

25 March 2022

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NSROC Submission to the Department of Planning and Environment (DPE) on the proposed reforms to the Design and Place SEPP.

NSROC member councils service an area extending from the Hawkesbury River in the north to Sydney Harbour in the south, west to Meadowbank on the Parramatta River. The eight NSROC member councils are Hornsby Shire Council, Hunter's Hill Council, Ku-ring-gai Municipal Council, Lane Cove Council, North Sydney Council, Mosman Municipal Council, City of Ryde and Willoughby City Council. The region has limited new release development areas and faces considerable cost constraints in sourcing land for community infrastructure.

Northern Sydney Regional Organisation of Councils (NSROC) appreciates the opportunity to make a submission on the proposed reforms to the Design and Place SEPP (the SEPP). It is however, disappointing that we were not afforded more time to provide feedback given the unprecedented level of change and reform currently expected of councils. Councils are currently under enormous time and resource pressure dealing with the induction of new councillors, the impact of COVID on revenue and the volume of NSW government regulatory reform requiring response.

The review and integration of a number of related policies and instruments into the SEPP offers the opportunity to create a comprehensive resource covering a wide range of issues impacting urban development and place making. Individual council submissions detail local or technical concerns and offer solutions to address these. This submission represents an overarching position for the region.

Councils acknowledge the need to improve the planning proposal process to facilitate more efficient and transparent decision making, however this must be balanced to ensure the quality of decision making remains of the highest order.

The aims of the new SEPP are generally supported including:

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

NSROC supports the SEPP's place-based approach with an emphasis on quality design, open space, mitigation of urban heat and improved provision of the active transport network. However, we would argue that there is scope to increase the focus on sustainability and resilience in the final SEPP and Guidelines. Effective and well considered planning decisions made in the short term will support community, industry and the economy to respond to shocks (economic, environmental, pandemic/health etc) in the long term, building resilience.

The State Government's NSW Waste and Sustainable Materials Strategy 2041 highlights the commitment to transition to a circular economy over the next 20 years. The 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.

NSROC also suggests changes in the details of the Apartment Design Guide and design guidance which are predominantly aimed at ensuring that waste management is considered as early as possible in the building design and siting process because of its importance in the long term amenity and liveability of the development and its surrounding public space (attached).

The SEPP represents a substantial shift in the planning regulatory environment. There must be a minimum period of 12 months from when the SEPP is finalised until it comes into effect. To ensure the successful implementation of the SEPP, the NSW Government must provide support and training to applicants, assessors and the community prior to its commencement.

While the establishment of the SEPP is generally supported, Government's relentless pursuit of reform across a broad range of sectors is creating a significant financial and administrative burden for councils. This is at a time when councils need to be working closely with community and local business to restart the local economy and build resilience. The ongoing pace of reform, which in turn generates financial uncertainty, is not sustainable and will impact on service delivery. Following is a small sample of what has been requested in recent months, it is not exhaustive.

Councils have been asked to provide detailed data and feedback on:

- Waste and Sustainable Materials Strategy implementation and the move to mandate FO/FOGO
- Changes to Domestic Waste Charges
- Changes to the collection and expenditure of infrastructure contributions
- Changes to the essential works list
- Establishment of benchmark costs for local infrastructure
- Australian Energy Regulator – Ring-fencing Guidelines
- Local Government Tendering Regulations
- Review of General Manager and Senior Staff Salaries
- A new approach to rezonings – Discussion Paper

Much of this consultation has occurred with short timelines for feedback, during a period of council change as local government elections were delayed, and more recently returning/new councillors and Mayors briefed. NSROC member councils seek greater coordination at the State Government level to ensure that local councils are not overwhelmed with simultaneous and significant requests.

Thank you again for the opportunity to make a submission on the proposed reforms to the Design and Place SEPP. If you require further information, please don't hesitate to contact me on 0401 640 823 or mmontgomery@lanecove.nsw.gov.au.

