

[REDACTED]

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**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 28 April 2021 7:35 AM  
**To:** PDPS DRDE Design and Places SEPP Mailbox  
**Cc:** DPE PS ePlanning Exhibitions Mailbox  
**Subject:** Webform submission from: Design and Place State Environmental Planning Policy (SEPP)

Submitted on Wed, 28/04/2021 - 07:35

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my submission to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

[REDACTED]

**Submission**

I support the intent of the Design and Places SEPP but oppose the discriminatory exclusion of Building Designers from practicing within the Design and Places SEPP as currently described by the definition of a 'Qualified Designer'.

It is of serious concern that the D&P SEPP seeks to further restrict building designers with the qualifications, skills, and experience to design and document buildings as described within the D&P SEPP.

The D&P SEPP should be consistent as to whom can design and document buildings of the type as would be covered by the D&P SEPP with the ABCB National Qualifications Framework for Building Designers, recognise the Building Designers Association of Australia Accreditation Scheme as per similar legislation and other jurisdictions.

Building Designers can design and document buildings within other State and Territory jurisdictions as buildings that would be described under SEPP 65 or as proposed under the Design and Places SEPP with all these State / Territories by enlarge having less failings than NSW.

The ABCB have released the National Framework for Building Practitioners discussion paper for public comment. The BDAA believes those Building Designers who are accredited through the legislation as described below should be expanded and included in the Design and Places SEPP as described within NSW planning legislation:

Environmental Planning and Assessment Amendment (Low Rise Medium DensityHousing) Regulation 2017 under the Environmental Planning and Assessment Act 1979 to require an application for a complying development certificate that relates to development, involving the erection or alteration of, or an addition to, a dual occupancy, manor house or multi dwelling housing (terraces) to be accompanied by a statement by a qualified designer (being a person registered as an architect in accordance with the Architects Act 2003) or a person accredited as a building designer through the Building Designers Association of Australia.

Of further concern is the proposal to replace BASIX with a report that can be done by engineers and architects. The BASIX tool is based on rigorous science and hard data, not opinion. The thermal performance (energy consumption) assessment using the NatHERS or Passive House pathways are subject to independent audit - a critical point in the accountability of the proponent, as currently provided by Australian Building Sustainability Association (ABSA). BASIX should remain a standalone pass/fail gateway to development.

**I agree to the above statement**

Yes