

24 April 2025

Ms Abbie Galvin LFRAIA  
Government Architect NSW  
Department of Planning, Housing and Infrastructure

Submitted via email - [government.architect@planning.nsw.gov.au](mailto:government.architect@planning.nsw.gov.au);  
[stakeholder.engagement@planning.nsw.gov.au](mailto:stakeholder.engagement@planning.nsw.gov.au)

Dear Ms Galvin LFRAIA

### **Re: Discussion Paper - NSW Housing Pattern Book Planning Pathways**

Thank you for the opportunity to make a submission on the NSW Housing Pattern Book Planning Pathways (the Discussion Paper). 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 660,667. We work together on policy and operational matters to drive efficiency and to enhance our region.

In principle, NSROC welcomes the development of reforms that will accelerate the delivery of diverse housing types to alleviate the current housing crisis. While the Discussion Paper is a positive step, there are still substantial matters that will require clarification prior to the introduction of the proposed new planning pathways.

The Discussion Paper has not been subject to public consultation and NSROC was not formally invited to make a submission. NSROC recommends substantive and broad consultation is undertaken if the streamlined processes proposed are to be pursued.

Of particular concern to NSROC is:

Waste Management – Dwelling design must adequately address storage and collection of waste. Developers utilising the pattern book should be required to engage with Councils to ensure that mandatory waste services can be provided efficiently and effectively. Dwellings with poorly designed waste storage and restricted collection access will negatively impact community amenity and potentially health and safety.

Tree Canopy – The NSROC region is renowned for its leafy urban environment. Pattern book plans must prioritise the retention of existing trees as well as enhance them with new plantings. Tree canopy enhances biodiversity, mitigates urban heat and reduces air pollution.

Parking – Further consideration of parking requirements is required. The Low and Mid Rise reforms are predicated on housing being provided in “well located”, “well serviced” areas, within walking distances of key services and amenities. However, discussions with industry and residents suggest there is an expectation that each dwelling in outer ring areas will have access to a minimum of 1 car parking space. If car parking is not required for a pattern, this should be clearly stated for the understanding of proponents. Provisions should also include on-site visitor parking where street parking is limited and electric vehicle charging.

Site characteristics – The Pattern Book is not considered appropriate for heritage conservation areas, irregularly shaped lots, sloping land, land with substantial existing tree canopy and other natural elements that should be retained by more sensitive layouts and designs. Detailed exemption criteria should be developed by demonstrating outcomes anticipated in varied conditions and this evidence base should be shared with Councils and the community for consideration.

Sustainability – The Pattern Book should reference expected sustainability requirements. Implementation of Pattern Books are an opportunity to make higher levels of sustainability more accessible; to merely deliver minimum standards of environmental performance would be a missed opportunity to ensure our future housing stock is suited to our future climate and is more energy efficient and resilient.

NSROC and its member councils would welcome the opportunity to collaborate with the Government Architect NSW to ensure the NSW Housing Pattern Book Planning Pathways achieve the goal of accelerating housing approval while maintaining the amenity and character of our communities.

Thank you for the opportunity to provide a submission on the Discussion Paper - NSW Housing Pattern Book Planning Pathways. If you require further information, please don't hesitate to contact me by phone on 0401 640 823 or at [mmontgomery@lanecove.nsw.gov.au](mailto:mmontgomery@lanecove.nsw.gov.au).

Yours sincerely



**Dr Meg Montgomery**  
**Executive Director**  
**Northern Sydney Regional Organisation of Councils**