

Response to Proposed NSW New Approach to Strategic Planning

Department of Planning, Housing and Infrastructure

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Prepared by the Northern Sydney Regional Organisation of Councils (NSROC) on behalf of our member councils:

- Hornsby Shire Council
- Hunter's Hill Council
- Ku-ring-gai Council
- Lane Cove Council
- Mosman Council
- North Sydney Council
- City of Ryde Council
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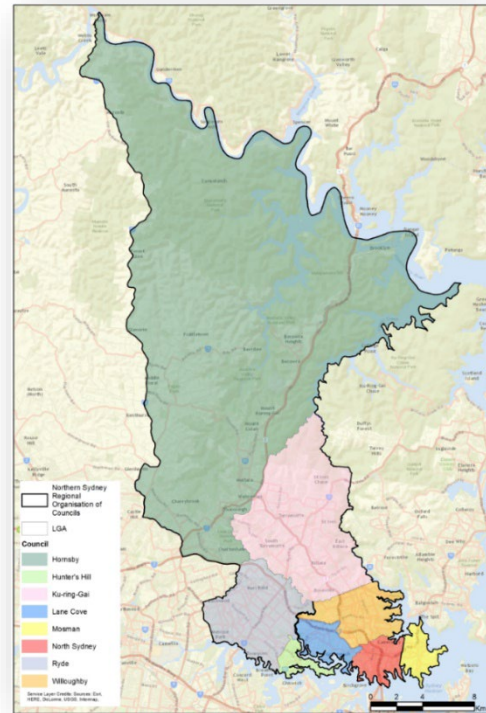
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Introduction

The Northern Sydney Regional Organisation of Councils (NSROC) welcomes this opportunity to make a submission to the Department of Planning, Housing and Infrastructure (DPHI) regarding the NSW Government's proposed strategic planning framework reforms which include *A New Approach to Strategic Planning: Discussion Paper*, *The Sydney Plan*, and the *Statewide Policy for Industrial Lands*.

NSROC members are the eight councils in the northern Sydney area: Hornsby, Hunter's Hill, Ku-ring-gai, Lane Cove, Mosman, North Sydney, Ryde, and Willoughby. With a combined population of over 660,000 (ABS Estimated Resident Population 2024), together we service an area of 639km² which extends from the Hawkesbury River in the north to Sydney Harbour in the south, west to Meadowbank on the Parramatta River.

This submission outlines the collective views of NSROC member councils on the proposed changes set out in the exhibited documents. This submission has been prepared with the input and support of our member council.



NSROC and its member councils seek to work collaboratively with the NSW Government to support this fundamental reset in how strategic planning is undertaken. This must be achieved through an approach that has regard for local circumstances and government.

Discussion Paper: A New Approach to Strategic Planning

The proposed approach presents a genuine opportunity to simplify the strategic planning system, but it also introduces several structural risks that need to be addressed to ensure the framework functions as intended. This section highlights these risks and identifies where greater clarity, stronger guidance and more robust governance arrangements will be essential to maintain coherence across the system and support councils to deliver integrated, evidence-based and community-aligned planning outcomes.

The Three-tiered approach

NSROC supports, in principle, the objective of making the strategic planning framework clearer, simpler and more effective. We see value in streamlining multiple layers of strategic planning which can, at times, duplicate effort and introduce inconsistencies between plans.

As plans are consolidated within the proposed three-tiered framework, maintaining clarity of direction is critical to ensuring the system remains effective. Clear policy intent, strong strategic signals and transparent lines of accountability will be essential to ensure that important objectives are not lost through consolidation but are instead retained and strengthened through reform.

Cross-border and sub-regional coordination

NSROC is concerned that the removal of District Plans creates a notable gap in how regional priorities are translated into local direction. District Plans currently play a critical bridging role by spatialising metropolitan objectives, providing clarity on sub-regional priorities and offering councils a defensible basis for their Local Strategic Planning Statements. Without this intermediary layer, the Sydney Plan becomes the primary reference point for local planning. However, in its current form, the Sydney Plan lacks the specificity, spatial detail and prioritisation needed to guide councils in a consistent and coordinated way. This raises practical concerns about how councils will justify local direction, particularly when challenged by proponents or when navigating competing state priorities.

The absence of District Plans also heightens the risk that local planning becomes siloed. Cross-border and regional coordination issues such as coordination of regional infrastructure, environmental systems, open space, waste and transport networks do not align neatly with local government boundaries. Under the proposed system, it is unclear how such matters will be identified, coordinated and resolved. Without a clear mechanism, there is a real risk that councils will be left to address regional issues independently, despite lacking the mandate, resources or visibility to do so effectively.

