

# Public Exhibition for the Explanation of Intended Effect New State Environmental Planning Policy (Design and Place)

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Your Organisation	n/a
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Stakeholder group	<input type="checkbox"/> Industry <input type="checkbox"/> Council <input type="checkbox"/> Aboriginal Community <input checked="" type="checkbox"/> Community <input type="checkbox"/> State Agency
Age demographic	<input type="checkbox"/> 18-25 <input checked="" type="checkbox"/> 26-45 <input type="checkbox"/> 46-65 <input type="checkbox"/> 65+

## Your feedback

### How to make a formal submission

We welcome your feedback on the Explanation of Intended Effect for a New Design and Place State Environmental Planning Policy. **Submissions close on 31 March 2021.**

Feedback is sought on all parts of the document. Please consider if the proposal:

- Reflects contemporary understanding and practices
- Clearly articulates the intentions of the policy
- Should consider other opportunities.

## Explanation of intended effect (EIE)

### PART 1

#### Introduction

My comment relates to principle 4.

This principle does not go far enough. To actually meet any of the goals in this principle, NSW needs to consider limitations to existing urban fringes. Development in places such as South West Sydney (for example... there are countless others) should not be prioritised when there is so much land ready to be upzoned far closer to existing economic and transport networks. One only needs to look at the existing density in Sydney's eastern suburbs and inner west to see this. Locations near existing transit links should be emphasised and construction within the currently developed envelope should be the focus for NSW.

### PART 2

#### Proposed new State Environmental Planning Policy (Design and Place)

Construction of low-density, poorly connected, low density development at city/town fringes should be allowed only in instances where existing land is degraded or significantly underutilised (i.e. former rubbish tip or mine site). Green spaces are obviously important in a city, but consideration should be given to whether green spaces such as golf courses can be fully or partially reimaged as housing within an urban park. The string of urban golf courses from Moore Park to to Bankstown and Canterbury is a prime example. Does central Sydney need this many golf courses more than it needs accessible and affordable housing that isn't 1.5 hours down the motorway? Is a golf course truly the best use of good land in a modern metropolis? Without getting into a discussion of the private use of vast swathes of what could be at least parkland, it should be obvious that if golf course land is suitable for development, it should at least be considered.

3.11 Design skills:

The requirements for qualified persons are great. Does NSW have enough of these workers currently? It seems counterintuitive to set requirements (possibly 'artificially' driving demand much higher than it currently is) without establishing an education and training pipeline.

3.2.2 Mandatory matters for consideration:

4. Local living:

I am concerned that the requirement for housing to be located "within 20 minutes walk of local shops" will result simply in developments being designed in coordination with the likes of Coles/Woolworths, rather than considering walkability more broadly. Being a 20 minute walk from Coles or Woolworths does not do much for "local living". Without a commitment to a lively town centre, all but the closest residents will in all likelihood drive to a large supermarket with a large car park and drive back again. I am yet to see a 'town centre' development anchored by a large supermarket become a lively place that locals enjoy spending time in.

5. Street design:

You have no idea how happy I am to see these inclusions! I just hope that requirements are set at a level that works for people, not developers and traffic engineers.

7. Green infrastructure:

I would like to see something in here about a requirement to provide x amount of shade, and to conduct a temperature effect study. Particularly in western parts of the state, publicly accessible places that are cooler than the ambient and do not require payment to be in (i.e. shops) such as libraries, botanic gardens etc will become increasingly useful under a climate change regime. NSW should be thinking about this *now* by ensuring that all residents have access to somewhere cool that doesn't require air conditioning. This section should also consider the use of non-native plant species to reap the benefits of deciduous trees. The effect of these in year-round use of public spaces in Canberra is astounding.

10. Density:

This section refers to "Consideration 10: Housing diversity". I note that Housing diversity is actually located at Consideration 11.

12. Transport and parking:

I would like to see more detail here, particularly with regard to precinct planning. There is an opportunity to do something bigger and more impactful with parking in precinct planning. Centrally located, underground parking lots for example. No parking requirements for lots or precincts adjacent to public transit etc.

18. Tree canopy:

See comments on 7. Green infrastructure.

**PART 3**

**Key components of the new State Environmental Planning Policy**

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**PART 4**

**Proposed amendments to existing State Environmental Planning Policies**

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**PART 5**

**Relationship with other planning instruments and policies**

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**PART 6**

**Planning pathways**

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**APPENDIX A**

**Proposed Amendments to the Apartment Design Guide and SEPP 65**

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**APPENDIX B**

**Proposed New Public Spaces and Urban Design Guide**

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**APPENDIX C**

**Sustainability in Residential Buildings**

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**Additional comments**

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**Thank you for your time in preparing this submission.**