

Attachment C

<h2>Summary of Submissions</h2>
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Draft Community Participation Plan:

Summary of submissions and City of Sydney response

Draft Community Participation Plan – publicly exhibited from 13 September to 11 October 2019

Glossary of terms

CPP – draft Community Participation Plan

DA – Development Application

CoS – City of Sydney

	Summary of matter raised in submission	Officer's response
FORMATTING	The headings to each column of Table 3 of the draft CPP should be repeated across each page of the table for ease of use.	Noted. This formatting issue has been resolved.
DEVELOPMENT APPLICATION (DA) RELATED COMMENTS	DAs should be notified to surrounding residents and workers by mail/letterbox drop, a site notice on buildings subject to a DA, email notification and the City website.	<p>The City's notification and advertising procedures for DAs currently include sending out notification letters (to nearby properties – the extent of notification is determined by the DA's degree of environmental impact), placing a site notice on the primary street frontage of the site (and where required, secondary frontage) and listing on the City website. Plans and associated documents are made available on the City website during the exhibition period, and are also kept online after.</p> <p>The City does not notify residents and surrounding properties via email. This is due to issues including maintaining records of current residents, particularly with regard to tenants rather than owner occupiers. New DAs are included in the City's Development applications weekly e-newsletter, which anyone can subscribe to.</p>

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<p>DEVELOPMENT APPLICATION (DA) RELATED COMMENTS</p>	<p>By placing onus on locals to check for DAs weekly online, the City risks receiving a low number of responses by a few individuals and local community groups only, missing out on genuine and transparent local engagement for DAs.</p> <p>DAs should not be permitted to be lodged over December and January each year. If they are, the exhibition period should be tripled in duration.</p>	<p>The City sends out a weekly e-newsletter that lists all new DAs on exhibition. Properties within a certain radius of a proposed DA (25m, 50m or 75m – depending on scale/environmental impact) are notified by mail. The City intends to carry out community consultation to review notification processes and improve engagement levels.</p> <p>The City cannot refuse to accept adequately made development applications over the Christmas/New Year holiday period. The City allows for additional time during the holiday period to comply with legislative requirements.</p> <p>Part 1 Schedule 1 of the <i>Environmental Planning and Assessment Act 1979</i> stipulates “the period between 20 December and 10 January (inclusive) is excluded from the calculation of a period of public exhibition.” Council policy detailed in the CPP is consistent with this requirement.</p> <p>This means the exhibition period of a DA lodged during this period could be extended by up to 21 days. It is considered that planning law and Council policy provide sufficient time for the public to make submissions over the holiday period. Extensions to the exhibition period can also be requested.</p>

	Summary of matter raised in submission	Officer's response
	<p>Page 15 of the draft CPP states 'Council may not notify or advertise a development application which is considered incomplete or deficient.' Council should be allowed to not accept DAs which are deficient and do not comply with existing legislative requirements/ planning controls under the LEP and DCP. This would save the community time in identifying issues with and challenging the DA.</p>	<p>In some instances, the City does not accept DAs at lodgement when it is evident the application is unclear and severely lacks relevant information required for assessment.</p> <p>Part 6, Division 1, Clause 51 of the Environmental Planning and Assessment Regulation 2000 states when a deficient application is lodged, the City can generally reject it if:</p> <ul style="list-style-type: none"> • the application is illegible or unclear as to the development consent sought, or • the application does not contain any information, or is not accompanied by any document, specified in Part 1 of Schedule 1. <p>There is a distinction between rejecting deficient DAs and assessing non-compliant DAs. The City is required to assess development applications that may not necessarily comply with relevant planning standards or controls, if the application is complete. Such applications are required to be notified in accordance with procedures set out in the draft CPP. This provides property owners, residents and the public with an opportunity to review the application and make a submission.</p>

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TECHNOLOGY	Maintain paper, email notification and notices on DA sites.	<p>The CPP maintains existing paper, site notice and email notifications. The City mails letters to properties within the vicinity of a site subject to a DA, puts up a site notice, and where a DA has a more significant environmental impact, advertises the application in a local or metropolitan newspaper. The City also provides a weekly DA notification e-newsletter.</p> <p>There are currently no changes proposed to notification or advertising procedures for development applications in the draft Community Participation Plan, however the City plans to review and improve these procedures in the future. The review process will begin with community consultation to ensure the community is involved from the outset and that their views help to shape future notification and advertising policy and process.</p>

