

Submission to Statewide Community Participation Plan - DRAFT

Department of Planning, Housing and Infrastructure

3 June 2026

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
- Willoughby City Council

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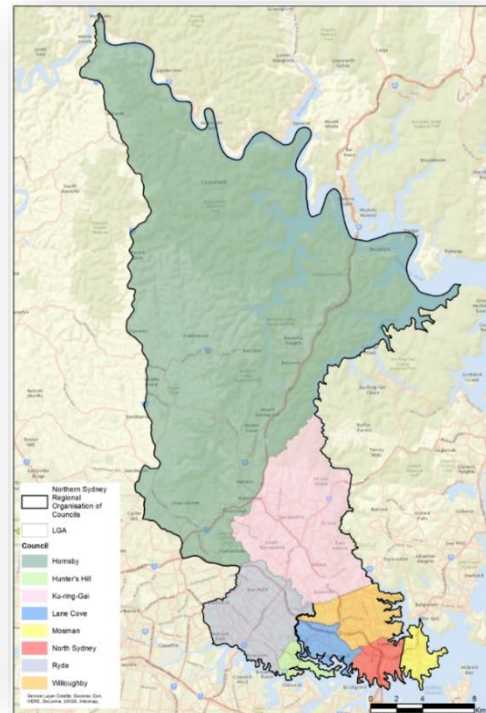
Introduction

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 Statewide Community Participation Plan.

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 councils but should be considered draft until it is formally endorsed by the NSROC Board.

NSROC and its member councils seek to work collaboratively with the NSW Government to shape this fundamental reset in community participation. This must be achieved through genuine council engagement and detailed consideration of the downstream impacts and unintended consequences.



Executive Summary

The Northern Sydney Regional Organisation of Councils (NSROC) acknowledges the NSW Government's intent to improve planning consistency, alignment, and efficiency across consent authorities. However, the proposed statewide Community Participation Plan (CPP) introduces an inflexible, centralised framework that disregards localised environmental protections, heritage conservation areas, and distinct community expectations.

The draft CPP fails to account for the local context, including the built-form complexities, varied topographies, and high-density characteristics of metropolitan environments compared to regional areas. If implemented without amendment, this reform risks eroding public confidence in the planning system.

Meaningful council engagement is required to gain a comprehensive understanding of how the reform will impact the daily statutory operations of local government. Proceeding without genuine consultation may increase administrative burden and introduce unintended operational risks.

Systemic Barriers to Public Participation

The intensive community engagement undertaken by councils during high-level strategic planning cycles does not justify shortening or removing community notification rights at the final Development Application (DA) stage. This is because macro-level strategic planning documents are too technical and abstract to trigger widespread public interest. Communities rarely engage with broad, high-level instruments. Conversely, residents actively engage with nearby tangible impacts, like overshadowing, loss of privacy, and visual bulk, when a development proposal on a neighbouring block is imminent. Confining consultation to early strategic phases removes the community from the process when the physical future of their neighbourhood is determined. This shift may also disproportionately affect Culturally and Linguistically Diverse communities, who already face steep linguistic and structural barriers within the planning system.

NSROC councils consider the proposed 14-day notification period to be inadequate for residential State Significant Developments particularly where a concurrent rezoning is included. Shortening and standardising exhibition periods is likely to worsen public participation as residents and other stakeholders expect more time to provide feedback on large, impactful projects. The proposal reduces what should be genuine consultation into an administrative exercise. It is unreasonable to expect residents to discover a proposal, review hundreds of pages of technical documents, and draft a formal response within two weeks.

Administrative Burden and Operational Risks for Councils

While the proposed CPP promises to streamline planning by removing notification requirements, it introduces significant operational risks and hidden resource demands for councils. Reducing the categories of local development requiring public notification does not diminish the assessment workload for council staff. Planning staff must still perform the same level of technical assessment

to verify if a DA complies with the Local Environmental Plan, Development Control Plan, or State Environmental Planning Policies.

Eliminating formal DA-stage exhibition rights will lead to community backlash. Once residents realise high-impact or dense residential developments are being built next door without prior warning, complaints and formal inquiries will increase. Council customer service, compliance, and legal teams will have to divert resources from core services to manage community concerns, confusion, and legal friction caused by this less-transparent process.

Finally, the administrative pressure to process highly complex technical applications under compressed windows, combined with the loss of community-verified site insights, increases the probability of assessment deficiencies. This leaves councils vulnerable to costly, resource-intensive litigation in the Land and Environment Court from both frustrated applicants and disenfranchised community action groups.

Conclusion

While the proposed CPP aims for administrative uniformity, it misunderstands the nexus between local governance, community identity, and statutory assessment. Stripping communities of their right to engage at the DA stage does not create efficiency; it merely shifts the burden of public dissatisfaction onto local councils, erodes democratic transparency, and increases systemic exposure to legal and operational risks.

Rather than centralising control and imposing restrictive, standardised timelines that fail to reflect the complexities of metropolitan environments, the NSW Government must collaborate with local government to fortify, rather than bypass, the local planning process.