The future strategic planning framework should therefore articulate more clearly how roles and responsibilities are distributed across the three tiers, including how cross-border issues will be governed and how councils will be supported to undertake robust, evidence-based Local Strategic Planning Statement (LSPS) updates. This must be considered in the context of councils' existing resourcing constraints. Clear guidance, coupled with appropriate financial and capacity-building support, will be essential to ensure that local planning remains aligned with metropolitan objectives.

The impact of state interventions

NSROC is concerned about the impact of significant state interventions, such as the Housing Delivery Authority (HDA) pathway on councils' ability to undertake and implement robust and meaningful strategic planning, which typically relies on comprehensive local analysis and significant community input. State interventions such as the HDA pathway have the potential to undermine councils' local strategic planning efforts and erode community trust in the broader planning system.

Greater clarity is needed on how state-led processes will align with, or be informed by, local strategic planning statements and how potential tensions between state interventions and local planning objectives will be managed within the new framework.

The HDA must have greater regard to Local Environmental Plans (LEPs) and LSPs. In doing so, the authority should consider the impacts of an HDA application on the locality, including consistency with councils' strategic planning framework and gazetted LEP.

Alignment with other government strategies

NSROC is concerned about the lack of detail in the discussion paper regarding alignment with other government plans and strategies, including transport, infrastructure, waste management and service delivery plans. The focus on short term actions by DPHI and Councils will not stimulate an integrated multi-agency approach to deliver against housing targets and a shared growth strategy. Strategic land use planning is most effective when it is closely integrated with infrastructure planning and investment decision-making. Greater clarity on how these strategies will be aligned with the new framework would strengthen the proposed approach.

Monitoring, review and updates

NSROC welcomes the stated intention to introduce coordinated and regular reviews of the strategic planning framework. However, the discussion paper provides limited detail on how monitoring, reporting and performance tracking will be achieved in practice.

In the absence of clear metrics and measurable key performance indicators, it is difficult to assess the effectiveness of both the current framework and the proposed reforms. NSROC considers that a clear performance and reporting framework including agreed measures of success will be critical to ensuring transparency, accountability and continuous improvement over time.

NSROC notes that the strategic planning package places a strong emphasis on housing supply, which is acknowledged as a critical priority. However, NSROC considers that the framework would be strengthened by clearer and more measurable KPIs and targets across a broader range of outcomes. In particular, there is a need for defined measures relating to climate risk and resilience, natural hazards, waste management, open space provision and environmental systems. Establishing balance and transparent performance measures across these areas will help ensure that housing delivery is supported by integrated, sustainable and resilient planning outcomes, rather than progressed in isolation.

Modular structure and flexible response

NSROC supports, in principle, the proposed modular structure, which is intended to allow individual components of strategic plans to be updated separately. This approach has the potential to improve flexibility and responsiveness over time while avoiding the need for wholesale plan reviews when only specific elements require updating.

However, further clarity is required on triggers for future updates, including the implications for local planning, implementation and resourcing. Clear guidance on when and how modules are to be reviewed or amended will be important to provide certainty for council and to support coordinated planning and delivery.

While technical appendices and implementation details may be updated to respond to changing circumstances, these should not result in divergence from the plan's core vision or key strategic directions.

NSROC considers the longevity of the overarching strategic vision and priorities to be critical to the effectiveness of the framework.

In this context, NSROC recommends the collaborative development of clearer, bolder and more aspirational vision statements. A strong strategic vision can provide confidence, guide decision-making across government and help ensure that shorter-term actions and interventions remain aligned with longer-term objectives.