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<p>TECHNOLOGY</p>	<p>Emphasis given to the use of the internet in providing opportunities for the community to share ideas, insight and feedback on projects and policies may deter those who are not computer literate, or who do not have access to such technology.</p>	<p>Under the CPP the City accommodates both traditional notification and feedback options, such as letters and site notices, as well as electronic formats such as email. The City's Community Engagement Strategy 2019 outlines how the City engages with a wide range of people, including through panels, community networks and programs, targeted consultation activities, as well as through the notification and advertising of development applications, proposed works and draft policies and plans.</p> <p>The City carries out various types of community engagement outside of online or digital channels, including holding public meetings, workshops, attending local weekend markets, face-to-face surveys and consulting with project-specific stakeholders. The City also provides face-to-face customer service at the Town Hall House One Stop Shop and our three neighbourhood service centres.</p> <p>The current notification and advertising process for development applications requires letters to be mailed out to properties in the vicinity of a site subject to a DA (dependent on the scale or potential impact of the proposal) and a site notice to be placed on the primary (and sometimes secondary) frontage of the site. DAs with more potentially greater impact are notified for longer periods of time, and are advertised in a local or metropolitan newspaper.</p> <p>Should a member of the public wish to view a hard copy of a DA, they can visit the One Stop Shop at Town Hall House, or their local neighbourhood centre, where customer service staff can print documents and provide assistance. Submissions are generally provided in writing, either by email, or a letter, which can be posted or hand delivered.</p>

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GENERAL COMMENTS AND RECOMMENDATIONS FOR COMMUNITY ENGAGEMENT	<p>Community liaison groups where membership includes community representatives, state government agencies and local government representatives enables early input from affected groups. This provides proponents with early advice on projects on issues which affect communities, enabling them to undertake mitigation strategies. Such a model could be implemented by the City for ongoing development of major projects.</p> <p>There is no substitute for initial face-to-face meetings with Council officers responsible for projects and planning; or public meetings, to enable the community to engage directly with those responsible for projects.</p> <p>For large-scale policy development, internet engagement may be effective in gauging public opinion and eliciting ideas for implementation of such policies. A mix of engagement strategies such as citizens' juries, panels and reference groups are appropriate for 'big issues' and policies.</p>	<p>Noted. These processes are consistent with measures outlined in the City's Community Engagement Strategy 2019. This community engagement approach is generally employed for strategic planning projects, such as planning proposals, strategic plans and draft planning controls.</p> <p>The draft CPP sets out processes for the exhibition and notification and public exhibition of strategic planning projects and development applications. The City uses a range of consultation tools for strategic planning guided by the City's Community Engagement Strategy 2019, including public meetings, workshops and drop-in sessions.</p> <p>The City uses a range of consultation tools for strategic planning guided by the City's Community Engagement Strategy 2019. The City currently engages a citizens' jury for the Sydney 2050 project, as well as a variety of advisory panels including the CoS Aboriginal and Torres Strait Islander Advisory Panel and Inclusion Advisory Panel, as well as others. The City also works with local residential action groups and reference groups. Extensive community consultation for specific projects has been carried out through online surveys, workshops, round tables and public meetings.</p>

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GENERAL COMMENTS AND RECOMMENDATIONS FOR COMMUNITY ENGAGEMENT	<p>Advice should be sought via direct communication with local community groups, and wide distribution of project intent, including by leaflets and via local news outlets.</p> <p>Feedback should be able to be obtained by letter, email, personal communication or through Sydney Your Say (website).</p> <p>Draft CPPs by other Councils have included more detail on what the author of the submission should include, or more instruction around content. The City could consider whether it should inform the community on what information will and will not be considered when it reviews submissions.</p> <p>Developers should establish funds to ensure heritage terrace homes continue to be lived in (and not converted to businesses).</p> <p>These funds should cover structural evaluation before and after demolition and construction, mitigation of negative impacts (noise cancelling headphones, acoustic mitigation to bedrooms, air purifiers and alternative local accommodation for all works outside daylight hours/agreed work hours), and protecting street trees.</p>	<p>These processes are consistent with measures outlined in the City's Community Engagement Strategy 2019. This community engagement approach is generally employed for strategic planning projects, such as planning proposals, plan-making and policy-making.</p> <p>The CPP and existing procedures enable feedback to be submitted through these channels.</p> <p>The City's webpage, which contains information on making submissions, will be updated to provide improved guidance on the matter.</p> <p>Not relevant to the draft CPP. Planning legislation limits developer contributions to essential infrastructure.</p>