Yours sincerely



Dr Meg Montgomery
Executive Director NSROC

Draft State Environmental Planning Policy (Design and Place) (DP SEPP)		
Part 2 Design principles and design considerations	Potential Amendment	Comments
<p>13(1) Development consent must not be granted for development to which this Policy applies unless the consent authority is satisfied that the development is consistent with the design principles.</p> <p>13(2) In determining whether development is consistent with the design principles, the consent authority must take into account the design considerations for each design principle.</p> <p>13(3) Sections 14–23 set out the requirements for a consent authority in relation to each design consideration.</p> <p>Design Consideration: 8) Resource efficiency and emissions reduction Section 21: The consent authority must consider whether the development—</p> <p>(a) for urban design development involving subdivision—minimises, and excludes as far as practicable, the use of on-site gas for cooking, heating and hot water, and</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>(c) minimises greenhouse gas emissions, as part of the goal of achieving net zero</p>	<p>Split consideration 21(b) to separate considerations surrounding waste and resource recovery and circular economy.</p> <p>Suggestion amendment: Delete: <i>21(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</i></p> <p>Insert 21(b1): <i>Is designed to ensure design and construction techniques contribute to the circular economy and circular economy design principles are embed into the design of the building.</i></p>	<p>It is recommended that clause 21 of the draft DP SEPP be amended to make specific reference to and include a stand-alone design consideration for circular economy.</p> <p>There is a strong need for clear planning policy direction that supports the implementation of circular economy principles across all phases of the development process.</p> <p>The existing written form of 21(b) is lengthy and the important need to reduce waste in the development's ongoing use is lost by integrating two issues in one point.</p> <p>The proposed amendment would better support the delivery of:</p> <ul style="list-style-type: none"> design principle (4): design sustainable and greener places to ensure the wellbeing of people, and the environment, and design consideration (8): resource efficiency and emissions reduction. <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.</p> <p>A specific design consideration that recognises the importance of transitioning to a circular economy would also prioritise the potential for material reuse and support high-quality recycling systems across new developments. This approach best places new developments to accord with state-wide principles and sustainability priorities that feature across a number of endorsed state government policy such as:</p> <ul style="list-style-type: none"> Greater Sydney Region Plan and supporting District Plans Circular Economy Policy Statement (February 2019)

<p><i>emissions by 2050, including by incorporating the following—</i></p> <p>(i) <i>passive design,</i></p> <p>(ii) <i>energy efficiency, and</i></p> <p>(iii) <i>the use of renewable energy.</i></p> <p>(d) <i>uses water sensitive design and maximises water re-use.</i></p>		<ul style="list-style-type: none"> • <i>NSW Waste and Sustainable Materials Strategy 2041: Stage 1 – 2021-2027</i> <p>In addition to the above, the inclusion of a stand-alone consideration for circular economy would reinforce the NSW state government commitment to transition to a circular economy over the next 20 years. This is a key commitment contained within <i>NSW Waste and Sustainable Materials Strategy 2041: Stage 1 – 2021-2027</i> and would support a number of policy directions and targets including:</p> <ul style="list-style-type: none"> • Have an 80% average recovery rate from all waste streams by 2030 • Significantly increase the use of recycled content by governments and industry
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Revised Apartment Design Guide (ADG) 2021