Recommendation

- Reinststate or replace the role of District Plans with a clear, spatially defined mechanism that translates metropolitan priorities into sub-regional direction.
- Provide stronger strategic signals and a more aspirational long-term vision to guide decision-making across government.
- Ensure councils' existing strategic work is recognised and integrated into State-led planning pathways.
- Develop a transparent, evidence-based framework for infrastructure sequencing and prioritisation, with meaningful council involvement.
- Align strategic planning for waste infrastructure with appropriate funding mechanisms by committing to return a higher proportion of Waste Levy revenue to councils for the development of waste infrastructure required to meet 80% recovery target.
- Recognise waste management infrastructure as essential city-shaping infrastructure and develop a coordinated metropolitan delivery strategy with clear spatial direction. NSROC notes Chapter 1 of the NSW Waste and Circular Infrastructure Plan lacks the spatial detail required to provide investment confidence to both Councils and the private sector. While the Plan identifies 'residual waste' and 'FOGO' as priorities, it fails to identify specific sites or 'waste hubs' within the Sydney region for the transfer, processing and disposal of waste.
- Introduce a clear performance and reporting framework with measurable KPIs across housing, climate resilience, natural hazards, waste, open space and environmental systems.
- Ensure monitoring arrangements are transparent, consistent and capable of driving continuous improvement.
- Provide clarity on how data will be collected, validated and used to inform updates to the strategic planning framework.
- Define clear triggers, processes and responsibilities for updating individual modules within the planning framework.
- Ensure the overarching strategic vision remains stable and enduring, even as individual components are updated.
- Provide guidance on the resourcing implications of modular updates for councils.
- Strengthen alignment between the Sydney Plan and other State strategies, including transport, infrastructure, waste, climate and service delivery plans.
- Ensure land use planning is fully integrated with infrastructure investment decision-making.

The Sydney Plan

NSROC has significant concerns about the Sydney Plan's lack of clarity, spatial direction and detail on how the intended outcomes will be delivered in practice. The document reads more like a short-term action program than a metropolitan plan that articulates how Sydney will evolve over time. Many of the strategic signals and guidance that councils would expect from a metropolitan-level plan have instead been deferred as future actions, creating uncertainty about the long-term vision, the spatial implications of growth, and the mechanisms through which the Plan will be implemented.

Response 1: Implement Sydney housing targets

NSROC acknowledges the scale of Sydney's housing supply and affordability challenges and supports the intention to accelerate delivery. NSROC notes the 5-year target to deliver 38,300 additional homes across our member council areas by 2029. However, it is important to recognise that councils do not build housing. Beyond zoning land, issuing approvals and planning for the supporting local infrastructure, councils have limited influence over market feasibility, construction costs, financing conditions or developer appetite. For this reason, housing capacity – not completions – is a more appropriate and realistic measure of council performance. Clearer guidance is also needed on what triggers government intervention if targets are not met, particularly given the persistent gap between dwelling approvals and completions.

Councils have already identified substantial housing capacity through their Local Housing Strategies and LEPs, yet these strategic foundations are not consistently recognised or considered in some State-led interventions.

NSROC is also concerned about the accuracy of the data currently used to track completions, noting that current methodologies exclude secondary dwellings such as granny flats, resulting in a potential under-representation of true housing delivery.

NSROC notes that achieving 5-year housing targets is heavily reliant on current zoning of land and existing development pipeline. The Sydney Plan should also set longer-term housing guidance, including 10- and 20-year targets, to support the strategic and coordinated delivery of housing over time, aligned with infrastructure funding and delivery.

The target-led approach of the plan prioritises housing quantity over quality, accessibility and amenity. To ensure broader liveability outcomes, NSROC urges State government support to plan for and fund the enabling and supporting infrastructure needed to accommodate significant housing growth.

This includes consideration of social infrastructure, sewer and water and importantly waste management provision which remains critically under-represented in the Sydney Plan despite its essential role in supporting increased density. Waste transfer, processing and transport infrastructure must be explicitly planned for and treated as core city-shaping infrastructure, rather than as a secondary or residual consideration.

Recommendation

- Adopt housing capacity, not completions, and approved development as the primary measure of council performance.
- Provide clear criteria for when and how State intervention will occur if targets are not met.
- Improve the transparency, accuracy and completeness of housing data, including the counting of secondary dwellings.
- Recognise and integrate existing council housing strategies, LSPs and LEPs into State-led pathways.
- Provide long-term spatial housing guidance, including 10- and 20-year targets which balance infill and greenfield growth.
- Ensure housing targets are supported by funded enabling infrastructure, including water, sewer, transport, social infrastructure and open space.
- Treat waste management infrastructure as essential city-shaping infrastructure and embed it explicitly in the Plan including transition of industrial zones into Circular Economy Precincts, that allow the co-location of resource recovery with green manufacturing.

Response 2: Increase housing diversity and choice

While NSROC acknowledges the importance of greater housing diversity and improved design outcomes, it does not support blanket standardised housing controls which erodes locally responsive planning. When identifying and planning for new locations for Transport Oriented Development (TOD), Low and Mid-rise Housing or other State-led rezoning precincts, early and meaningful engagement with councils is crucial.

