

28 April 2021

Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Sir/Madam

Submission – Design and Place SEPP EIE

Thank you for the opportunity to comment on the Design and Place SEPP EIE.

Council is not supportive of the proposed new Design and Place SEPP as it will introduce new design quality considerations as another layer of bureaucratic red tape. This comes at a time when the Department is:

- advocating a streamlined assessment process;
- making the planning system faster & simpler; and
- creating new exempt and complying development opportunities which will avoid the SEPP consideration.

Unfortunately, the new SEPP will create less certainty for developers, increase the cost of doing development in NSW, especially for the mum and dad developers, and increase the complexity of the development assessment process. This is all without consideration of the capacity of regional councils and communities to bear additional development costs.

The reality for most regional councils is they are currently struggling to get compliant DAs, and compliance with DCP provisions such as building line setbacks. The new SEPP will introduce yet further uncertainty, application complexity and cost to even the most basic applications, and it may not achieve any great outcome other than to introduce extra leverage for opponents.

There may be merit in these considerations in a SEPP that applies to metro areas, or at the very most regional centres, but it might be best introduced as part of a proposed Standard Instrument Development Control Plan for regional areas. This would allow a reasonable level of discretion for variation subject to a merit assessment.

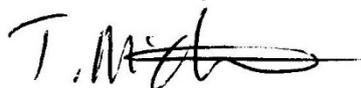
Good design outcomes for public spaces are demanded by our communities but they come at a hefty price. The desire to create well designed public places must be balanced with the financial capacity of councils and communities to pay. Mandating public place design considerations in a SEPP will only add extra cost to the design process and may even delay public place revitalisation projects until the SEPPs standards are financially achievable. This

in turn may require councils to raise additional revenue via rates or developer contributions which again come at a cost to the community.

Again, thank you for the opportunity to provide input to the EIE. The above comments should be treated as preliminary only as they have not been endorsed by Council and, because of time constraints with the overwhelming range of DPIE reforms currently on notification, have not considered all the potential implications these changes may have on Council and its community.

If you require any further information please do not hesitate to contact me by email tony.mcateer@richmondvalley.nsw.gov.au or telephone 02 66600276.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'T. McAteer', with a long horizontal flourish extending to the right.

Tony McAteer

Strategic Land Use Planner