local Government New Zealand (LGNZ) to identify and address issues for business in complying with resource, building and related regulations when building on land.
- 8 The aim of the study was to identify solutions to any problems that were resulting in unintended and unreasonable compliance costs for business in their building on land whilst ensuring that government policy objectives continue to be met.
- 9 Officials have:
- Mapped resource, building control and related regulatory requirements, in order to describe the overall system of regulations including the connections and interfaces between different components
 - Held targeted discussions¹ with businesses and territorial authorities to explore:
 - How the system is implemented and administered
 - How different types of businesses experience the system
 - The issues that businesses experience in engaging with the system
 - Developed options to resolve issues

COMMENT

An important sector

- 10 Affordable access to quality housing is critical to New Zealanders' social wellbeing and cohesion and individual health and security. It is also a sector of significant economic activity. The sector is a large employer and contributes to a large share of New Zealand's expenditure on GDP. A large proportion of individual wealth and savings is in housing. Recent figures indicate that:

¹ Targeted discussions were held with five territorial authorities, several national scale construction companies, a national group home company, a national scale retirement village operator, meetings organised with builders and their representatives through Registered Master Builders Federation of New Zealand and Certified Builders Association of New Zealand and with property owners and developers through the New Zealand Property Council.

- There are just less than 1.5 million occupied dwellings in New Zealand
 - 90% of New Zealand households' net worth is represented by housing assets with an aggregate value of around \$500 billion
 - Around 25,000 new dwellings are built each year
 - Investment on residential dwellings represented 5.6% of expenditure on GDP in March 2006 year
 - Around 180,000 people are employed in the construction sector
- 11 Therefore we are aiming for good regulation that promotes quality buildings and innovation, but avoids unnecessary costs.

Complex regulatory system

- 12 The system that applies to land development, building and construction is relatively complex. The laws and regulations underpinning it are made under several pieces of related legislation including the:
- Building Act 2004
 - Resource Management Act 1991
 - Local Government Act 2002
 - Historic Places Act 1993
 - Fire Service Act 1975
 - Fencing of Swimming Pools Act 1987
- 13 Legislative oversight of these laws and associated regulations is provided by MfE, DBH and DIA. Their day-to-day administration is largely the responsibility of 85 local authorities (including both territorial and regional councils). Other agencies including the New Zealand Fire Service, the Historic Places Trust and network utility operators also become involved in advising on and administering regulatory requirements.
- 14 Depending on the scale and impact of a development or building project, the developer, builder or landowner may need to:
- Interpret District and Regional plan requirements
 - Interpret Building Code, fire evacuation scheme and fencing of swimming pool requirements
 - Obtain information from central and local government agencies and the NZ Fire Service on regulatory requirements
 - Apply to territorial authorities for resource and building consents

- Arrange for inspections by territorial authorities and the New Zealand Fire Service for Building Code and fire evacuation scheme purposes
- Comply with requirements for historic buildings and archaeological sites
- Meet Building Act requirements in respect of certified systems and building warrants of fitness

An evolving regulatory system

15 The system is evolving. Government recently reviewed both the Building Act 1991 and the Resource Management Act 1991. Both were major reviews and both resulted in significant changes to the system that are still being implemented:

- The Building Act 1991 was repealed and replaced by the Building Act 2004, which aims to improve inputs critical to the performance of buildings, including provisions to license building practitioners, accredit building consent authorities (local authorities), certify building products, and review the New Zealand Building Code
- The Resource Management Act 1991 was amended by the Resource Management Amendment Act 2005, which aims to address problems with delays, costs, inconsistencies, uncertainty and a lack of national leadership. The Act increases the Minister for the Environment's powers to investigate council performance, requires councils to keep records about iwi and hapu, provides that there is no duty to consult about resource consents, requires decision-makers to be qualified progressively, improves the provisions relating to National Environmental Standards, National Policy Statements and the Board of Inquiry process, and permits existing investment to be taken into account in consent decisions.

16 These changes are currently being implemented and are resulting in big changes to regulatory processes and requirements. New provisions, such as building consent authority accreditation, will contribute to administrative improvements that should go some way to addressing the issues identified in this report once fully implemented. Over the short term, implementation is requiring adjustments from both those that administer the system and those that are regulated by it.

