



25 March 2022

NSW Department of Planning Industry and Environment
GPO Box 239
SYDNEY NSW 2001

designandplacesupp@planning.nsw.gov.au

Dear Sir or Madam

Re: Submission to the Department of Planning and Environment in response to the draft Design and Place State Environmental Planning Policy

Thank you for the opportunity to provide feedback on the Design and Place SEPP. Please find the attached SSROC's submission. As noted in correspondence on 28 February 2022, provided by Ms Rebecca Habchy, Project Officer, Government Architect NSW, SSROC is now providing its final submission.

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of eleven local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of about 1.7 million, one third of the population of Sydney, including Australia's most densely populated suburbs. SSROC seeks to advocate for the needs of our member councils and bring a regional perspective to the issues raised.

SSROC population and housing data¹, in the period from 2011 to 2016, reveals a very diverse socio-economic area marked by rapidly rising numbers of dwellings and underlying growth in the number of households in the area. The estimated resident population increased by over 150,000 during this five-year census period.

Although the urban growth of the SSROC area is unique, our region shares a number of issues and drivers with many other urban areas managing rapid population growth sustainably while enhancing liveability.

Because of its size and diversity, issues experienced within SSROC often reflect statewide trends like population growth supported by migration. The experience of strong growth and related development across both highly urban as well as more suburban parts of Sydney has provided a number of valuable insights and has helped to shape our feedback on the draft SEPP.

SSROC strongly supports the Department's work to elevate the importance of design excellence and place-based design in the planning system.

SSROC appreciates this opportunity to help shape and contribute to the policy to enable better design and place outcomes.

¹ Source: Australian Bureau of Statistics, Census of population and Housing 2011 and 2016, compiled by id <https://profile.id.com.au/ssroc/>

Introduction

In the face of the pandemic and global environmental challenges, our local councils are placing sustainability, resilience, and quality of places at the forefront of development and strategic planning. SSROC councils seek to use their local plans and strategies to deliver sustainable and resilient places and sound place-based and building design outcomes.

Most of our councils have broadly embraced the intent of the Design and Place SEPP and its supporting guides and look forward to working with the NSW Government to enhance and deliver positive design outcomes for the buildings and public places in their local areas.

At the same time, however, the 2022-23 financial year will be especially challenging from a budget and resourcing perspective for local councils. Following IPART's unprecedented and unanticipated low-rate peg determination, councils will be re-casting their 2022-23 budget projections. Councils will therefore be looking to the NSW Department of Planning and Environment (DPE) for support and guidance in all facets of transitioning and implementing the DP SEPP.

The submission is structured in three parts:

- **Part A** contains general comments about the overall design and place policy framework, and contains recommendations to assist local councils during transition and implementation;
- **Part B** contains SSROC's response to selected specific provisions within the DP SEPP, Apartment Design Guide and Urban Design Guide with particular focus on important aspects of policy which include sustainability and resilience, green infrastructure, waste management, design review panels and inclusive design;
- **Part C** contains SSROC's response to selected specific provisions within the DP SEPP, Apartment Design Guide and Urban Design Guide that relate to waste management, resource recovery and recycling. The circular economy forms a particular priority for the councils in SSROC.

Background: Our Understanding

The NSW Government is proposing to introduce a new Design and Place State Environmental Planning Policy (DP SEPP). SSROC made a submission to the Explanation of Intended Effect (EIE) which was exhibited in 2021.

The documents on exhibition are:

- the proposed draft Design and Place State Environmental Planning Policy (DP SEPP) 2021
- proposed changes to the Environment and Planning Assessment Regulation 2021 (EPA Regulation)
- proposed direction by the Minister under section 9.1 of the Environmental Planning and Assessment Act 1979 (9.1 Direction)
- the revised Apartment Design Guide (ADG)
- the proposed new Urban Design Guide (UDG)
- updates to residential sustainability (BASIX)
- BASIX sandbox tool
- Design Review Panel Manual for Local Government (DRPM)
- Design & Place - Cost Benefit Analysis (Summary)

Key features of the DP SEPP

Principles-based approach

The DP SEPP will introduce a principles-based approach to planning with 5 design principles supported by 2 considerations and specific measures to satisfy each principle².

Principles	Considerations	
1. Deliver beauty and amenity to create a sense of belonging for people	<i>Overall design quality</i>	<i>Comfortable, inclusive and healthy places</i>
2. Deliver inviting public spaces and enhanced public life to create engaged communities	<i>Culture, character and heritage</i>	<i>Public space for public life</i>
3. Promote productive and connected places to enable communities to thrive	<i>Sustainable transport and walkability</i>	<i>Vibrant and affordable neighbourhoods</i>
4. Design sustainable and greener places to ensure the wellbeing of people and the environment	<i>Green infrastructure</i>	<i>Resource efficiency and emissions reduction</i>
5. Deliver resilient and diverse places for enduring communities	<i>Resilience and adaptation to change</i>	<i>Optimal and diverse land use</i>

The stated aims of the draft DP SEPP are:

- a) to provide a consistent set of principles and considerations to guide the design of the built environment
- b) to ensure a high quality and innovative design of the built environment
- c) to create place that support the health and well-being of the community
- d) to integrate good design processes into planning and development
- e) to recognise the economic, environmental, cultural and social benefits of high-quality design
- f) to ensure sustainable development and conserve the environment
- g) to minimise the consumption of non-renewable energy and reduce greenhouse gas emissions
- h) to achieve better built form and aesthetics of buildings, streetscapes and public spaces
- i) to recognise the importance of Country to Aboriginal people and to incorporate local Aboriginal knowledge, culture and tradition into development.

² Refer to Part 2 of the DP SEPP public consultation draft

Application of the DP SEPP

The DP SEPP will apply to all of NSW and spans places of all scales from precincts, large developments and buildings to infrastructure and public space. Land excluded includes some rural land, industrial land, environmental conservation land and waterways. Small scale development such as detached houses and complying development are excluded from the DP SEPP (except for BASIX requirements).

Guidance

The DP SEPP gives effect to two guides, a revised Apartment Design Guide and a new Urban Design Guide. Changes to update BASIX are also proposed along with an alternative merit-based assessment pathway to meeting sustainability requirements.

Design Skills

The DP SEPP also introduces requirements for qualified designers to prepare a design verification statement for a range of developments to verify that they designed or directed the design of proposals and state how it meets the objectives of the DP SEPP and relevant guidance and to justify any alternative design solutions.

Design Review Panels

Establishment of Design Review Panels, appointed by the Minister, is required for all councils. Panels will be required to adhere to the process set out in a new *Local Government Design Review Panel Manual*.

Timeframe

A delayed commencement of 6 months is proposed following gazettal of the DP SEPP.

Part A: General Comments

Overview

SSROC is supportive of the DP SEPP and welcomes the strengthening of BASIX, the updates to the Apartment Design Guide and the new Urban Design Guide. SSROC broadly agrees with the principles and supports the consolidation of policies and guidance within the SEPP.

