

24 June 2026

Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Submitted via the [Planning Portal](#)

Re: Submission – Low-Rise Housing and Targeted Assessment Discussion Paper

Dear Ms Fishburn

Thank you for the opportunity to make a submission to the Department of Planning, Housing and Infrastructure (DPHI) regarding the *Low-rise housing reforms and targeted assessment – Discussion Paper* (the 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.

The Northern Sydney Regional Organisation of Councils (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. NSROC brings these councils together to work on projects and common goals to create solutions that benefit not just individual communities, but the entire region. NSROC member councils service an area of 639km² with a population of 662,281 as of 2026 which extends from the Hawkesbury River in the north to Sydney Harbour in the south, west to Meadowbank on the Parramatta River.

Overall, NSROC is supportive of reforms that will result in a more efficient, risk based and proportionate planning system. However, there are operational and assessment issues that require further consideration and clarification prior to finalising an EIE for a low-rise housing code and targeted assessment. To ensure the pathway can function effectively without compromising assessment quality, environmental outcomes and procedural fairness, it will be important to consider the matters outlined below.

Targeted Assessment Pathway (TAP)

- NSROC does not support the inability of the consent authority to consider the likely impacts of the development, the suitability of the site or the public interest as part of the assessment of development within the TAP.
- Applicants frequently lodge applications that include inadequate information to enable assessment. The 50-day assessment period will not be met where there are delays in the applicant providing additional information. A mechanism should be developed that incentivises an applicant to respond in a timely manner. Alternatively, the assessment clock should not commence until all mandatory documentation has been submitted and verified by the consent authority.
- The reforms should clearly articulate whether an applicant has the right to appeal decisions.

- The Guiding Principles should be strengthened to emphasise design quality and deliverability to ensure consistent high-quality outcomes
- The paper does not provide clarity regarding the proposed fees for applications received under the TAP. Given their similarity, fees should be aligned with the existing fees applicable to Development Applications, calculated in accordance with the formula prescribed under Part 13 and Schedule 4 of the *Environmental Planning and Assessment Regulation*.
- A process of monitoring and continuous improvement should be implemented to ensure the proposed TAP achieves its aims before further typologies are added.

Single Statewide Low-Rise Housing Code

- The code should focus on standardised, repeatable controls, while leaving complex, site specific and locally responsive matters to existing planning instruments.
- High-risk areas (eg flood, bushfire, coastal hazard) should be excluded from the reforms.
- Heritage items and heritage conservation areas should be excluded and a full merit assessment retained due to site-specific complexity and the need for localised character-based controls.
- Conservation zones should be excluded from the reforms.
- Stage 1 should focus on high-volume, low complexity housing types (eg. Detached dwellings, dual occupancies) in low risk, established residential zones with adequate infrastructure.

NSROC supports the proposed shift to a more risk-based, efficient and standardised planning system. Its effectiveness and broader community acceptance will be contingent on striking the right balance between efficiency gains, design quality, local character and community outcomes

NSROC would welcome the opportunity to continue to work with government on low- rise housing and targeted assessment pathways reform. For any further information, please contact Dr Meg Montgomery, NSROC Executive Director on 0401 640 823 or mmontgomery@lanecove.nsw.gov.au.

Yours sincerely



Dr Meg Montgomery

Executive Director
Northern Sydney Regional Organisation of Councils