

[REDACTED]

From: DPE PS Government Architect Mailbox
Sent: Friday, 7 May 2021 11:35 AM
To: PDPS DRDE Design and Places SEPP Mailbox
Cc: [REDACTED]
Subject: FW: Design and Place SEPP

From: Paul Dolphin [REDACTED]
Sent: Friday, 7 May 2021 11:18 AM
To: DPE PS Government Architect Mailbox <government.architect@planning.nsw.gov.au>
Subject: Design and Place SEPP

FAO Abbie Galvin. I am writing with regards to the Design and Places Sepp. The proposed wording of the SEPP looks to limit the ability of Accredited Building Designers to undertake certain design work.

Item 3.1.1

a registered architect (qualified designer, same definition as presently used) will be required for all buildings with three or more storeys, and in the case of multi-residential buildings, four dwellings

Currently Building Designers are permitted to do this work, 3 story buildings and multi residential dwellings. We are excluded from the design of multi-storey residential developments if specifically they are three or more storeys AND four or more unit developments, under SEPP 65 this is limited to registered architects.

Sepp 65 was introduced by Premier Bob Carr in 2002 to combat the proliferation of three storey walk up flat developments Ironically, the examples he produced to support his argument were mainly designed by architects.

This type of work that we are permitted to do is a substantial part of our work load. There is no evidence or justification as to why this change should occur. This is illogical and will put people out of business. 95% of DAs in Australia are submitted by building designers not architects, and as such they should not be excluded from practicing their trade in certain areas such as multi residential design or three storey building. It is wrong to say that Architects are better trained or more experienced. For example, I have 3 degrees, an architect need only one and I have 25 years' experience in the built environment.

This SEPP goes against the logic of the fantastic Design and Building Practitioners Act 2020. As the Shergold Wier Report advises we should be accrediting design practitioners and this is what the Building Design Association has been working towards for many years. To now reduce our field of work with this SEPP is market restriction based on no solid evidence that architects provide better buildings. In Fact SEPP 65 which is the current SEPP excludes Building Designers for designing high rise residential design – yet all the high rise problems in Sydney have been caused by Registered Architects not Building Designers.

The BDA have been working with government for many years on an accreditation scheme and this legislation should include Accredited Building Designers that have achieved the relevant CPD training and Experience. This legislation with put people out of work at a time when we need more than ever to have skilled and experienced designers working in the field.

The wording should be changed to include Accredited Building Designers. I would like to know the Government Architects stance on this, and why they are supporting this change in wording despite the Shergold Weir Report and the DBP Act.

Many thanks!

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