There is strong alignment between the intent of the policy, to “put sustainability, resilience and quality of places at the forefront of development”³ and improved design and sustainability outcomes sought by councils and their communities.

SSROC appreciates the Department of Planning and Environment (DPE) decision to extend the timeframe for developing the DP SEPP to enable more consultation with councils and other stakeholders, together with webinars and forums convened during the exhibition period have helped council staff better understand various components of the DP SEPP. However, it is disappointing that the timing of the local government elections in December 2021 has limited the opportunity for newly-elected councillors to engage on this important reform.

While there is support for elevating design in the planning system, and the DP SEPP is broadly supported, SSROC understands councils do have concerns about aspects of the proposed SEPP and its implementation may prove challenging to implement, given the other significant planning reforms underway.

³ <https://www.planning.nsw.gov.au/Policy-and-Legislation/State-Environmental-Planning-Policies/Design-and-Place-State-Environmental-Planning-Policy>

Specific comments on provisions within the DP SEPP, BASIX and the Apartment Design Guide are set out in Parts B and C of this submission.

Principles-based approach

The proposed shift to a principles-based approach is a significant change to the planning system.

SSROC recognises that a principles-based approach to assessing development applications and flexibility in applying design controls that regulate development can support good design outcomes. However, many councils remain concerned that the assessment pathways for approval and refusal are unclear and this will create uncertainty for owners, applicants and the community and lead to longer assessment timeframes, strain council resources and could also result in an increased risk of court cases.

Some councils are of the view that having more transparent minimum standards with merit-assessment for non-compliance would address these concerns. If the DP SEPP is implemented as proposed, these risks will need to be carefully monitored and managed.

It would appear that before the DP SEPP is made, further testing and trialling of the proposed approach is needed to demonstrate that the principles-based approach proposed will not lead to these undesirable outcomes.

Recommendation 1

SSROC recommends that DPE develop a program to test and trial the use of the proposed principles-based approach with local councils prior to making the DP SEPP.

Relationship between DP SEPP and locally developed plans

While the intent of the DP SEPP to lift design quality and outcomes state-wide, SSROC is concerned that the standardised controls may have the unintended effect of limiting local councils' ability to tailor responses to local and regional circumstances. Introduction of the DP SEPP alongside other recent reforms to employment zones and the continued expansion of complying development erodes local community decision-making and place-making are restricting flexibility.

Councils remain unclear about how the DP SEPP relates to other planning instruments. The relationship between the DP SEPP and guidance (Apartment Design Guide and Urban Design Guide) and other State Environmental Planning Policies, Local Environmental Plans and Development Control Plans and what takes precedence when there is a conflict is one example.

While the DP SEPP principles are supported, and many aspects of guidance are welcome, it is difficult to understand how issues that are particularly important to local communities can be planned for and tailored appropriately. For example, state-wide blanket controls such as those proposed for density in the Urban Design Guide may not be appropriate in different local contexts. Supplements to the Urban Design Guide could help illustrate how the Guide works in highly urban, suburban and regional contexts.

Recommendation 2

SSROC recommends that DPE revise the draft DP SEPP in consultation with councils to ensure there is sufficient flexibility and scope for local place-making and clarify the relationship between the DP SEPP and other planning instruments.

Implementation and Resourcing

Introduction of the DP SEPP and elevating design will likely require new skills, additional staff and require establishment of new systems and processes within councils. This will be complex and

there are costs associated with implementation which will be exacerbated by current skills shortages and councils' financial constraints.

It is critical that introduction of the DP SEPP is carefully managed and appropriately resourced by both state and local government. SSROC recommends that a detailed implementation plan be developed jointly with councils before the DP SEPP is finalised. This should map out steps, timeframes and resources needed to ensure that the proposed commencement within 6 months of gazettal is feasible, well-organised and properly resourced.

As with all new policy change, issues will arise, despite the guidance and templates within the Design Review Panel Manual for Local Government which have been developed to support councils to implement the policy. These are certainly a welcome start, but from experience of other planning reforms, there will be a need for proactive real-time support, particularly during the transition period and in the first 12 to 18 months of the policy commencing. SSROC will seek to provide a support network of its councils to enable the sharing of information, documents, templates etc.

Resourcing for implementation should include:

- training for council staff – the DPE has indicated it will be putting together a training program, and we urge the department to work closely with the local councils to identify and understand what technical, professional and administrative training will be needed to support councils. These may vary from region to region.
- funding for additional positions or consultants and sharing of resources for councils that are unable to fund new positions or have difficulty attracting skilled planners
- a facility such as a help desk or hotline within DPE to provide a real-time central point of contact to ensure prompt and consistent responses to queries; and
- an implementation group (or groups) that include councils to resolve issues as they arise and support implementation, particularly during the early days of the policy transition and commencement.

Recommendation 3

SSROC recommends that DPE work with councils to develop an agreed and appropriately resourced implementation plan for the DP SEPP, with consideration of practical real-time support such as training for council staff, a DPE hotline or help-desk, and council support networks and implementation groups.

Recommendation 4

SSROC recommends that the implementation plan for the DP SEPP include a resourcing strategy for councils. The resourcing strategy should identify gaps in capacity, guidance, funding and system improvements to support councils.

Part B: Specific comments on the exhibition documents

SSROC supports the intent of the exhibition documents including the draft DP SEPP, Draft Apartment Design Guide and Draft Urban Design Guide. The comments below are proposed additions and refinements.

Response to draft Design and Place SEPP

Part 2 Design principles and design considerations

SSROC notes the DP SEPP Sections 12 and 13 introduce design principles and design considerations that must be considered by the consent authority. SSROC is supportive of this approach.

20 Design consideration - Green infrastructure

The inclusion of green infrastructure as a design consideration in the SEPP is strongly supported by SSROC. The SEPP considerations include retaining or improving existing green infrastructure to support natural systems and the intention to maximise tree canopy have wider council support. Section 20(b) and (c) highlight the importance of ensuring green infrastructure thrives through the provision of deep soil and appropriate maintenance, both fundamental to the successful creation of green spaces.

SSROC welcomes the inclusion of minimum tree canopy targets across streets, parks and properties as provided in the UDG and ADG. The inclusion of definitions of tree planting rates, prioritising the protection of existing trees, consideration of species diversity to deliver canopy cover and contribute to biodiversity are all supported.

Where trees are not suitable for a site, then greening alternatives, such as green roofs and walls are encouraged to be factored into the design early in the process. The SEPP and its supporting material include strong green infrastructure guidance, important for local development outcomes, creating cooler and more attractive liveable communities.

Recommendation 5

SSROC supports retaining in the final DP SEPP the strong green infrastructure objectives included in the draft SEPP which recognise the essential role of green infrastructure, including tree canopy and other initiatives in creating cooler and more liveable development.

