

SUBMISSION ON DRAFT SEPP 65

The subject draft does not address the following critical elements of viable planning:

1. PARKING

- a. My research shows that most Residents in a Lot have more than one car. Therefore, they are forced to park one or more cars in the nearby streets which are denied to others for casual parking.
- b. Public transport does not reduce the ownership of cars by Lot owners
BECAUSE: -
 - i. Public Transport is inadequate, in particular at night and weekends;
 - ii. The majority of workers cannot use public transport to get to and from their places of work BECAUSE public transport does not go near those places of work at rational times if ever.
- c. Therefore, SEPP 65 must specify many more car spaces for each Lot.

2. ON SITE STORAGE

- a. The dog box sized Lots do not provide adequate storage space.
- b. Therefore, these residents are forced to use the allocated car space for storage creating a fire hazard.
- c. Therefore, SEPP 65 must specify substantial fire rated storage spaces for residents residing in each Lot.

3. STREETSCAPE

- a. Good planning requires that the exterior of buildings provide interesting aesthetic and pleasing sympathy with its neighbours.
- b. Historically, the residential buildings, in particular in Europe and some Australian Capital Cities have been retained by Public acclaim because of the streetscape.
- c. Therefore, SEPP65 must insist on the Streetscape be paramount in the development of residential flat buildings to be satisfying to the Public.

4. WHERE WILL THE CHILDREN PLAY & THE ELDERLY SUNBAKE

- a. Young children cannot be expected to go to a far distant playing field to develop their skills and love of nature.

- b. Likewise the elderly and the infirm cannot be expected to struggle off to some faraway field to enjoy the sun and stumbling exercising.
- c. **Therefore, SEPP65 must specify that playing areas, in particular for young children and elderly to play or contemplate must be part of the development of each residential flat building.**

5. LANDSCAPING

- a. The illustrations are dominated by native trees, grasses and spinifex which cannot provide sanctuary for the elderly, infirm and children.
- b. Imported trees, bushes and grasses lend themselves to lawns and shady and sanctuary not provided by spinifex and its native companions.
- c. **Therefore, SEPP65 must stress a preference for, if not dictate landscaping which provides lawns which can be used by children etc. and trees which provide shade.**

6. ORIENTATION

- a. Many, if NOT all streets do not run North, South, East of West. Most developers pushed designs will tend to maximise the Lot yield by squaring up the plan facing the street.
- b. This may achieve the specified minimum of 3 hours of sunlight BUT it does not maximise the solar access to most of the Lots.
- c. **Therefore, SEPP 65 must require an average of more than 3 hours of solar access over the whole of the residential flat building(s).**

7. SOLAR ENERGY

- a. Energy will become much more expensive in the future.
- b. **Therefore, SEPP65 must require the installation of solar panels or other devices to provide power and solar hot water systems.**

8. NUMBER of FLOORS

- a. The illustrations are mostly, if not all of four or about six storey buildings. This means that SEPP65 is advocating the use of lifts which on low rise buildings will radically increase the costs of Lots.
- b. **Therefore, SEPP65 must foster either three storey walk up blocks or very high blocks to spreads the costs of lifts to an acceptable market price.**

9. CERTIFICATION

- a. It was alleged at the Sydney Presentation by a member of the audience that Private Certifiers will not rigidly enforce SEPP 65 because they accept bribes from developers.
- b. From my research and experience there is not good evidence that this statement is correct. The BPB has disciplined, including suspended a number of “slack” Certifiers.
- c. Today 80% of certifiers are Council Officers who with Private Certifiers are appointed, monitored and disciplined by the BPB.
- d. **Therefore, a practice note for SEPP 65 must stress that if Construction Certificates are found not to comply with SEPP65 (and indeed the DA) that a formal complaint must be lodged with the BPB.**