This will ensure that local context considerations including community expectations, household demographics, infrastructure capacity and servicing constraints and existing neighbourhood character are adequately considered and addressed.

NSROC also notes that Build-to-Rent (BTR) developments raise concerns for council financial sustainability and the ongoing availability of employment lands, due to councils receiving substantially lower rate revenue than from equivalent strata-titled developments. This undermines councils' ability to maintain per capita funding to service population growth.

Recommendation

- Avoid blanket, standardised controls that undermine locally responsive planning.
- Undertake early and meaningful engagement with councils when identifying TOD, low- and mid-rise, or State-led rezoning precincts.
- Ensure local context, including demographics, infrastructure capacity, servicing constraints and neighbourhood character, is central to decision-making.
- Provide clarity on how diversity objectives will be balanced with infrastructure readiness and community expectations.
- Include greater consideration and details regarding waste and resource management as an essential service in the updated Apartment Design Guide including requirements for on-site collection of waste in large apartment (> 24 apartments) blocks.
- Immediate engagement with NSROC and other local councils on the rateability of BTR dwellings with a clear schedule for the consultation process

Response 3: Secure the supply of affordable housing

NSROC acknowledges the role of planning mechanisms in supporting affordable housing but considers that the Sydney Plan fails to reflect the scale of demand or the practical and financial constraints councils face in delivering these outcomes. The framework should explicitly encompass social housing, which requires sustained State Government leadership, funding and delivery – not reliance on local government, whose landholdings and resources are limited.

Action 3.4 requires councils to identify surplus council-owned land for affordable housing. In many cases, the most viable opportunities for affordable housing are located on State-owned land. This restricts councils' ability to progress outcomes independently. Even when councils have identified suitable sites, delivery can be delayed by low State processes or competing priorities. Strengthened collaboration between councils and the State will be essential to unlock appropriate land and accelerate delivery.

The plan also does not sufficiently integrate affordable housing with the broader infrastructure and services required to support liveable communities. Delivery cannot be considered in isolation from the capacity of essential systems, including social infrastructure, open space and community facilities.

Recommendation

- Expand the framework to explicitly include social housing, supported by sustained State Government funding and delivery.
- Prioritise the use of State-owned land for affordable and social housing, rather than relying primarily on council-owned land.
- Establish clear partnership mechanisms between councils and State agencies to unlock suitable sites and accelerate delivery.
- Integrate affordable housing planning with essential infrastructure and services, including open space, community facilities, waste management and transport.
- Ensure affordable housing outcomes are embedded within a broader place-making and liveability framework, not treated in isolation.

Response 4: Grow well-located jobs

NSROC supports the intent to grow and diversify jobs in well-located centres, but the Sydney Plan provides limited guidance on how higher-order centres should evolve or how councils are expected to plan for their future role.

The existing hierarchy of metropolitan, strategic and local centres provides a clear and practical framework for decision-making, particularly in coordinating major transport investment, health and education precincts and employment-intensive land uses. The inclusion of job targets for the individual centres, and at a district scale, was a useful indication of how employment growth will be balanced across the region. By comparison, the proposed approach lacks the spatial detail and policy direction needed to guide local planning or support consistent decision-making across the region.

Similar to the absence of longer-term housing targets, the Plan fails to provide centre-specific job targets for the next 20 years, which are essential to providing communities and local councils certainty regarding the level of growth anticipated over the lifetime of the Plan and supporting policies and infrastructure decisions. The inclusion of targets is the most transparent mechanism for conveying the scale of growth to be planned.

The employment targets for the North Sydney CBD have also been combined with the Sydney CBD, leaving the North Sydney CBD's specific target unclear. The Plan has also not considered how jobs targets for the Sydney CBD will be managed at the council level, given that the Sydney CBD sits across two LGAs.

The North Sydney CBD complements the City of Sydney CBD but has a distinctly different role with a mature commercial function. Subsuming the North Sydney CBD into the Sydney CBD without clear employment targets fails to account for its administrative and geographic separation from the southern portion of the Sydney CBD. The lack of employment vision for the North Sydney CBD has the potential to weaken its economic contribution to both the local and regional economy particularly given the incursion of residential development. Since 10- and 20-year job ranges have been provided for the Sydney CBD as a whole, separate, and clearly defined employment projections, targets, and vision are required for the North Sydney CBD to ensure that planning measures support its economic growth and longer-term certainty is established.