21 Design consideration—resource efficiency and emissions reduction

Section 21(a) excludes as far as practicable, the use of on-site gas for cooking, heating and hot water, for subdivision development. SSROC supports the NSW Government's commitment to reach Net Zero by 2050. Electrifying development, fostering the use of the most efficient technologies available and sourcing electricity from renewable sources is needed to reach net zero. Given the longevity of development, SSROC recommends electrifying all new development not just new subdivisions. This is especially important in apartments where the expense of retrofitting is costly.

Recommendation 6

SSROC recommends that Section 21(a) of the DP SEPP be amended to exclude on-site gas for cooking, heating and hot water apply to all residential development to transition to net zero.

SSROC agrees with and supports the intent of Section 21(b), however the current wording could be improved to convey the circular economy outcomes and place emphasis on the ongoing waste management of the development.

Recommendation 7

SSROC recommends the wording of Section 21(b) of the DP SEPP be amended so that its intent is clearer, for example,

- (b) is designed to minimise waste
- (i) from demolition and construction,
 - (ii) integrating waste management infrastructure to facilitate source separation of waste streams and safe and efficient collection.
 - (iii) by the choice and reuse of building materials,

SSROC supports Section 21(d) promoting water sensitive urban design and water re-use. Water in the landscape is needed to mitigate urban heat and a push for water efficient landscaping could have perverse outcomes.

22 Design consideration - resilience and adapting to change

SSROC commends the inclusion of resilience and adaptation as a design principle. SSROC recommends that Section 22 be amended and updated to ensure the SEPP promotes adaptability over time. There are known climate risks that have near term impacts, that could be addressed if resilience features were adaptable over time.

The impact of natural hazards on development can also be mitigated through the selection of building materials. For example, tiled roofs in areas subject to intense hail are more likely to fail than roofs made from Colourbond or lighter roofs and facades reducing urban heat impacts. The design of the development should also include consider the design life of materials chosen to ensure ongoing resilience. This may be addressed through the Resilience Guideline, which is not on exhibition.

Recommendation 8

SSROC recommends the DP SEPP be amended to include the word 'anticipate' in Section 22(a)(i) and introduce design life considerations in Section 22(b) as follows:

22 Design consideration - resilience and adapting to change

The consent authority must be satisfied that the development is resilient to natural hazards by

- a) incorporating measures to:
 - *anticipate*, avoid or reduce exposure to natural hazards, and
 - mitigate and adapt to the risks of natural hazards, including risks of climate change and compounding risks,
- b) mitigating the impact of expected natural hazards through the siting and design of the development *including materials selection*.

Part 3 Assessment of development

Division 2 BASIX standards for residential development

SSROC supports the application of higher BASIX standards. However, councils would like more flexibility in responding to local risks and the aspirations of their community to set high BASIX standards for their community.

SSROC welcomes the review of the BASIX standards every three years noting that the water use target is a priority as it was not part of the current review.

Recommendation 9

SSROC recommends the DP SEPP be amended to enable local councils to set a higher BASIX standard for their community after a community feedback process.

Schedule 1 Energy and water use standards for non-residential development

SSROC commends the inclusion of sustainability standards across non-residential development. SSROC would like to work with the NSW Government on how implementation of these aspects will impact council assessment processes. There is also a need to understand the verification process and post construction commitments, and a need for training and support for council assessors.

Recommendation 10

SSROC recommends that the implementation phase for non-residential sustainability standards in the DP SEPP should fully define the verification processes for sustainability commitments and provide training for a range of stakeholders.

Part 4 Design review

Design Review Panels

While some councils already have Design Review Panels, many councils have legitimate concerns and questions about the costs and resourcing associated with administration of these Panels. This is particularly acute in light of the current financial plight of councils as discussed in the opening to this submission.

Under the new proposals, many councils will be required to establish Design Review Panels for the first time. SSROC notes that the draft Environmental Planning and Assessment (Design and Place) Regulation 2021 allows for a Panel to be established for two or more councils⁴. This model could address the issue but will require further consideration about how the costs are borne between councils and other logistics to be worked out.

Councils have differing views about how Panels should be established. Some councils have many years of experience appointing and successfully running Panels and are well-equipped to continue to do so. The DP SEPP and Regulation propose that the Minister appoint Panels in consultation with councils. SSROC would like to see these provisions broadened to permit alternative Design Review processes by agreement between local government and the Government Architect NSW, for example, panel members being appointed by council rather than the Minister based on expertise. Further consultation with local government should occur to agree an approach appropriate to the differing circumstances of councils across the state.

Recommendation 11

SSROC recommends that DPE engage with local government to agree a process for establishing Design Review Panels that is responsive to the different circumstances and experience between regional and metropolitan councils and those councils with experience in establishing and operating panels.

Design Verification

SSROC is concerned that the definition of “urban designer” is confusing and vague. It is not clear what constitutes 5 years experience in precinct or master planning. While there are definitions for “architect” and “landscape architect” in the draft EPA (Design and Place) Regulation it does not define a “qualified town planner”. It is unclear whether this a

⁴ See proposed clause 268B in the [Environmental Planning and Assessment Amendment \(Design and Place\) Regulation 2021 public consultation draft](#)

recognised planning degree or a qualification recognised by the Planning Institute of Australia.

Recommendation 12

SSROC recommends that DPE give further consideration to the definition of “urban designer” in consultation with local government practitioners and other bodies such as the Planning Institute of Australia prior to the DP SEPP being made.

Response to the draft Apartment Design Guide

Green Infrastructure (ADG, section 1.5)

The Apartment Design Guide (ADG) provides tree canopy targets, defines tree planting rates, considers species diversity and biodiversity in delivering canopy cover. It also prioritises the protection of existing trees. Where trees are not suitable for a site, then greening alternatives, such as green roofs and walls are encouraged to be factored into the design early in the process. This is aligned with local government advocacy to protect mature urban vegetation and that developments and precincts include measures to alleviate the urban heat island effect.

SSROC supports the modest increases to deep soil and tree canopy requirements and would support the more stringent requirements that were originally foreshadowed in the EIE.

The ADG Guide refers to trees that should be retained as ‘significant trees’. The terminology ‘significant tree’ is problematic. For most councils this means trees listed on a significant tree list or heritage list, however, there are many other trees in local areas which do not meet the ‘significant tree’ criteria but are well established and have considerable canopy and other benefits.

Recommendation 13

SSROC recommends that the reference to ‘significant tree’ in the Apartment Design Guide be replaced with ‘healthy and well-structured established tree’.

Apartment Mix and Diversity (ADG, section 2.3)

The ADG currently requires that a minimum of 20 per cent of apartments incorporate the Liveable Housing Australia (LHA) *Liveable Housing Design Guidelines* (LHDG) Silver Level universal design features⁵. It is disappointing that the opportunity has not been taken to increase these provisions in the Revised ADG, as was foreshadowed in the EIE for a Design and Place SEPP.

