

# Submission

## Improving Planning Processes to Deliver Infrastructure Faster - Explanation of Intended Effect

16 April 2024

**Prepared by Northern Sydney Regional Organisation of Councils**

**Member Councils:** Hornsby Council  
Hunter's Hill Council  
Ku-ring-gai Council  
Lane Cove Council  
Mosman Council  
North Sydney Council  
City of Ryde Council  
Willoughby City Council

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## Overview

Thank you for the opportunity to make a submission on the Improving Planning Processes to Deliver Infrastructure Faster – Explanation of Intended Effect (EIE). This submission has been prepared with the input and support of our member councils but should be considered draft until it is formally endorsed by the NSROC Board.

Northern Sydney Regional Organisation of Councils (NSROC) is a voluntary association of eight local councils who have come together to collaborate and promote a united voice on key issues in our region. Our member councils are Hornsby, Hunter's Hill, Ku-ring-gai, Lane Cove, Mosman, North Sydney, Ryde and Willoughby. Collectively, the NSROC member councils service an area of 639km<sup>2</sup> with a population of 633,978. We work together on policy and operational matters to drive efficiency and to enhance our region.

NSROC is deeply concerned about the blanket, one-size-fits-all reforms proposed by the NSW Government that remove local councils from the assessment process. The amendment of SEPPs to broaden exempt and complying development pathways, as well as changes to state significant development thresholds, effectively denies residents the opportunity to shape their communities.

NSROC acknowledges the housing crisis and agrees that new housing capacity should be well located with access to infrastructure, services and public transport. This must be achieved through a tailored approach that has regard for local circumstances.

## Comments

In refining the proposed changes to the SEPP, NSROC requests that Government consider the following:

- The proposed changes to educational establishments touch on many activities likely to impact local council interests and responsibilities including increasing traffic, drainage and stormwater capacity. Accordingly, the changes to the T&I SEPP should include a requirement to consult and consider local council advice and plans prior to approval of the use.
- The complying development planning pathway for health service facilities height should remain at 12m and the proposed change to increase the maximum height to 30m should not proceed. Buildings 30m in height are at risk of significant impact on the amenity of surrounding properties. Developments of this scale should be subject to community consultation. At a minimum, the changes to the T&I SEPP should include a requirement to consult and consider local council advice and plans prior to approval of the use.
- Consideration should be given to including tree banners as temporary structures within the exempt criteria at Section 2.74(1) of the State Environmental Planning Policy (Transport and Infrastructure) 2021. Tree banners are used by councils across NSW as a deterrent in the fight against illegal tree clearing/tree vandalism on public land. Specific requirements should apply to tree banners as temporary development, including that the banner be permitted up to a height to match the height of the trees that were vandalised and the period of time permitted for the banner must match the time for replacement trees to grow to maturity.
- Councils are concerned about potential trip hazards and fire sources as well as the possible obscuring of sight lines for traffic safety in the location of electric vehicle charging units. The proposed changes to the T&I SEPP for electric vehicle charging units should include a stated requirement to consult and consider the local council advice and plans prior to approval of the

use. It should also be made clear that landowner's consent must be obtained prior to the installation of any electric vehicle charging unit within the public domain. Requiring landowner's consent will ensure that such infrastructure is located appropriately.

- Waste and resource recovery facilities are essential services. Landfills in metropolitan Sydney will be exhausted by 2031 and both landfill and resource recovery facilities will need to be delivered well before that date. Consideration should be given to including exempt and complying criteria for the provision of waste infrastructure facilities by public authorities.
- The proposed changes to the T&I SEPP for emergency services facilities and Volunteer Marine Rescue NSW facilities should include a stated requirement to consult and consider the local council advice and plans prior to approval of the use.

## **Conclusion**

NSROC councils would welcome the opportunity to work constructively with Government and agency representatives to develop a planning framework that delivers the Government's commitments to speed up the delivery of infrastructure and increase housing supply while also maintaining the liveability values expected by our communities.

Thank you for the opportunity to provide a submission on the Improving Planning Processes to Deliver Infrastructure Faster – Explanation of Intended Effect.

NSROC member councils stand ready to help the NSW Government respond to the housing crisis and ensure that well designed and well-located housing is delivered across the region.

If you require further information, please don't hesitate to contact NSROC Executive Director Dr Meg Montgomery on 0401 640 823 or at [mmontgomery@lanecove.nsw.gov.au](mailto:mmontgomery@lanecove.nsw.gov.au).

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