Issues for business

17 The main issues for the businesses interviewed in the study concerned:

- Delays and unpredictable time frames in the processing by local authorities of resource consents, building consents and code compliance certificates
- Inconsistencies in the interpretation of regulatory requirements by local authorities and other agencies involved in its administration.

- 18 While government statistics indicate that a large number of resource and building consents are processed within statutory timeframes², there is a widespread perception amongst builders and developers that timeframes are not always being met by local authorities. From their perspective, ‘time is money’ and ‘delays cost’, especially when they are unplanned. This is because:
- Builders and developers must manage project inputs including labour, sub contractors and delivery of materials within time frames and budgets
 - Developments are sometimes debt financed and delays in obtaining consents and other regulatory approvals can result in additional interest costs
 - Construction contracts are often fixed price
 - Developer and builder liquidity is often linked to a schedule of progress payments based on contract milestones including the approval of consents and the issuing of compliance certificates
- 19 The businesses spoken to also wanted more consistent application and interpretation of regulatory requirements³. This is because differences in application and interpretation between local authorities and others involved in their interpretation and administration can cause:
- Frustration, when different advice is received on similar issues
 - Delays and additional cost, when differences in advice and interpretation need to be reconciled
 - Additional costs for companies seeking to build standardised products across New Zealand
 - A potential loss of innovation, by encouraging businesses to rely on acceptable or prescribed methods of construction rather than alternative methods or new products.

² 26.1. Information on the performance of local authorities in processing resource and building consents indicates that: (i) of the around 55,000 applications for resource consents each year most (77%) are processed within statutory time frames; (ii) of the less than 5% of resource consent applications that are publicly notified over half (56%) are processed within statutory time limits; and (iii) of the building consents issued by 13 local authorities for which the Department of Building and Housing has information, 82.6% were issued within statutory time limits.

³ Particular concerns for builders and developers include differences between local authorities in their approaches to: permitted activities under district plans – with some territorial authorities not including relatively common and low impact activities such as small scale earthworks associated with building work; interpretations of Building Code performance requirements; approaches to approving variations to building work against building consents; policies on acceptance of producer statements and expert advice in support of building consent applications and proof of Code Compliance.

Underlying Causes

20 The local authorities spoken to in the study acknowledged the issues identified by businesses. They told us that they can be attributed to a variety of causes including the poor quality of information that is sometimes provided by users in support resource and building consent applications, the difficulties they face in recruiting and retaining suitably qualified staff and high work loads associated with record levels of building activity and changes to the regulatory system. These and other critical issues are discussed below.

A. Connections and linkages between related regulatory requirements are not always well made

21 From a business or user perspective, the costs of complying with resource and building regulations could be lowered if those administering them made better connections between related requirements. For instance:

- If it were easier for users to find information they need on all resource, building and related regulatory requirements in one place⁴
- If better connections were made between those administering resource and building consent applications within local authorities, as planning and building functions are sometimes managed and administered separately meaning that applicants may need to deal with multiple staff in different departments and that requirements or changes to building consent applications (for instance) may have implications for resource consent application that need to also be communicated to users
- If better connections were made between territorial authorities and the New Zealand Fire Service in their administration of building requirements related to fire safety and fire evacuation⁵
- If the requirements related to the building and fencing of swimming pools were made under a single piece of legislation
- If better connections were made between local authorities, network utility operators, regional councils, and the Historic Places Trust in the processing of resource and building and consents

⁴ While there is good information on particular elements of the regulatory system (such as that provided by the Ministry for the Environment on the Resource Management Act and that provided by the Department of Building and Housing on the Building Act) it isn't all in one place.

⁵ The Building Act 2004 contains provisions requiring Building Consent Authorities to copy building consent applications for certain buildings to the New Zealand Fire Service Commission, so that the Commission can advise on "provisions for means of escape from fire" and "the needs of persons who are authorised by law to enter the building to undertake fire-fighting". The intent of this was to provide a means to advise building owners of any such requirements prior to building work commencing so as to minimise issues of compliance and additional costs to owners on completion of building work.

- If the DBH, MfE and DIA worked together to support a more connected approach to local service delivery. Instead government departments provide support for the parts of the system that they have legislative responsibility for. For instance, MfE is training and certifying RMA hearings commissioners and running training workshops for RMA practitioners. DBH is supporting local authorities to become accredited Building Consent Authorities.