SSROC understands that the minimum 20 percent Silver Level has been retained while the NSW Government considers its position in relation to the agreement by Building Ministers in [April 2021](#) to include minimum accessibility provisions for residential housing and apartments in the National Construction Code based on LHDG Silver Level.⁶

SSROC is concerned that retaining the current provisions in the revised ADG will exacerbate the existing significant shortfall in accessible dwellings which limits opportunities for people with disabilities and others to access housing suited to their needs in their community.

⁵ [Apartment Design Guide](#), July 2015, Objective 4Q-1

⁶ [Building Ministers’ Meeting: Communique April 2021](#)

Recommendation 14

SSROC recommends the Apartment Design Guide be amended to increase the percentage of dwellings required to meet the Liveable Housing Design Guidelines (LHDG) Silver Level and require a proportion of dwellings meet LHDG Gold Level or an equivalent or higher standard.

Response to the draft Urban Design Guide

SSROC supports the objectives of the Urban Design Guide and the place-based framework. This aligns with our advocacy around achieving improvements in liveability and sustainability of our communities.

Objective 4 Place-based risks are mitigated, and ecological values sustained to ensure resilient communities

SSROC advocates for developments and precincts to include measures to alleviate the urban heat island effect. Heat kills more Australians than any other natural disaster yet is not specifically mentioned as a risk under Objective 4. For heat mitigation to be incorporated into the design phase, assessment guidance is needed. SSROC noted that LGNSW, in partnership with the NSW Government, has funded Western Sydney Regional Group of Councils to develop the [Cool Suburbs Tool](#) to identify the most appropriate urban heat interventions to existing and new developments which may provide useful guidance for proponents and assessors.

Recommendation 15

SSROC recommends that the Urban Design Guide be amended to strengthen the coherence and implementation of Objective 4:

- Identify heat as a natural hazard e.g. To reduce the impacts of hazards such as *heat*, bushfire, drought or flooding, whether natural or human induced.
- Provide assessment guidance for addressing urban heat at the precinct scale.
- Including references to other hazard related guidance including the Floodplain Management Manual and Planning for Bushfire Protection 2019 guide.
- Provide proponents and assessors with appropriate tools such as the flagged 'design for resilience' template and accompanying guideline.

Objective 10 Tree canopy supports, sustainable liveable and cool neighbourhoods

Objective 10.1 of the UDG relates to enhancing urban tree canopy and includes point 5: *Consider site-specific constraints and requirements when planting trees and ensure future flexibility*. SSROC proposes a strengthening of the wording of 'future flexibility'.

Recommendation 16

SSROC recommends that the wording of objective 10.1 point 5 in the Urban Design Guide be amended to read:

- *Consider site-specific constraints and requirements when planting trees and ensure well designed and constructed spaces for mature trees.*

Species selection is included in point 6 of objective 10.1. It is suggested that this section could also be strengthened by the addition of *species diversity*, not just biodiversity, which focussed on native flora and fauna.

Recommendation 17

SSROC recommends that the wording of objective 10.1 point 6 in the Urban Design Guide be amended to read:

- *For species selection, gain maximum benefits from the urban canopy by considering species suitability for the site attributes and constraints, species diversity and contribution to biodiversity.*

The placement of trees to allow for maximum canopy growth is covered in objective 10.4 requiring the appropriate selection of tree species *to avoid new tree placement that blocks high-amenity views*. However, a 'high amenity view' could be defined and interpreted in many ways and apply to a range of views from water to bushland and city views. Given the complexity of this definition, and the possibility of a wider than anticipated scope, SSROC suggests this point be deleted or reworded.

Recommendation 18

SSROC recommends that objective 10.4, point 2 in the Urban Design Guide be deleted to remove the reference to 'high amenity views'.

Objective 18 Built form enlivens the ground plane and activates and frames public space

Urban heat islands are also influenced by hard, sealed surfaces in the public streetscape. Urban heat could be addressed through *18.5 Consider the impacts of material choices by* listing light finishes or avoiding materials with a low Solar Reflectance Index.

Part C: Specific comments on Waste Management

(Apartment Design Guide, section 3.3)

SSROC councils play a lead role in providing waste, recycling and other resource recovery services to their communities. Waste management is complex, and every council across NSW is required to deliver an increasing range of waste services within their communities, therefore getting it right is vital. Where good waste outcomes are not achieved the implications can impact human and environmental health with significant perverse outcomes.

Some of the key considerations impacting local councils' ability to deliver waste services include:

- Increasing waste generation rates, according to the NSW EPA in 2018–19 the average NSW household generated 21.75 kg of waste a week
- State and Federal mandates to meet waste diversion rates and emissions reduction targets including the Waste and Sustainable Materials Strategy: 2041
- Increasing community expectations borne out of concern for a changing climate
- Pressure from population growth and increasing community diversity
- The need to activate Circular Economy principles
- Changing waste servicing requirements both in terms of storage and collection.

To overcome challenges and meet waste diversion targets and other sustainability objectives a clear regulatory framework is essential. The Waste and Sustainable Materials Strategy (WaSM)

2041⁷ will help guide NSW in achieving the ambitious target of an 80% recovery rate from all waste streams by 2030 through the implementation of multiple strategic priorities. To this end, the draft DP SEPP and ADG offer important vehicles to ensure that the NSW State Government can work collaboratively with local government to implement these strategic waste programs and meet the objectives of WaSM specifically with regard to the management of organic waste (food organics/garden organics).

SSROC acknowledges that the DP SEPP mandates consideration of the ADG and UDG and clarifies that the assessment of new developments is to be against the objectives of the relevant guide.

We make the following comments regarding the proposed waste objectives contained within the ADG. Further detailed comments can be found in Attachment 1.

Objective 3.3.1

Whilst there is minimal change between objective 4W-1 in the current ADG and objective 3.3.1 in the Revised ADG, SSROC would recommend that the term “waste storage” be replaced with “waste infrastructure” as this term has broader application. Waste infrastructure would include “waste storage and collection areas”.

Objective 3.3.1 in its current phrasing also implies that waste storage could impede streetscapes and visual amenity, but this overlooks the opportunity for well-planned infrastructure that is responsive to future needs to be integrated into the overall design of the development so that it contributes to the built form and liveability of the dwelling and surrounds. There is the potential to rephrase this objective to ensure these opportunities are also identified. Refer to Appendix 1 for more detailed advice.

Objective 3.3.2

SSROC supports the change from Objective 4W-2 in the current ADG to Objective 3.3.2 which now reflects additional waste streams such as organics. This is essential, considering the organics mandate proposed under the WaSM strategy and with respect to the safe handling of problem household wastes which could include new collection opportunities in the future. To build upon this positive change this objective could be more prescriptive and identify other waste streams including “bulky waste”. Bulky waste is problematic when inadequate storage leads to residents placing waste on footpaths and kerbsides, impacting amenity, and is difficult and costly for councils to manage. Whilst many councils have bulky waste collections in place there are several key factors which can influence the efficiency and safety of such collections including appropriate storage and access for service providers.