As discussed above, clear employment expectations are essential to enable councils to plan for this growth through their LSPs and for the community to understand the anticipated development. It is also important to send a strong and unambiguous message to the development and investment sector about the future of the centre. This is especially important given the ambiguous approvals process introduced by the HDA.

It is noted that councils are required to have their LSPs completed by 2027 but without the provision of tangible targets, this planning work cannot meaningfully commence. A clear long-term strategic direction is required with respect to jobs across Sydney.

Concerningly, in some locations the Plan's suggested mix of residential and non-residential uses does not align with current planning controls or the strategic intent already established through LSPs and LEPs. This creates further uncertainty for councils and risks undermining long-term planning work already undertaken. The increasing use of State-led pathways, including the HDA process, further limits councils' ability to manage land use outcomes in centres and ensure an appropriate balance between housing, employment and support services.

Strengthening the centres framework with more explicit spatial guidance and a clearer articulation of roles would significantly improve its usefulness for local government and support more coherent outcomes across Greater Sydney.

Additionally, the extensive proliferation of data centres, particularly in centres such as Macquarie Park risks displacing other higher-employment and innovation focused land uses. An overconcentration of data centres may reduce the availability of flexible employment land, limit opportunities for complementary industries and ultimately undermine the long-term economic diversity and resilience of these centres. The policy should therefore promote a balanced mix of employment uses to safeguard the ongoing strategic function and productivity of centres.

Recommendation

- Reinststate or strengthen a clear centres hierarchy with defined roles for metropolitan, strategic and local centres.
- Provide spatially explicit guidance on the future function, scale and land-use mix of higher-order centres.
- Retain and enhance employment in centres through the assessment of SSDs and development of planning controls to protect the E2 Commercial Centre zone in the North Sydney CBD for employment purposes.
- Reintroduce or update employment targets at centre and district levels to guide balanced job distribution.
- Provide separate and clearly defined employment projections, capacity targets, and vision for the North Sydney CBD to ensure that planning measures support its economic growth and longer-term certainty is established.
- Ensure the centres framework aligns with existing LSPs, LEPs and precinct-level strategies.
- Clarify how State-led pathways (including HDA processes) will protect employment land and maintain an appropriate balance between jobs, housing and services.
- Recognise and provide guidance on the role of smaller supporting centres, such as neighbourhood and local centres.
- Establish a transparent process for State–local collaboration when planning or rezoning major centres.
- Incorporate flexible options to support the provision of essential services, including waste services. These options should be clearly linked to the Local Government Act, particularly in relation to councils’ ability to charge for waste services in mixed residential and commercial zones.
- Retain and strengthen the job corridors, including the Eastern Economic Corridor, particularly along the North-West Metro line.

Response 5: Align infrastructure to planned growth

NSROC strongly supports the principle of aligning land use planning with infrastructure delivery and recognises that coordinated sequencing is essential to support growth. However, councils’ ability to deliver the infrastructure required for rapidly expanding communities is significantly constrained under the current local infrastructure contributions framework. This constraint is compounded by rate pegging, which limits councils’ capacity to raise sufficient revenue to fund new and upgraded infrastructure in line with growth.

The scale and pace of growth anticipated in the Sydney Plan far exceeds the financial capacity of councils, particularly for infrastructure that serves multiple LGAs or requires regional coordination. NSROC notes that removing the nexus between where contributions are raised and spent, along with excluding many critical infrastructure types from the essential infrastructure list, limits councils’ ability to deliver the necessary infrastructure to support growth.

The draft Sydney Plan does not provide a transparent, evidence-based framework for sequencing or prioritising infrastructure across Greater Sydney. While the Urban Development Program is a valuable data source, it remains unclear how this information informs the Sydney Infrastructure Opportunities Plan or how decisions about timing, location and responsibility for infrastructure delivery are made. Given the fiscal pressures facing all levels of government, a clear, robust and transparent prioritisation process, developed with meaningful council input, is essential.

NSROC is particularly concerned that waste infrastructure is critically underrepresented in the Sydney Plan, despite the plan itself acknowledging that Sydney’s landfill capacity is likely to be exhausted by 2030. Waste transfer, processing and transport facilities are fundamental to supporting higher densities and must be treated as essential infrastructure.

Delivering this infrastructure requires a coordinated metropolitan strategy that identifies suitable locations, delivery pathways and funding responsibilities – an outcome that is beyond the remit of individual councils and requires urgent State Government leadership. The Sydney Plan must explicitly recognise waste management as essential infrastructure and reflect its central role in supporting sustainable growth.

