

13 October 2025

The Hon. Paul Scully MP  
Minister for Planning and Public Spaces  
GPO Box 5341  
SYDNEY NSW 2001

Dear Minister

**Subject: Environmental Planning and Assessment (Planning System Reforms) Bill 2025**

As you are aware, Northern Sydney Regional Organisation of Councils (NSROC) is an association of eight local councils: Hornsby, Hunters Hill, Ku-ring-gai, Lane Cove, Mosman, North Sydney, Ryde, and Willoughby, which together serve a resident population of nearly 700,000.

I write in my capacity as NSROC President regarding the NSW Planning System Reforms Bill. While we support the goal of increasing housing supply and accelerating development approval processes, we seek clarity and consultation on several key proposals intended to deliver these objectives.

Complying Development Variation Certificates

The Bill allows for the issue of 'variation certificates' for Complying Developments. There is a lack of detail on what constitutes a minor variation and this, coupled with a 10-day prescribed period for determination before an application is deemed approved, presents a challenge for councils and accredited certifiers.

The truncated timeframe is likely to preclude a proper assessment of potential cumulative impacts on local amenity particularly in the case of multiple and subsequent variation requests relating to the same development. Also, as currently drafted, a 'deemed approval' may perversely incentivise consent authorities to issue quick refusals instead of reasoned approvals. This would ultimately defeat the reform's objective of increasing efficiency and certainty for developers in low-risk projects.

We ask for a collaborative approach with councils to clearly define these provisions, and a process that ensures due diligence is not compromised.

### Targeted Assessment Development

The specific types of development falling under this category have not yet defined however the proposed limited assessment may limit consent authorities' consideration of significant environmental, social, and economic impacts, site suitability, and the public interest, unless these issues are explicitly raised through other planning instruments. This could lead to the approval of developments that are not suitable for their location or have negative community impacts.

We ask for a collaborative approach with councils to clearly articulate the operation of this assessment pathway.

### Development Coordination Authority (DCA)

The DCA's main role is to provide a centralised point of contact and to issue 'general terms of approval' (GTAs) on behalf of various government agencies for integrated development applications. While the aim is to streamline the current process, there is a lack of detail regarding how the DCA will consult and coordinate with councils, whose input is essential for GTAs to align with local context and infrastructure planning.

We ask for further detail on the proposed mechanism to ensure the DCA consults with councils.

### Review of the Housing Delivery Authority (HDA)

The HDA was established to accelerate delivery of homes and help meet the NSW target under the National Housing Accord. The Bill will enshrine the HDA as a permanent pathway within the NSW Planning System. We remain concerned that the HDA limits community and council ability to contribute to significant developments.

We ask that a mechanism to review whether the HDA has achieved its stated aims be included in the Bill.

### Absence of Strategic Planning

The HDA is recommending projects including concurrent rezonings be declared State Significant Developments without reference to, or the benefit of, regional strategic plans. While the government has flagged their future release, these critical documents are not informing current decision making.

The absence of a clear strategic vision risks prioritising reactive, ad-hoc proposals from developers over a cohesive, strategic plan. This approach could threaten suburban liveability and erode public confidence.

We ask that the regional strategic plans be released as soon as possible.

### Call for Council Engagement and Collaboration

To ensure these reforms achieve their intended aims and avoid a one-size-fits-all approach, a more detailed and collaborative process is essential. We call for detailed information and active council engagement in the ongoing refinement of the reforms.

NSROC and its member councils are ready to work with the State Government to provide input and help refine the new planning pathways. By genuinely involving councils in ongoing consultation, the invaluable local knowledge of our communities can help ensure that increased housing density is delivered alongside the necessary services and infrastructure. A partnership grounded in open communication will support a well-designed, well-located housing supply across the region while preserving the amenity our communities expect.

We look forward to collaborating on planning reforms that are both ambitious and responsive to local needs.

Yours sincerely



**Mayor Tanya Taylor**  
**President**  
**Northern Sydney Regional Organisation of Councils**