

- There needs to be more detail relating to the protocol of the Panels. They need to be more impartial and consistent. I recently had one RFB job in a southern Sydney Panel, where we have two DAs. Even with same panel members, we have conflicting comments (180° different) on the same issues.
- The Panel meetings needs to be more transparent, as they were initially. The southern Sydney panel meetings are now being held behind closed doors, with even the client and applicant being excluded from dialogue between Council planners and the panel members.
- There needs to be more strict legislation and more detail relating to the 'Architect directing the design'. Draftsmen are designing and submitting DAs where they get an Architect to merely sign off on the statement.
- The paragraph under '2D Floor space ratio' relating to FSR filling 70% of the envelope is unclear. Councils would 'extend' this control to a point that any development is limited to 70% of the GFA allowable under the LEP.
- It should be legislated that Council planners assessing DAs cannot do their own SEPP65 assessment additional to the report prepared by a panel (Hurstville Council is currently doing this).
- The increase in submission requirements is increasing red tape when the Department is stating that it wants to reduce red tape. As an example, the draft SEPP states that solar access studies must be submitted 'where required'. Councils will interpret this as 'always required'. This will add substantial costs to developments, particularly smaller developments. If we are to provide affordable housing, controls such as these are only adding to costs as they are passed onto the consumer. The same issue relates to the provision of physical models for 20 units (number should be increased).
- The minimum Living / Dining room areas should be larger and the bedroom sizes (particularly the minimum 3m excluding wardrobe) should be smaller.
- If the 25% of site area for communal open space is unachievable in smaller developments, larger private open space can be provide in lieu. This should be in 'acceptable solutions' otherwise Councils will ignore it.
- It should be legislated somehow and better defined that the SEPP is meant to be 'flexible'. Councils are currently using 'rules of thumb' as rigid controls.