

From: David Perks | [REDACTED]
Sent: Sunday, 22 May 2022 11:42 AM
To: Maxwell Duncan [REDACTED]
Subject: REV2022/00004 For the Attention of Commercial/Industrial and Traffic Referrals

Hi Max,

Please find attached my concerns on the waste management provisions of this application should the property become a non-residential property.

I also wish to flag the council process for DA's that do not contain a waste management plan, given that REV2022/00004 does not!

Purpose of the Waste Management Plan

This *Waste Management Plan (WMP)* will detail the arrangements for waste management during all stages of development and occupation.

The WMP must be completed in accordance with the Waste Management Guidelines (Guidelines).

A completed WMP is a mandatory requirement for any Development Application (DA) submitted under WLEP 2011 or WLEP 2000. DAs that are submitted without a completed WMP will be rejected or refused by Council.

I have gone to some lengths to extract relevant supporting information for my concerns and would appreciate that this is brought to the attention of the relevant council experts before their next referral responses are made.

To summarise

With regard to REV2022/0004 and the failure to include a waste management plan, Councils own process is to reject or refuse the application. The application has not been rejected, therefore it must be refused.

Since this is the 6th notification for this development, it is baffling why Council's assessment team have not checked for compliance with the Councils non-residential waste management requirements prior to now.

Had they done so, they would have found that

1. There is no operating waste management plan
2. The proposed waste storage area is deficient for the volume of waste that will be generated
3. The intention to use Councils' household waste collection service is not valid
4. The use of a commercial waste collection service would require access to the site beyond its operating hours
5. The commercial waste collection provisions would not comply with BCA and AS2890.2

6. The storage area is within 3m of dwelling openings.

It now seems appropriate that Council rectify these oversights in the next round of referral responses, and that the assessment report advocates to LPP that the decision to refuse the development is upheld.

Thanks

David