

Department of Planning, Industry and Environment  
Draft Design and Place SEPP Team  
Locked Bag 5022  
Parramatta NSW 2124

Dear Sir/Madam

## **Explanation of Intended Effects – Design and Place SEPP**

Thank you for giving Queanbeyan-Palerang Regional Council (QPRC) the opportunity to comment on the *Explanation of Intended Effects – Draft Design and Place SEPP* currently being exhibited by the Department.

Council has reviewed the draft documentation and provides the comments below as feedback.

Whilst the overarching objectives and principles of the draft SEPP in respect of promoting attractive public spaces and high quality building design are worthy of consideration, it is unclear what the final provisions of the draft SEPP might be or how its aspirations will be given practical effect when progressing planning proposals or assessing development applications under the NSW planning system.

QPRC supports clear guidelines and controls that provide for high quality urban environments, recognising there has always been a trade-off between high quality design and the cost of construction. It is unclear how the aspirations for both high quality design and additional consultation set out in the proposed SEPP will be balanced against the NSW Government's broader policy commitments to reducing development assessment timeframes and costs of development.

Council understands the proposed changes require a consent authority to consider design issues around 'Country' for all development applications and planning proposals, and, that this potentially includes formal consultation with Traditional Custodians on all such proposals. Council's previous experience is that additional consultation with Local Aboriginal Land Councils (LALCs) would likely add significant time and costs to development applications with no certainty around timeframes or responsiveness. The Department would need to consider funding specialist positions within LALCs to specifically respond to consultation on these planning issues if that consultation in respect of 'Country' is to be both meaningful and timely.

Council is of the view that the additional matters for consideration to be included under s4.15 of the *Environmental Planning and Assessment Act, 1979*, ('the Act'), whilst important planning considerations, will add time and costs to the assessment of development applications. Again, it is not clear the Government's priorities in respect of timeliness and reducing costs have been considered and resolved when proposing these changes.

#### OFFICES

144 Wallace St, Braidwood  
10 Majara St, Bungendore  
256 Crawford St, Queanbeyan

#### POSTAL

PO Box 348, Bungendore NSW 2621  
PO Box 90, Queanbeyan NSW 2620

#### PHONE/FAX

Bungendore/Braidwood  
P: 02 6238 8111  
Queanbeyan  
P: 02 6285 6000 F: 02 6285 6666

#### EMAIL/WEB

W: [www.qprc.nsw.gov.au](http://www.qprc.nsw.gov.au)  
E: [council@qprc.nsw.gov.au](mailto:council@qprc.nsw.gov.au)

ABN 95 933 070 982

There also appears to be some inconsistency as to what, if any, changes are being made to the Act. Page 28 of the EIE suggests new mandatory matters for consideration will be added to s4.15 Evaluation (clause 3.2.2). However at page 38 (clause 5.1.1) it states there will be no changes made to the Act.

Council notes similar recent documents such as the *Urban Design for Regional NSW* have had limited impact on design outcomes or influencing the quality of design in submitted applications, largely as these requirements are not supported with suitable legislative controls to ensure their implementation.

In summary, Council's initial review of the EIE suggests significant new consultation and information may be required to support future planning proposals and development applications in order to meet the objectives of the SEPP. This could potentially add significant time and cost to development generally.

Again thank you for the opportunity to make a submission. If you have any enquiries in respect of this matter please contact myself on 6285 6277.

Yours sincerely



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**Martin Brown**  
Program Coordinator  
Land Use Planning  
**Queanbeyan-Palerang Regional Council**