B. Labour and Skill shortages and the need to invest in business processes are impacting on local authority capability

22 The processing of resource and building consents involves the interpretation of district plan requirements and building performance standards. These can require complex technical issues and territorial authorities need to exercise quite a high degree of judgment. These need to be made by suitably skilled and experienced people. At the same time, demand for the processing of resource and building consents and related regulatory requirements is at record high levels and there is a need for ongoing investment in the development of business processes and systems.

23 Local authorities told us that they are struggling to attract and retain suitably skilled and qualified people to staff these functions. Staff shortages can contribute to delays and can result in situations where difficult judgments are being made by relatively inexperienced staff. They explained their difficulties in recruiting and retaining staff in terms of:

- A buoyant construction sector that is resulting in high levels of demand for labour including for planners and building assessors
- Tight labour supply as a result of high levels of employment throughout the economy
- Lack of ability to compete due to negative perceptions of the work and perceived comparative disadvantage in pay
- An ageing workforce
- Until very recently, no formal training for building assessors
- Expansion of regulatory roles required of territorial authorities in the face of human and financial resource constraints.

C. Regulatory requirements and expectations could be better communicated

24 In order for resource and building consents to be properly processed within statutory timeframes it is critical that local authorities adequately communicate their requirements for consent applications to users, and that users properly understand and address these requirements. This does not always happen, and is contributing to delays in the processing of consent applications.

- 25 Local authorities told us that inadequate or incomplete information from consent applicants is a common cause of delay⁶. Builders and developers told us that consent requirements are not always well communicated to them by local authorities and some believe requests for additional information for local authorities are used as an excuse by them to delay the processing of consent applications.
- 26 Some local authorities also questioned the rigidity of the requirement for building consents to be processed within 20 days, and suggested that a longer period may be reasonable for very large and complex applications. Builders on the other hand expressed a strong preference for consents to be processed within the 20 day period, but suggested that if a longer period is necessary local authorities should communicate this to them and set expectations appropriately so that users can plan around expected time frames.

D. Accountability for administrative performance

- 27 Businesses told us that different local authorities take different approaches to how they provide regulatory services. Those building across New Zealand spoke of considerable variability between local authorities.
- 28 Generally, businesses want regulations to be administered in ways that are predictable, proactive (in terms of making connections between resource and building consent requirements for instance), user friendly (in terms of communicating expectations for instance), well integrated and efficient.
- 29 Businesses cited the following as good examples of service provision:
- One council's development of a web based tool to allow applicants to track progress in the processing of their consents
 - Another council's initiative to provide more integrated and fast track service for larger developers
 - Another council's efforts to advise users of how long they might expect consents applications to take to be processed (even if this was greater than the required 20 days)
- 30 Users want those delivering services to be held to account for their performance (especially in respect of consent processing times). Several builders and developers commented that while the legislation requires consents to be processed within specified time frames, no means is provided for users to complain or to hold those delivering services to account when timeframes are not met.

⁶ When information is inadequate, local authorities can request additional information from applicants. When they do this, the clock stops ticking. As a result the actual elapsed time to process a building consent, from the user's perspective, may be greater than 20 days.

- 31 On the other hand, local authorities are legally accountable for the decisions they make including the granting of building consents and code compliance certificates. Exposure to liability (for example from weathertightness claims) has contributed to risk aversion and delays in the processing of Building Consent applications and Code Compliance Certificates, especially when alternative solutions are proposed. The current legal approach to liability (joint and several) and the quantum of awards being made by the courts has made this a strong factor in council processes in recent times.

G. Some issues related to legislation

- 32 Although most of the issues identified by builders and developers related to implementation and administration of regulatory requirements, some legislative issues were identified. Common issues identified by builders and developers included:
- Whether there should be increased guidance on the sequence for obtaining resource and building consents - some (but not all) builders and local authorities commented that there should be a requirement to obtain a PIM and / or resource consent before applying for a building consent. Those opposed to the idea thought it would result in longer time frames in obtaining multiple consents
 - The need to better clarify the process for approving variations against Building Consents – most persons spoken to commented that legislative requirements need redrafting to provide improved clarity and guidance to local authorities and to minimise the potential for delays
 - Remove potential for conflicting requirements between district and regional plans and Building Code requirements. Examples were provided where different requirements across district plans and the Building Code relating to the management of noise or natural hazards (for instance) may create uncertainty for users as to what is required
 - Problems were identified with the inclusion of requirements for the fencing of swimming pools under both the Fencing of Swimming Pools Act and the Building Act, and the view proposed that requirements should be consolidated under the Building Act
 - Problems were identified with the inclusion of requirements for fire safety and fire evacuation scheme requirements for buildings under both the Building Act and the Fire Service Act, and the view promoted that the two sets of requirements should be consolidated under the Building Act