Objective 3.3.2 could also be expanded to make clear that safe and convenient onsite facilities should represent more than one integrated waste storage area. Such facilities should be present within apartment kitchens to maximise organic and inorganic recycling at the source, include safe, hygienic and accessible waste storage within apartment buildings which have clear carting routes connected to a communal integrated storage area. Feedback from councils has repeatedly indicated that having good opportunities to separate waste at the source typically leads to increased resource recovery, greater participation in waste separation and a reduction in contamination.

SSROC also recommends a third objective be included in the revised ADG to adequately address waste collection to avoid poor outcomes, including collection vehicles being unable to access waste storage areas. The proposed third objective covering waste collection could be:

⁷ <https://www.dpie.nsw.gov.au/our-work/environment-energy-and-science/waste-and-sustainable-materials-strategy>

Proposed Objective 3.3.3 - *Provide adequate waste storage capacity and access to ensure that the development can be serviced safely and efficiently and to maximise resource recovery.*

If a third objective is not considered possible, consideration could be given to expanding Objective 3.3.1 to not only include waste infrastructure but also waste collection services.

Recommendation 19

SSROC recommends that the Apartment Design Guide be amended to:

- Expand waste objective 3.3.1 to refer to waste infrastructure;
- Expand objective 3.3.2 to cover the wider range of waste types; and
- Include a new (third) objective 3.3.3 to adequately address waste collection to better support councils with waste management service delivery.

Design Guidance for Waste Collection

Developing appropriate waste servicing arrangements for new developments is a critical aspect of the development application process for councils and the inclusion of council endorsed/standardised (but not mandated) waste servicing plans is one area which can support council planning staff in ensuring good waste management outcomes.

The complexity of waste servicing is set to increase for many councils with the WaSM Strategy setting out priorities for organic waste diversion and a mandated separate collection of food and/or garden organics for all NSW Councils by 2030. This will result in an increase of kerbside bins for all residential properties, meaning greater requirements for internal waste infrastructure to store and relocate organic waste, capacity within waste storage areas for a third type of bin, along with an increase in the area available for bin presentation to the kerb (where applicable). This will be coupled with an increase in waste truck movements to service a third bin.

To provide adequately sized infrastructure, the waste generation calculation needs to be based on local waste data however SSROC supports a minimum standard within the ADG. Waste generation rates may be impacted by population age, diversity and a range of other social variables including size of households and councils should have an opportunity to provide input into this process to determine a localised calculation based upon their specific community profile. Councils may have higher specifications for their community.

Safe access to integrated waste storage rooms is essential and is not fully prescribed within the revised ADG. Although reference is made to safety and limiting residents access to chutes and compactors, the guidance should go further to refer to the safety of service staff including cleaners, building managers and waste collection staff. Furthermore, the guidance could refer to the relevant Australian Standards as they apply to waste collection services and reference better practice options such as the nose in/nose out waste collection vehicle movements which many councils recommend ensuring pedestrian and service staff safety.

Section 1.3 of the revised ADG refers to site access and speaks to design considerations which may minimise conflicts between pedestrians, vehicle access and movement routes adjoining the site. SSROC notes that this could be expanded to make specific reference to ensure waste infrastructure and servicing requirements are integrated into the overall design if the development is to avoid poor amenity and environmental outcomes as displayed in Images 1 and 2.

In the case of large apartment buildings this would include facilitating access by a heavy rigid waste collection vehicle collecting from the site on multiple occasions per week. As such the potential amendment could read; *Minimise conflicts between pedestrians, vehicle access, service vehicles (such as waste collection vehicles) and movement routes adjoining the site.*



Image 1 & 2: pedestrian access and safety impacted plus poor amenity outcomes from inadequate planning for waste collection services.

Design Guidance for Waste Storage

As previously identified, appropriate waste storage infrastructure is critical to ensuring waste is separated at the source, leading to higher rates of resource recovery and lower contamination within apartment buildings. SSROC makes the following comments and recommendations regarding the opportunities to strengthen the design guidance around waste storage.

The revised ADG expands the reference to options for waste separation at the source and SSROC strongly supports this, especially the direct reference to providing two days' worth of storage in apartment kitchens to allow for organics and recycling to be separated from residual waste. There is strong support from within the sector that where the infrastructure exists to make waste separation easy the result is a higher uptake by residents and less contamination.

SSROC concurs with the need to separate commercial waste infrastructure in mixed-use developments both to ensure the safety of residents and tenants and for effective resource recovery.

There are some concerns across the local government sector regarding waste chutes in Figure 3.3.1. It is clear that councils have varying preference to the operation of waste chutes. Whilst waste chutes can offer spatial efficiencies, reference to the individual waste streams should be removed and a more general comment aligning with local practice would potentially be more useful and allow councils the flexibility to manage this based on the waste services available.

Waste chutes in residential apartment buildings (especially for organics) can lead to hygiene issues as well as potentially increasing contamination rates when used incorrectly. Some councils have provided feedback suggesting that a FOGO collection area rather than a chute is a more appropriate option within apartment buildings. Further to this, any storage and disposal option sited within a corridor should be very carefully considered to determine the appropriate mix of chutes and storage along with the method by which stored waste is transported to the integrated area.

Figure 3.3.1 refers to diverter systems which councils have found problematic. Councils have also found issues with the operation of turntables in apartment buildings and prefer to allow front in/front out access for collection vehicles. SSROC recommends removal of the reference to diverter systems and for councils to have the flexibility to recommend these at the council planning level where appropriate.

Both waste storage in residential corridors and integrated waste rooms should be well designed and meet all accessibility standards to ensure the safety of residents and service staff. Access doors should be a minimum double door and/or 2 metres in width to allow for maximum manoeuvrability of the bins within the room and allow bin movements to ensure bins are not overflowing and are easy to access.

Figure 3.3.3 does not necessarily reflect the preference of councils regarding waste room design and potentially should be removed in favour of enabling councils to recommend the design of the room at the council planning level. The revised ADG could refer to the key features that should be considered as part of waste storage design and these may include (but not limited to); minimum door width of 2m/double doors to allow for access, minimum floor size upward of 9m² to cater for recycling, organics and residual waste as well as allowing provision for future waste collections of textiles, e-waste, soft plastics as well as providing for a general bulky waste collection area. Resident and service staff amenity and safety can be impacted by poor design, as shown in Image 3. In addition to the size of integrated waste storage rooms, we concur with the recommendation contained in the design guidance covering the need to include hot and cold water for washing, access to sewer, excellent ventilation and lighting and other measures such as tiling of floors to ensure hygiene and safety.



Image 3: inadequately sized bulky waste storage room.

Recommendation 20

SSROC recommends that updates should be made to the design guidance in the Apartment Design Guide for waste collection and waste storage to ensure good waste outcomes can be achieved.

5 Conclusion

Thank you for the opportunity to comment on the Design and Place State Environmental Planning Policy. The breadth of the proposed SEPP is ambitious and should continue to be developed with extensive input from Councils to correctly navigate the intersections of the SEPP with local plans.

