

SUBMISSION

Regarding draft State Environmental Planning Policy
(Infrastructure) Amendment (Review) 2016



1. General

a) Comments

- i. It is a statutory requirement that the State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP) be reviewed every five years. This statutory review is designed to ensure that this policy remains up to date and responsive to changes in infrastructure technology, design and public demand.
- ii. The review and resulting draft has a strong focus on improving the delivery of social infrastructure as well as involving housekeeping amendments.

b) Recommendations

- i. Improvements in the provision of social infrastructure is supported.
- ii. Council considers it has a crucial role in the provision of social infrastructure in the Willoughby Local Government Area (LGA).

The numbers below refer to the Key Amendments identified in the State Environmental Planning Policy (Infrastructure) Amendment (Review) 2016 – Explanation of Intended Effect.

Proposed key amendments

2. Education Provisions

a) General

- i. It is proposed to transfer the provisions for educational establishments from the Infrastructure SEPP into a new stand-alone Education SEPP, and update and expand these provisions.
- ii. This has been done as part of the draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.

b) Comments

- i. A detailed response is provided in the separate submission from Willoughby Council regarding draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.

c) Recommendations

- i. The State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 is supported subject to a list of concerns identified as detailed in the submission.

3. Health service facilities

a) General

It is noted that changes are proposed to:

- i. Introduce new complying development which permits health service facilities, buildings used for training / education of professionals, commercial premises, administration buildings, child care centres, car parks within the boundaries of existing health service facilities (for buildings no greater than 12 metres in height or closer than 5 metres from the boundary).
- ii. Allow a public authority to carry out without development consent alterations or additions to health service facilities, car parks, and helipads for patients within the boundaries of a health service facility (for buildings no greater than 12 metres in height or closer than 5 metres from the boundary).
- iii. Allow a public authority to carry out with consent an expanded number of developments to service patients or staff or visitors including child care centres, commercial premises, community facilities, recreation areas and facilities, residential accommodation, health research industries and buildings for training or education of health or other professionals on state land within the boundaries of a health facility.
- iv. Permit health services in additional residential and business zones.

b) Comments

- i. In regards health services buildings, concern is raised that all uses are not specified to be hospital related or even clinically based.

- ii. There is concern regarding hospital sites such as the Royal North Shore Hospital site in St Leonards potentially containing general commercial or administration buildings that are either non-hospital related or non-clinical related. This concern is based on limited and important hospital land being used for non- health related purposes that could occur more appropriately elsewhere. With an increasing and aging population, land for hospital services into the future should be expanded not eroded through introduction of commercial uses more suitable elsewhere.

c) Recommendations

- i. Development on hospital sites are to be hospital related or clinically based.

4. Council operational land

a) General

- i. It is proposed to extend exempt development and development permitted without consent to include Council operational lands.

b) Comments:

- i. The proposed exempt development provisions for operational lands include walking tracks, bicycle related storage facilities, barriers, ticketing machines, viewing platforms, some sporting facilities, play equipment, picnic tables and shelters.
- ii. The proposed development permitted without consent ranges from roads, cycleways, single storey car parks, recreation areas and facilities, lighting, landscaping, amenities, food preparation facilities and maintenance depots.

c) Recommendations

- i. The flexibility provided to Councils to provide much needed infrastructure on Council operational land is supported.

5. Optimising Commuter hubs

a) General

- i. The draft SEPP includes new provisions for railway stations, transport interchanges, commuter car parks, bus stops and bus depots, that are intended to assist transport operators with constructing and optimising infrastructure, and to provide more services and conveniences at commuter hubs.

b) Comments

- i. It is noted that the more complex development would be subject to consent, such as tourist and visitor accommodation above railway stations, and retail or business premises in a railway

- complex.
- ii. Minor development would be exempt development, such as vending machines, automatic teller machines and coffee carts.

c) Recommendations

- i. No objection is raised to the more efficient utilisation of commuter hub infrastructure, subject to guidelines being agreed by Councils upfront to avoid poor positioning, clutter and loss of amenity through accumulation of these minor installations and development consent being required for more complex or major development.

6. Police service facilities and Police Stations

a) General

- i. It is proposed to introduce new provisions to cater for NSW Police Force facilities. Changes to Division 6 of the Infrastructure SEPP will allow the NSW Police Force to access the same provisions as the Ambulance Service of NSW and Fire and Rescue NSW.

b) Comments

- i. It is noted the provisions:
- require development consent for police service facilities in residential zones, RE1 Public Recreation and E4 Environmental Living zones.
 - allow police service facilities in industrial, special purpose and business zones without consent.
 - allow demolition, restoration and alterations and additions to existing police and emergency services facilities without consent on any land.

c) Recommendations

- i. No objection is raised, provided early information is provided to and advice sought from Councils to ensure optimal locations and avoid unforeseen issues.