

Attachment A

**Summary of Submissions and
City of Sydney Response**

SUMMARY OF SUBMISSIONS AND CITY OF SYDNEY RESPONSE

Draft amendment to Sydney Development Control Plan 2012 and Green Square Town Centre Development Control Plan 2012, and draft Guidelines to Waste Management in New Developments.

Publicly exhibited from 28 April 2018 to 30 May 2018.

Summary of matter raised in submission	Officer's response
6 submissions received	
<u>General</u>	
Supportive of planning controls which strengthen sustainability performance of buildings.	The City notes the supportive submission.
<u>Energy</u>	
Supportive of establishing standards in both Development Control Plans for new, and major refurbishments of commercial office buildings with a net lettable floor area over 1,000 square metres to commit to achieving a 5.5. star NABERS Energy rating for the base building.	The City notes the supportive submission.
The City should investigate the scope for encouraging developers to go beyond a commitment to a NABERS Energy rating and aim for Green Star certification.	Noted. The City may consider the extent to which other rating tools can be referenced in the planning controls in future reviews/amendments.
Suggest clarifying the text in DCP to reflect a preference for additional tools to be considered acceptable to assess the environmental performance of buildings which have a level of independence and quality, have been developed collaboratively between industry and government, hold an ISO 9000 Quality Management Certification and has certifications governed by the Competition and Consumer Act.	Noted. The City may consider the extent to which other rating tools can be referenced in the planning controls in future reviews/amendments. Further work will need to be undertaken to ensure potential references to additional tools are sound and are supported by industry.

Summary of matter raised in submission	Officer's response
<p>Support the development of a pathway for the City's current planning controls to be strengthened over time to deliver net zero building standards.</p>	<p>While beyond the scope of this amendment, the City notes the supportive response to its progression towards planning controls which aim to deliver net zero building standards.</p> <p>No change to the exhibited controls is recommended.</p>
<p><u>Waste</u> City should investigate waste incineration as a method of energy production.</p> <p>The new Guidelines for Waste Management in new developments include further requirements under Clauses 3.1-3.14 along with a Reference section on Design requirements for collection vehicle access, however the Guidelines are not referred to under DCP Clause 3.11.13. Recommend referring to the new Guidelines under this Clause, as containing minimum requirements for the 'Design and location of waste collection points and loading areas', similar to the reference to the Guidelines under Clause 3.14.</p>	<p>Beyond the scope of the planning controls and the amendment. Submission to be forwarded to the relevant unit within the City for potential investigation.</p> <p>City notes omission and will include suggested reference within Sydney DCP 2012.</p>

Summary of matter raised in submission	Officer's response
<p>Recommend bulk recycling bins (660L and above) only be available for buildings where recycling is disposed of by residents through a diverter or separate recycling chute, or floor-level recycling crates or bins, which then empty into the bulk recycling bin. Recommend bulk recycling bins (660L and above) should not be available to developments where residents will deposit their recycling waste directly into recycling bins in the communal bin storage area (i.e. systems should not exist where residents deposit their recycling directly into bulk recycling bins).</p>	<p>City notes this is addressed post-occupation of a building and therefore should not be addressed in Guidelines.</p>
<p>Submission notes recommendations, through WSROC waste factsheets, of the critical importance of collection of bulky cardboard (particularly in buildings with diverter or dual chutes) and recommends this be included in the Guidelines. Recommend that additional guidance be provided regarding operation of the bulky waste space in conjunction with the weekly bookable collection service.</p>	<p>Agreed. Definition of 'bulky waste' includes 'packaging' that cannot fit into Mobile Garbage Bins (MBGs). City will update definition in Guideline to include 'cardboard' for clarity.</p>
<p>Suggest the inclusion of guidance on the dropoff point and storage of bulky e-waste, and the operating of this in conjunction with the weekly bookable collection service.</p>	<p>The Guidelines do include space provisions for problem waste and bulky waste collections which includes bulky e-waste. The Guidelines provide requirements on where these areas (referred to as 'Waste and Recycling Storage Areas') need to be located.</p> <p>The operation of e-waste collection is not relevant to the Guidelines, which are intended to influence the design of buildings.</p>