Plan to address issues

- 33 There are already initiatives underway across central and local government that will help address the issues identified in this report. These include:

- Initiatives by some of the local authorities, to improve how they administer resource and building consent functions including moves to better connect and integrate processing of resource and building consents
- The Department of Building and Housing's:
 - Implementation of Building Consent Authority accreditation which should result in more consistent and professional approaches to the delivery of building consent functions by local authorities
 - Review of the Building Code, which should result in better specification of building performance requirements and improved guidance to local authorities and builders
 - Support for the development of 'clusters' across several neighbouring territorial authorities, as a means of developing common approaches to interpretation of building code and other regulatory requirements, creating efficiencies and pooling resources
 - Preliminary discussions with LGNZ on the possibility of enhancing and extending the collection of service and performance data
- The Ministry for the Environment's work with local government and others on a number of measures to improve consistency in the administration of the RMA. The main focus of this effort is on national direction, training, capacity-building for businesses and the public, and the Quality Planning Website. Recent initiatives include:
 - Training and certifying over 850 RMA hearings commissioners under the Making Good Decisions Programme, and upgrading the programme (quality of decisions as well as timeliness were identified as important in the last RMA review)
 - Running training workshops for RMA practitioners
 - Encouraging electronic initiatives, including on-line forms and assisting Councils to put their plans on-line
 - A series of booklets and an interactive CD Rom, an 0800 RMA information line, and updated web resources launched in August 2006
 - RMA information for small to medium businesses put on www.biz.org.nz
 - Detailed guidance for RMA practitioners through the Quality Planning website. The website includes 75 guidance documents and 1,000 articles and publications, and now attracts 20,000 visits a month
 - National environmental standards that set new minimum standards for addressing specific environmental issues throughout the country (for example the standards related to air and drinking water)
 - One on one targeted assistance to councils

- The Department of Internal Affairs' Review of Fire Legislation (in consultation with the Fire Service, Local Government New Zealand, and other agencies), which will include examination of the legislative framework for fire safety and fire evacuation requirements in respect of buildings including consideration of any further legislative changes necessary in respect of coordination and enforcement issues between the fire service and territorial authorities in the granting of building consents, issuing of code compliance certificates and inspection of Fire Evacuation scheme requirements.

34 In addition to the above, officials have identified a package of initiatives to help resolve the issues identified in this study. Details of these initiatives including the proposed work, timeframes and the agencies to be involved in each are described in the table below.

Additional Initiatives

<i>Desired outcome</i>	<i>Actions</i>	<i>Agencies</i>
Users have easy access to all the information and resources they need to understand and meet regulatory requirements in building on land.	Audit adequacy of and accessibility to users of existing information / resources and recommend improvements for implementation in 2007/2008 by 30 June 2007	DBH, MfE, DIA in consultation with LGNZ
Connections between related regulatory requirements are effectively made for users by those administering the system	Advise on whether the provisions provided for in the Building Act 2004 that allow the Fire Service Commission to advise on certain building consent applications are working effectively to ensure that building owners are aware of both fire safety and fire evacuation requirements with implications for building design and construction before building work commences so as to minimise compliance issues on completion of building work, and recommend solutions for implementation in 2007 / 2008 by 30 June 2007	DIA and DBH in consultation with the New Zealand Fire Services Commission and LGNZ
	Seek priority for legislation to better align provisions between the Fencing of Swimming Pools Act and the Building Act by June 2007 Introduce legislation to better align provisions between the Fencing of Swimming Pools Act and the Building Act in 2007/2008 (subject to legislative priority)	DBH and Minister for Building and Construction
	Advise on whether there should be increased guidance to local authorities and applicants on the sequence for obtaining resource and building consents or a requirement for local authorities to advise applicants of the need for a resource consent at the time of first considering a building consent application rather than when granting a building consent and the means to achieve this to be implemented in 2007 / 2008 by 30 June 2007	MfE and DBH in consultation with LGNZ