Part 3 Environmental Consideration

3.3 Waste	Potential Amendment	Comments
<p>Objective 3.3.1</p> <p>Minimise waste storage impacts on the streetscape, building entries and amenity of residents</p>	<p>Replace objective 3.3.1:</p> <p>Minimise waste storage impacts on the streetscape, building entries and amenity of residents</p> <p>Insert revised objective:</p> <p>Incorporate well-designed and innovative waste and resource recovery systems that minimise impact on the streetscape, public domain, building presentation areas and amenity of occupants, neighbouring sites and pedestrians.</p>	<p>The incorporation of good design solutions for waste and resource recovery systems where they are integrated holistically within the development will not only result in improving on-going waste management practices for the development but will also result in improvements to the overall design quality and environmental performance.</p> <p>Waste and resource recovery systems are essential elements of a development yet are often undervalued or considered too late in the design and development process.</p> <p>Waste and resource recovery systems are often retrospectively applied and designed to fit in around other development and site considerations and constraints. This results in poor outcomes for residents and the community in regard to amenity, reduced resource recovery and costly outcomes to local councils that burden the community for the life of the development.</p> <p>There is opportunity for the revised ADG to recognise the importance of integrating waste and resource recovery systems holistically within developments to secure sustainability planning priorities and State-wide resource recovery targets.</p> <p>It is proposed to revise objective 3.3.1 to broaden its application. The current focus on “waste storage” does not consider the additional components of waste management and resource recovery systems that are key to delivering residential apartment buildings that deliver improved design quality and sound planning and waste management outcomes.</p> <p>It is recommended that this objective be broadened to refer to waste and resource recovery systems to better</p>

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		<p>reflect and integrate all aspects of required on-site waste management infrastructure for residential apartment buildings.</p> <p>This broadens the focus of waste and resource recovery beyond just waste storage areas for residential apartment buildings and through the proposed amendment would now include consideration of waste and recycling infrastructure such as bin presentation areas, collection points and any interim storage areas for all waste streams.</p> <p>The objective has also been expanded to strengthen the consideration of amenity to not only future residents but neighbouring sites and pedestrians.</p> <p>Poorly planned and designed waste and recycling systems can have significant amenity impacts on future occupants but also broader community such as neighbouring sites and pedestrians in terms of visual impacts, noise, traffic and safety as well as odours.</p>
<p>Objective 3.3.2</p> <p>Minimise occupants' waste to landfill by providing safe and convenient onsite organic and inorganic waste and recycling facilities.</p>	<p>Proposed amendment:</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.</p>	<p>It is recommended a minor change be made to objective 3.3.2 to include the importance of designing waste and resource recovery facilities that support waste stream separation.</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>The reference to ensuring safe and convenient access to these facilities is retained and supported.</p>

New objective: Objective 3.3.3	New objective proposed: Developments are to ensure the quality design of waste management collection services are integrated with and are a cohesive part of any new development.	<p>It is recommended that a specific objective be included that prioritises the consideration of waste collection as part of the environmental considerations for future residential apartment buildings.</p> <p>The proposed amendment ensures local councils waste collection service is considered early on in the design phase of new developments and are integrated holistically within the development akin to considerations of car parking and landscaping. Considering the requirements of local councils waste collection service is vital in ensuring new developments deliver waste collection services that are safe, efficient, cost-effective and do not impact on amenity.</p> <p>There is a real opportunity for the ADG to establish the importance of good design of waste management systems that integrates the consideration of waste collection early on in the development and design process.</p>
Design Guidance: Waste Collection		
Encourage waste separation at the source, ideally in the kitchen, by providing a dedicated waste storage area within each apartment to accommodate 2 days' worth of waste, recycling and organics.		No change
Integrate waste management infrastructure to facilitate separation of waste, recycling and organics at the point of disposal – for large buildings, on each residential level.		No change
Prepare an operational waste management plan for residents (and other occupants	Proposed amendment:	The proposed amendment expands the considerations and inclusions for the preparation and submission of a