To ensure the fiscal capacity of councils, NSROC calls for a larger proportion of Waste Levy revenue to be allocated to essential waste infrastructure to address capacity constraints and support growth.

Recommendation

- Develop a transparent, evidence-based infrastructure prioritisation framework with clear criteria and council involvement.
- Address the limitations of the local infrastructure contributions system, including funding gaps for regional and cross-LGA infrastructure.
- Clarify how data from the Urban Development Program informs the Sydney Infrastructure Opportunities Plan and sequencing decisions.
- Explicitly recognise waste management infrastructure as essential city-shaping infrastructure and embed it in metropolitan planning.
- Deliver a coordinated metropolitan waste infrastructure strategy, including site identification, delivery pathways and funding responsibilities.
- Allocate a larger proportion of Waste Levy revenue to the planning, development and delivery of essential waste and resource recovery infrastructure.
- Provide clear guidance on responsibility, timing and funding for infrastructure required to support planned growth.

Response 6: Create a more vibrant Sydney

NSROC supports the goal of fostering vibrant, inclusive communities and recognises the important role of land use planning in strengthening social cohesion and wellbeing. However, the Sydney Plan does not yet articulate how these aspirations will translate into coordinated, deliverable actions, nor does it address the infrastructure, services or local capacity needed to achieve this at the pace and scale proposed. A more comprehensive integrated approach is required to ensure that vibrancy is not reduced to entertainment alone but is embedded as a holistic outcome across all communities.

A focus on entertainment precincts will not deliver the diverse, inclusive and resilient places that Sydney needs, particularly in suburban contexts where community life is shaped by a much broader set of social, cultural and civic functions. Vibrancy is supported by a wide range of elements, including social and community infrastructure, cultural facilities, heritage, accessible public spaces and opportunities for everyday social connection. These components must be recognised as core to place-making, not treated as secondary to entertainment-led activation.

The response also places disproportionate responsibility on local government, without acknowledging the essential role of the State in identifying areas of need, coordinating investment and partnering with councils to deliver outcomes. Many of the levers required to create genuinely vibrant and inclusive communities, such as funding for cultural infrastructure, transport, public domain upgrades and social services, sit with State agencies. As drafted, the response lacks sufficient depth and does not yet demonstrate a clear commitment to delivering the social, cultural and physical infrastructure required to support the vision.

Recommendation

- Broaden the definition of vibrancy beyond entertainment precincts to include social infrastructure, cultural facilities, heritage, public spaces and community services.
- Assess existing infrastructure to identify critical gaps in services and local capacity needed to achieve this at the pace and scale proposed. Develop a holistic place-making framework that integrates social, cultural, environmental and economic elements.
- Clarify the State's role in delivering cultural infrastructure, public domain upgrades, transport improvements and social services.
- Establish mechanisms for State-local partnership to identify needs, coordinate investment and deliver community-focused outcomes.
- Provide clearer guidance on how vibrancy objectives will be implemented, funded and sequenced, particularly in suburban and emerging centres.
- Ensure that vibrancy initiatives are supported by adequate infrastructure and local capacity, not treated as standalone activation measures.

Response 7: Grow and connect public open space

NSROC supports the intent of the Plan to improve access to open space and strengthen green-blue infrastructure but is concerned that the approach lacks depth and is not embedded within a comprehensive metropolitan green infrastructure strategy. Greater emphasis is needed on the role of open space in supporting liveability, with the planning framework being clearly framed around this objective and supported by appropriate funding mechanisms to enable delivery. Government needs to provide a

mechanism to support and sustain Councils' existing ratio of public open space for the proposed population increase in established areas.

The Sydney Plan does not yet explain how open space targets will be funded, how land will be secured in established areas, or how targets will be applied in high-density and transit-oriented contexts. With finite land supply, open space planning must move beyond traditional acquisition models and consider more innovative approaches to delivering accessible, high-quality public spaces.

A major opportunity lies in unlocking significant open space and corridor land owned by State agencies such as Sydney Water and Transport for NSW. The Inner West GreenWay demonstrates the value of multi-agency collaboration in delivering continuous, high-amenity open space networks, and should be treated as a model for future initiatives. However, realising these opportunities requires clear State leadership, coordinated planning and a commitment to long-term delivery.

It is unclear how the priority green grid links in Appendix G: Blue Green Grid were identified. There are additional opportunities in the northern region to strengthen and extend the Grid including across LGA borders.