<i>Desired outcome</i>	<i>Actions</i>	<i>Agencies</i>
	Identify any additional administrative or legislative measures necessary to improve consistency in approaches across local authorities to their processing of variations to building work against building consents for implementation in 2007 / 2008 by 30 June 2007	DBH
	Review the extent to which conflicting requirements between district and regional plans and building consent performance requirements are issues and develop the legislative and administrative measures to resolve any such issues for implementation before July 2008 by December 2007	DBH and MfE in consultation LGNZ
Expectations of good performance are clear and accountabilities improved in the administration of resource and building regulatory functions	Develop performance indicators in support of good practice administration of resource and building consent functions and advise on a timetable for publishing comparative performance data by 30 June 2007 Work with local government to identify, share and promote best practice approaches to the administration of resource and building consent functions (ongoing) with progress to be reported in July 2007.	DBH, MfE and DIA in consultation with LGNZ
	Advise on whether current statutory timeframes for the processing of resource and building consents are reasonable for all resource and building consent applications by June 2007 with any necessary changes to be implemented in 2007 / 2008.	DBH and MfE in consultation with LGNZ
Regulatory requirements are more consistently conveyed and decisions on them more consistently made across local authorities	Work with territorial authorities to identify regulatory actions and decisions where common approaches to interpretation and decision making would be desirable, appropriate and practical, and in such cases facilitate more consistent approaches a (such as common policies on the acceptance of producer statements) with progress to be reported in July 2007	DBH and MfE in consultation with LGNZ
	Advise on what additional support central government can provide to encourage the expansion of current local authority clustering initiatives so as to address a broader range of common issues related to their administration of resource and building regulations by 30 June 2007 for implementation in 2007 / 2008.	DIA, MfE and DBH in consultation with LGNZ
The negative impacts of skill and labour shortages for the administration of resource and building regulations are reduced	Identify and report on the reasons for and implications of labour and skill shortages in the administration of resource and building regulatory functions and advise on practical solutions. Scope study by 30 June 07 with study to be carried out in 07/08 year and findings to be implemented as soon as possible following completion.	DBH and MfE, in consultation with LGNZ, DoL and TEC

- 35 It is recommended that Ministers note the above work programme, and invite the Minister for Building and Construction, the Minister for the Environment and the Minister of Local Government in consultation with the President of Local Government New Zealand to report on progress to the Cabinet Policy Committee in July 2007. This report will also advise on any legislative or resource implications necessary to implement required solutions.

FINANCIAL IMPLICATIONS

- 36 It is expected that solutions to the issues identified in this study will have implications for existing work programmes and budgets. The July progress report referred to above will report on these implications and whether or not any additional funds or reprioritisation of existing work will be necessary to implement solutions.

HUMAN RIGHTS

- 37 There are no human rights implications arising from the proposals in this paper.

LEGISLATIVE IMPLICATIONS

- 38 The Minister for Building Construction intends to seek Cabinet agreement for priority for the introduction of legislation necessary to align requirements for the fencing and building of swimming pools. The July progress report referred to above will also advise on any additional legislative implications to implement any required solutions.

CONSULTATION

- 39 Development of this paper was overseen by a steering group comprising DBH, MfE, DIA and LGNZ. The work involved discussions with five local authorities, one on one discussions with several large developers, builders and a rest home operator, and meetings with smaller builders and members of the New Zealand Property Council.
- 40 A previous version of this paper was circulated to the Minister of Commerce, the Minister for the Environment, the Minister of Local Government and the President of Local Government New Zealand for comment prior to the papers' finalisation for Cabinet.