in mixed-use developments) addressing waste collection, separation and storage, including locations of collection points, bin cart routes and equipment such as chutes.	<p>Prepare an operational waste management plan for residents (and other occupants in mixed-use developments) addressing:</p> <ul style="list-style-type: none"> Expected waste generated from the development and how the development will manage waste generated on site. This is to include identifying all allocated waste bins. Waste separation and storage, including locations of collection points, bin cart routes and equipment such as chutes. How waste will be collected and managed for the development. This includes responsibility for cleaning, transfer of bins between storage and collection points and general maintenance of waste management facilities. 	<p>waste management plan for new residential apartment buildings.</p> <p>The waste management plan is a valuable tool in communicating and demonstrating how the consideration of waste and resource recovery has been integrated cohesively within the development and supports 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>Proposed amendment: For safety, limit direct resident access to any areas that house chute systems and compactors. Single or dual waste chute systems are encouraged in high density residential apartments and are designed to include:</p> <ul style="list-style-type: none"> Single-chute system for waste and a service room on each residential floor containing the chute inlet and enough space for one mobile garbage bins each for recyclables and organics. 	<p>The proposed amendment supports the design and inclusion of waste chute systems within larger residential apartment buildings.</p> <p>This approach accords with the EPA Better Practice Guide that recognises that waste chutes are the most effective method for waste collection.</p>

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	<ul style="list-style-type: none"> • Dual chute system for waste and recycling with a service room on each level with enough space for a mobile bin for organics. • Restricted access for residents to waste chute rooms and compactors. 	
Integrate all waste management facilities and collection infrastructure within the built form of the development to improve amenity for residents and the neighbourhood.		No change.
New design guidance	<p>Proposed new design guidance: Integrate development design with local council waste collection service. For some developments this may include:</p> <ul style="list-style-type: none"> • an on-site waste collection service, and • on-site loading, manoeuvring and access by Councils Standard Heavy Rigid Collection Vehicles. 	<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 councils waste collection service.</p> <p>Waste management requirements need to be given adequate consideration early on in the design phase of the development process 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 kerbsides 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 councils waste collection service and reflect that</p>

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		<p>waste collection services for residential apartment buildings vary across local government boundaries. The proposed amendment requires local waste collection service to be understood and considered early on in the design process to support improved design and resource recovery outcomes.</p> <p>The amendment also reflects that in some instances, on-site collection is required, and this can include requiring access and loading areas that accommodate a heavy rigid vehicle.</p> <p>The <i>Better practice guide for resource recovery for residential developments (EPA)</i> supports the use of on-site collection systems for medium and high-density residential apartment buildings given that kerbside collection for this development type is likely to result in adverse safety and traffic impacts.</p>
Design Guidance: Waste Storage		
In mixed-use developments, separate residential waste infrastructure from commercial waste infrastructure to facilitate secure management.		No change.
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>Proposed amendment:</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>Allocate communal space for residents that supports materials separated at source to</p>	<p>The inclusion of providing space for bulky waste items are important safeguards that reduce incidents of illegally dumping bulky waste in common areas or the footpath. Regular illegal dumping can attract other dumped waste which can detract significantly from the quality and appearance of the development and result in amenity and safety impacts.</p> <p>The proposed amended recommends an expansion of the design guidance to include allocation of communal space within the development footprints for problem waste. Providing space for additional waste streams such</p>

	<p>achieve high value recovery such as textiles, e-waste, glass, and plastics.</p>	<p>as e-waste, textiles, household batteries and <i>Return and Earn</i> containers will help to:</p> <ul style="list-style-type: none"> • Increase resource recovery rates for the building and support state-wide resource recovery and waste diversion targets mandated within <i>Waste and Resource Recovery Strategy</i> • Support occupants within a high-density environment with a convenient and correct way to dispose of problem waste <p>The <i>Better practice guide for resource recovery for residential developments (EPA)</i> recognises the need for new developments to incorporate high value resource recovery. The revised ADG provides a good opportunity to align with and support best practice measures. The Better Practice Guide identifies practical solutions for how early design solutions can encourage high value recovery in residential apartment buildings and is supported by a Case Study 2: High-rise mixed-use development with a problem waste collection service.</p>
<p>Locate communal waste and recycling storage rooms in convenient and accessible locations for each vertical circulation core.</p>	<p>Replace design guidance with:</p> <p>Locate communal waste and recycling storage rooms in convenient and accessible locations for each vertical circulation core.</p> <p>Waste storage areas are to be provide adequate capacity for storing all generated waste streams and are located to support the convenient use of all users (including waste collection staff) that supports waste stream separation and higher value recovery.</p>	<p>It is the experience of many local councils that developments are failing to incorporate well designed waste management facilities that are responsive to the waste management needs of the occupants, such as waste storage areas that promote waste stream separation.</p> <p>This has significant impact on the resource recovery rates of the development and limits the potential for the development to fulfill broader sustainability planning priorities and objectives as well as deliver on state</p>

