Northern Sydney regional Organisation of Councils

Comments on Waste Management Aspects of Draft Medium Density Housing Design Guide

Section of Design Guide	Comment	
Aims p 4	NSROC supports the objectives "improve the quality of neighbourhoods and precincts;"; "improve liveability through optimal internal and external amenity," and "improve the relationship of dwellings to the public domain including streets, lanes and parks". However, the Guide has not properly considered critical elements of waste management for future residents and has left too much flexibility in the guidance for waste management than is necessary for a complying development standard.	
Section 1.2, Structure of the Guide, Part 2 Design Guidelines P5	NSROC supports the comments " detailed design element - site layout, residential amenity and servicing requirements. These elements are universal and often independent of local character issues." Unfortunately the Guide does not adequately the practical reality of residential waste collections in a cost effective manner.	
Section 1.4, Obtaining Consent, Design Controls, Page 7	The Guide states "The Codes SEPP requires that the proposed development meet the Design Criteria contained in Part 3 of this guide." However, the criteria in Part 3 are not sufficiently robust in regard to the waste management aspects for a complying development and would need specific additional details to be more helpful as a guide to staff assessing a development application.	
Section 1.5, Design Principles, pages 10 and 11	"Sustainability" includes reuse and recycling but appears to be more aimed at the building phase rather than the equally important operational phase of the residential development. Amenity "Good amenity combines... efficient layouts and service areas". This principle is supported but more detail is required in the design criteria to ensure it is achieved in each new complying development.	
Section 2A, Setbacks page 18	The words here should mention that setbacks may need to make allowance for operational issues such as waste storage and collection, parking, easements etc.	
Section 2D, Local Character, Connections, page 26	The dot points include connections and the need to understand existing linkages to the street which needs to consider servicing from the street such as waste collections. Local character can be significantly impacted when insufficient provision is made for servicing such as storage of waste bins leading to bins remaining unshielded in limited front or side setbacks to the detriment of the neighbourhood.	
Section 2D, neighbourhood scale, page 27.	The priorities for inclusion in neighbourhood scale should include servicing from the road network such as waste but also water, electricity and other services.	
Section 2D, Local scale page 29	The second dot point should say "physical and services" in the second dot point.	
Section 2E, Public Domain Interface page 30	The fourth paragraph should include infrastructure and servicing requirements such as waste or parking.	
Section 2E, Public Domain Interface, Design Guidance point 16, page 31	Add "while remaining functional" after "out of public view."	
Section 2F, Internal streets – Pedestrian and vehicle access,	The design of internal streets should identify required functions (such as waste collection or delivery vehicles) and cater for them.	

page 32		
Section 2F, Internal streets – Pedestrian and vehicle access, Page 33, Design guidance- Internal streets -7	NSROC supports not providing dead ends to such streets, and would support providing turning circles sufficient for waste and removal truck.	
Section 2F, Internal streets – Pedestrian and vehicle access, Page 33, Design guidance- Internal streets - 15	Add words to number 15 so that passing places and street widths consider how service vehicles will access the development.	
Section 2F, Internal streets – Pedestrian and vehicle access, Page 33, Design guidance- Basement entries -22	Where waste vehicles need to access the basement the entry should be sized to allow the appropriate entry, exit and any turning manoeuvres. A single width will rarely be sufficient unless the truck is not turning at all while passing through the entry.	
Section 2F, Internal streets – Pedestrian and vehicle access, Page 33, Design guidance- Basement entries -22	Siting driveway entries at the lowest point may reduce visual prominence but should ensure it takes drainage issues such as overland flow of stormwater into consideration to prevent flooding the basement.	
Section 2G – Orientation and siting, page 34	Include “servicing” and “functionality” in the list of parameters to be balanced.	
Section 2 H – Building Separation, Design Guidance -8 -	Add “and wide enough to accommodate services and equipment:” after “functional”.	
Section 2M – Private Open space – page 46	It should be mentioned that these spaces may need to include space for infrastructure like waste bins once the dwellings are occupied and this should be allowed for in a way that avoids spoiling the character and amenity of the space.	
Section 2N – Storage –Point 9 page 48	This point could usefully include reference to storage for waste bins which every dwelling will need either internally or as a part of the common area.	
Section 2O – Car and Bicycle parking, page 50	The design guidance makes no mention of provision for service vehicles like removals, deliveries or waste. Again the design guide has not sufficiently considered operational and functional issues which are important for every dwelling.	
Section 2T – Communal spaces – Pages 62 and 63	The description and associated design guidance should spell out better the need for communal open space to be provided for shared functions such as waste storage, parking, On-site Stormwater detention etc.	
Section 2Y – Water	The mention of waste sensitive urban design (WSUD) is supported but it should also be noted that WSUD also requires infrastructure such as rainwater tanks, rain	

management and conservation – Page 74 and 75	gardens which need to be incorporated into private or communal space and also need to remain functional through the life of the development. Here again the Design Guide has given insufficient consideration of ongoing operational management. Point 5 of the Design Guidance suggest installing detention tanks underground but good design can also incorporate above ground storage for detention, especially at the less frequent intervals of inundation. Underground tanks are much more expensive and as volumes are generally related to site area, shallow depth storages can be effective. .	
Section 2Z – Waste management- introduction page 76 Design guidance – page 77	The intent of this section is supported, but the section could be given more weight by stressing that rubbish removal is one of the three cardinal roles of local government and is required for all developments. Therefore, the design should assist with that function.	
Section 2Z – Waste management- Design guidance - 1, 4, 5, 6, 7 and 10 – page 77	DG1- Locating waste storage areas discreetly away from the front of the development is supported, but designers need to consider how it will function for each dwelling because in some instances the frontage will be the only practical space. DG4 – The suggestion of using the smallest vehicle possible is not supported because it fails to consider the communal need for efficient and cost effective waste collection and disposal. There are few landfills or transfer stations in Sydney and it is critical to ensure that trucks are appropriately sized to avoid a large number of trips by small vehicles. Waste trucks should spend more time collecting waste than they spend driving it to and from a disposal point. DG5 – The provision of storage for bulky goods is supported, noting that it is the goods which are there temporarily, rather than the storage itself. DG6- NSROC strongly supports the need for a Waste Management Plan which needs to be assessed by an appropriately qualified and experienced person taking into account both the local site and its place in the broader community's waste management. DG 7 – Strongly opposed see DG4. Complying development would further exacerbate this issue and would also prevent Council planning for additional transfer stations where waste from small trucks could be aggregated. A council could plan for medium density in certain areas and conceivably incorporate waste infrastructure in a section 94 plan or similar. DG10- The screening of such features is supported provided that it does not interfere with the functional aspects such as turning circles or bin storage volumes.	