To accomplish desired coordinated planning outcomes, the Sydney Plan should be divided into three separate plans for North, Central and West Sydney to better reflect the distinct planning needs and requirements of each metropolitan area, particularly in relation to open space provision and biodiversity outcomes.

Recommendation

- Develop a metropolitan green infrastructure strategy that sets specific open space targets, integrates open space, waterways, biodiversity corridors and climate resilience.
- Provide clear guidance on funding mechanisms, land acquisition pathways and delivery responsibilities for open space in established and high-density areas.
- Support innovative open space delivery models beyond traditional acquisition, including shared-use agreements, adaptive re-use and vertical open space to achieve targets.
- Unlock State-owned corridor land (e.g., Sydney Water, Education, TfNSW) through a coordinated, multi-agency program.
- Ensure open space planning is integrated with housing, transport and infrastructure sequencing, not treated as an afterthought.
- Separate the Sydney Plan into three distinct plans for North, Central and West Sydney to better reflect the differing planning needs of each area, particularly in relation to open space and biodiversity.
- Assess the capacity of existing open space to accommodate population growth and review whether its current function remains appropriate. This assessment should consider the primary role of open space in meeting community needs, including conservation and natural values, as well as passive and active recreation. There should be no reduction in the total area of existing public open space.
- Include Regional Plans for sporting and recreational infrastructure within the Sydney Plan to support coordinated planning and delivery across the metropolitan area.
- Undertake additional consultation with councils on Appendix G: Blue Green Grid to highlight other priority green grid links and support the formation of a larger network connecting the Northern District to the CBD

Response 8: Secure an ongoing pipeline of productive industrial lands

Refer to our feedback on the Statewide Industrial Lands Policy.

Response 9: Minimise the impact of natural hazards

NSROC supports the intent of Response 9 to strengthen climate resilience and improve the management of natural hazards, but the approach remains high-level and lacks the clarity, integration and operational guidance needed for effective implementation. Climate impacts do not respect LGA boundaries, which means coordinated, cross-government planning for flooding, bushfire and extreme heat is essential. The removal of district-level plans has made this coordination more difficult, and the Sydney Plan does not yet outline how cross-LGA governance, shared responsibilities or regional infrastructure needs will be addressed.

There is also uncertainty about how the proposed planning guidance aligns with existing council disaster management plans, emergency response arrangements and established governance structures. Councils require clarity on roles, responsibilities and funding pathways to ensure local planning is consistent with State expectations and that disaster resilience measures can be delivered at scale.

NSROC is further concerned that disaster-related waste management is insufficiently addressed. Major events generate significant volumes of waste, yet the Plan does not outline how this will be managed, where facilities will be located or how responsibilities will be coordinated across councils and State agencies. Clear Plan A / Plan B arrangements, supported by regional coordination and State leadership, are essential to ensure disaster waste can be managed safely, efficiently and sustainably.

Overall, the response requires greater depth and operational detail to ensure climate resilience is embedded as a practical, deliverable outcome rather than an aspirational objective.

Recommendation

- Establish a cross-LGA governance framework for flood, bushfire and heat planning, supported by State leadership.
- Clarify how new hazard guidance aligns with existing council disaster plans and emergency management structures.
- Provide clear roles, responsibilities and funding pathways for implementing hazard mitigation measures.
- Develop a regional disaster waste management strategy, including facility locations, responsibilities and contingency arrangements.
- Strengthen the response with operational detail, ensuring climate resilience is a deliverable outcome rather than an aspirational statement.

Response 10: Sequence planned growth in greenfield areas

This is not a relevant matter for NSROC.

Response 11: Manage land uses beyond the urban footprint

NSROC is broadly in support of Response 11 and its actions.

Response 12: Protect and enhance the natural environment

NSROC is generally supportive of Response 12 and its intention to strengthen environmental outcomes but is concerned that it does not reflect the scale or urgency of the climate and environmental challenges facing councils. While the Sydney Plan places significant emphasis on addressing the housing crisis, it does not afford the same level of priority to the climate crisis.

As drafted, climate objectives are positioned as secondary considerations rather than core drivers of land-use planning and decision-making, which is misaligned with the severity of climate risks facing Greater Sydney. A more ambitious, coordinated and climate-led approach is needed—one that positions environmental resilience as a central organising principle for growth, rather than an adjunct to housing delivery.