Recommendations

- 41 I recommend that you:
- 1 **Note** that, as part of the government's Quality Regulation Review, the Department of Building and Housing (DBH) led a study with the Ministry for the Environment (MfE), the Department of Internal Affairs (DIA) and Local Government New Zealand (LGNZ) to identify and address issues for business in complying with resource, building and related regulations when building on land;

- 2 **Note** that the main issues identified by the study for developers, builders and other users concerns are:
- 2.1 delays and unpredictable timeframes in the processing of resource consents, building consents and code compliance certificates;
 - 2.2 inconsistencies in the interpretation of regulatory requirements by those administering them;
- 3 **Note** that work is already underway across central and local government to address these issues;
- 4 **Agree** to the following programme of work, in addition to the work referred to in paragraph 3, to help resolve the issues identified in paragraph 2:

Desired outcome	Actions	Agencies
Users have easy access to all the information and resources they need to understand and meet regulatory requirements in building on land.	Audit adequacy of and accessibility to users of existing information / resources and recommend improvements for implementation in 2007/2008 by 30 June 2007	DBH, MfE, DIA in consultation with LGNZ
Connections between related regulatory requirements are effectively made for users by those administering the system	Advise on whether the provisions provided for in the Building Act 2004 that allow the Fire Service Commission to advise on certain building consent applications are working effectively to ensure that building owners are aware of both fire safety and fire evacuation requirements with implications for building design and construction before building work commences so as to minimise compliance issues on completion of building work, and recommend solutions for implementation in 2007 / 2008 by 30 June 2007	DIA and DBH in consultation with the New Zealand Fire Services Commission and LGNZ
	Seek priority for legislation to better align provisions between the Fencing of Swimming Pools Act and the Building Act by June 2007 Introduce legislation to better align provisions between the Fencing of Swimming Pools Act and the Building Act in 2007/2008 (subject to legislative priority)	DBH and Minister for Building and Construction
	Advise on whether there should be increased guidance to local authorities and applicants on the sequence for obtaining resource and building consents or a requirement for local authorities to advise applicants of the need for a resource consent at the time of first considering a building consent application rather than when granting a building consent and the means to achieve this to be implemented in 2007 / 2008 by 30 June 2007	MfE and DBH in consultation with LGNZ
	Identify any additional administrative or legislative measures necessary to improve consistency in	DBH

Desired outcome	Actions	Agencies
	approaches across local authorities to their processing of variations to building work against building consents for implementation in 2007 / 2008 by 30 June 2007	
	Review the extent to which conflicting requirements between district and regional plans and building consent performance requirements are issues and develop the legislative and administrative measures to resolve any such issues for implementation before July 2008 by December 2007	DBH and MfE in consultation LGNZ
Expectations of good performance are clear and accountabilities improved in the administration of resource and building regulatory functions	Develop performance indicators in support of good practice administration of resource and building consent functions and advise on a timetable for publishing comparative performance data by 30 June 2007 Work with local government to identify, share and promote best practice approaches to the administration of resource and building consent functions (ongoing) with progress to be reported in July 2007.	DBH, MfE and DIA in consultation with LGNZ
	Advise on whether current statutory timeframes for the processing of resource and building consents are reasonable for all resource and building consent applications by June 2007 with any necessary changes to be implemented in 2007 / 2008.	DBH and MfE in consultation with LGNZ
Regulatory requirements are more consistently conveyed and decisions on them more consistently made across local authorities	Work with territorial authorities to identify regulatory actions and decisions where common approaches to interpretation and decision making would be desirable, appropriate and practical, and in such cases facilitate more consistent approaches a (such as common policies on the acceptance of producer statements) with progress to be reported in July 2007	DBH and MfE in consultation with LGNZ
	Advise on what additional support central government can provide to encourage the expansion of current local authority clustering initiatives so as to address a broader range of common issues related to their administration of resource and building regulations by 30 June 2007 for implementation in 2007 / 2008.	DIA, MfE and DBH in consultation with LGNZ
The negative impacts of skill and labour shortages for the administration of resource and building regulations are reduced	Identify and report on the reasons for and implications of labour and skill shortages in the administration of resource and building regulatory functions and advise on practical solutions. Scope study by 30 June 07 with study to be carried out in 07/08 year and findings to be implemented as soon as possible following completion.	DBH and MfE, in consultation with LGNZ, DoL and TEC

- 5 **Invite** the Minister for Building and Construction, Minister for the Environment and Minister of Local Government, in consultation with the President of Local Government New Zealand, to report to the Cabinet Policy Committee in July 2007 on progress in completing the above work programme, including any policy, legislative or funding implications arising from the work;
- 6 **Note** that the Minister for Building and Construction indicates that consultation is not required with the government caucuses or with other parties represented in Parliament.

Hon Clayton Cosgrove
Minister for Building and Construction