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To the review of Legislation  
regulating the Architectural Profession

I wish to register my interest in this review. I understand the review meets in Adelaide on June 8. I may however not be able to attend in person as I am based near Murray Bridge, 70km from Adelaide.

I am an architect registered in South Australia. My interest is that I have formed the view from the draft report that the Productivity Commission may be basing its views on underlying assumptions about the architectural profession which may be in error, as evidenced in particular by comparison with my own architectural practice.

I am an architect in sole practice, emphasising ecologically sustainable development, in particular new and emergent systems for passive and low energy buildings suited to the hot arid lands characterised by much of South Australia, and the majority of the inner continent land mass of Australia.

Clearly my architectural work is not of the character of work carried out by draughtspersons, building designers, design engineers or other categories.

It differs in that it involves primary research, prototyping and commercialisation of emergent systems. This work is possible only by an architect, and is beyond the capabilities of the other categories.

It is possible only for an architect because:- only the architect has the basic broad based holistic training to view development beyond the design/document/construct overview consideration by the other categories (and which appears to be an underlying assumption by the Productivity Commission of what an architect's work comprises) - the architect's role extends pre-design into the primary research and prototyping roles, and after construction into induction and post occupancy monitoring and review - only the architect has the holistic view of development to integrate passive building performance with systems. All other categories segregate the building and occupant demand to one side of the equation, and introduce supply and systems as stand alone separate elements to the other.

For example a design engineer might view the building envelope as a 'given', and design mechanical systems which are avoided entirely in an architect's integrated passive building scheme.

As a result, the architect's product achieves performance:consumption standards significantly better than development by such other categories (vide <http://www.emilis.sa.on.net> where all residential projects operate at <2kWhr/day energy consumption).

- only the architect has access to the Royal Australian Institute of Architects instigated 'Environment Design Guide' and other support and resource material. (the HIA Pathe and similar documents operate at a significantly lower intellectual level based around conventional development presumptions).
- - only the architect has the professional standing to be able to prototype emergent systems in client projects.
- only the architect can define risk inherent in emergent solutions, and quantify these against precautionary principle and best outcome benefits

These things set the architect apart from the run of the mill other categories. The public deserves to have a ready means to be able to identify the special advantages inherent in the architect from other run of the mill categories.

This is currently offered by the protected definition of architect. Enquiries by the public to architect bodies permits the public to quickly receive the list of architects specialising in the development area they seek (in my case ESD, for others heritage, urban design, facility management, and other such specialisations.)

Were the situation to be created where everyone involved in the development industry were 'equal'; large costs will be accrued by the public through them having developments carried out by generalists in other categories (who may claim specialist knowledge without any means for the public to check those claims).

With the definition of architect the processes within the architectural profession of -peer review, - architecture awards processes, -research paper referees, -completed project analysis and so on ensure that an architect's claims of special skills can be readily checked.

As a result, the public accrues significant savings both because - the most relevant skills are brought to bear on the development the first time round (avoiding run-on costs of fixing up a development to achieve its claimed outcomes later at additional cost), and - the development in the case of ESD achieves the lower resource consumption and environmental impact for the life cycle of the development inherent in the ESD ethic.

Thus first the public pays less by getting the right product the first time. In contrast, using generalists results in subsequent follow up revamp expenditures until the public get what they seek. (For example, there is an emergent renovation demand for 300,000 detached houses in Adelaide as public demand for energy efficiency in coming years requires new works on that existing housing stock which individually currently fail to achieve those outcomes.)

The follow on result are also savings in development of public infrastructure (power stations, water and waste treatment infrastructure) needed to service current poor performance development. This benefit on the public purse is measurable in terms like those noted below. Where developments achieve best practice standards for example of energy efficiency, the demand on increasing the size of public supply infrastructure is correspondingly reduced.

For an individual detached residential building, this architect's own home/office is instructive: Such a development accrues for the occupant savings within the development of - electrical energy demand from the public mains – nil savings 6kWhr/day for the building life cycle (notional  $6 \times 365 \times 60 \times 10c = \$13,000$ ) plus  
- water supply demand from public- nil  
- waste disposal demand on public infrastructure – nil thus achieving life cycle savings total for the 3 items above of about \$39,000 saving direct to the householder.

Plus savings on public purse demands by: - carbon credit savings in environment protection terms from repair/mitigation works not required, - reduced demand on public infrastructure expansion (regional power plant, water storage and pumping, waste treatment plant through to local distribution, piping, transformers, and so on).

Of about \$40,000 per allotment capital works plus associated recurrent maintenance and repair costs. On such an individual project the architect's fees might be \$15,000 against the accrued individual and societal life cycle savings of about \$120,000