Councils have already undertaken substantial work to improve tree canopy, reduce urban heat and embed resilience through their LSPs, LEPs and local strategies. State-led initiatives such as the Low and Mid-Rise Housing Reforms, including associated deep-soil and canopy requirements do not always align with existing local frameworks. Without stronger integration and clearer expectations, the Sydney Plan risks duplicating effort, creating inconsistencies and missing opportunities to leverage the significant progress already made at the local level.

There is growing evidence that the response to the housing crisis is being undertaken at considerable cost to the urban tree canopy. The twin objectives of addressing the housing crisis and tackling the increased

loss of life supporting tree canopy should not be mutually exclusive. A more sophisticated way of balancing these two vital objectives is required and the draft Sydney Plan should show leadership in this respect.

Recommendation

- Elevate climate and environmental resilience as central drivers of land-use planning, not secondary considerations.
- Integrate the Sydney Plan with existing local canopy, heat mitigation and biodiversity strategies, avoiding duplication or inconsistency.
- Ensure State-led reforms (e.g., Low and Mid-Rise Housing) align with local deep-soil, canopy and environmental requirements.
- Develop a coordinated, climate-led approach that embeds resilience, biodiversity and ecological health into all growth decisions.
- Provide measurable environmental KPIs to track progress and ensure accountability.

Statewide Policy on Industrial Lands

NSROC is generally supportive of the Statewide Policy for Industrial Lands and its objectives to secure, intensify and actively manage industrial land across NSW. While NSROC acknowledges the urgent need for reform to address the significant challenges facing the supply of industrial land, the Policy must ensure councils are involved from the outset and recognise their role as the third tier of government.

Clear processes are required to manage the tension between retaining employment land and delivering new housing, including transparent criteria for assessing alternative uses of industrial land, how public benefit is measured and whether changes genuinely contribute to housing supply.

One such tension is the substantial growth in data centres, which presents a complex set of challenges particularly in locations like Macquarie Park, Lane Cove and North Sydney. Suitable industrial land in the NSROC region is scarce, with infrastructure already being under pressure. Strategic intent must be realigned to support a diverse, innovation-driven employment ecosystem.

Macquarie Park is a major contributor to NSW's economy and should be classified as an 'emerging CBD' and 'state significant industrial land'. The draft Plan's classification of Macquarie Park as a 'commercial centre' (70:30 ratio employment/residential) under the *Housed* priority, directly contradicts its categorisation as 'regionally significant industrial land' (on which residential land use is explicitly not supported) under the *Prosperous* priority. NSROC agrees that Macquarie Park needs to be protected as key commercial and industrial centre, this contradiction creates uncertainty for Council, landowners and businesses. Government must work collaboratively with Council to agree a coherent land use hierarchy.

Without a coordinated, strategic approach to managing this sector, the acceleration of data centres and their cumulative impacts risks undermining surrounding employment, energy, water and surrounding land uses.

NSROC also emphasises the need for stronger recognition of region-serving infrastructure. In particular, management infrastructure including transfer stations, resource recovery centres and residual waste disposal facilities continue to be undervalued in their essential role as critical infrastructure. These uses operate across LGA boundaries and require long-term protection, adequate buffers from encroaching residential development, and a coordinated cross-council planning approach.

Given existing and forecast capacity constraints, NSROC considers waste infrastructure to be a critical component of industrial land planning that warrants greater emphasis and certainty within the policy framework.

The policy should consider the pivotal role of industrial land in driving the transition to low-carbon and renewable energy. The link between industrial land strategy and the state's Net Zero targets is missing. The policy should therefore include an explicit objective that aligns industrial land use with the State's Net Zero 2050 target.

Recommendation

- Develop a strategic, metropolitan-level framework for data centre planning that considers cumulative impacts on land supply, energy, water and surrounding employment uses.
- Explicitly recognise waste facilities, landfills and resource recovery centres as critical regional infrastructure within the policy.
- Provide long-term protection and adequate buffers for region-serving waste infrastructure.
- Provide a clear and coherent land-use policy hierarchy for Macquarie Park, supported by centre specific visions and explicit guidance for resolving conflicts between employment and residential land-use priorities. This hierarchy must be jointly developed with council to ensure alignment between strategic planning, zoning, SSD/HDA mechanisms and the intended 70:30 employment residential ratio for the centre.
- Include an explicit objective linking industrial land use to the State's Net Zero targets.

Conclusion

NSROC appreciates the opportunity to provide this submission and looks forward to working constructively with the NSW Government to refine and finalise a strategic planning framework that delivers coordinated, infrastructure-led and locally responsive outcomes.