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		<p>government led commitments on transitioning to a circular economy.</p> <p>The proposed amendment reflects the need for waste storage areas to be designed so that they are of sufficient size to cater for all waste streams and support waste stream separation.</p> <p>A key consideration in designing and locating waste storage areas within developments is the safety and convenience for all users such as occupants as well as waste collection staff and caretakers. Designing to ensure that waste storage areas are adequately sized and are conveniently located maximises higher value recovery and reducing contamination.</p>
<p>For onsite waste storage facilities, provide:</p> <ul style="list-style-type: none"> • hot and cold water • drainage connected to the sewer • self-closing, sealed and outward-opening dual doors • automated lighting • mechanical ventilation • waterproofing. 		No change.
Where applicable, allow for vehicle access (as required by Australian Standards) on site for local council or contracted waste collection service vehicles	<p>Proposed amendment:</p> <p>Where applicable, Where on-site waste collection is required by local council, waste collection vehicle access is to be designed to comply with AS2890.2</p>	Minor change to reflect the relevant Australian Standard and a direct link to local councils waste service.

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 unobstructed access for collection contractors.	This consideration should be moved to the Waste Collection: Design Guidance.	
New design guidance	<p>Insert the following new design guidance:</p> <p>Demonstrate that organic waste can be managed in the development through measures such as:</p> <ul style="list-style-type: none"> • Multiple options for on-site organic waste management to maximise recovery (e.g. 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>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 “food waste can make up 70% of the average residential bin and is a highly recyclable product when source separated”. 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> <p>The proposed inclusion of more specific design guidance would also better support the delivery and application of Objective 3.3.2: Minimise occupants’ waste to landfill by providing safe and convenient onsite organic and inorganic waste and recycling facilities</p> <p>The additional design guidance for organic waste also identifies that it is also important to consider potential amenity impacts associated with the storage of organic waste which should not be overlooked in the design phase for new developments.</p>

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		The <i>Better practice guide for resource recovery in residential developments</i> (EPA) provides considerations for the management of organic waste (food waste) within residential apartment buildings. This is a valuable source of information for applicants and designers and could be referred to within the revised ADG, specifically Appendix E: Treatment and management of food waste.
New design guidance	<p>Insert the following new design guidance:</p> <p>Waste storage areas are to provide adequate capacity for storing all the waste and recycling likely to be generated between collection cycles. Developments are to refer to individual council waste generation rates to determine expected waste generation and bin allocation.</p>	<p>It is recommended that guidance be provided for the development to consider the likely waste generated by the development in accordance with the relevant local councils waste generation rates for residential apartment buildings.</p> <p>Waste generation is a key consideration in determining the required number of allocated bins (and their sizes) which will influence the size of bin storage areas for the development.</p> <p>Currently the ADG is silent on waste generation rates and their influence on the design of waste and resource recovery systems in new developments.</p>
<p>Figure 3.3.1: Waste Chutes</p> <p>Waste chutes for separate waste streams can offer spatial efficiencies in larger apartment buildings and provide for convenient collection and disposal of waste and recycling. Diverter systems offer further efficiencies and can be arranged with multiple compaction systems within the waste collection room. Providing a dedicated waste room on each floor can help to minimise impact on the amenity of adjacent apartments. Ensure universal access is considered.</p>	<p>It is recommended that Figure 3.3.1 Waste Chutes be deleted.</p> <p>Potential amendment:</p> <p>Replace Figure 3.3.1 with a link to Appendix G of the <i>Better Practice Guide for resource recovery in residential developments</i> and Figure G2.2.</p>	<p>Councils do not support the use of triple waste chutes and many councils do not allow the use of dual chutes. Concern is also raised over the implications of illustrating waste chutes catering for the three waste streams when many local councils are not in a position to service organic waste stream currently for residential apartment buildings and are unlikely to support this collection system in the future.</p> <p>In addition, local councils are waiting for further guidance on the best method for the safe and effective serving of onsite organic waste in high density residential development.</p>