SSROC member councils cover a large portion of Greater Sydney and have a direct interest in supporting and advocating for changes to improve and sustain place-making and urban design and amenity. SSROC would encourage the SEPP review process to consider the opportunities noted in this submission to strengthen what has been proposed through supporting local councils' strategic planning role. Local planning strives to both adopt and adapt sound planning and design principles to place-making in ways that respond to their local contexts, with their built and natural environments, to better meet community and business needs and aspirations will responding to the challenges of growth and a changing climate.

In order to make this submission within the timeframe for receiving comments, it has not been possible for it to be reviewed by councils or to be endorsed by the SSROC. I will contact you further if any issues arise as it is reviewed. If you have any queries, please do not hesitate to contact me or Mark Nutting, SSROC Strategic Planning Manager on 8396 3800.

The new SEPP's provisions will no doubt have a major impact on facilitating place-making and our local councils' role in delivering and implementing changes in support of good design for our communities.

Again, thank you for the opportunity to comment on the draft Design and Place SEPP. SSROC would welcome the opportunity to assist with further information during this review to ensure the views of our member councils continue to be considered.

Yours faithfully



Helen Sloan
Chief Executive Officer
Southern Sydney Regional Organisation of Councils

Attachment 1: Design and Place SEPP and Apartment Design Guide

Feedback on principles related to waste and resource recovery

1. Design and Place SEPP - Design Principles and Design Considerations

Design Principle	Design Consideration	Recommendations
<p>To deliver sustainable and greener places to ensure the well-being of people and the environment</p>	<p>21 - Resource efficiency and emissions reduction</p> <p>(b) is designed to minimise waste from associated demolition, construction and during the ongoing use of the development, including by the choice and reuse of building materials.</p>	<p>Amend Design Consideration clause (b) to instead read:</p> <p>b) is designed to:</p> <ul style="list-style-type: none"> • minimise waste from associated demolition, construction and during the ongoing use of the development, including by the choice and reuse of building materials; • ensure there is adequate space and access for the separation, storage and collection of waste and recycling; and • ensure circular economy design principles are embedded into the design and construction of the building. <p>Rationale - Waste and recycling from ongoing use of the development needs to be separated, as the type of waste produced by residents is very different to demolition and construction waste. This will also support objectives proposed in the Apartment Design Guide (ADG), to ensure there is a link between the ADG and SEPP with regards to operational/ongoing use waste.</p> <p>The draft DP SEPP represents a significant opportunity to apply circular economy principles across the life cycle of new developments in ensuring new buildings are both durable and adaptable and accord with state adopted circular economy principles that feature across a number of endorsed state government policy such as:</p> <ul style="list-style-type: none"> • <i>Greater Sydney Region Plan and supporting District Plans</i> • <i>Circular Economy Policy Statement (February 2019)</i> • <i>NSW Waste and Sustainable Materials Strategy 2041.</i>

<p>Promote productive and connected places</p>	<p>19 - Sustainable transport and walkability</p>	<p>Insert new sub clause: (f) minimise the impact of waste storage and collection on public spaces.</p> <p>Rationale: On-street waste presentation (of bins and bulky waste) and collection can create hazards for active travel and pedestrians and detracts from walkability and amenity. Councils receive numerous complaints from people trying to negotiate kerbs lined with bins. Council is also aware of the risks this creates when pram and wheelchair users are forced into the street because bins have formed an impassable barrier, or when bins are placed on the roadway causing traffic and pedestrian hazards.</p> <p>This will support ADG objective 3.3.1, which is not currently addressed in the SEPP.</p>
	<p>21 - Sec 21(c) minimises greenhouse gas emissions as part of the goal of achieving net zero emissions by 2050, including by incorporating the following:</p> <ul style="list-style-type: none"> I. Passive design II. Energy efficiency III. The use of renewable energy 	<p>Amend to include:</p> <ul style="list-style-type: none"> I. Passive design II. Energy efficiency III. The use of renewable energy IV. Resource recovery principles <p>Rationale: The reduction of carbon emissions from recycling and resource recovery is key to achieving net zero emissions. This has been demonstrated in several studies and reports from State and Federal government indicating that organics diversion from landfill is paramount. Although the generation of methane (21 times more potent than carbon) occurs off-site, methane generation indirectly from developments must be taken into consideration for an effective zero carbon emissions commitment.</p>

2. Apartment Design Guide (Guide)

General comments:

Councils are concerned that the waste section did not include “design criteria” but only “design guidance. To remedy this, the objectives need greater detail and strength. If adequate waste collection, storage and access for a council’s service vehicles are not prioritised at the design stage then the financial and safety consequences for the occupants, surrounding street and councils waste services are highly deleterious. Currently, in Sydney there are many examples of apartments that did not allow sufficient ceiling heights or adequate space to be serviced onsite by council waste collection services creating a number of costly ongoing impacts for affected streets:

- impassable barriers of bins on collection days creating traffic and pedestrian hazards;
- increased dumping and high contamination of recycling in buildings due to inadequate waste storage, and
- occupants having to pay higher fees for bespoke arrangements to get their building serviced by a private company.

Objectives		
Objective (revised)	Recommendations	Rationale
3.3.1 Minimise waste storage impacts on the streetscape, building entries and amenity of residents.	Amend to instead read: Waste storage and collection areas are designed to minimise impacts on the streetscape, building entry and amenity of residents, neighbouring sites and pedestrians.	Critical to minimise both storage and collection impacts. Collection impacts typically effect an entire street (e.g., bins wheeled out to the kerbside, verge or placed on the road can create safety and traffic hazards for all users).

<p>Introduction text: Well-designed infrastructure for safe and convenient collection and storage can help to minimise waste by promoting best practice management, including separation of waste streams for recycling.</p>	<p>Amend introduction to instead read:</p> <p>Sustainable waste management is relevant throughout the life cycle of a development and best considered early in the design process.</p> <p>Best practice waste management involves source separation to allow for better use of resources and the minimisation of waste disposal. The effective management of resources from domestic and commercial waste contributes to residents' and neighbours' visual and physical amenity and limits potential harmful environmental impacts.</p>	<p>'Source separation' is required for the efficient management of waste resources. Inclusion of the word 'sustainable' in the 'waste management' sphere is recommended. This activity is not only about managing waste to keep a safe and healthy environment, but also about ensuring that waste has a value, which in turn will drive the Circular Economy (alignment with State and Federal Direction) and ensure waste minimisation.</p> <p>Recycling should be mandatory.</p>
--	---	---