Summary of matter raised in submission	Officer's response
<p>The new minimum of 4 metres for waste storage space, and the formulas provided in the Guideline fall below the recommendation from Western Sydney Regional Organisational Councils' (WSROC) Technical Waste Fact Sheets developed by Jacobs. The fact sheets recommended that Development Control Plans include a larger space requirement, specifically "A minimum space of 8 square metres for every 50 units".</p>	<p>The City has weekly waste collection and therefore the suggested size is too high for the City's area in relation to buildings with 100 units or less. This would cause undue economic constraints on building developers and require further additional floor space to be used by waste storage. Agreed that for buildings with more than 100 units that the size guidance should be increased marginally.</p>
<p>Recommend including in the Waste and Recycling Management Plan a specific requirement for consideration of how initial high volumes of waste materials will be managed during peak move-in periods to ensure maximum recovery.</p>	<p>City notes this is an operational issue and therefore is not relevant to the Guidelines, which are intended to influence the design of buildings. The City does provide extra collections where requested to cater for peak move-in periods.</p>
<p>Recommend including in the Waste and Recycling Management Plan a requirement to identify who has responsibility for initial high volumes of waste materials during peak move-in periods.</p>	<p>Agreed. Waste Management Plan template to be updated.</p>
<p>Recommend investigation and trialling of identification systems in new developments could help overcome one of the biggest barriers to improving waste recovery in multi-unit developments, namely the anonymity of waste disposal and associated lack of accountability.</p>	<p>Noted, however does not directly relate to Guidelines.</p>
<p>For waste allocations, allocation needs to be considered for number of bedrooms within a development rather than number of units to gain further accuracy and enable further resource efficiency.</p>	<p>'Per unit' is the recognised measure provided by the EPA. The waste generation rates the City uses factors in average occupancy and number of bedrooms.</p>

Summary of matter raised in submission	Officer's response
<p>Commercial waste collection overlaps with Council's on a constant basis, and whilst kept apart as two separate systems build inefficiencies that cost the Council and community. Technology for data collection with smart systems is now available to allow both commercial and public collections to overlap whilst maintaining cost allocations. Submission advocates that City require policy frameworks for all areas of public waste and recycling to be integrated within the one policy document.</p>	<p>Better practice waste management in mixed use developments requires the complete separation of the residential and commercial waste facilities. Waste disposal is a business expense which should be paid by the business, not by residents who happen to be in the same building. Similarly, residents should not be allowed to use commercial waste facilities that are paid for by a private business. Separation is also important for quality data reporting.</p>
<p>Recommend use of kerbside Easy System "Eco Point" in ground solution.</p>	<p>See above comment regarding better practice waste management in mixed use developments. Additionally, the Guidelines are not to be drafted to</p>
<p>3 bin system – red landfill, yellow dry recyclables and green food waste. Size of each bin (depth) pending allocation requirements for all users, public, units and commercial tenants within building.</p>	<p>preference one technology over another, as this may be perceived as third party endorsement and therefore providing competitive advantage to specific businesses.</p>
<p>Recommend use of Easy System "Eco Point" above ground solution.</p>	<p>The Guidelines allow for alternative waste options and it is a proponent/developer's responsibility to research suitable waste management options.</p>
<p>3 bin system – adjacent to driveway/s or road within a development, which includes bins, signage, lighting and concrete base.</p>	<p>See above comment regarding better practice waste management in mixed use developments, and comment regarding preference of technology. Additionally, the Guideline provides for a similar option to developers at a precinct level. This is captured in the reference section of the Guidelines.</p>

Summary of matter raised in submission	Officer's response
<p>Recommend use of "Eco Point" for commercial areas.</p> <p>Smart collection software allocates waste and recycling on a monthly basis proportionately to usage litres/per day as per tables for all users of the development.</p> <p>Recommend use of "Eco Point" above ground system.</p> <p>4 bin system – where recycling demand is required, specifically at public recycling centres.</p> <p>Recommend use of "Eco Point" above ground system.</p> <p>4 bin system – in public recreation areas.</p> <p>Submission related to a business proposition for a product which aims to improve waste management for customers.</p>	<p>See comment regarding preference of technology. Additionally, suggestion too prescriptive/detailed to be included in Guidelines. A commercial developer may choose to use smart collection software.</p> <p>City notes the suggestion. Third party endorsement again is an issue. However, suggestion to be provided regarding public recycling centres to relevant unit within the City.</p> <p>City notes the suggestion. Third party endorsement again is an issue. However, suggestion to be provided regarding various waste bins being made available in public recreation areas to relevant unit within the City.</p> <p>Beyond the scope of the planning controls and the amendment.</p> <p>Minor changes to the exhibited controls and Guidelines are recommended. Summary of changes shown at Attachment B. Changes to draft Sydney DCP 2012 shown at Attachment C, and changes to the Guidelines shown at Attachment D.</p>