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		<p>It is recommended that the ADG provide a link to the waste chute system considerations provided within the guide: <i>Better practice guide for resource recovery in residential developments</i> (EPA) (Appendix G).</p> <p>Figure G2.2: Cross-section of chute and bin storage and service room system illustrates the general principles and operation of a waste chute system supported by recycling and organics bins located in the bin storage and service room on each level. Extra recycling and organics bin storage and the bulky waste storage area are provided in the basement.</p>
<p>Figure 3.3.2 Integrated waste rooms for separated streams offer considerable space savings compared to manual bin storage.</p>	<p>It is recommended that Figure 3.3.2 be deleted.</p> <p>It is recommended that a revised illustration be provided that is reflective of local councils waste and resource recovery system requirements.</p>	<p>It is recommended that the Figures for waste storage rooms be deleted and replaced with illustrations that reflect the <i>Better practice guide for resource recovery in residential developments</i>.</p> <p>Alternatively, WSROC and relevant local councils are available to assist in the preparation of illustrations that better reflects the servicing requirements of local councils.</p>
<p>Figure 3.3.3 Waste collection room bin infrastructure for each waste stream: residual, recycling, organics.</p>	<p>It is recommended that Figure 3.3.3 be deleted.</p>	<p>Councils are concerned this figure is a poor example of bin room layout that is contrary to bin room design requirements and safe access.</p>
New: Part 3.3A Circular Economy		
<p>New environmental consideration to be included within Part 3: Environmental Considerations</p> <p>3.3A Circular Economy</p>	<p>Insert objective:</p> <p>Embed circular economy design principles into the design of residential apartment buildings to maximise the recycling and reuse of materials.</p>	<p>It is recommended that Part 3 of the revised ADG be amended to make to include a stand-alone design consideration for circular economy.</p> <p>There is a strong need for clear planning policy direction that supports the implementation of circular economy principles across all phases of the development process. The proposed amendment would better support the delivery of:</p>

		<ul style="list-style-type: none"> • <i>design principle (4): design sustainable and greener places to ensure the wellbeing of people, and the environment, and</i> • <i>design consideration (8): resource efficiency and emissions reduction.</i>
New design guidance: Circular Economy		
To best support the delivery of circular economy principles it is recommended that the following additional design guidance be provided within the revised ADG.	Potential Amendment	Comments
	<p>New design guidance:</p> <p>Ensure design and construction techniques contribute to the circular economy.</p> <p>New design guidance:</p> <p>Reuse and recycle construction and demolition waste, aiming for zero waste to landfill.</p>	<p>The proposed design criteria strengthen the consideration of circular economy and best aligns with circular economy principles that have been committed by current state policy directions.</p> <p>This approach better strengthens the planning framework to align with current state policy targets and commitments surrounding transitioning to a circular economy and waste reduction targets.</p> <p>The proposed amendments reflect the current and innovative approach that has been used by the DPE in the preparation of the draft Phase 2 Aerotropolis Development Control Plan and builds on the objectives from the Phase 1 Development Control Plan.</p>

Revised Apartment Design Guide (ADG) 2021		
Part 1 Designing for the site		
1.3 Site access and address	Potential Amendment	Comments
Minimise conflicts between pedestrians, vehicle access and movement routes adjoining the site.	<p>Potential amendment:</p> <p>Minimise conflicts between pedestrians, vehicle access, service vehicles (such as waste collection) and movement routes adjoining the site</p>	It is agreed that well-designed building entries also enable efficient servicing of the development and delivery of goods to residents.