<p>3.3.1 Minimise waste storage impacts on the streetscape, building entries and amenity of residents.</p>	<p>Amend to instead read:</p> <p>Minimise waste storage and collection impacts on the streetscape, buildings entries and amenity of residents and the neighbourhood.</p>	<p>It is critical to minimise both storage and collection impacts on the streetscape.</p>
<p>3.3.2 Minimise occupants' waste to landfill by providing safe and convenient onsite organic and inorganic waste and recycling facilities.</p>	<p>Amend to instead read:</p> <p>Minimise occupants' waste to landfill by providing waste and resource recovery facilities that promote waste stream separation, including safe and convenient onsite organic and inorganic waste and recycling facilities. Bin capacity and bin storage areas to be calculated with reference to current waste/recycling generation rates.</p>	<p>The proposed expansion of Objective 3.3.2 would require new developments to consider and demonstrate how the efficient waste separation of general waste, recycling and organics as well as problem waste occurs on site.</p>

<p>Proposed new objective (3.3.3) Provide adequate waste storage capacity (for minimum 3 days generation) and access to ensure that the development can be serviced safely and efficiently and to maximise resource recovery.</p>		<p>This objective would strengthen the need for developers to design waste storage spaces and truck access that can be serviced as part of the standard council service, avoiding the need for bespoke arrangements, high frequency of servicing and unintended on-street servicing due to access issues.</p>
--	--	---

Design Guidance

Waste Collection	Recommendations	Rationale
Integrate waste management infrastructure to facilitate separation of waste, recycling and organics at the point of disposal – for large buildings, on each residential level.	Agreed, but some SSROC councils suggested expanding the reference to include storage for 3 days of waste, and recycling on each residential level.	Some designers or developers may not realise that these buildings may not be serviced daily.
Prepare an operational waste management plan for residents (and other occupants in mixed-use developments) addressing waste collection, separation and storage, including locations of collection points, bin cart routes and equipment such as chutes	<p>Amend to include additional points in blue below:</p> <p>Prepare an operational waste management plan for residents (and other occupants in mixed-use developments) addressing expected waste generation rates, waste collection, separation and storage, including the number and location of bins / collection points, bin cart routes and equipment such as chutes.</p> <p>The Plan should also detail responsibilities for how waste will be collected and managed for the development. For large buildings a loading dock management plan should be included along with maintenance agreements for any large-scale infrastructure such as turntables, hoists, and bin lifts.</p>	<p>The proposed amendment expands the considerations and inclusions for the preparation and submission of a waste management plan for new residential apartment buildings.</p> <p>The waste management plan is a valuable tool in demonstrating how the consideration of waste and resource recovery has been integrated cohesively within the development and will support the delivery of the local council waste service.</p>
For safety, limit direct resident access to any areas that house chute systems and compactors.	<p>Amend to include additional point in blue below:</p> <p>For safety, limit direct resident access to any areas that house chute systems and compactors. Some local councils do not permit the use of compactors and may have different rules for chute systems. [Check the local development control plan].</p>	Some councils have different rules regarding the use of compactors and some styles of chutes such as e-divertors. It is important that they check the local development control plan at the design stage.

<p>Integrate all waste management facilities and collection infrastructure within the built form of the development to improve amenity for residents and the neighbourhood.</p>	<p>Amend to include “collection staff”: Integrate all waste management facilities and collection infrastructure within the built form of the development to improve amenity for residents, collection staff and the neighbourhood.</p>	<p>The health and safety needs of collection staff such as cleaners aren't always considered at the design stage.</p>
<p>Proposed new design guidance: Integrate development design with local council waste collection service. For some developments this may include an on-site waste collection service, on-site loading, maneuvering and access by Councils Heavy Rigid Collection Vehicles (Australian Standard 2890.2 Parking Facilities: Off Street Commercial Vehicle Facilities).</p>		<p>An additional design guidance for waste collection is proposed that responds to the need for new developments to give early and adequate consideration of a council's waste collection service to ensure safe, affordable and sustainable outcomes for the community. Unfortunately, there have been many examples of developments where waste management (particularly designing for waste collection) has been an afterthought, resulting in impeded access of essential waste collection vehicles, inadequate kerbside space resulting in bins on road thereby impacting amenity and public safety, additional costs to the ratepayers and services unable to be provided by Council, resulting in residents left without recycling and bulky waste services.</p> <p>An additional design guidance for waste collection is proposed to ensure new developments are integrated with a council's waste collection service and reflect that waste collection services for residential apartment buildings vary across local government boundaries.</p>

Design Guidance		
Waste Storage	Recommendations	Rationale
<p>In mixed-use developments, separate residential waste infrastructure from commercial waste infrastructure to facilitate secure management.</p>	<p>Amend to include additional point in blue below: In mixed-use developments, residential and commercial waste infrastructure must be separate, to facilitate secure management, and to maximise source separation and recycling.</p>	<p>Important that residential and commercial waste infrastructure is not only separate but is set up to separate each type of waste to maximise recovery.</p>

<p>Allocate communal space for residents to temporarily store unwanted bulky items such as furniture, appliances and mattresses awaiting disposal through council's clean-up service, or to be available for re-use by other residents.</p>	<p>Amend to include additions in blue below:</p> <p>Allocate separate, self-contained communal space (e.g., room or caged area) for residents to temporarily store unwanted bulky items such as furniture, electrical items, textiles, soft plastics and mattresses awaiting disposal through council's clean-up service, or to be available for re-use by other residents.</p>	<p>Safety – bulky items can topple over or become trip hazards.</p> <p>Expanded to refer to hard to recycle items that are not accepted in the yellow bins or bulk waste collection services, including textiles, soft plastics and electrical items.</p> <p>Guidance on the collection of bulky waste is not included nor the space required for storage of bulky waste; one of our councils have suggested a minimum of 9m² for large unit blocks.</p>
<p>Locate communal waste and recycling storage rooms in convenient and accessible locations for each vertical circulation core.</p>	<p>Amend to include:</p> <p>Locate communal waste, organic waste and recycling storage rooms in safe, convenient and accessible locations for all users (including collection staff), for each vertical circulation core.</p>	<p>Organic waste will be collected in most high-rise developments to meet the NSW Government mandate for organics collection by 2030. All users including collection staff but the needs of both occupants and collection staff need to be considered in the design.</p>
<p>Where applicable, allow for vehicle access (as required by Australian Standards) on site for local council or contracted waste collection service vehicles.</p>	<p>Define Heavy Rigid Vehicle as per Australian Standard 2890.2</p> <p>Parking Facilities: Off Street Commercial Vehicle Facilities.</p>	
<p>Locate collection infrastructure for council waste collection services wholly within the development's basement and within close proximity to the onsite loading dock to permit</p>	<p>Amend: Where feasible, locate collection infrastructure for council waste collection services wholly within the development's footprint and within close proximity to the onsite loading dock to permit unobstructed access for waste collection staff.</p>	<p>Not all sites can physically fit a Council HRV in the basement and the site needs to be of adequate size to accommodate Council's largest vehicle on-site.</p> <p>Most residential apartment buildings of 3 or more storeys will be required to have on-site collection. Locate collection infrastructure for council waste</p>

