

## Submission for Draft SEPP 65 amendment and Draft Apartment Design Guide

To Whom it May Concern,

We wish to make a submission regarding the above documents.

### Relationship between SEPP 65 and the Apartment Design Guide

We support the changes in general and also the perceived intention that the ADG become more 'enforceable'. However, we believe the relationship between the two documents is unclear when it comes to refusal or approval of development applications. It is stated that the ADG overrides any DCP in a number of areas but to what extent does it contribute to a judgement based on actual legislation? It is stated that it is a guide, and that it is flexible and yet in other places implies that it can be used by councils to 'enforce' these design guides.

### Car Parking

We support the idea that car parking can be much reduced in areas close to train stations. In our local council area this relates to Mascot Train station precinct. We would ask that the car parking be more clearly set out to include minimum requirements for car share places, bicycle, motorbike and scooter parking, emergency services, deliveries and removalist vehicles. These places should be provided even if no private car spaces are provided.

In the case where a developer proposes no private car spaces some criteria should be shown to be met, such as viable public transport or walking access to major supermarkets and shopping areas, schools, health care providers and recreation facilities. In the case of the Mascot train Station precinct I believe very few of these criteria could be met and so the council would be reasonable to require some car parking, even if that is reduced from their usual DCP guides.

Yours Sincerely,



Dunn & Hillam Architects  
Director (ARB 7352)