Provide clear sightlines where vehicles cross pedestrian pathways.	Ensure the safety of all users including waste collection staff and provide clear sightlines where vehicles cross pedestrian pathways	<p>Minimising conflict and maintaining safety of residents, waste collection staff and pedestrians is also vital and should form part of the considerations in early development design.</p> <p>The proposed amendments reflect the need to include specific reference to ensuring that new developments have waste infrastructure and waste servicing requirements integrated into the overall design of the development.</p> <p>For larger apartment buildings this will require a heavy rigid collection vehicle accessing the site and nominated collection point which is best considered early in the design process.</p>
1.4 Relationship to the street	Potential Amendment	Comments
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.	<p>Potential amendment:</p> <p>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 and waste collection areas. This also includes integrating waste collection vehicle access cohesively with the development.</p>	<p>The location of waste infrastructure within the development footprint and basement is generally supported.</p> <p>However there needs to be an emphasis of ensuring new developments are integrated with Councils standard waste service and that this may include on-site waste collection by a heavy rigid vehicle.</p> <p>There should be a recognition that it is essential that local councils waste service requirements for site servicing and waste collection is understood early in the design process.</p>
1.6 Parking	Potential Amendment	Comments
Balance the visual impact of vehicle entries so they are clearly visible but also recessive to the overall building form and streetscape.	<p>Potential amendment:</p> <p>Balance the visual impact of vehicle entries so they are clearly visible but also recessive to the overall building form and streetscape without</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>

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	limiting the ability to safely and efficiently service (such as waste collection) and access the site.	This factor needs to be considered in the overall design and site layout to minimise impacts on the built form and streetscape.
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.	Potential amendment: Consider deep soil zones, stormwater management, the retention of trees during and servicing requirements (such as waste) for the development initial design stages, as these can affect the size and shape of a car park footprint and basement design (including height clearances)	<p>It is our experience that early design and consideration of waste management systems for new developments result in positive outcomes for the community, built and natural environments.</p> <p>It is accepted as better practice in waste management systems for medium and high-density developments for the waste collection vehicle to enter the site to collect waste and service the development. This can be from a nominated collection point within the building footprint or within the basement car parking area where waste rooms are located.</p> <p>It is therefore essential that upfront planning for vehicle access and manoeuvring reflect the need to consider whether the development must be designed to facilitate on-site waste collection vehicle collection.</p> <p>The common standard waste collection vehicle for high density developments is a heavy rigid vehicle. Failure to consider safe and efficient access, egress and manoeuvring at the early design and planning stage of developments can have significant consequences for the development. Best outcomes for the site and the development are achieved when considerations of waste collection vehicle access requirements are considered and designed upfront in the process.</p> <p>It is recommended that the ADG be amended to reflect considerations of waste servicing requirements so that it</p>

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		can be integrated into the development early on in the design process.
Minimise the width and number of vehicle access points, ramp length and visual impact.	Potential amendment: Minimise the width and number of vehicle access points, ramp length and visual impact without compromising the servicing needs of the development.	As above.

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draft Local Government Design Review Panel Manual		
Section 2.6 Panel member induction and training	Potential Amendment	Comments
<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 • Confirmation of the panel members • Availability for all sessions. 	<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>It is recommended that the Manual be amended to provide recognition on the importance of understanding the relevant local council waste service for panel members.</p> <p>To assist in securing optimum planning and waste management outcomes for residential apartment buildings, 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.</p> <p>It is our experience that the consideration of waste and resource recovery are not highly valued in the design and planning stage of developments and are often overlooked in the early design stages. Failure to provide due consideration and correct advice regarding local councils 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> <p>While local councils have the responsibility to provide residential waste services under the <i>Local Government Act 1993</i>, it is important to also note (and understand) that variations across local government boundaries in vary significantly.</p> <p>The proposed amendment would ensure that adequate training and information are provided to panel members so that they are best placed to provide design advice that also aligns with individual council waste servicing requirements.</p>