<p>unobstructed access for contractors.</p>		<p>collection services wholly within the property, and within close proximity to the onsite loading dock to permit unobstructed access for contractors.</p> <p>Collection vehicles must be able to enter and exit the site in a forward direction, with clear driver sight lines of footpaths and roadways.</p> <p>Waste collection from basements incurs potential for damage to parked cars and infrastructure, adds safety risks for waste crews, takes additional time, and adds health and amenity problems. It also requires ceiling heights of 4.5m, which are very contentious for some developers, as well as a host of other requirements including gradient, load bearing, turning opportunities and overhead space that is free of utilities.</p>
<p>Proposed new design guidance: Adequately sized waste storage area that meets Council requirements for storage and separation of streams.</p>		<p>This is in current ADG but is missing in draft ADG.</p>
<p>Proposed new design guidance: Waste storage area is designed to allow bins to be easily maneuvered within and between storage and collection points.</p>		<p>This is in current ADG but is missing in draft ADG. This needs to be reflected within the diagram figures.</p>
<p>Proposed new design guidance: Demonstrate that organic waste can be managed in the development through measures such as: Multiple options for on-site organic waste management to maximise recovery</p>		<p>It is proposed that additional design guidance for waste storage be included that addresses how new developments will integrate organic waste separation and collection within new developments.</p> <p>While some local councils may not be ready to provide an organic waste service to all new residential apartment buildings, it is important that new buildings are designed to future proof developments to ensure compatibility with future organic waste service.</p> <p>The <i>Better practice guide for resource recovery in residential developments</i> (EPA) identifies that “<i>food waste can make up 70% of the average residential bin and is a highly recyclable product when source separated</i>”.</p>

<p>(e.g.</p> <ul style="list-style-type: none">• communal composting, worm farms, individual composting, dehydrators;• Organics and recycling service to all households;• Consolidated organic waste drop off points designed to minimise any potential odour and vermin risks. This includes the provision of rooms that are temperature controlled and suitably ventilated.		<p>The importance of ensuring new developments support separation of organic waste should not be underestimated and would support achieving adopted targets and commitments within the Waste and Sustainable Materials Strategy.</p>
--	--	--

Other Areas of the ADG linked to Waste:

Section of the draft ADG	Design consideration	Recommendations
1.3 Site access and address	<p>Accessibility and serviceability:</p> <p>Minimise conflicts between pedestrians, vehicle access and movement routes adjoining the site.</p> <p>Provide clear sightlines where vehicles cross pedestrian pathways.</p>	<p>Minimising conflict and maintaining safety of residents, staff and visitors providing services is vital.</p> <p>Proposed amendments:</p> <p>Minimise conflicts between pedestrians, vehicle access, service vehicles (such as waste collection) and movement routes adjoining the site.</p> <p>Ensure the safety of all users including services (such as waste collection) and provide clear sightlines where vehicles cross pedestrian pathways</p>

<p>1.4: Relationship to the street</p>	<p>Utilities and building services:</p> <ul style="list-style-type: none"> • Reduce the visual impact of utilities and building services on public space by locating them in basement car parks wherever possible, including substations, pump rooms, water tanks and waste storage areas. • Where building services are required to be located at or above ground level, including waste facilities, loading areas, car parking vents, rainwater goods, and infrastructure for electrical, fire, hydraulic or mechanical services, ensure they are: <ul style="list-style-type: none"> ○ visually and physically recessive ○ integrated with the development's built-form and landscape ○ not in front of the primary building frontage ○ screened with planting or other design elements. 	<p>See previous comments regarding basements. Some sites are unlikely to accommodate onsite basement due to size of blocks and street frontage. Needs to also note that vehicle access is required to meet the applicable waste collection service provided by Councils.</p> <p>Waste facilities must be located within the applicable bin carting distance.</p>
--	--	--

<p>1.6 Parking</p>	<p>Vehicle entries:</p> <p>Balance the visual impact of vehicle entries so they are clearly visible but also recessive to the overall building form and streetscape.</p> <p>Locate car park and vehicle entries behind the building line.</p> <p>Design and locate vehicle access points to achieve safety, minimise conflicts between pedestrians and vehicles, and create high-quality streetscapes. Where possible locate vehicle access to the site for servicing and car parking on secondary streets, to minimise the impact on public space.</p> <p>Minimise the width and number of vehicle access points, ramp length and visual impact.</p>	<p>It should be reflected within the ADG that waste collection vehicles require specific height clearances for movement, circulation and operation to ensure that waste collection safely and efficiently takes place.</p> <p>This factor needs to be considered in the overall design and site layout to minimise impacts on the built form and streetscape.</p> <p>Proposed amendments:</p> <ul style="list-style-type: none"> • Balance the visual impact of vehicle entries so they are clearly visible but also recessive to the overall building form and streetscape without limiting the ability to safely and efficiently service (such as waste collection) and access the site. • Design and locate vehicle access points to achieve safety, minimise conflicts between pedestrians and vehicles, and create high-quality streetscapes without limiting the ability to safely and efficiently service (such as waste collection) and access the site. Where possible locate vehicle access to the site for servicing and car parking on secondary streets, to minimise the impact on public space. • The dimensions of service vehicles need to be considered and integrated into the overall development to reduce the impact on the built environment and streetscape.
	<p>Car parking:</p> <p>Consider deep soil zones, stormwater management and the retention of trees during initial design stages, as these can affect the size and shape of a car park footprint.</p>	<p>This requirement needs to consider access requirements for services, including waste collection if located in the basement.</p> <p>Proposed amendment:</p> <p>Consider deep soil zones, stormwater management, the retention of trees and servicing requirements (such as waste) for the development during initial design stages, as these can affect the size and shape of a car park footprint and basement design (including height clearances).</p>

Appendix5.2	Kitchen furniture schedule	<p>Support the inclusion of waste bin and recycling bin, however the diagrams should include:</p> <p>A recycling bin (in all diagrams);</p> <p>Drawing and dimensions for waste, recycling and organics bins for all apartment types. Bin sizes should increase in size relative to number of bedrooms; and</p> <p>An additional bin for the storage of recyclables such as batteries, textiles, soft plastics and light globes.</p>
-------------	----------------------------	--

Section 2.6 Panel member induction and training	<p>Panel members should complete an induction and training before the first session of a design review panel. As a minimum, training should cover:</p> <ul style="list-style-type: none"> • Understanding conflicts of interest and codes of conduct • Confidentiality • The NSW protocols for good design review • How to use the DP SEPP design • Principles to frame a discussion and provide advice • The local planning context • Local council waste service • Confirmation of the panel members • Availability for all sessions. 	<p>Amend to include 'Local council waste service' in the training topics.</p> <p>It is essential that panel members have a strong understanding of the local waste service including waste collection vehicles (sizes) and how waste is collected so that they can provide design advice that also aligns with individual council waste servicing requirements. Failure to provide due consideration and correct advice regarding local council's waste service responsibilities and requirements can have significant impacts on the design of the development that are often costly and timely for both the applicant and local council.</p> <p>These costs are often then passed on to the wider community, who are left with not only the financial burden but adverse amenity and safety impacts.</p>
--	---	--